



VIA EMAIL: Alyssa.Loveday@tceq.texas.gov

October 12, 2023

Ms. Alyssa Loveday
Texas Commission on Environmental Quality
Industrial Wastewater Permitting Team (MC 148)
12100 Park 35 Circle
Austin, TX 78753

**RE: Notice of Planned Participation - Annual Progress Report (2023)
Southwestern Electric Power Company
dba American Electric Power (AEP)
H.W. Pirkey Power Plant; Harrison County, TX
TPDES Permit No. 02496; EPA ID No. TX0087726**

Dear Mr. Loveday:

The Southwestern Electric Power Company (SWEPCO) hereby submits this Notice of Planned Participation (NOPP) Annual Progress Report for the H.W. Pirkey Power Plant (Pirkey) as required by 40 CFR 423.19(f)(3). This report details the completion of interim milestones listed in the NOPP, provides a narrative discussion of all completed, missed, or delayed milestones, and includes updated milestones.

As required by 40 CFR 257.103(f)(2)(viii), SWEPCO submitted a site-specific alternative for initiation of closure due to permanent cessation of a coal-fired boiler. The submission was placed in the Pirkey Plant operating record and posted to the CCR Rule Compliance Data and Information website. That submission anticipated that SWEPCO would cease coal combustion by March 31, 2023 in order to meet the CCR rule pond closure deadline of October 17, 2023. U.S. EPA deemed the submission complete on January 11, 2022, but to date, has taken no further action on the pending application. SWEPCO achieved the cessation of coal combustion by consuming all usable lignite located on-site and not restarting the generating unit.

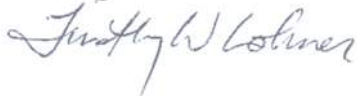
Interim Milestones	Completed/ Missed/ Delayed?	Narrative Discussion	Updated Milestone (if applicable)
Cessation of coal combustion by March 31, 2023	Completed.	As part of its CCR compliance program, SWEPCO submitted a site-specific alternative for initiation of closure due to permanent cessation of a coal-fired boiler. It anticipated that SWEPCO would cease coal combustion by March 31, 2023, in order to meet the CCR rule pond closure deadline of October 17, 2023.	Plant stopped coal combustion on March 31, 2023.
CCR pond closure by October 17, 2023	In progress and on schedule.	Sluicing of bottom ash and all non-CCR wastewaters to the East Pond ceased on April 25, 2023 and all CCR material, plus one-foot of soil, was removed from this pond by July 20, 2023. For the West Pond, sluicing of bottom ash and all non-CCR wastewaters ceased on March 30, 2022. All CCR material, plus one foot of soil, was removed by July 26, 2022. Closure certification documentation to close the West Pond has been submitted to TCEQ's Waste Permitting section.	

SWEPSCO does not waive, and expressly reserves, all rights or options available to it pursuant to 40 CFR Part 423, including 40 CFR 423.13(o)(1) (regarding transferring to another compliance option), 40 CFR 423.18 (regarding qualifying events) or any other provision of state or federal law that may apply.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief: true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Thank you for your attention to the aforementioned details. If you need additional information or have any questions regarding this request, please contact Emily Veteto at 214-777-1373 or via email at emmatlock@aep.com.

Sincerely,



Timothy Lohner, PhD
Environmental Manager
Environmental Permit Services
American Electric Power

C: Thomas Starr, TCEQ
Sam McDonald, Pirkey
Kathy Milenkovski, AEP Legal
Emily Veteto, AEP Environmental Services