



December 2, 2022

Submitted Electronically via Email

Attn: Richard Huggins
Energy Recovery and Waste Disposal Branch
Office of Resource Conservation and Recovery
United States Environmental Protection Agency

RE: Southwestern Electric Power Company
Flint Creek Power Plant Alternative Closure Demonstration

Dear Mr. Huggins,

American Electric Power (AEP) submitted the Flint Creek CCR Surface Impoundment Demonstration for a Site-Specific Alternate to Initiation of Closure Deadline on November 30, 2020, and the requested additional updated information on March 1, 2022. Since that time, AEP has ceased sluicing CCR waste streams to the Primary Bottom Ash Pond (PBAP) and has continued to make progress on its plan for closure of the PBAP. However, as AEP representatives informed US EPA by phone call on August 18, 2022, unforeseen conditions beyond AEP's control are causing delays to the originally proposed schedule for completing the removal of all CCR material and repurposing of the PBAP for continued treatment of all non-CCR waste streams by February 28, 2023. For the reasons set forth below, AEP now anticipates that this work will not be completed before June 30, 2023.

Progress To Date

AEP as agent for its affiliate Southwestern Electric Power Company (SWEPCO), an owner and operator of the Flint Creek Power Plant, completed detailed design, awarded all equipment contracts, received all associated materials, and started installation activities to support the outage per the original demonstration submittal. Details regarding AEP's progress are as follows.

CCR Waste Streams

- AEP engaged Burns & McDonnell (BMcD) in September 2020 to begin detailed design associated with dry bottom ash conversion and removal of all CCR materials and repurposing of the PBAP.
- AEP awarded the submerged and dry flight conveyors to United Conveyor Corporation (UCC) in December 2020. All materials have been received at Flint Creek Power Plant.
- The balance of equipment contracts to support the dry bottom ash conversion were awarded in August 2021. All materials have been received at Flint Creek Power Plant.
- AEP awarded civil/foundations, mechanical/structural steel, and electrical construction subcontracts on April 11, 2022, May 27, 2022, and June 1, 2022, respectively. Subcontractors are all mobilized and executing work at Flint Creek Power Plant.
- The outage per the original demonstration submittal at Flint Creek Power Plant remains on schedule.

- Flint Creek has stopped sluicing and placing bottom ash in the primary bottom ash pond as of November 30, 2022.

Non-CCR Waste Streams

- AEP engaged Burns & McDonnell (BMcD) in September 2020 to begin detailed design associated with tank based chemical treatment systems for coal pile runoff and demineralizer regeneration waste neutralization.
 - During the detailed design process AEP determined that a new coal pile runoff pond was not necessary. Rather a dedicated chemical treatment system will be furnished and installed to promote removal of coal fines from active stormwater flows in the coal yard.
 - AEP determined that the existing acid and caustic systems could be expanded to neutralize waste originating from the demineralizer regeneration process. As such no additional chemical treatment systems were needed. New shop fabricated tanks and neutralization pumps will be furnished and installed to transfer, mix, circulate and discharge the neutralized waste stream to the repurposed wastewater pond.
- AEP awarded the chemical treatment system equipment contract in October 2021. Submittal reviews are complete. The polymer injection system was delivered in September 2022.
- The shop fabricated tanks contract was awarded in November 2021. Submittal reviews are complete, and the tanks are on site and set into place at Flint Creek Power Plant.
- AEP awarded the neutralization pump skid in March 2022. Submittal reviews are complete, and the skid was delivered in October 2022.
- AEP awarded civil/foundations, mechanical/structural steel, and electrical construction subcontracts on April 11, 2022, May 27, 2022, and June 1, 2022, respectively. Subcontractors are all mobilized and executing construction work at Flint Creek Power Plant. These construction subcontract award dates were later than planned; however, construction is expected to finish in accordance with the plan described in AEP's November 30, 2020, Demonstration Request.

Drivers Preventing Completion by Original Proposed Dates and Steps Taken to Minimize Extension of Schedule Compliance Dates

The Demonstration Narrative submitted on November 30, 2020, incorporated a plan, schedule, and resultant pond closure date based on knowledge at the time. With further development of the project scope of work, we recognized the intended disposal location for the pond closure material, the onsite landfill, was not certified to accept the amount of material that would be removed from the Pond. Additionally, the Arkansas Department of Environmental Quality (ADEQ) permit limits the amount of operating open area space, which negatively impacts the productivity the original schedule was based on.

- The project needed to develop and certify the three areas of the landfill that had been permitted but not fully developed and approved by ADEQ for use. The engineering and design commenced immediately on December 2020. Time required to develop the landfill space resulted in a 4 week pause in dredge and hauling material to the landfill until the next area was certified by ADEQ for use on June 7, 2022.
- The ADEQ landfill permit limits the operating open area of the onsite landfill, which restricts the amount of material that can be hauled, conditioned and compacted at a time. Thus, the project's daily productivity is capped, and we cannot mitigate any delays experienced in closing the pond or gain any schedule recovery.

Based on the amount of material removed to date and estimated quantity remaining, it is calculated that there is more CCR material than originally assumed in calculation of the completion date. Consequently, more time to excavate, condition, haul, and dispose in the on-site landfill is required than originally scheduled to accommodate the additional material.

Steps taken to mitigate those drivers and remain on schedule.

- The project continued to dredge and dewater material while the landfill was being developed, but not at full production due to space limitations at the pond.
- To expediate the development of disposal areas, the project concentrated on certification of Phase 2 area only. After certification of Phase 2, to ensure acceptable disposal space and for no delay in closing the pond due to landfill space, the project has obtained certification for use of Phase 3 and Phase 4 areas.
- The project is working 13 days in a row, weather permitting, in attempt to complete as soon as possible.

In conclusion, AEP has made great strides towards completing work at Flint Creek in accordance with the originally proposed schedule. AEP has ceased sluicing and placing bottom ash in the PBAP as of November 30, 2022. However due to unforeseen conditions, the closing of the pond will not be completed by February 28, 2023. The new proposed date for completion of the Primary Bottom Ash Pond closure is June 30, 2023.

Sincerely,



David A. Miller, P.E.
Director, Programs and Reporting Services
Environmental Services Division