CLOSURE PLAN

CFR 257.102(b)

East and West Bottom Ash Ponds

Pirkey Power Plant
Hallsville, Texas

October 2016
Revised December 2021

Prepared for : Southwest Electric Power Company - Pirkey Plant

Hallsville, Texas

Prepared by: American Electric Power Service Corporation

1 Riverside Plaza

Columbus, OH 43215

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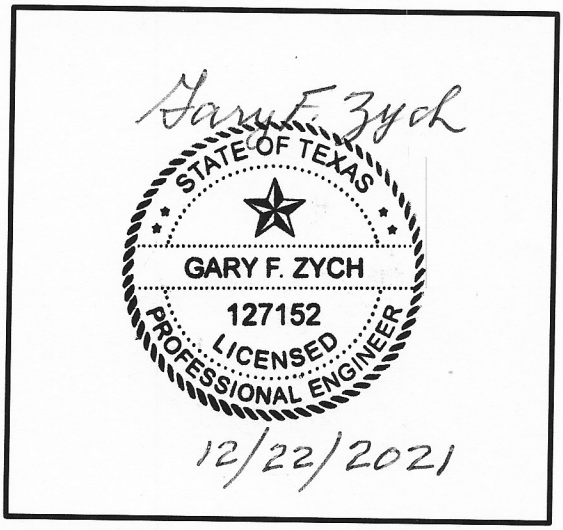
PIRKEY POWER PLANT
EAST AND WEST BOTTOM ASH PONDS

PREPARED BY Brett A. Dreger DATE 12/21/2021
Brett A. Dreger, P.E.

REVIEWED BY Arthur W. Rentzsch DATE 12/21/2021
Arthur W. Rentzsch

APPROVED BY Gary F. Zych DATE 12/22/2021
Gary F. Zych, P.E.
Department Manager – AEP Geotechnical Engineering
American Electric Power Service Corporation
F-3341



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(b)

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Revision December 2021:
Revised the schedule to show a sequence change; WBAP closes first then EBAP

1.0 OBJECTIVE

This report was prepared by AEP- Geotechnical Engineering Services (GES) section to fulfill requirements of CCR 257.102(b) (30 TAC 352.1211) for Closure Plans of Existing CCR Surface Impoundments.

2.0 DESCRIPTION OF THE CCR UNIT

The Henry W. Pirkey Power Station is located at 2400 FM 3251 and south of Hallsville, Texas. It is owned and operated by Southwest Electric Power Company (SWEPCO). The facility operates two surface impoundments for managing CCR materials called the East Bottom Ash Pond (East BAP) and the West Bottom Ash Pond (West BAP). These two ponds and a Clearwater Pond are collectively referenced at the Bottom Ash Complex. The Clearwater Pond is not a CCR surface impoundment.

The East BAP is located directly adjacent to and east of the West BAP. The East BAP receives sluiced bottom ash and has a surface area of 31.5 acres and a storage capacity of 188 acre-feet. The pond is almost entirely incised, with a reported maximum embankment height of 4 feet.

The West BAP, which also receives sluiced bottom ash, is located northwest of the main plant buildings and shares its eastern border with the western border of the East BAP. The West BAP receives sluiced bottom ash and has a surface area of 30.9 acres and a storage capacity of 188 acre-feet. The maximum embankment height is 25 feet. The main upstream embankment slopes are 3 feet horizontal to 1 foot vertical (3:1 H:V); while the main downstream slopes area 2.5:1 H:V.

The sluicing of CCR materials is alternated between the two CCR surface impoundments. CCR material is sluiced to one pond while the CCR material is dewatered and excavated from the other pond. The transport water from the sluicing operation is discharged into the Clearwater Pond. The plant recycles the water from the Clearwater Pond for plant operations.

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]

Closure of the Pirkey Power Plant East and West Bottom Ash Ponds will be completed by removal of all CCR material and sediments from each pond.

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 by removal of the East and West bottom ash ponds will include removal of all CCR from the surface impoundments. The removal of all CCR and any sediments will be accomplished by dredging and/or mechanical means. The CCR material will be either placed in the onsite CCR landfill or hauled offsite for beneficial reuse. A visual evaluation of the pond bottom by a third party consultant will be the basis for declaring the CCR material has been removed. After all CCR material has been removed, an additional 12 inches of soil from the pond bottom will be removed. Following the removal of CCR and

soil, the dikes forming the pond will be used as subgrade material to regrade the area. The disturbed area will be seeded at the completion.

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 areas that may have been affected by releases from the CCR unit, have been removed and groundwater monitoring demonstrates that all concentrations of the assessment monitoring constituents listed in appendix IV to part 257 do not exceed either statistically equivalent background levels or MCLs for two consecutive sampling events using the statistical procedures in § 257.93(g).

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 188 Acre-Ft. or 303,307 cubic yards for the East Bottom Ash Pond and 188 Acre-Ft. or 303,307 cubic yards for the West Bottom Ash 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 generating units will cease operation in March 2023. During 2021, a splitter dike was constructed within the East BAP so that operations could continue until the generating units cease operations. The following schedule is related to the work necessary to complete final closure activities of both ponds.

Initiate engineering and design for closure	December 2020
Modify the East BAP	September 2021
Bid and award construction contract	November 2021 – March 2022
Dewater and remove CCR from West BAP	October 2021 – June 2022
West BAP remove soil and Regrade area to drain	June 2022-October 2022
Dewater and remove CCR from East BAP	April 2023-July 2023
East BAP remove soil and regrade area to drain	July 2023 – December 2023