

5-year Periodic Hazard Potential Classification Assessment

July 17, 2026

Hazard Potential Classification Assessment

Pirkey Plant

West Bottom Ash Pond

On May 5, 2023, the Pirkey Power Plant, West Bottom Ash Pond was closed by removal in accordance with 40 CFR 257.102 and 30 TAC §352.1221(a) and the most recent Written Closure Plan. This notification is being prepared in accordance with 40 CFR 257.102(h) and 30 TAC §352.1221(a) and placed into the operating record in accordance with 40 CFR 257.105(i)(8) and 30 TAC §352.1301(a).

Based on the completion of closure by removal the facility no longer functions as a CCR surface impoundment, and the Hazard Classification Assessment required under 40 CFR 257.73(a)(2)(i) and 30 TAC §352.731 is no longer applicable.

Closure Completion Notification for Closure by Removal

May 5, 2023

Closure Completion Notification

Henry W. Pirkey Plant

West Bottom Ash Pond

On May 5, 2023, the Henry W. Pirkey, West Bottom Ash Pond was closed by removal in accordance with 40 CFR 257.102 and the most recent Written Closure Plan. This notification is being placed in the operating record in accordance with 40 CFR 257.102(h). This notification being made to demonstrate compliance with 40 CFR 257.103(f)(2) which allowed Pirkey West Bottom Ash Pond to receive CCR and non-CCR wastestreams after April 11, 2021.

The State of Texas received partial delegation from USEPA on June 1, 2021. Parts of 40 CFR 257.103 were subsequently modified by USEPA Rulemaking and were not included. Thus, these provision remains under USEPA jurisdiction. However, 40 CFR 257.102 Criteria for Conduction the Closure and Retrofit of CCR Units has been delegated. Therefore, final review and approval of closure will be determined by TCEQ.

CLOSURE CERTIFICATION BY QUALIFIED PROFESSIONAL ENGINEER

I certify that the Pirkey Power Plant's West Bottom Ash Pond has been closed in accordance with the most recent written closure plan specified by paragraph 40 CFR §257.102(b) and 30 TAC §352.1221, and the requirements of section 40 CFR §257.102 and 30 TAC §352.1221.



David Anthony Miller

Printed Name of Licensed Professional Engineer

David Anthony Miller

Signature

112498

License Number

Texas

Licensing State

05.05.2023

Date

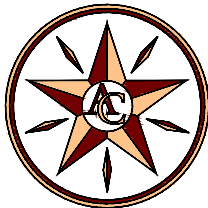
West Bottom Ash Pond CCR Removal Certification

H.W. Pirkey Power Plant

The CCR Removal Certification for the H.W. Pirkey Power Plant West Bottom Ash Pond was prepared by Akron Consulting, LLC (TBPE Firm #14014). This Certification/Statement of Professional Opinion is limited to the information available to Akron at the time the report was written. On the basis of and subject to the foregoing, it is my professional opinion as a Professional Engineer licensed in the State of Texas, that the report has been prepared in accordance with good and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances and at the time and in the same locale. It is my professional opinion that the removal of the CCR material in the West Bottom Ash Pond was performed in accordance with the current requirements of 40 CFR § 257.102 (30 TAC 352.1221) and Section 4.0 of the most recent written Closure Plan.

The use of the words “certification” and/or “certify” in this document shall be interpreted and construed as a Statement of Professional Opinion, and is not and shall not be interpreted or construed as a guarantee, warranty or legal opinion. This certification in no way relieves the Owner or Operator of the facility of his/her duty to fully implement the other requirements outlined in the entire section of 40 CFR § 257.

Engineer: Lane D. Roberts
Registration Number: 105135
State: Texas
Date: 12/30/2022



AKRON CONSULTING, LLC
431 N. CENTER ST.
LONGVIEW, TX 75601
TBPE Firm Reg. # 14014
(O) 903-236-9744
(F) 903-236-9745
www.akron-consulting.com



Southwestern Electric Power Company
Pirkey Power Station
West 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.

The AEP H.W. Pirkey Power Station is located at 2400 FM 3251, Hallsville, TX 75650. The plant is located in southern Harrison County, approximately 5 miles southeast of Hallsville, Texas, and approximately 8 miles southwest of Marshall, Texas.

The West Bottom Ash Pond is located at the north end of the Plant and approximately 3,000 feet northwest of Brandy Branch Reservoir. Loss of human life is not probable in the event of a catastrophic failure of the embankment and a failure of the embankment is expected to have a low economic and environmental impact. The US EPA CCR Impoundment Assessment Report has listed this ash pond 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, Pirkey West Bottom Ash Pond 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 30 TAC 352.731.

Gary F. Zych, P.E.

Gary F. Zych
7/29/2021

