

**Annual Report-04
Alternative Closure Requirements
East and West Bottom Ash Ponds**

**Henry W. Pirkey Power Plant
Southwestern Electric Power Company
2400 FM 3251
Harrison County
Hallsville, TX**

November 2024

Prepared by:

American Electric Power Service Corporation
Environmental Services Division
1 Riverside Plaza
Columbus, OH 43215



1.0 BACKGROUND

The Henry W. Pirkey Power Plant is owned and operated by the Southwestern Electric Power Company (SWEPCO), a subsidiary of American Electric Power (AEP). The power plant operates a bottom ash pond complex of two CCR surface impoundments (East Bottom Ash Pond (EBAP) and West Bottom Ash Pond (WBAP)) for the management of bottom ash and non-coal combustion residual (CCR) wastewaters. The EBAP and WBAP are unlined according to 40 CFR 257.71 and 30 TAC 352.711. Therefore, the EBAP and WBAP are subject to the closure requirements of both 40 CFR 257.101(a)(1) (August 28, 2020), and 30 TAC 352.1211(a) and (b)(1).

However, under 40 CFR 257.101(a)(3), and 30 TAC 352.1211(b)(3), the timeframe specified in paragraph 40 CFR 257.101(a), and 30 TAC 352.1211 do not apply if the owner or operator complies with the alternative closure procedures specified in 40 CFR 257.103 and 30 TAC 352.1231 **Alternative Closure Requirements**.

AEP/SWEPCO has elected to close under 40 CFR 257.103(f)(2) *Permanent cessation of a coal fired boiler(s) by a date certain* which was adopted by Texas Commission on Environmental Quality (TCEQ) in 30 TAC 352.1231. On November 30, 2020, as required by 40 CFR 257.103(f)(3)(i)(C) *Process to Obtain Authorization*, AEP/SWEPCO submitted to EPA a demonstration to close the EBAP and WBAP according to 40 CFR 257.103(f)(2)(v). The demonstration is pending EPA's review.

On October 23, 2020, AEP/SWEPCO submitted a letter to TCEQ requesting an extension to continue operating the surface impoundments for CCR and non-CCR wastewaters beyond October 31, 2020, while EPA reviews the alternative closure demonstration. In correspondence dated October 30, 2020, TCEQ granted the facility approval of the extension, pending EPA's approval of the demonstration.

On November 30, 2021, AEP/SWEPCO posted the first annual progress report for the permanent cessation of a coal fired boiler by a date certain.

On January 11, 2022, AEP/SWEPCO received notification from the EPA that the demonstration was considered administratively complete and is pending EPA's final decision.

On November 30, 2022, AEP/SWEPCO posted the second annual progress report for the permanent cessation of a coal fired boiler by a date certain.

2.0 PURPOSE

This annual report, documenting the continued lack of alternative capacity and the progress towards the closure of the CCR surface impoundments, is required to be prepared by 40 CFR 257.103(f)(2) and 30 TAC 352.1231. The owner or operator has completed the progress report when the report has been placed in the facility's operating record as required by 40 CFR 257.105(i)(20) and 30 TAC 352.1301.

This Report-04 covers the period from December 1, 2023 – November 30, 2024.

3.0 CONTINUED LACK OF ALTERNATIVE CAPACITY AND PROGRESS TOWARDS CLOSURE

Annual Report-04
Alternative Closure Requirements-EBAP and WBAP
Solid Waste Permit No: none
Henry W. Pirkey PP, Hallsville, Texas

The bottom ash handling system operates as a wet-sludge of bottom ash to the bottom ash complex for settling of the bottom ash. Demineralizer regeneration waste is also discharged to the bottom ash complex for treatment.

Pirkey Power Plant does not have an existing alternate impoundment on-site that meets the liner or aquifer separation requirements of EPA's CCR regulation. In addition, Pirkey Power Plant does not have an existing alternate impoundment on-site that can be utilized for treatment of the non-CCR wastestream. There is currently no existing installed infrastructure at the plant to support rerouting of these flows so that they 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.

On March 30, 2022, WBAP ceased receipt of CCR and non-CCR wastestreams and commenced closure by removal for this CCR Unit in accordance with the certified closure plan. The CCR material was removed from April to June of 2022 from the WBAP. An additional 12 inches of soil was then removed, finishing in July of 2022. The last inspection for the removal was completed on July 26, 2022. The groundwater monitoring samples for final closure were collected in November 2022. On May 5, 2023, the WBAP was closed by removal in accordance with 30 TAC §352.1221 (40 CFR 257.102) and the most recent Written Closure Plan. Groundwater monitoring will continue until TCEQ's Executive Director issues a closure certification.

On April 25, 2023, EBAP ceased receipt of CCR and non-CCR wastestreams and commenced closure by removal for this CCR Unit in accordance with the certified closure plan. The CCR material was removed from April to June of 2023 from the EBAP. An additional 12 inches of soil was then removed, finishing in July of 2023. The last inspection for the removal was completed on July 20, 2023. The groundwater monitoring samples for final closure were collected in August 2023. On October 17, 2023, the EBAP was closed by removal in accordance with 30 TAC §352.1221 (40 CFR 257.102) and the most recent Written Closure Plan. Groundwater monitoring will continue until TCEQ's Executive Director issues a closure certification.

The CCR removed from the EBAP, WBAP, and the 12 inches layer of underlying soils were transported to the on-site landfill for disposal.

AEP/SWEPCO certifies that Henry W. Pirkey Power Plant ceased operation of its coal-fired boilers on March 31, 2023, and the bottom ash complex was closed by removal by October 17, 2023.

AEP/SWEPCO complied with all relevant requirements of 40 CFR 257 Subpart D and 30 TAC 352. No corrective action is required currently.

This report reaffirms AEP/SWEPCO's statements that there was no alternative disposal capacity to replace that of the EBAP and WBAP for the management of CCR and non-CCR wastewaters generated by the power plant.

4.0 PLANNED WORK

AEP/SWEPCO will continue to ensure that the EBAP and WBAP remains in compliance with all relevant requirements of 40 CFR 257 Subpart and 30 TAC 352 including the sampling and analyses of all the monitoring wells associated with the certified groundwater monitoring well network.

Annual Report-04
Alternative Closure Requirements-EBAP and WBAP
Solid Waste Permit No: none
Henry W. Pirkey PP, Hallsville, Texas

Groundwater monitoring will continue until TCEQ's Executive Director issues a closure certification.