

## **Closure Completion Notification for Closure by Removal**

January 15, 2025

Closure Completion Notification

Flint Creek Plant

Primary Bottom Ash Pond

On December 24, 2024, the Flint Creek Plant Primary Bottom Ash Pond was transitioned to closure status in accordance with 40 CFR 257.102. This notice of completion of closure is being placed in the operating record in accordance with 40 CFR 257.102(h).

Effective with the Closure Completion Notification, the former ash storage site is no longer a CCR unit. The following operating record documents are no longer required going forward:

- Hazard Potential Classification
- Emergency Action Plan (EAP)
- Face to Face Meeting Documentation for EAP
- History of Construction and Revisions for Surface Impoundments
- Structural Stability Assessments
- Safety Factor Assessments
- Fugitive Dust Plan
- Inflow Design Flood System Control Plan

**CLOSURE CERTIFICATION BY QUALIFIED PROFESSIONAL ENGINEER**

I certify that the AEP Flint Creek Primary Bottom Ash Pond has been closed in accordance with the most recent written closure plan specified by 40 CFR 257.102(b) and the requirements of 40 CFR 257.102.

David Anthony Miller

Printed Name of Licensed Professional Engineer

*David Anthony Miller*

Signature



15296

License Number

Arkansas

Licensing State

01.15.2025

Date

#### 4.0 PROFESSIONAL ENGINEER CERTIFICATION

This Closure By Removal Certification and Construction Summary Report confirms that the construction activities associated with the closure of the PBAP (refer to Section 3.0) were performed in accordance with the requirements contained in the Closure Plan; and therefore, meet the closure criteria defined in 40 CFR §257.102.

The following certification statement provides confirmation that this report was prepared by a qualified professional engineer registered in the state of Arkansas and that there is sufficient information to demonstrate that the closure of the PBAP meets the requirements of the Closure Plan and 40 CFR §257.102.

### Professional Engineer's Certification

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*Based on the work completed, the visual observation of the pond bottom by CEC field personnel during CCR removal, and review of the final topographic survey, I certify that the CCR contained in the Flint Creek Primary Bottom Ash Pond has been removed in general accordance with the Closure Plan prepared by American Electric Power dated September 2016, revised October 2023.*

**Jeff A Shepherd, P.E.**

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**Printed Name of Professional Engineer**



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**Signature**

**10836**

**Arkansas**

**01-30-2024**

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**Registration No.**

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**Registration State**

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**Date**



Southwestern Electric Power Company  
Flint Creek Plant  
Primary Bottom Ash Pond  
**Hazard Potential Classification Assessment**

AEP has performed an evaluation to classify the above CCR Surface Impoundment in accordance with FEMA's Hazard Potential Classification System for Dams. These guidelines evaluate the consequences of a potential failure not the likelihood of a failure. Guidelines that were developed and utilized are included below.

**Hazard Potential Classification Systems (from FEMA 333, April 2004)**

**1. Low Hazard Potential**

Dams assigned the low hazard potential classification are those where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the owner's property.

**2. Significant Hazard Potential**

Dams assigned the significant hazard potential classification are those dams where failure or mis-operation results in no probable loss of human life but can cause economic loss, environmental damage, disruption of lifeline facilities, or can impact other concerns. Significant hazard potential classification dams are often located in predominantly rural or agricultural areas but could be located in areas with population and significant infrastructure.

**3. High Hazard Potential**

Dams assigned the high hazard potential classification are those where failure or mis-operation will probably cause loss of human life.

Flint Creek's Primary Bottom ash dam is situated upstream of Little Flint Creek Reservoir. The impact of the failure or mis-operation of the dam will be contained within the Little Flint Creek Reservoir with minimal off property impact and no potential for human life loss, and no potential economic and infrastructure lifeline losses. The US EPA CCR Impoundment Assessment Report also listed the dam as Low Hazard.

There has been no changes in classification by the State Dam Safety nor has there been any other physical changes that would warrant a change in the classification.

Based on the FEMA Hazard Potential Classification Systems for Dams and on the above discussion, the Flint Creek Primary Bottom Ash Dam is classified as a **Low Hazard Potential Dam**.

Professional Engineer's Certification:

I certify that this Hazard Potential Classification Assessment is in accordance with the requirements of section 40 CFR 257.73 (a)(2)(i).

Gary F. Zych, P.E.



7/28/2021