

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

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.

Printed Name of Professional Engineer


Signature

10836

Arkansas

01-30-2024

Registration No.

Registration State

Date



STRUCTURAL STABILITY ASSESSMENT PERIODIC 5-YR REVIEW

CFR 257.73(d)

Primary Bottom Ash Pond

Flint Creek Plant
Gentry, Arkansas

October, 2021

Prepared for: Southwestern Electric Power Company

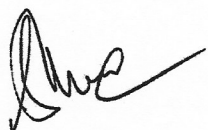
Prepared by: American Electric Power Service Corporation

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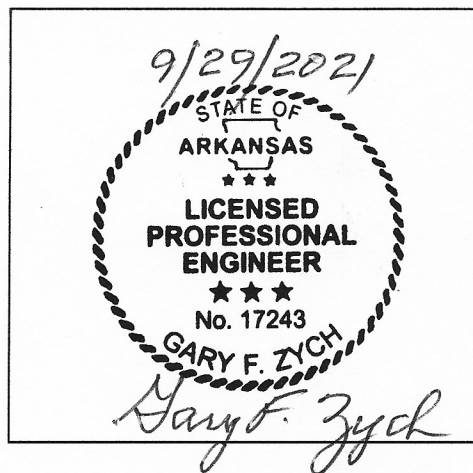
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Structural Stability Assessment
Periodic 5-Yr Review
CFR 257.73(d)
Flint Creek Plant
Primary Bottom Ash Pond

PREPARED BY:  DATE: 09-27-2021
Shah S. Baig, P.E.

REVIEWED BY: *Brett A. Dreger* DATE: 9/28/2021
Brett A. Dreger, P.E.

APPROVED BY: *Gary F. Zych* DATE: 9/29/2021
Gary F. Zych, P.E.
Section Manager – AEP Geotechnical Engineering



I certify to the best of my knowledge, information and belief that the information contained in this structural stability assessment meets the requirements of 40 CFR 257.73(d)

Structural Stability Assessment
Periodic 5-Year Review
Flint Creek Plant
Primary Bottom Ash Pond

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1.0 OBJECTIVE 257.73(d)

This report was prepared by AEP- Geotechnical Engineering Services (GES) section to fulfill requirements of CFR 257.73(d) and document whether the design, construction, operations, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices. This is the first periodic 5-year review of the initial assessment as per the Rule.

Note: There has not been any change to the dike/dam structure or the spillway system (overflow discharge structure) since the initial assessment.

2.0 NAME AND DESCRIPTION OF CCR SURFACE IMPOUNDMENT

The Flint Creek Power Plant is located near the City of Gentry, Benton County, Arkansas. It is owned and operated by Southwestern Electric Power Company (SWEPCO). The facility operates one surface impoundment for storing CCR called the Primary Bottom Ash Pond.

The Primary Bottom Ash Pond dam is a cross valley dam on a tributary to the Little Flint Creek. The dam is 45 feet high and has side slopes of 3H:1V. The downstream slope is partially submerged by the Little Flint Creek Reservoir.

3.0 STABLE FOUNDATION AND ABUTMENTS 257.73(d)(1)(i)

[Was the facility designed for and constructed on stable foundations and abutments? Describe any foundation improvements required as part of construction.]

Based on the design drawings, a foundation key was constructed along the centerline of the dam. The key was excavated 6-8 feet below existing ground. The construction specifications required the area beneath the extent of the dike/dam to be stripped of all organics and vegetation. After stripping and prior to placing compacted fill, the specifications required proof-rolling of the subgrade.

Based on the subsurface investigations data, the relative density and description of the foundation materials are adequate for this CCR unit.

4.0 SLOPE PROTECTION 257.73(d)(1)(ii)

[Describe the slope protection measures on the upstream and downstream slopes.]

The unit has been constructed with a layer of riprap on both the upstream slope and downstream slope for protection against erosion and wave action. The current condition of the riprap layer is adequate. The remaining sections of the slopes above the riprap is vegetated and maintained. Any erosion that may occur is repaired within a timely period.

5.0 EMBANKMENT CONSTRUCTION 257.73 (d)(1)(iii)

[Describe the specifications for compaction and/or recent boring to give a relative comparison of density.]

The design drawings show that the embankment materials were to be compacted to 90% Modified proctor density. Based on the soil test borings from the geotechnical investigation through the embankment indicate that the material is stiff and representative of compacted earthen materials.

6.0 VEGETATION CONTROL 257.73 (d)(1)(iv)

[Describe the maintenance plan for vegetative cover.]

The vegetative areas are mowed to facilitate inspections and maintain the growth of the vegetative layer; and prevent the growth of woody vegetation.

7.0 SPILLWAY SYSTEM 257.73(d)(1)(v)

[Describe the spillway system and its capacity to pass the Inflow Design Flood as per its Hazard Classification.]

The spillway system consists of a primary weir box and pipe for normal operations and an open channel spillway to pass flood events. The CCR unit has a Low Hazard rating and design flood is the 100-year flood. The facility can safely pass this flood as well as the full PMF without overtopping the dam crest.

8.0 BURIED HYDRAULIC STRUCTURES 257.73 (d)(1)(vi)

[Describe the condition of the sections of any hydraulic structure that is buried beneath and/or in the embankment.]

There are no pipes that are part of the spillway system that are buried within or beneath the embankment.

9.0 SUDDEN DRAWDOWN 257.73 (d)(1)(vii)

[If the downstream slope is susceptible to inundation, discuss the stability due to a sudden drawdown.]

The downslope is partially inundated by the Little Flint Creek reservoir. The reservoir is used to supply the power plant with a source of water for operations. The principal/emergency spillway is a concrete overflow section that is only activated during large precipitation events. The overflow section has only operated 2 times since the construction of the dam. The pool level is maintained by the plant via pumps for the operation of the plant. The reservoir area and volume is large compared to the pump capacity of the plant. Therefore, the condition for a sudden drawdown of the reservoir is not feasible.

The dam for the primary bottom ash pond was designed for the normal fluctuations of the Little Flint Creek Reservoir.