CLOSURE PLAN

30 TAC 352.1211 [40 CFR 257.102(b)]

FGD Stack Out Area

Pirkey Power Plant
Hallsville, Texas

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Prepared for: Southwest Electric Power Company - Pirkey Plant

Hallsville, Texas

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PIRKEY POWER PLANT
FGD STACK OUT AREA

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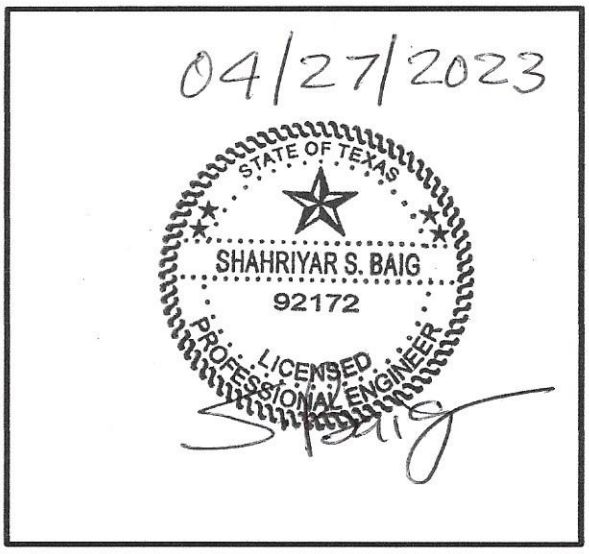

I certify to the best of my knowledge, information, and belief that the information contained in this closure plan meets the requirements of 30 TAC 352.1211 (40 CFR § 257.102)

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1.0 OBJECTIVE

This report was prepared by AEP- Geotechnical Engineering Services (GES) section to fulfill requirements of CFR 257.102(b) for Closure Plans of Existing CCR Units.

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 a FGD Stack Out Pad Area to collect and temporarily store the CCR materials until they can be hauled to the Plant's Landfill facility.

The Pirkey FGD Stack Out Area is a Class 2, Industrial Solid Waste Facility and designated as a waste pile per the Texas Commission on Environmental Quality (TCEQ).

The FGD Stack Out Area is located directly adjacent to and west of the main plant area. The FGD Stack Out Area receives a mixture of fly ash and scrubber sludge material that is deposited by a radial stacker equipment. The FGD Stack Out Area is approximately 5 acres and has a storage capacity of 18.6 acre-feet or 30,000 cubic yards. The FGD Stack Out Area gently grades into an existing surge pond.

3.0 DESCRIPTION OF CLOSURE PLAN 30 TAC 352.1221 [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 FGD Stack Out Area will be by removal of the CCR material and re-grading the area for positive drainage.

4.0 CLOSURE BY REMOVAL 30 TAC 352.1221 [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 CCR will include removal of all CCR from the CCR unit. The removal of all CCR from the CCR unit and any areas subsequently determined to have been affected by releases from the CCR unit will be accomplished by excavation of the CCR material, then hauling and placing of the material in the onsite Pirkey Landfill. The procedures for removal or decontamination of any areas affected by releases from the CCR unit to the underlying and surrounding soils will be determined by visual evaluation until all the CCR materials are removed. After all the CCR materials has been removed, an additional 12 inches of native soil will be removed. Following removal of the final quantities of CCR, the stack out area will be graded and modified as necessary to maintain positive drainage.

4.1 CLOSURE PERFORMANCE STANDARDS 30 TAC 352.1211 [40 CFR 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 in the unit and any areas 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 30 TAC 352.1211 [40 CFR 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 30,000 Cubic Yards for the FGD Stack Out Area.

6.0 ESTIMATE OF LARGEST AREA OF CCR REQUIRING COVER 30 TAC 352.1211 [40 CFR 257.102 (b)(1)(v)]

[An estimate of the largest area of CCR unit ever requiring a final cover

The FGD Stack Out Area will be closed by removal of CCR materials as such this section is not applicable.

7.0 CLOSURE SCHEDULE 30 TAC 352.1211 [40 CFR 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 unit had ceased operation in March 2023. The following schedule is related to the work necessary to complete final closure activities of the Stack Out Area.

Tentative Schedule of Closure Activities

Activity	Start-to-Completion Dates
Prepare Design/Drawings for Closure	May-July 2023
Award Construction Contract for Closure	July-August 2023
Install Erosion and Sediment Control	August-September 2023
Initiate Closure Activities	August-October 2023
Prepare Construction Certification Report	December 2023