

**Annual Report-01
Alternative Closure Requirements
Bottom Ash Pond**

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

May 2020

Rev 1. Aug 2020

Prepared by: American Electric Power Service Corporation

1 Riverside Plaza
Columbus, OH 43215



Annual Report-01
Alternative Closure Requirements-BAP
Solid Waste Permit No: none
NPS, Oologah, OK

1.0 BACKGROUND

The Northeastern Power Station 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 is subject to the closure requirements of OAC 252:517-15-6(b)(1).

AEP/PSO submitted to Oklahoma Department of Environmental Quality (ODEQ) on December 5, 2018 a demonstration to close the bottom ash pond according to the Alternate Closure Requirement (ACR) in OAC 252:517-15-8(b), Permanent cessation of a coal fired boiler(s) by a date certain. The ACR was accepted by ODEQ on April 11, 2019.

2.0 PURPOSE

This annual report is required by OAC 252:517-15-8. The 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-01 covers the period from: April 12, 2019 – May 11, 2020.

3.0 PROGRESS

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

The existing ponds, excluding the bottom ash pond, 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 wastewaters and industrial storm water runoff generated at the power plant site.

There are no off-site ponds that could be used for the wet sluicing and treatment of industrial wastewaters.

AEP/PSO certifies that Northeastern Power Station will cease operation of Unit 3 coal-fired boiler by December 31, 2026 and that the bottom ash pond will be closed no later than October 27, 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, 2020 and approved by ODEQ February 21, 2020. No corrective action is required at this time.

AEP/POS continues to work towards completing the permitting process for the bottom ash pond.

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4.0 PLANNED WORK

AEP/PSO will follow the schedule defined in the written Closure Plan for the bottom ash pond.

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 another progress report by May 11, 2021.



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

August 11, 2020

Ms. Jill Parker-Witt, P.E.
American Electric Power – Northeastern Power Station
502 North Allen Avenue
Shreveport, LA 71101

Re: Alternative Closure Requirements Annual Report – 01
Tier II Permit Application – Existing Coal Combustion Residuals Surface Impoundment
Public Service Company of Oklahoma, Northeastern Power Station
Rogers County

Dear Ms. Parker-Witt:

The Oklahoma Department of Environmental Quality (DEQ) approved Public Service Company of Oklahoma's Northeastern Power Station (NPS) to close the existing Coal Combustion Residuals (CCR) Surface Impoundment Bottom Ash Pond (BAP) under the Alternative Closure Requirements (ACR) on April 4, 2019. On April 30, 2020, by email, DEQ received from NPS the Alternative Closure Requirements Annual Report-01 (Report). The Report is required by Oklahoma Administrative Code (OAC) 252:517-15-8(c)(2)(A) to be submitted to DEQ for approval within thirteen (13) months after completing the notice of intent to comply with the ACR.

The Report stated NPS has not found alternative capacity for the CCR and non-CCR wastewater to replace that of the BAP. NPS still plans to close the Unit 3 coal-fired boiler by December 31, 2026, then to close the BAP by October 27, 2028. NPS is in the process of permitting the BAP.

NPS has met the requirements of OAC 252:517-15-8(c)(2)(A) and DEQ accepts the Report as submitted. The next annual progress report is due twelve (12) months after May 7, 2020. If you have any questions, please contact Ms. Cindy Hailes of my staff at (405) 702-5114 or at cindy.hailes@deq.ok.gov.

Sincerely,

Hillary Young, P. E.
Chief Engineer
Land Protection Division

HY/ckh

cc: Mark Barton, Plant Manager, American Electric Power-Northeastern Power Station
Sam Miller, American Electric Power-Northeastern Power Station



