

**Annual Report-03
Alternative Closure Requirements
Bottom Ash Pond**

**Northeastern Power Station
Public Service Company of Oklahoma
Oologah, OK**

April 2022

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1.0 BACKGROUND

The Northeastern Power Station (NPS) is owned and operated by the Public Service Company of Oklahoma (PSO), a subsidiary of American Electric Power (AEP). The power station operates a 72 acre coal combustion residual (CCR) surface impoundment for the management of bottom ash and non-CCR wastewaters. The surface impoundment, referenced as the Bottom Ash Pond (BAP), fails the Location Requirements as per the Oklahoma Department of Environmental Quality (ODEQ) CCR regulations OAC 252:517 and would be subject to the closure requirements of OAC 252:517-15-6(b)(1).

However, on December 5, 2018 AEP/PSO submitted to ODEQ a demonstration to close the bottom ash pond according to the Alternate Closure Requirement (ACR) in OAC 252:517-15-8(f)(2), Permanent Cessation of a Coal Fired Boiler(s) by a date certain. On February 8, 2013, a settlement agreement was signed between AEP/PSO and the Department of Justice which set a closure data of December 31, 2026 for the coal-fired boiler Unit 3. The ACR was accepted by ODEQ on April 11, 2019 and a copy of the decision was placed into the facility's operating record and on the facility's publicly accessible CCR internet site in accordance with OAC 252:517-15-8(f)(2)(I).

2.0 PURPOSE

This annual report is required by OAC 252:517-15-8(f)(2)(J) to be submitted no later than twelve (12) months after completing the first annual progress reports, which was submitted April 30, 2020. This report reaffirms PSO's statements that there is no alternative disposal capacity for the bottom ash and non-CCR wastewaters generated by the power plant.

This Report-03 covers the period from: April 12, 2021 – April 11, 2022.

3.0 PROGRESS

The bottom ash handling system operates as a wet-slucice of bottom ash to the BAP for settling of the bottom ash. Non-CCR wastewaters and industrial storm water runoff are also discharged to the BAP for treatment.

The existing ponds, excluding the BAP, on the plant site do not meet the requirements of OAC 252:517 regulations and cannot be used as a CCR surface impoundment. Additionally, these ponds do not have the treatment capacity required for the volume of non-CCR wastewaters and industrial storm water runoff generated at the power plant site.

There no piping/pumping system present in which this wastewater stream 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.

AEP/PSO certifies that NPS will cease operation of Unit 3 coal-fired boiler by December 31, 2026 and that the BAP will be closed no later than October 17, 2028.

AEP/PSO was in compliance with all relevant requirements of OAC 252:517, including the semi-annual groundwater sampling and testing during this report period. The results are summarized in the report, "Annual Groundwater Monitoring Report" that was submitted to ODEQ on January 31, 2022. ODEQ approved the report on March 24, 2022. No corrective action is required at this time.

No alternative capacity for the CCR and non-CCR wastewater to replace that of the BAP has been found. AEP/PSO continues to work towards completing the permitting process for the BAP.

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Solid Waste Permit No: Pending
NPS, Oologah, OK

4.0 PLANNED WORK

AEP/PSO submitted (via email) an updated Closure Plan to ODEQ on April 7, 2022 and will follow the schedule defined in that BAP Closure Plan.

AEP/PSO will continue to ensure that the BAP remains in compliance with all relevant requirements of OAC 252:517 including the sampling and analyses all of the monitoring wells as part of OAC 252:517 Subchapter 9 requirements

AEP will submit the next annual progress report by April 30, 2023.