

Annual Progress Report - Permanent Cessation of a Coal Fired Boiler(s) by a date certain

On 11/30/2021, the Annual Progress Report for the closure of Pirkey Power Plant East and West Bottom Ash Ponds were placed into the Operating Record according to 40 CFR 257.105(i)(20) with the incorrect title of Progress Report on Surface Impoundment Alternate Capacity Infeasible Closure. On 12/14/2021, the Report was posted to the publicly accessible internet site (40 CFR 257.107(i)(20)) and the Director notification (40 CFR 257.106(i)(20)) was sent.

On 2/01/2022, the title for the Annual Progress Report was corrected to Progress Report on Surface Impoundment Alternative Closure due to Source Boiler Retirement.

**Annual Report-01
Alternative Closure Requirements
East and West Bottom Ash Ponds**

**Henry W. Pirkey Power Plant
Southwestern Electric Power Company
2400 FM 3251
Harrison County
Hallsville, TX**

November 2021

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1.0 BACKGROUND

The Henry W. Pirkey Power Plant is owned and operated by the Southwestern Electric Power Company (SWEPCO), a subsidiary of American Electric Power (AEP). The power plant operates a bottom ash pond complex of two CCR surface impoundments (East Bottom Ash Pond (EBAP) and West Bottom Ash Pond (WBAP)) for the management of bottom ash and non-coal combustion residual (CCR) wastewaters. The EBAP and WBAP are unlined according to 40 CFR 257.71 and 30 TAC 352.711. Therefore, the EBAP and WBAP are subject to the closure requirements of both 40 CFR 257.101(a)(1) (August 28, 2020), and 30 TAC 352.1211(a) and (b)(1).

However, under 40 CFR 257.101(a)(3), and 30 TAC 352.1211(b)(3), the timeframe specified in paragraph 40 CFR 257.101(a), and 30 TAC 352.1211 do not apply if the owner or operator complies with the alternative closure procedures specified in 40 CFR 257.103 and 30 TAC 352.1231 **Alternative Closure Requirements**.

AEP/SWEPCO has elected to close under 40 CFR 257.103(f)(2) *Permanent cessation of a coal fired boiler(s) by a date certain* which was adopted by Texas Commission on Environmental Quality (TCEQ) in 30 TAC 352.1231. On November 30, 2020, as required by 40 CFR 257.103(f)(3)(i)(C) *Process to Obtain Authorization*, AEP/SWEPCO submitted to EPA a demonstration to close the EBAP and WBAP according to 40 CFR 257.103(f)(2)(v). The demonstration is pending EPA's review.

On October 23, 2020, AEP/SWEPCO submitted a letter to TCEQ requesting an extension to continue to operate the surface impoundments for CCR and non-CCR wastewaters beyond October 31, 2020 while EPA reviews the alternative closure demonstration. In correspondence dated October 30, 2020, TCEQ granted the facility approval of the extension, pending EPA's approval of the demonstration.

2.0 PURPOSE

This annual report, documenting the continued lack of alternative capacity and the progress towards the closure of the CCR surface impoundments, is required to be prepared by 40 CFR 257.103(f)(2) and 30 TAC 352.1231. The owner or operator has completed the progress report when the report has been placed in the facility's operating record as required by 40 CFR 257.105(i)(20) and 30 TAC 352.1301.

This Report-01 covers the period from December 1, 2020 – November 30, 2021.

3.0 PROGRESS

The bottom ash handling system operates as a wet-sludge of bottom ash to the bottom ash complex for settling of the bottom ash. Demineralizer regeneration waste is also discharged to the bottom ash complex for treatment.

Pirkey Power Plant does not have an existing alternate impoundment on-site that meets the liner or aquifer separation requirements of EPA's CCR regulation. In addition, Pirkey Power Plant does not have an existing alternate impoundment on-site that can be utilized for treatment of the non-CCR wastestream. There is currently no existing installed infrastructure at the plant to support rerouting of these flows so that they could be transported to an offsite treatment facility and transporting this volume of CCR wastewater via trucking is not physically possible. There are no off-site ponds that could be used for the wet sluicing and treatment of industrial wastewaters. Additionally, the on-site CCR ash landfill is not permitted to accept the process waters.

Annual Report-01
Alternative Closure Requirements-EBAP and WBAP
Solid Waste Permit No: none
Henry W. Pirkey PP, Hallsville, Texas

During the engineering and design of the closure of the two ponds, it was determined that the storm water outlet of the EBAP needed to discharge into the WBAP. Therefore, the closure sequence will be WBAP in 2022 then EBAP. The EBAP will need to drain through the WBAP during closure in 2023. If the EBAP is closed first, the storm water from this pond would not be able to discharge through the outlet into the WBAP because it would still be active.

In order to reduce the volume of water and closure area that will need to be removed once the plant shuts down in the spring of 2023, an intermediate berm was constructed in the EBAP since it was the non-active pond in 2021.

AEP/SWEPCO certifies that Henry W. Pirkey Power Plant will cease operation of its coal-fired boilers and the bottom ash complex will be closed by removal no later than October 17, 2023.

AEP/SWEPCO was in compliance with all relevant requirements of 40 CFR 257 Subpart D and 30 TAC 352 and no corrective action is required at this time.

This report reaffirms AEP/SWEPCO's statements that there continues to be no alternative disposal capacity to replace that of the EBAP and WBAP for the management of CCR and non-CCR wastewaters generated by the power plant.

4.0 PLANNED WORK

AEP/SWEPCO will continue to make progress towards achieving the scheduled closure of the bottom ash complex.

AEP/SWEPCO will continue to ensure that the EBAP and WBAP remains in compliance with all relevant requirements of 40 CFR 257 Subpart and 30 TAC 352 including the sampling and analyses all of the monitoring wells associated with the certified groundwater monitoring well network as part of 40 CFR 257.90-98 and 30 TAC 352 Subchapter H requirements.

AEP/SWEPCO will place in its operating record an annual progress report covering the time period of December 1, 2021 – November 30, 2022, by November 30, 2022.