ALTERNATIVE SOURCE DEMONSTRATION REPORT

2025 1st SEMIANNUAL EVENT TEXAS STATE CCR RULE

H.W. Pirkey Power Plant
West Bottom Ash Pond
Registration No. CCR104
Hallsville, Texas

Prepared for

American Electric Power
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Columbus, Ohio 43215-2372

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Project CHA1147I

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Geosyntec consultants

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LIST OF ACRONYMS

Å	angstrom
AEP	American Electric Power
amsl	above mean sea level
ASD	alternative source demonstration
bgs	below ground surface
CCR	coal combustion residuals
EBAP	East Bottom Ash Pond
EDS	energy-dispersive spectroscopy
EPRI	Electric Power Research Institute
ft	feet
GWPS	groundwater protection standard
LCL	lower confidence limit
mg/kg	milligram per kilogram
mg/L	milligram per liter
SEM	scanning electron microscopy
SPLP	Synthetic Precipitation Leaching Procedure
SSL	statistically significant level
TAC	Texas Administrative Code
TCEQ	Texas Commission on Environmental Quality
USEPA	United States Environmental Protection Agency
VAP	vertical aquifer profiling
WBAP	West Bottom Ash Pond
XRD	X-ray diffraction

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1. INTRODUCTION AND SUMMARY

This alternative source demonstration (ASD) report has been prepared to address a statistically significant level (SSL) for cobalt in the groundwater monitoring network for the former West Bottom Ash Pond (WBAP), located at the H.W. Pirkey Plant (Site) in Hallsville, Texas, following the first semiannual assessment monitoring event of 2025. The H.W. Pirkey Plant has four coal combustion residuals (CCR) storage units regulated by the Texas Commission on Environmental Quality (TCEQ) under Registration No. CCR104 (**Figure 1**). Three of the units, including the former WBAP, have been closed by removal, and one unit is still active.

In April 2025, a semiannual assessment monitoring event was conducted at the former WBAP in accordance with the Texas Administrative Code (TAC) Title 30 §352.951(a) [30 TAC §352.951(a)]. The monitoring data was submitted to Groundwater Stats Consulting, LLC for statistical analysis. Confidence intervals were recalculated for the Appendix IV parameters at the compliance wells to assess whether these parameters were present at SSLs above the groundwater protection standards (GWPSs). An SSL was concluded if the lower confidence limit (LCL) of a parameter exceeded the GWPS (i.e., if the entire confidence interval exceeded the GWPS). The following SSL was identified at the former WBAP (Geosyntec 2025a):

- The LCL for cobalt exceeded the GWPS of 0.00900 milligrams per liter (mg/L) at AD-28 (0.0133 mg/L).

No other SSLs were identified.

1.1 CCR Rule Requirements

TCEQ regulations regarding assessment monitoring programs for CCR landfills and surface impoundments provide owners and operators with the option to make an ASD when an SSL is identified:

> In making a demonstration under this subsection, the owner or operator must, within 90 days of detecting a statistically significant level above the groundwater protection standard of any constituent listed in Appendix IV adopted by reference in §352.1431 of this title, submit a report prepared and certified in accordance with §352.4 of this title (relating to Engineering and Geoscientific Information) to the executive director, and any local pollution agency with jurisdiction that has requested to be notified, demonstrating that a source other than a CCR unit caused the exceedance or that the exceedance resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. (30 TAC §352.951(e))

Pursuant to 30 TAC §352.951(e), Geosyntec Consultants (Geosyntec) has prepared this ASD report to document that the SSL identified for cobalt at well AD-28 in the groundwater monitoring network for the WBAP is from a source other than the former WBAP.

1.2 Demonstration of Alternative Sources

An evaluation was completed to assess possible alternative sources to which each identified SSL could be attributed. Alternative sources were categorized into the following five types, based on methodology provided by the Electric Power Research Institute (EPRI 2017):

- ASD Type I: Sampling Causes
- ASD Type II: Laboratory Causes
- ASD Type III: Statistical Evaluation Causes
- ASD Type IV: Natural Variation
- ASD Type V: Anthropogenic Source

A demonstration was conducted to show that the SSL identified for cobalt was based on a Type IV cause and not by a release from the former Pirkey WBAP.

2. SUMMARY OF SITE CONDITIONS

The WBAP design and construction, regional geology and Site hydrogeology, and groundwater monitoring system and flow conditions are described below.

2.1 WBAP Design and Construction

The WBAP was a 30.9-acre CCR surface impoundment located at the north end of the Pirkey Plant, immediately west of the East Bottom Ash Pond (EBAP) (**Figure 1**). It was constructed while the Pirkey Plant was being developed in 1983 and 1984 and placed into operation in 1985 to receive bottom ash and economizer ash sluiced from the Plant boiler (Arcadis 2016). The Pirkey Power Plant placed CCR and non-CCR waste streams into the pond complex, alternating between the EBAP and WBAP. Bottom ash generated at the plant was sluiced to one of the ponds (the active pond) until it was close to full. Bottom ash in the inactive pond was drained and dewatered and then removed from the pond. Dry ash was loaded into trucks and transported to the Landfill. It typically took approximately twelve months for the active pond to fill, at which time the second pond (which has been emptied of bottom ash) became the active pond, and the first pond was then drained.

A Closure Plan was developed in October 2016 and revised in December 2021 (AEP 2021) and February 2025 (AEP 2025). This document detailed the closure activities which were to take place throughout the closure of the WBAP. AEP submitted a certified notification that the receipt of CCR materials had ceased as of March 30, 2022, and the closure activities had been initiated (AEP 2022). At that time, the closure of the WBAP commenced by removal in accordance with the 2021 Closure Plan, with CCR material removal occurring from April to June of 2022. The final inspection for CCR material removal was completed on July 26, 2022. On May 5, 2023, the WBAP was certified closed by removal in accordance with 30 TAC §352.1221 and the 2021 Closure Plan, and notification was placed in the Operating Record (AEP 2023a).

The former WBAP was constructed with compacted clay embankments around the pond perimeter and a compacted clay liner over the pond base (Arcadis 2016). Multiple lithological borings advanced following installation of the clay liner confirmed that at least 6 feet of clay was present below the base of the former EBAP (Arcadis 2016). The bottom elevation of the former WBAP was approximately 347 feet above mean sea level (ft amsl), and the elevation of the top of the pond embankment was approximately 357 ft amsl prior to pond closure.

2.2 Regional Geology / Site Hydrogeology

The former WBAP was positioned on an outcrop of the Eocene-age Recklaw Formation, which consists predominantly of clay and fine-grained sand (Arcadis 2016). The Recklaw Formation is underlain by the Carrizo Sand, which crops out in the topographically lower southern portion of the Site. The Carrizo Sand consists of fine to medium grained sand interbedded with silt and clay.

The very-fine- to fine-grained clayey and silty sand found beneath an upper silty to silty sandy clay layer in the vicinity of the former WBAP is considered to be the Uppermost Aquifer below this CCR unit (Arcadis, 2016). In the vicinity of the WBAP it is approximately 15-feet thick and located between an elevation of 325 and 340 feet above mean sea level.

2.3 Groundwater Monitoring History and Flow Conditions

The monitoring well network for the former WBAP monitors groundwater within the uppermost aquifer. Geologic cross-section A-A' from Arcadis (2016), provided as **Attachment A**, shows the subsurface structure of the uppermost aquifer (indicated on the figure as clayey silty sand, tan to gray) underlying the former WBAP and the former EBAP. Geologic cross-section A-A' demonstrates lateral continuity of the uppermost aquifer spanning the entire length of the former WBAP.

Groundwater flow direction in the area of the former WBAP is west-southwesterly (**Figure 1**). Seasonal variability in groundwater flow has not been observed since the monitoring well network was installed. Groundwater flow gradients in the uppermost aquifer are approximately 0.01 feet per foot. The monitoring well network for the former WBAP unit consists of upgradient monitoring wells AD-3, AD-12, and AD-18 and compliance wells AD-17, AD-28, and AD-30, all of which are screened within the uppermost aquifer at depths ranging from 10 to 57 feet below ground surface (ft bgs) (301 to 348 ft amsl). Groundwater elevations at the unit have ranged from approximately 325 to 370 ft amsl (approximately 10 to 35 ft bgs depending on well location).

3. ALTERNATIVE SOURCE DEMONSTRATION

The ASD evaluation method and proposed alternative source of cobalt in AD-28 groundwater are described below.

3.1 Proposed Alternative Source

An initial review of Site geochemistry, Site historical data, and laboratory quality assurance and quality control data did not identify alternative sources for cobalt due to Type I (sampling), Type II (laboratory), Type III (statistical evaluation), or Type V (anthropogenic) issues. Groundwater sampling, laboratory analysis, and statistical evaluations were generally completed in accordance with 30 TAC §352.931 and the draft TCEQ guidance for groundwater monitoring (TCEQ 2020). As described below, the SSLs have been attributed to natural variation associated with the underlying geology, which is a Type IV (natural variation) issue.

Monitoring well AD-28 is located near the southwest corner of the former WBAP, as shown in **Figure 1**. Previous ASDs for cobalt at the former WBAP provided evidence that cobalt is present in the aquifer geologic media at the Site and that the observed cobalt concentrations in groundwater were due to natural variation of native geogenic sources (Geosyntec 2025b)[1]. The previous ASDs demonstrated that the former WBAP did not appear to be a source for cobalt in downgradient groundwater, based on observed concentrations of cobalt both in the ash material and in leachate from Synthetic Precipitation Leaching Procedure (SPLP) analysis (SW-864 Test Method 1312, [United States Environmental Protection Agency, USEPA 1994]) of the ash material. Cobalt was not detected in the most recent SPLP ash leachate sample (collected in 2019) below the reporting limit of 0.01 mg/L, which is lower than the average concentration at AD-28 (0.0141 mg/L) (**Table 1**).

Cobalt was detected at a concentration of 0.000501 mg/L in a surface water sample collected from the WBAP on November 4, 2020. Cobalt was also detected in a surface water sample collected on February 28, 2023 from the EBAP at a concentration of 0.0035 mg/L (**Table 1**). Both the WBAP and EBAP have been closed by removal since the samples were collected (AEP 2023a, AEP 2023b). As discussed in Section 2.1, the EBAP and WBAP had historically received the same process water, with the use of each pond dependent on available freeboard and cleaning schedule; thus, there is a basis for the equivalency between these two surface water samples. These concentrations are lower than the reported cobalt concentrations for downgradient network wells from the most recent sampling event (**Figure 2**). Additionally, cobalt concentrations in both pond surface water samples were over an order of magnitude lower than the average concentration observed at AD-28 (**Table 1**). Thus, the former WBAP is not the likely source of cobalt at AD-28.

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[1] A citation is provided for the most recently completed ASD addressing the source of aqueous cobalt concentrations at the WBAP groundwater monitoring network. Additional previous ASD reports have also presented this discussion, and references to those reports are included within the referenced document.

As noted in the previous ASDs, soil samples collected across the Site, including from locations near the former WBAP, identified cobalt in the aquifer solids at concentrations ranging from non-detect to 23.5 milligrams per kilogram (mg/kg) with the highest value reported at AD-41, which is upgradient of the WBAP and EBAP (**Figure 3**). SB-28 was advanced in the vicinity of AD-28 in April 2020 to re-log the geology at AD-28 and collect samples for laboratory analysis of total metals and mineralogy. The SB-28 field boring log, which was generated by Auckland Consulting LLC, is provided as **Attachment B**. Cobalt was identified at SB-28 at concentrations of 4.53 mg/kg at 15.5-16 ft bgs and 8.70 mg/kg at 40-41 ft bgs (**Table 2**). The 15.5-16 ft bgs interval at SB-28 correlates to the depth of the monitoring well screen of AD-28 (15-35 ft bgs), indicating that naturally occurring cobalt is present in aquifer solids within the AD-28 screened interval.

In addition to the analysis of total cobalt, soil samples were submitted for mineralogical analysis to evaluate the presence of cobalt-containing minerals. X-ray diffraction (XRD) analysis of soils from SB-28 identified pyrite (an iron sulfide mineral) in samples collected at 25-30 ft bgs and 40-41 ft bgs at concentrations up to 3% by weight (**Table 3**). Cobalt is known to undergo isomorphic substitution for iron in crystalline iron minerals such as pyrite due to their similar ionic radii of approximately 1.56 angstrom (Å) for iron vs. 1.52 Å for cobalt (Clementi and Raimondi 1963, Krupka and Serne 2002, Hitzman et al. 2017). The presence of iron-bearing minerals in soil near the former WBAP constitutes a potential source of naturally occurring cobalt.

The aquifer solids at SB-28 are distinctly red in color at shallow depths, as illustrated in the photolog of soil cores provided in **Attachment C**. Red color in soils is often associated with the presence of oxidized iron-bearing minerals such as hematite and goethite. Goethite, an iron oxide mineral (FeOOH), was present at depths up to 16 ft bgs at SB-28 at up to 37% of the total aquifer solids (**Table 3**). The weathering of pyrite to goethite under oxidizing conditions is a well-understood phenomenon, including in formations in east Texas (Senkayi et al. 1986, Dixon et al. 1982). Pyrite weathering processes likely result in the release of isomorphically substituted cobalt from the pyrite crystal structure as the mineral undergoes oxidative weathering to iron oxide minerals such as goethite.

As described in previous ASDs for the former WBAP, vertical aquifer profiling (VAP) was completed in May 2019 to collect groundwater samples from upgradient locations B-2 and B-3 during the soil boring and sample collection process (Geosyntec 2019). A groundwater sample was also collected from AD-30, one of the existing compliance wells within the WBAP groundwater monitoring network. Solid phase materials within these groundwater samples were separated and submitted for analysis of chemical composition and mineralogy. For the VAP samples, separation was completed using a centrifuge due to the high abundance of suspended solids. For the groundwater sample at AD-30, the sample was filtered using a 1.5-micron filter. Based on total metals analysis, cobalt was identified both in the centrifuged solid material collected from upgradient VAP location B-3 [VAP-B3-(40-45)] and in the material retained on the filter after processing groundwater from permanent monitoring wells AD-30, B-2, and B-3 (**Table 2**). The concentrations of cobalt in the solid material retained after filtration were comparable to the bulk soil samples collected from the same locations. This material is expected to be captured as suspended particulates in the groundwater samples collected from the monitoring well network, contributing to aqueous cobalt concentrations.

The solid sample [VAP-B3-(40-45)] was submitted for mineralogical analysis via XRD and scanning electron microscopy (SEM) using an energy dispersive spectroscopic analyzer (EDS). The XRD results identified pyrite as approximately 3% of the solid phase (**Table 4**). Pyrite was identified during SEM/EDS analysis of lignite which is mined immediately adjacent to the Site. Logging completed while the VAP boring was advanced identified coal at several intervals, including 45 and 48 ft bgs (**Figure 4**). Furthermore, SEM/EDS of both centrifuged solid samples [VAP-B3-(40-45) and VAP-B3-(50-55)] identified pyrite in backscattered electron micrographs by the distinctive framboidal morphology (Harris et al. 1981, Sawlowicz 2000). Major peaks associated with iron and sulfur were identified in the EDS spectrum, which further confirm the identification of pyrite (**Attachment D**). While cobalt was not identified in the EDS spectrum, it is likely present at concentrations below the detection limit.

The former WBAP was not identified as the source of cobalt at wells in the WBAP monitoring well network based on the low concentrations of cobalt in the pond itself and the ubiquity of naturally occurring cobalt in the aquifer formation, especially in soil and groundwater samples upgradient from the WBAP. Cobalt in the WBAP network groundwater is believed to be a function of natural variability within the aquifer. Naturally occurring cobalt is known to substitute for iron in iron-bearing minerals. The presence of iron sulfide (as pyrite) and iron oxides/hydroxides has been confirmed at AD-28 and across the Site. The weathering of pyrite to iron oxide/hydroxide minerals constitutes a natural mechanism of cobalt release into groundwater from the crystalline structure of these aquifer minerals.

4. CONCLUSIONS AND RECOMMENDATIONS

The preceding information serves as the ASD prepared in accordance with 30 TAC §352.951(e) and supports the position that the SSL for cobalt identified at AD-28 during the semiannual assessment monitoring in April 2025 was not due to a release from the former WBAP. The identified SSL should instead be attributed to natural variation in the underlying geology, including the presence of pyrite and iron oxide minerals (e.g., goethite) in the solid aquifer material. Therefore, no further action is warranted. Certification of this ASD by a qualified professional engineer is provided in **Attachment E**.

5. REFERENCES

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TABLES

Table 1. Summary of Key Cobalt Analytical Data
Alternative Source Demonstration Report
West Bottom Ash Pond – H.W. Pirkey Plant

Sample	Sample Date	Unit	Cobalt Concentration
Bottom Ash (Solid Material)	2/11/2019	mg/kg	5.8
Texas-Specific Soil Background Concentration			7
SPLP Leachate of Bottom Ash	2/11/2019	mg/L	<0.01
WBAP Pond Water	11/4/2020		0.000501
EBAP Pond Water	2/28/2023		0.0035
AD-28 - Average	May 2016 - April 2025		0.0141
Site-Specific Groundwater Protection Standard			0.00900

Notes:

1. Texas-specific soil background concentration from Texas Administrative Code (TAC) Title 30 Chapter 350 (Texas Risk Reduction Program) [table in 30 TAC 350.51(m)].
2. The average value for AD-28 was calculated using all cobalt data collected under Code of Federal Regulations (CFR) Title 40 Chapter 257 Subpart D.
3. Site-specific Groundwater Protection Standard from "Statistical Analysis Summary - 2025 1st Semiannual Event. West Bottom Ash Pond. H.W. Pirkey Plant" (Geosyntec 2025a).

EBAP: East Bottom Ash Pond
mg/kg: milligrams per kilogram
mg/L: milligrams per liter
SPLP: synthetic precipitation leaching procedure
WBAP: West Bottom Ash Pond

Table 2. Soil Cobalt Data
Alternative Source Demonstration Report
West Bottom Ash Pond – H.W. Pirkey Plant

Location ID	Location	Sample Depth (ft bgs)	Cobalt (mg/kg)
Bulk Soil Samples			
AD-28 (SB-28)	WBAP Network	6-6.5	< 2.38
		15.5-16	4.53
		25-30	< 2.50
		40-41	8.70
AD-30	WBAP Network	7	1.00
		23	15.0
B-2	Upgradient	10	2.36
		16	3.62
		71	10.30
		82	7.21
		87	3.11
B-3	Upgradient	10	1.30
		20	0.59
		97	1.11
AD-41	Upgradient	15	<1.0
		35	23.5
		95	1.90
Solid Material Retained After Filtration			
AD-30	WBAP Network	15-25	9.3 J
B-2	Upgradient	38-48	4.3 J
B-3	Upgradient	29-34	12.0
		VAP 40-45	18.0

Notes:
1. For AD-28 and AD-30, samples were collected from additional boreholes advanced in the immediate area of the location identified by the well ID. Samples were not collected from the cuttings of the borings advanced for well installation.
2. Samples at B-2, B-3, and AD-41 were collected from cores removed from the borehole during well lithology logging.
3. Depths for samples collected after filtration represent the screened interval for the permanent well where the sample was collected.

ft bgs: feet below ground surface
J: Estimated value. Result is less than the reporting limit but greater than or equal to the method detec
mg/kg: milligrams per kilogram
VAP: vertical aquifer profile
WBAP: West Bottom Ash Pond

Table 3. AD-28 Mineralogy Results
West Bottom Ash Pond – H. W. Pirkey Plant

Boring ID	**SB-28 (AD-28)**			
Sample Depth Interval	6-6.5	15.5-16	25-30	40-41
Sample Location	Above Screened Interval	Within Screened Interval		Below Screened Interval
Color	Red-brown to yellow-brown	Light gray, light red-brown	Brown, light red-brown	Gray to dark gray
Mineralogy				
Quartz	58%	46%	73%	34%
Pyrite	--	--	3%	3%
K-Feldspar	--	1%	1%	1%
Siderite	--	--	2%	52%
Goethite	37%	15%	--	--
Anhydrite	--	--	--	2%
Clay/Mica	5%	38%	21%	8%

Notes:
1. Sample depths are shown in feet below ground surface (ft bgs)
2. Well AD-28 is screened from 15-35 ft bgs.
3. Mineralogical components are shown in relative percent (%) abundance.

Table 4. B-3 X-Ray Diffraction Results
Alternative Source Demonstration Report
West Bottom Ash Pond – H. W. Pirkey Plant

Constituent	**VAP-B3-(40-45)**
Quartz	15
Plagioclase Feldspar	0.5
Orthoclase	ND
Calcite	ND
Dolomite	ND
Siderite	0.5
Goethite	ND
Hematite	2
Pyrite	3
Kaolinte	42
Chlorite	4
Illite/Mica	6
Smectite	12
Amorphous	15

Notes:

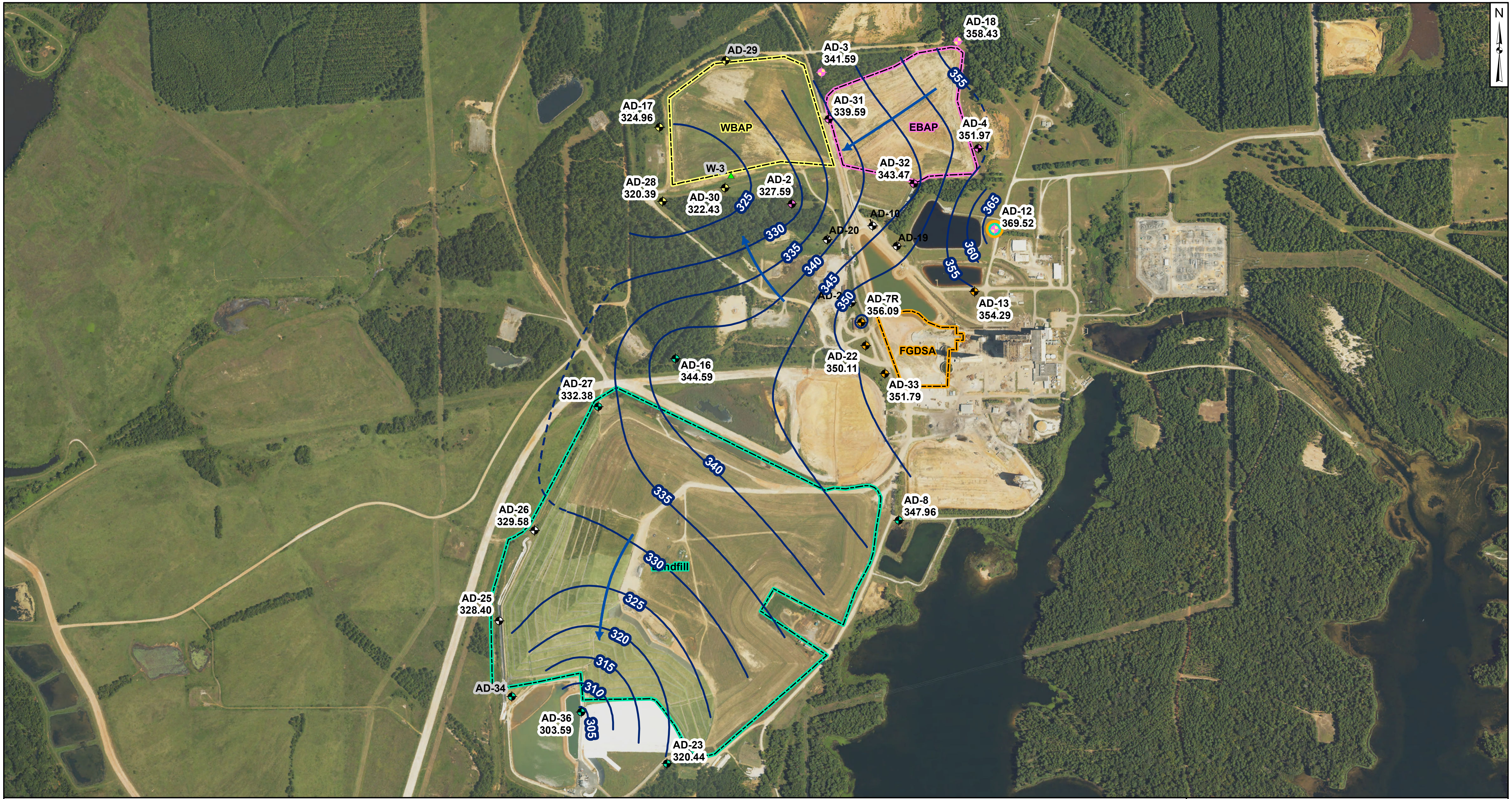
1. Results given in units of relative percent (%) abundance.

2. VAP-B3-(40-45) represents the centrifuged solid material from the groundwater sample collected at that interval.

ND: not detected

VAP: vertical aquifer profiling

FIGURES



Legend

Groundwater Monitoring Wells

- Out of Network
- East Bottom Ash Pond (EBAP)
- West Bottom Ash Pond (WBAP)
- Landfill
- Flue Gas Desulfurization Stackout Area (FGDSA)
- EBAP and WBAP
- All CCR Unit Networks
- Piezometer
- Groundwater Elevation Contour
- Groundwater Elevation Contour (Inferred)
- Approximate Groundwater Flow Direction

Notes

1. Monitoring well coordinates and water levels (collected on April 21, 22, and 23, 2025) provided by AEP.
2. Site features based on information available in coal combustion residuals (CCR) Groundwater Monitoring Well Network Evaluation Update (Arcadis 2022) provided by AEP.
3. Groundwater elevation units are feet above mean sea level (ft msl).
4. Wells AD-10, AD-19, AD-20, AD-21, AD-29, and W-3 were not gauged during the April 2025 event.
5. AD-7R replaced AD-7, which was abandoned on September 12, 2023.
6. Wells shaded in gray are within the network but not used for contouring.
7. Well AD-34 had artesian characteristics during this event and was not used for contouring.
8. AD-35 was abandoned on November 13, 2018 and is not shown on the map.
9. Removal of CCR plus one foot of material for the WBAP was completed for on July 26, 2022.
10. Removal of CCR plus one foot of material for the EBAP was completed on July 20, 2023.
11. Removal of CCR plus one foot of material for the FGDSA was completed on September 18, 2023.
12. Map is updated to incorporate Landfill survey data collected on May 1, 2024.
13. Aerial imagery provided by the TxGIO DataHub (dated 2024).

1,000 500 0 1,000 Feet

Beth Ann Gross

December 23, 2025
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STATE OF TEXAS
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PROFESSIONAL ENGINEER

Potentiometric Contours: Uppermost Aquifer April 2025

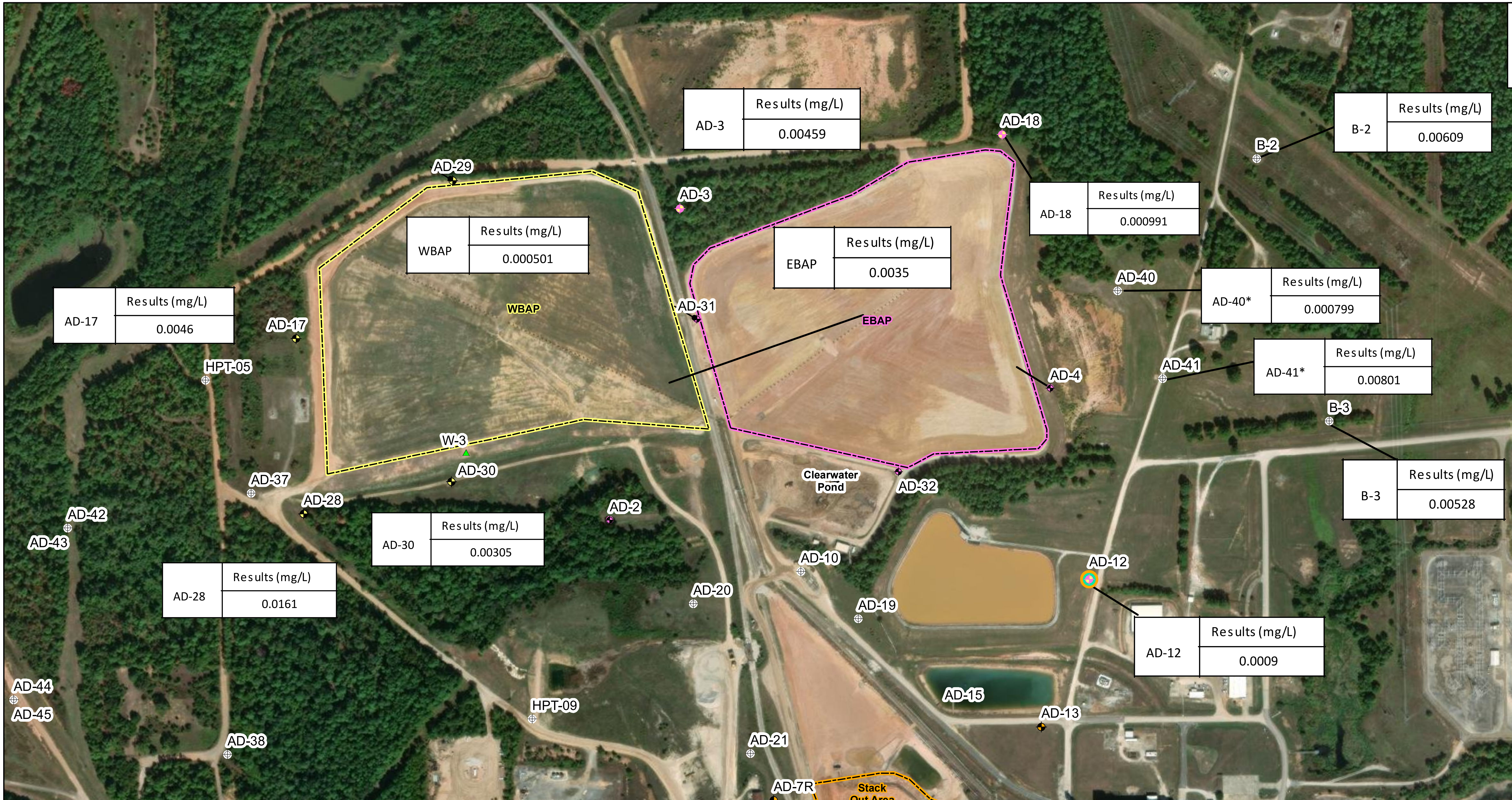
AEP Pirkey Power Plant
Hallsville, Texas

Geosyntec consultants

Columbus, Ohio | 2025/10/28

Figure 1

A:\Projects\AEP\Groundwater Statistical Evaluation - CHA8423\Groundwater Mapping\GIS Files\MXD\Pirkey\2025\AEP-Pirkey_GW_2025-04Pirkey.mxd. okiemute.commander. 10/28/2025. CHA8500B/12/01_04.



Legend

Out of Network	Stackout Area	EBAP
EBAP	EBAP and WBAP	Stack Out Area
WBAP	All CCR Unit Networks	WBAP
Landfill	Piezometer	

Notes
- Monitoring well coordinates, site features, and data provided by AEP.
- AD-15 location is approximated.
- Samples collected in April 2025.
- * - Well most recently sampled August 2019.
- AD-29 included in the well network for water level measurements only.
- WBAP surface water results shown for November 2020 sample. EBAP surface water results shown for February 2023 sample.
- WBAP: West Bottom Ash Pond
- EBAP: East Bottom Ash Pond
- Aerial imagery provided by ESRI, dated September 19, 2023.

400 200 0 400
Feet

Cobalt Distribution in Groundwater

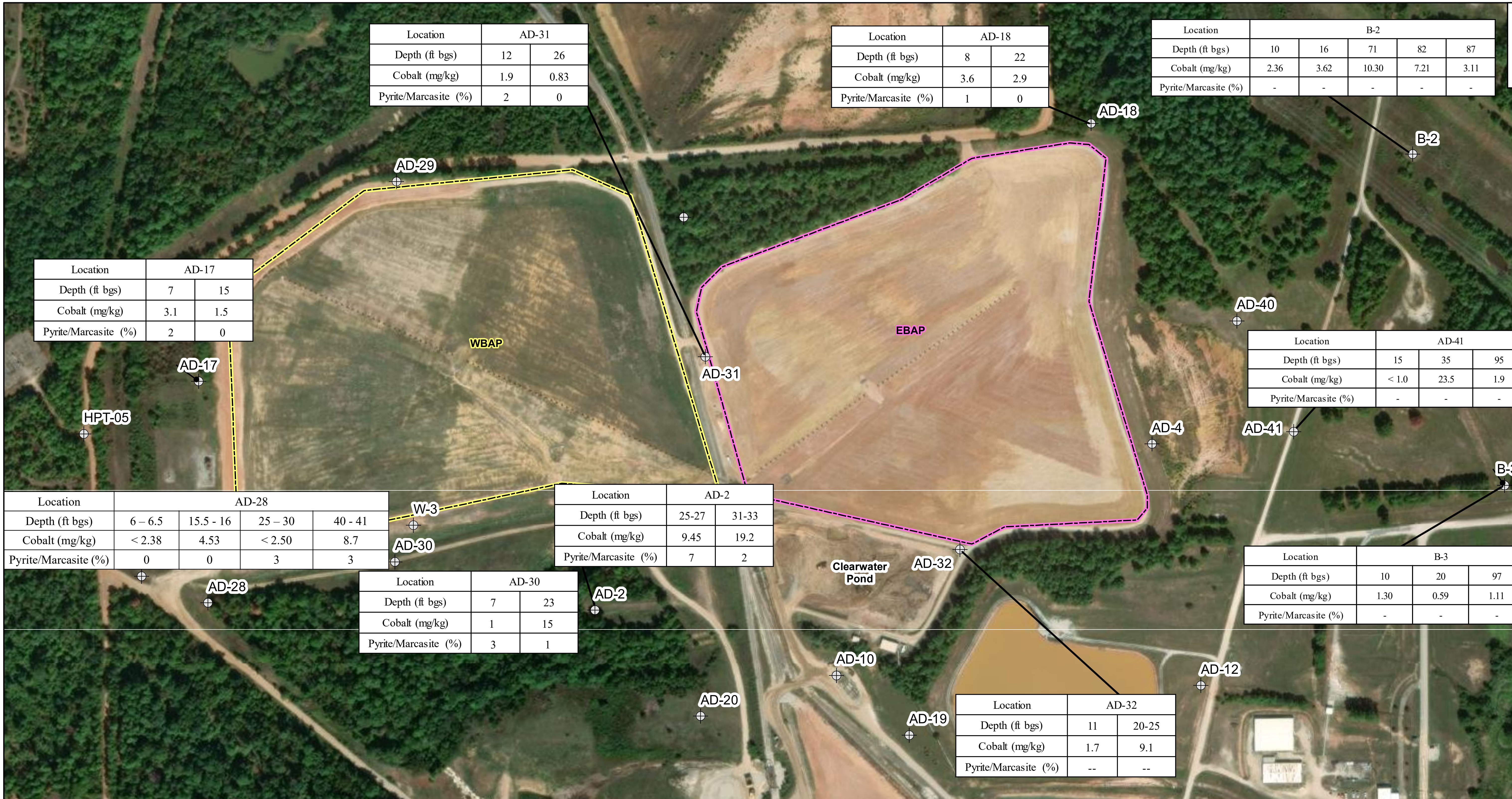
AEP Pirkey Power Plant
Hallsville, Texas

Geosyntec consultants

Columbus, Ohio | October 2025

Figure 2

P:\Projects\AEP\Groundwater Statistical Evaluation - CHA8423\Groundwater Mapping\GIS Files\MXD\Pirkey\2023\20240116_AEP_WBAP_Pirkey_Cobalt.mxd. BAres. 3/21/2025. Project/Phase/Task.



Location	AD-31	
Depth (ft bgs)	12	26
Cobalt (mg/kg)	1.9	0.83
Pyrite/Marcasite (%)	2	0

Location	AD-18	
Depth (ft bgs)	8	22
Cobalt (mg/kg)	3.6	2.9
Pyrite/Marcasite (%)	1	0

Location	B-2				
Depth (ft bgs)	10	16	71	82	87
Cobalt (mg/kg)	2.36	3.62	10.30	7.21	3.11
Pyrite/Marcasite (%)	-	-	-	-	-

Location	AD-17	
Depth (ft bgs)	7	15
Cobalt (mg/kg)	3.1	1.5
Pyrite/Marcasite (%)	2	0

Location	AD-41		
Depth (ft bgs)	15	35	95
Cobalt (mg/kg)	< 1.0	23.5	1.9
Pyrite/Marcasite (%)	-	-	-

Location	AD-28			
Depth (ft bgs)	6 – 6.5	15.5 - 16	25 – 30	40 - 41
Cobalt (mg/kg)	< 2.38	4.53	< 2.50	8.7
Pyrite/Marcasite (%)	0	0	3	3

Location	AD-2	
Depth (ft bgs)	25-27	31-33
Cobalt (mg/kg)	9.45	19.2
Pyrite/Marcasite (%)	7	2

Location	AD-30	
Depth (ft bgs)	7	23
Cobalt (mg/kg)	1	15
Pyrite/Marcasite (%)	3	1

Location	B-3		
Depth (ft bgs)	10	20	97
Cobalt (mg/kg)	1.30	0.59	1.11
Pyrite/Marcasite (%)	-	-	-

Location	AD-32	
Depth (ft bgs)	11	20-25
Cobalt (mg/kg)	1.7	9.1
Pyrite/Marcasite (%)	--	--

Legend

- Monitoring Wells
- EBAP
- WBAP

Notes
- Monitoring well coordinates provided by AEP.
- AD-2 and AD-28 samples collected on April 20, 2020
- All other data provided by AEP, 2019.
- ft bgs: feet below ground surface.
- mg/kg: milligrams per kilogram.
- -- not analyzed.
- WBAP: West Bottom Ash Pond
- EBAP: East Bottom Ash Pond
- Aerial imagery provided by ESRI and dated September 19, 2023.

300 150 0 300 Feet

Cobalt Distribution in Soil

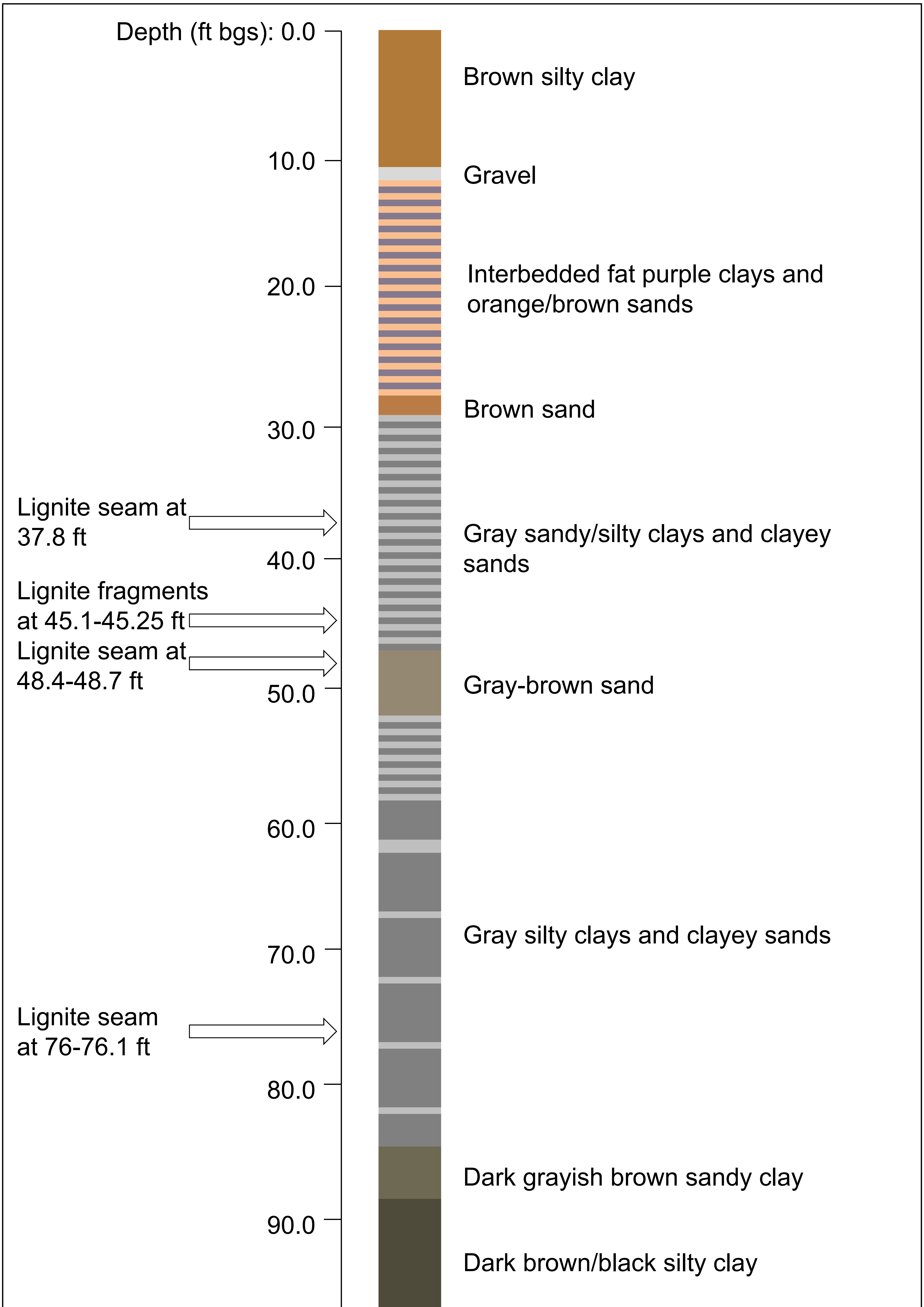
AEP Pirkey Power Plant
Hallsville, Texas

Geosyntec consultants

Columbus, Ohio | October 2025

Figure 3

P:\Projects\AEP\Groundwater Statistical Evaluation - CHA8423\Groundwater Mapping\GIS Files\MXD\Pirkey\2023\20240116 Pirkey_SoilChem_minerals.mxd. BAres. 3/21/2025. Project/Phase/Task.



Notes:
- Ft = feet
- Bgs = below ground surface
- Boring completed May 2019
- Total depth of 97.5 ft bgs
- Well installed in offset boring screened at 29-34 ft bgs

B-3 Visual Boring Log

AEP Pirkey Power Plant
Hallsville, TX

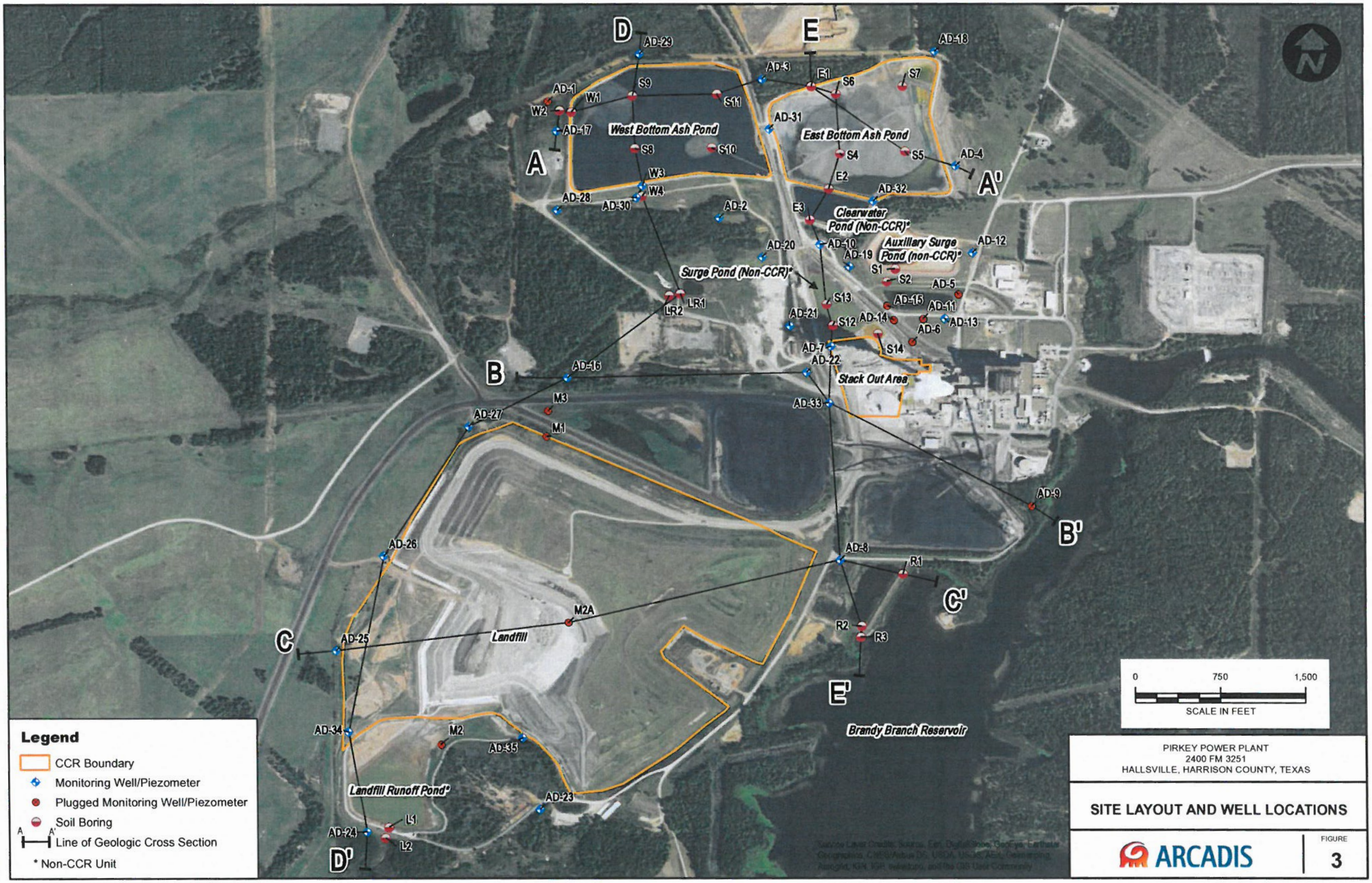
Geosyntec consultants

CHA8495B | October 2025

Figure 4

\\annarbor-01\data\Projects\AEP\Legal Department - ASD Review\Pirkey\2019-05 Field Investigation\Field Forms\Compiled Boring Logs\Visual boring logs

ATTACHMENT A
Geologic Cross Section A-A’



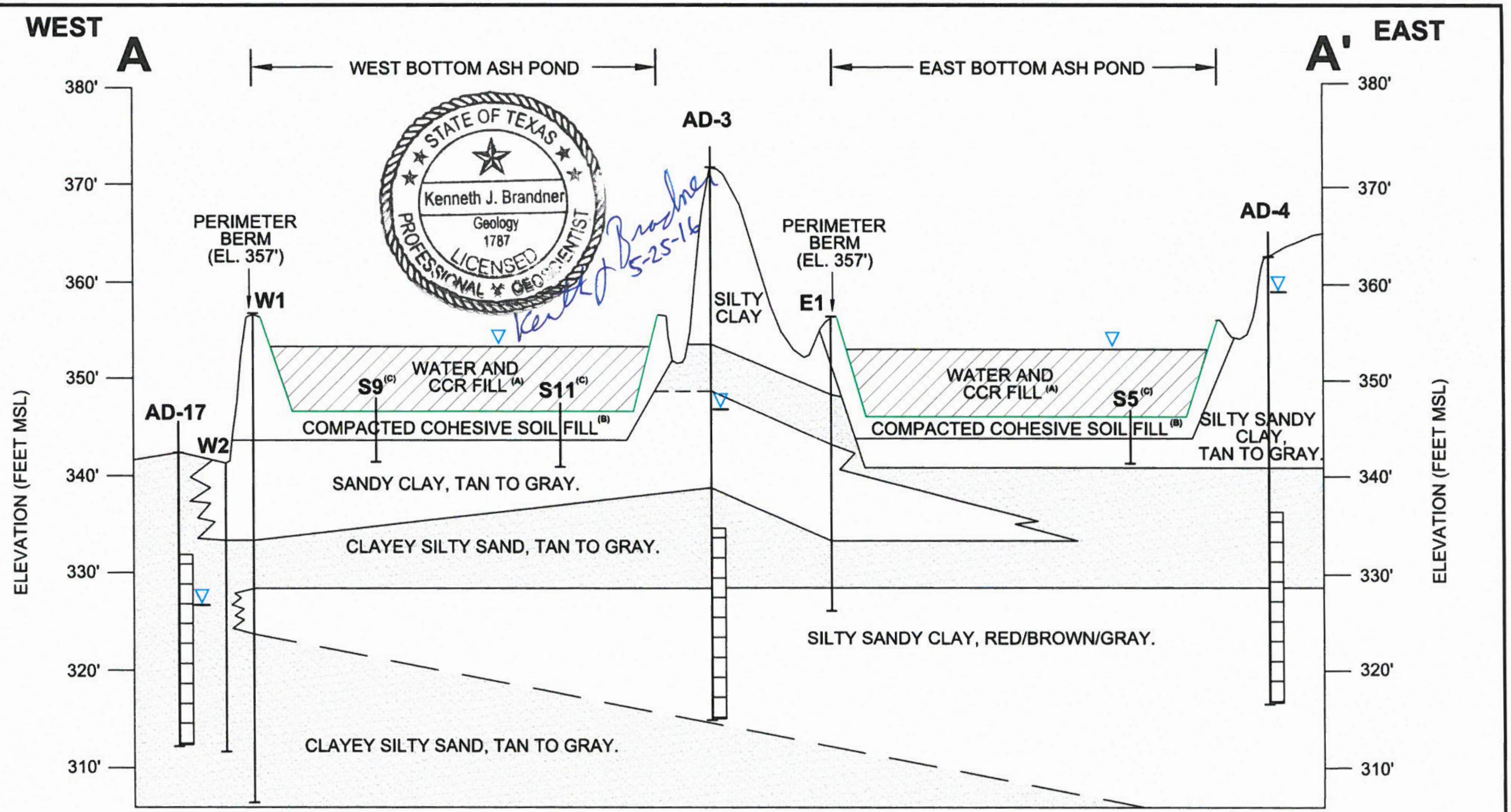
PIRKEY POWER PLANT
2400 FM 3251
HALLSVILLE, HARRISON COUNTY, TEXAS

SITE LAYOUT AND WELL LOCATIONS

ARCADIS

FIGURE 3

Document Path: Z:\GISPROJECTS_ENV\AEP\Pirkey Plant\MXD\Figure 3 - Site Layout and Well Locations.mxd



LEGEND

MONITORING WELL SCREENED INTERVAL

WATER LEVEL IN MONITORING WELL (1/20/16)

BASE OF CCR UNIT

0 300'
HORIZONTAL SCALE

NOTES:

A) TOP OF WEST BOTTOM ASH POND AND EAST BOTTOM ASH POND PERIMETER BERM ELEVATION IS 357', OPERATING ELEVATION IS 354'(JOHNSON & PACE, MAY 2011). BASE ELEVATION OF WEST BOTTOM ASH POND AND EAST BOTTOM ASH POND IS 347' (SARGENT & LUNDY, JANUARY 1983).
B) COMPACTED COHESIVE SOIL FROM ELEVATION 344' TO 347' (SARGENT & LUNDY, SEPTEMBER 1984;AMEC, AUGUST 2011).
C) SOIL BORING INSTALLED BY SOUTHWESTERN LABORATORIES DURING ASH POND CONSTRUCTION IN 1983.

PIRKEY POWER PLANT
2400 FM 3251
HALLSVILLE, HARRISON COUNTY, TEXAS

CROSS SECTION A - A'

ARCADIS

FIGURE
4

ATTACHMENT B
SB-28 Boring Log

PROJECT NO. ______ PROJ. ______ BOR. NO. SB-28

LOCATION AD-28/MW-28 - Pirkey Power Plant ELEV. ______ DATE 4/20/20

SILTS & SANDS – CONDITION			COHESIVE SOILS - CLAYS – CONSISTENCY		PENETROMETER	N - VALUE
VLo ...... Very Loose	0- 4		Vso.. Very Soft		0 - 0.25	<2
Lo .... Loose	4-10		So.... Soft		0.25 - 0.5	2 - 4
MDe ..... Med. Dense	10-30		Mst.. Stiff		0.5 - 1.0	4 - 8
De .... Dense	30-50		St.... Stiff		1.0 - 2.0	8 - 15
VDe ...... Very Dense	>50		VSt.. Very Stiff		2.0 - 4.0	15 - 30
			H..... Hard		> 4.0	>30

COLORS	MATERIALS	SAND ADJ.	CHARACTERTICS
Li .... Light .....Br ....Brown	Cl ..... Clay, Clayer	F.......Fine	Calc ..... Calcareous
Dk ... Dark .....Bk ....Black	Si ..... Silt, Silty	M ....Medium	Lig .... Lignite
G ..... Grey ....Bl ....Blue	Sa ..... Sand, Sandy	Co....Coarse	Org .... Organic
T ...... Tan ....Gr ....Grenn	Ls .... Limestone	Si.....Silty	Lam ...... Laminate
R ...... Red ......Y ......Yellow	Gr .... Gravel		Sls .... Slickensided
Rdish.Reddish.Wh ...White	SiS ... Siltstone		SL .... Slightly
	SS .... Sandstone		Sm(s) ... Seam (s)
	Sh..... Shale, Shaley		Nod ...... Nodules

STRATUM DESCRIPTION

	Sample Interval (TEST ASSIGNMENT)	Recovery (SAMPLE NO.)	DEPTH FT.	SAMPLES	CONDITION OR CONSISTENCY	COLOR	MINOR MATERIALS OR ADJECTIVES	PREDOMINATE MATERIAL	CHARACTERISTICS OR MODIFICATIONS	STANDARD PENETROMETER SEAT - 6"	1st - 6"	2nd - 6"	UNIFIED SOIL CLASSIFICATION	N - VALUE OR HAND PENETROMETER
0	0-5	4'	0		0-2	Br, Lt.Br	Si	Sa	Silty sand, trace clay &				moist	(0-2)
SM			2			Lt.Rd Br			roots, trace fine Iron ore					
2'									gravel,				moist	(2-5)
					2-10'	Rd Br, Yllw Br	Si, Gr	Cl	Clay - some silt, trace					
									v.f. sand, trace coarse iron					
									ore concretions,				moist	(5-10)
CL	5-10	1.5'							- some v.f. sand, ironstone					
									layer @ 6-6.5'					
10'									clayey vf to f					
	10-15	1'	10		10'-16-	Rd Br, Lt.Br	Si Cl	Sa	Silty Sand with clay in				v. moist	(10-15)
SC-SM									thin lences, trace cemented					
									clayey sand					
	15-20	1.5'				Lt.Br and Lt.Rd Br			- clay lense @ 15' (6")				v. moist	(15-16)
16'									+ ironstone layer @ 15.5' &					
SM									cemented sand to 16'-					
	20-25	3"			16-40	Br, Lt.Rd Br	Si	Sa	Silty Sand - some ironstone				Saturated @ 16' to 40'	
						Gray			- gray @ 20'					
	25-30	3'							+ some cemented clayey sand (only recovery @ 25-30')					
	30-35	NR												
	35-40	NR												
									B.T. @ 40'					
									*Split Spoon Driven from 40-41'					
40'														
SC	40-41	1'			40-41	Gray, Dk Gray	Cl	Sa	Clayey sand w/ lenses of					
									cemented sand @ 41.5-41.75				v. moist	40-41
									trace v.f. gypsum crystals @ 40-41'					
									*6-6.5' collected @ 1140					
									*15.5-16' collected @ 1215					
									*25-30' collected @ 1230					
									*40-41 collected @ 1300					

Type Boring HSA — Dry Auger ☒ Rotary Wash ☐

SEEPAGE @ 16 FT. WHILE DRILLING, W.L. @ ____ FT. ON COMPL.
(OR) BAILED TO ____ FT. UPON COMPLETION.
W.L. @ ____ FT AND CAVED TO ____ FT. ON ________.

*GPS: 32.46544°, -94.49432 (18' W-NW of AD-28/MW-28)

ATTACHMENT C
SB-28 Boring Photographic Log

GEOSYNTEC CONSULTANTS
Photographic Record

Client: American Electric Power | **Project Number: CHA8495/12A/02**

Site Name: H.W. Pirkey Plant WBAP | **Site Location: Hallsville, Texas**

Photograph 1

Date: 4/21/2020

Direction: N/A

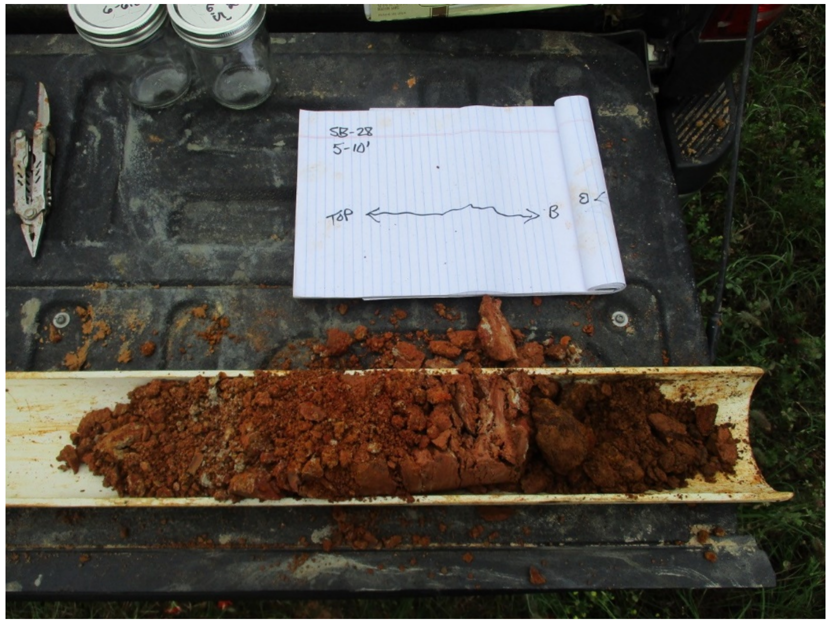
Comments:
Multiple sections of core from soil boring SB-28 advanced near downgradient monitoring well AD-28 within the Western Bottom Ash Pond (WBAP) CCR unit. 5-foot pushes were used. Note the reddish color indicating the presence of oxidized iron-bearing minerals.

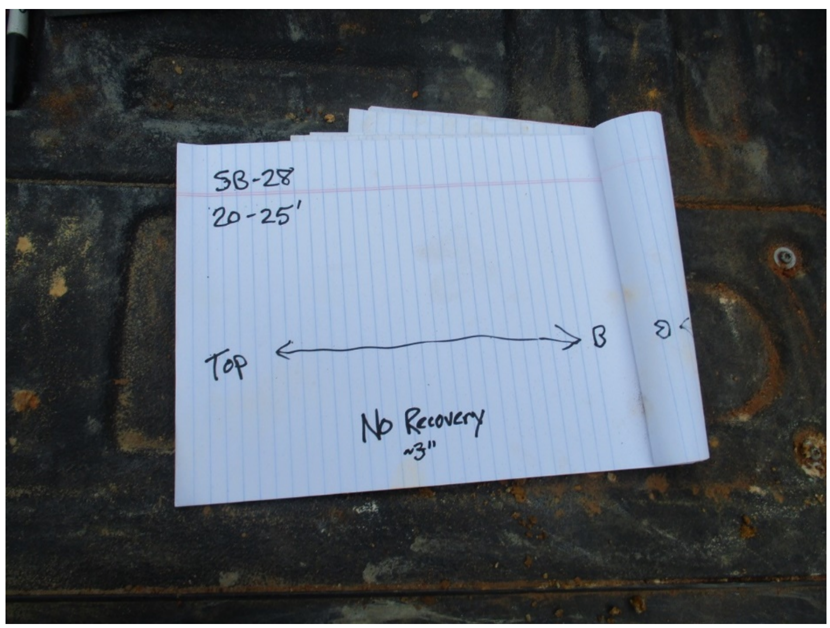
Photograph 2

Date: 4/21/2020

Direction: N/A

Comments:
0-5 foot interval of SB-28.

Photograph 3 **Date: 4/21/2020** **Direction: N/A** **Comments:** 5-10 foot interval of SB-28. Recovery of this interval was limited. A sample was collected from this interval from 6-6.5 ft. below ground surface (bgs).	
Photograph 4 **Date: 4/21/2020** **Direction: N/A** **Comments:** 10-15 foot interval of SB-28. Recovery of this interval was limited.	

Photograph 5	
Date: 4/21/2020	
Direction: N/A	
Comments: 15-20 foot interval of SB-28. Recovery of this interval was limited. A sample was collected from this interval from 15.5-16 ft. bgs.	
Photograph 6	
Date: 4/21/2020	
Direction: N/A	
Comments: Field geologist's note indicating that very little of the 20-25 foot interval of SB-28 was recovered.	

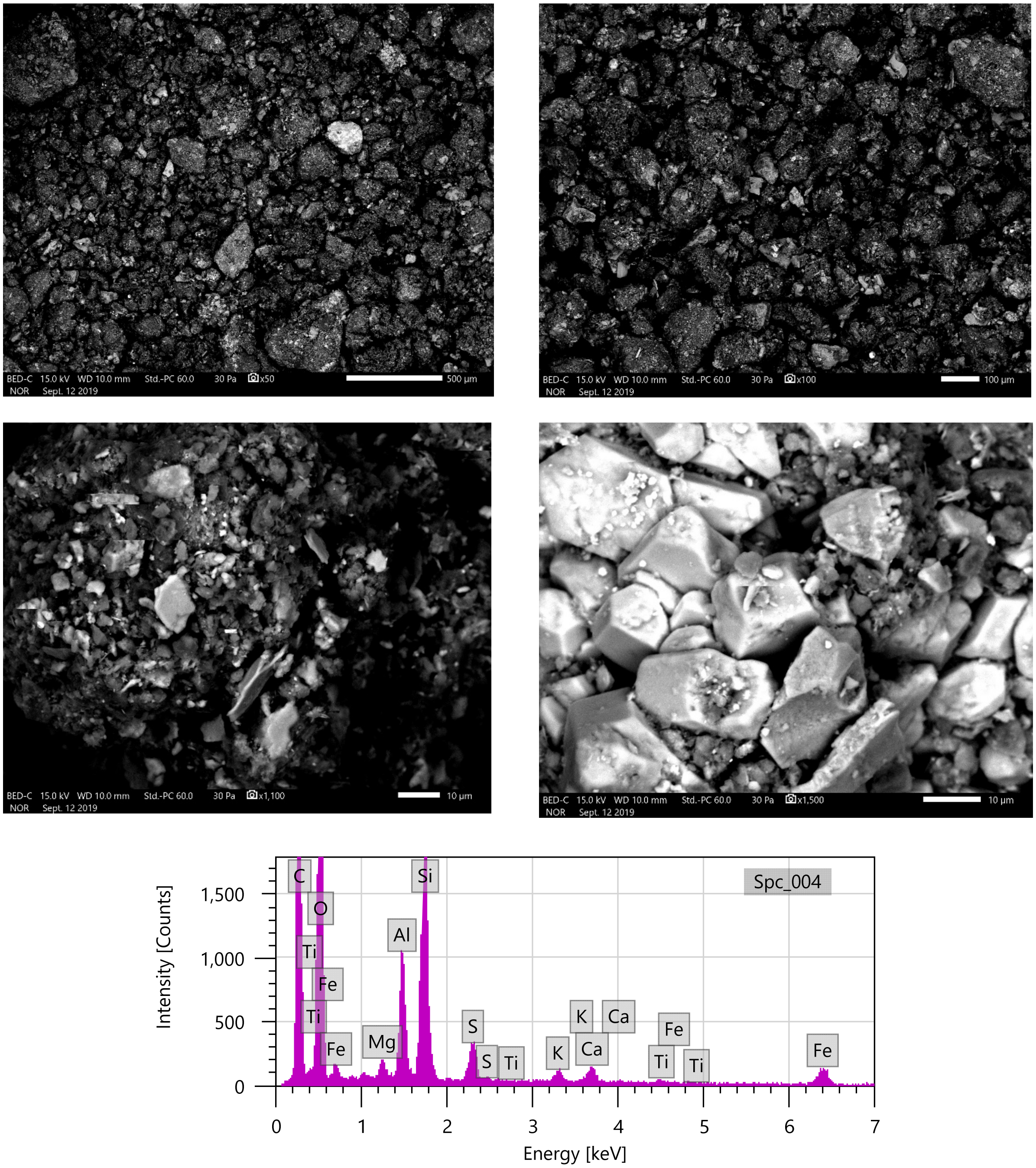
Photograph 7 **Date: 4/21/2020** **Direction: N/A** **Comments:** 25-30 foot interval of SB-28. Very little of this interval was recovered. Note the color change of the soil from red to dark brown/black. A sample was collected from this interval.	
Photograph 8 **Date: 4/21/2020** **Direction: N/A** **Comments:** Bottom of SB-28. The boring log indicates no recovery of soil from the 30-40 foot interval. A sample was collected from this interval.	

ATTACHMENT D
SEM/EDS Analysis

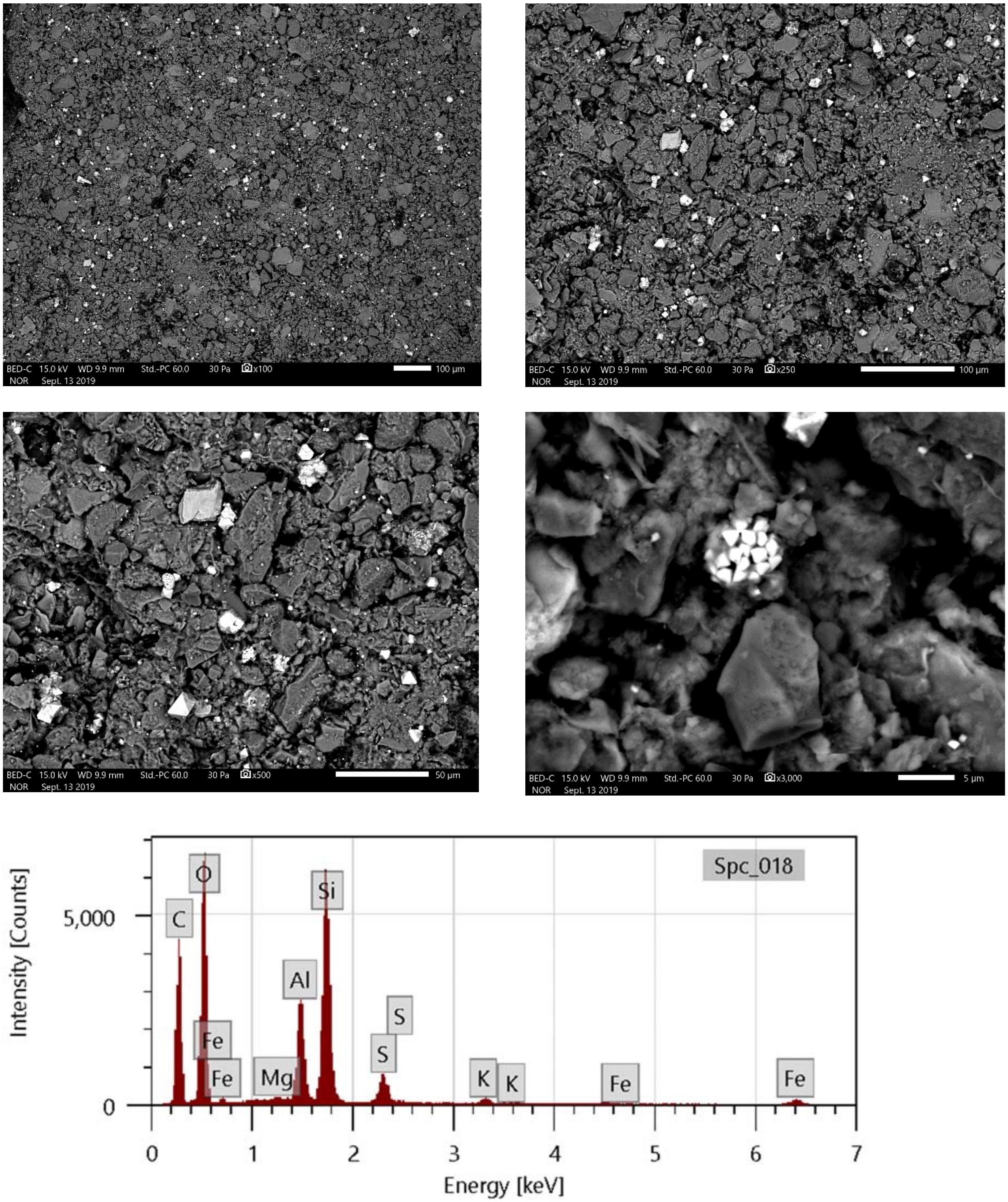
September 16, 2019

Dr. Bruce Sass
941 Chatham Lane, Suite 103, Columbus, OH 43221

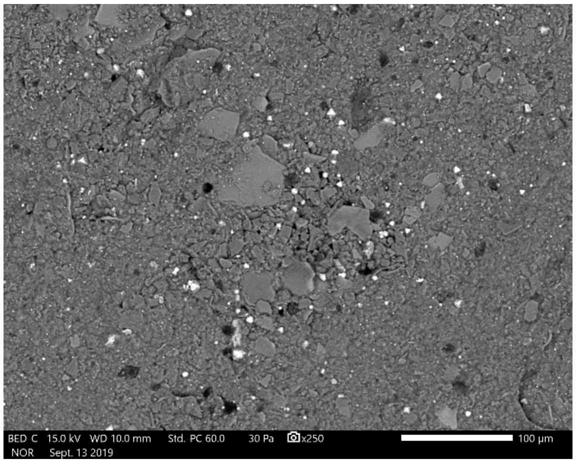
via Email: BSass@geosyntec.com

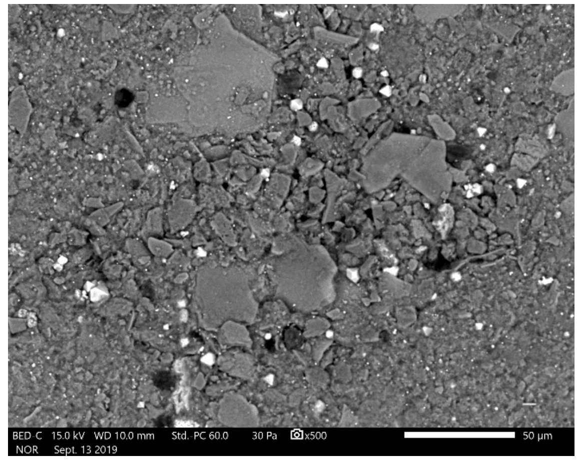


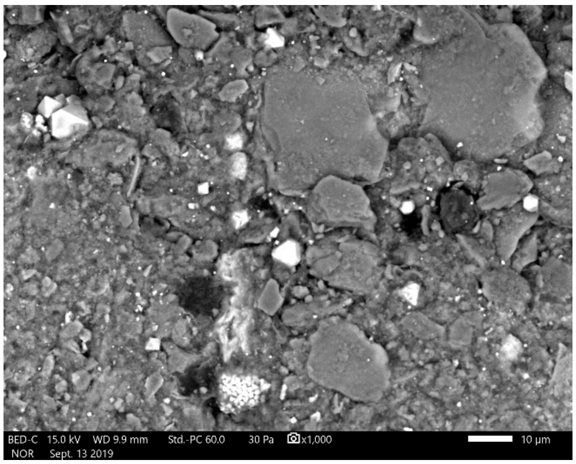
Lignite. Backscattered electron micrographs show the sample at 100X, 1,100X, and 1,500X. EDS spectrum at bottom is an area scan of the region shown in top right micrograph. Bright particles are mostly quartz and feldspar. Major peaks for carbon, oxygen, silicon, and aluminum suggest coal and clay.

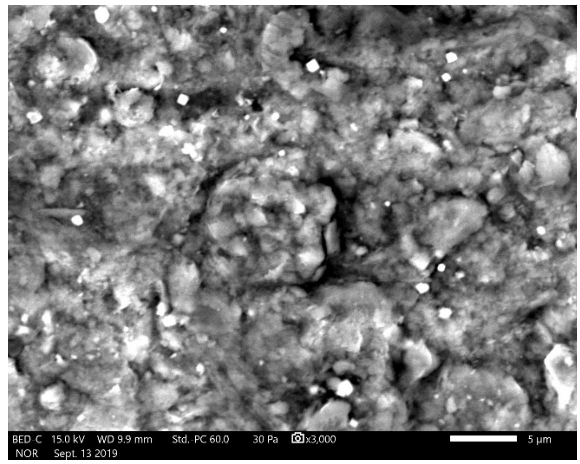


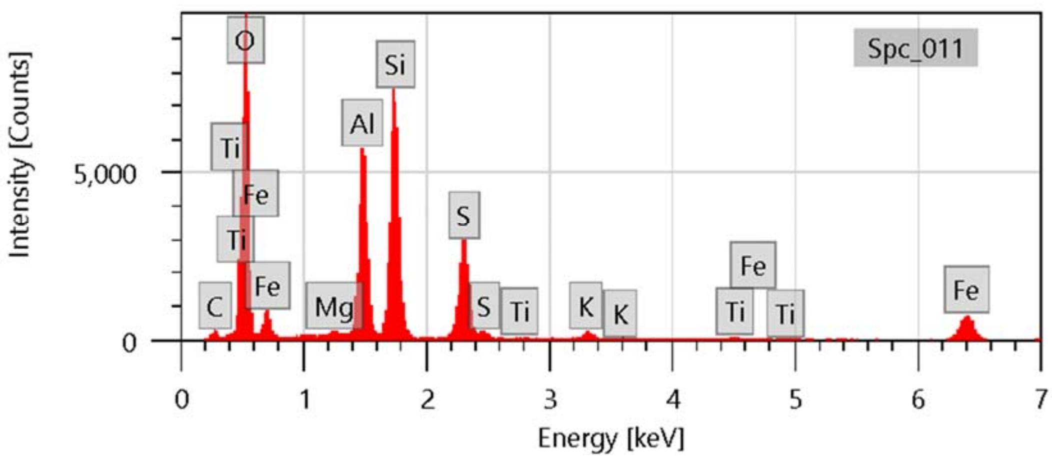
Sample VAP B3 40-45. Backscattered electron micrographs show the sample at 100X, 250X, 500X, and 3000X. EDS spectrum at bottom is an area scan of the region shown at 500X. Bright particles are pyrite (framboid in bottom right micrograph). Major peaks for carbon, oxygen, silicon, and aluminum suggest coal and clay.











Sample VAP B3 50-55. Backscattered electron micrographs show the sample at 250X, 500X, 1000X, and 3000X. EDS spectrum at bottom is an area scan of the region shown at 3000X. Bright particles are mostly pyrite (framboid in bottom left micrograph); occasional particles of Fe-Ti oxide are detected. Major peaks for oxygen, silicon, and aluminum suggest clay. Large blocky particles are mostly quartz, feldspar, and clay.

ATTACHMENT E
Certification by a Qualified Professional Engineer

CERTIFICATION BY A QUALIFIED PROFESSIONAL ENGINEER

I certify that the above described alternative source demonstration is appropriate for evaluating the groundwater monitoring data for the CCR management area of the former Pirkey West Bottom Ash Pond and that the requirements of 30 TAC §352.951(e) have been met.

Beth Ann Gross
Printed Name of Licensed Professional Engineer

Beth Ann Gross

Signature

Geosyntec Consultants
2039 Centre Pointe Blvd, Suite 103
Tallahassee, Florida 32308

Texas Registered Engineering Firm
No. F-1182

License Number	Licensing State	Date
79864	Texas	December 23, 2025