CLOSURE PLAN

CCR 257.102(b)

Bottom Ash Storage Pond

Welsh Power Plant Pittsburg, Texas

October 2016 Revised February 2021

Prepared for : Southwest Electric Power Company - Welsh Plant

Pittsburg, Texas

Prepared by: American Electric Power Service Corporation

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CCR 257.102(b)
WELSH POWER PLANT
BOTTOM ASH STORAGE POND

PREPARED BY Gary F. Zych DATE 2/11/2021

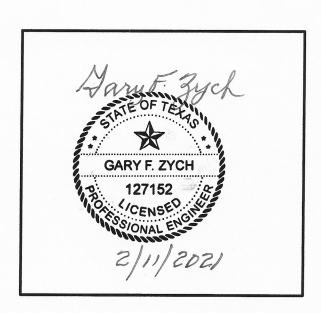
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REVIEWED BY <u>Arthur W. Rentzsch</u> DATE <u>02/11/2021</u>
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APPROVED BY Gary F. Zych DATE 2/11/2021

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Section Manager – AEPSC Geotechnical Engineering



I certify to the best of my knowledge, information, and belief that the information contained in this closure plan meets the requirements of 40 CFR § 257.102

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1.0 OBJECTIVE

This report was prepared by AEP- Geotechnical Engineering Services (GES) section to fulfill requirements of CCR 257.102(b) for Closure Plans of Existing CCR Surface Impoundments

2.0 DESCRIPTION OF THE CCR UNIT

The AEP J. Robert Welsh Plant is located in southern Titus County, approximately 8 miles northeast of Pittsburg, Texas, and approximately two miles northwest of Cason, Texas. It is owned and operated by Southwest Electric Power Company (SWEPCO). The facility operates two surface impoundments for storing CCR materials called the Primary Bottom Ash pond (PBAP) and the Bottom Ash Storage pond. This report addresses the closure plan for the Bottom Ash Storage Pond (BASP). The Bottom Ash Storage pond CCR unit is located at the south end of the Plant and approximately 1,000 feet west of the Welsh Reservoir.

In 2000, the 22-acre Bottom Ash Storage Pond was constructed south of the landfill. The Bottom Ash Storage Pond receives bottom ash and economizer ash dredged from the primary bottom ash pond and non-CCR flows.

3.0 DESCRIPTION OF CLOSURE PLAN 257.102(b)(1)(i)

[A narrative description of how the CCR unit will be closed in accordance with this section]

The Welsh Bottom Ash Storage Pond will be closed by removal.

4.0 CLOSURE BY REMOVAL 257.102 (b)(1)(ii)

[If closure of the CCR unit will be accomplished through removal of CCR from the CCR unit, a description of the procedures to remove the CCR and decontaminate the CCR unit in accordance with paragraph (c) of this section.]

Closure will include removal of all CCR from the CCR unit. The removal of all CCR unit will be accomplished by mechanical means. The CCR material will be either hauled and placed at the onsite CCR landfill or hauled offsite for beneficial reuse.

The geomembrane liner in the pond will be removed and disposed at an approved off-site landfill. After the liner is removed, 12 inches of bottom soil will be removed as part of the closure of the CCR surface impoundment.

A 3rd party QAQC consultant will verify the removal of the CCR material and soil.

4.1 CLOSURE PERFORMANCE STANDARDS 257.102 (c)

[An owner or operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do

not exceed the groundwater protection standard established pursuant to §257.95(h) for constituents listed in appendix IV to this part.]

Closure of the CCR unit will be completed when all CCR materials in the unit and any soils affected by releases from the CCR unit have been removed, and groundwater monitoring demonstrates that all concentrations of constituents are below background values using the statistical procedures in §257.93(g) for two consecutive sampling events.

5.0 ESTIMATE OF MAXIMUM CCR VOLUME 257.102 (b)(1)(iv)

[An estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit.]

The estimated maximum CCR volume on-site is 500,000 cubic yards in the Bottom Ash Storage Pond.

6.0 ESTIMATE OF LARGEST AREA OF CCR REQUIRING COVER 257.102 (b)(1)(v)

[An estimate of the largest area of CCR unit ever requiring a final cover

This pond will be closed by removal of CCR materials as such this section is not applicable.

7.0 CLOSURE SCHEDULE 257.102(b)(1)(vi)

[A schedule for completing all activities necessary to satisfy the closure criteria in the section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including identification of major milestones such as coordinating with and obtaining necessary approvals and permits from other agencies, the dewatering and stabilization phases of the CCR surface impoundment closure, or installation of the final cover system, and the estimated timeframes to complete each step or phase of the CCR unit closure.

The following table presents milestone activities and schedule to complete the closure of the BASP.

Cease sluicing CCR from PBAP and miscellaneous	April 11, 2021
non-CCR wastewater streams to BASP	
Commence Closure by submitting the Request for	No later than April 11, 2021
proposal for closure design	
Engineering/design schedule based on proposals	To be determined later
Construction schedule based on proposals	To be determined later
Completion of closure	No later than April 11, 2026