



An **AEP** Company

BOUNDLESS ENERGY™

2400 FM Rd. 3251
Hallsville, TX 75650

October 12, 2021

Certified Mail—Return Receipt Requested

Mr. Toby Baker, Executive Director
Texas Commission On Environmental Quality
P. O. Box 13087
Austin, Texas 78711-3087

Re: American Electric Power (AEP)
Southwestern Electric Power Company (SWEPCO)
H. W. Pirkey Power Plant (Pirkey), Harrison County, TX
TPDES Permit No. 02496, EPA ID No. TX0087726
Notice of Planned Participation (NOPP)

Dear Mr. Baker,

Southwestern Electric Power Company (SWEPCO) hereby submits this Notice of Planned Participation (NOPP) seeking to qualify H. W. Pirkey Power Plant (facility only has one generating unit—Unit 1) as an electrical generating facility that will achieve permanent cessation of coal combustion by December 31, 2028, pursuant to 40 CFR 423.19(f)(2). The information required to be included in this NOPP can be found in the table below.

40 CFR 423.19(f)(2) requirement:	Southwestern Electric Power Company response:
Identification of the electric generating units intended to achieve the permanent cessation of coal combustion;	H. W. Pirkey Power Plant Unit 1
The expected date that each electric generating unit is projected to achieve permanent cessation of coal combustion;	October 17, 2023
Whether each date represents a retirement or a fuel conversion;	The date listed is for the retirement of the facility's generating unit, however, as of the date of this submittal, we reserve the right to implement a fuel conversion for the unit.
What the relevant regulatory body is;	Pirkey (Unit 1) is regulated by the Public Utility Commission of Texas (PUCT) and the Southwest Power Pool (SPP)
Whether each retirement or fuel conversion has been approved by a regulatory body;	SWEPCO has a case in front of the PUCT (state utility commission of Texas), however, at this point in time there has been no formal approval received from the PUCT for the retirement of the generating unit at Pirkey.
A copy of the most recent integrated resource plan for which the applicable state agency approved the retirement or repowering of the unit subject to the ELGs, certification of electric generating unit cessation under 40 CFR 257.103(b), or other documentation supporting that the	<p>As required by 40 CFR 257.103(f)(2)(viii), Southwestern Electric Power Company submitted a site-specific alternative for initiation of closure due to permanent cessation of a coal-fired boiler. The submission has been placed in Pirkey Plant's operating record and posted to the CCR Rule Compliance Data and Information website. A link to this information is provided here as supporting documentation of the intent to cease combustion of coal no later than December 31, 2028.</p> <p>https://www.aep.com/Assets/docs/requiredpostings/ccr/2020/12-2-2020/PK-EBAP-SIPermanentCessationofBoilerNotice-11302020.pdf</p> <p>That submission anticipates that SWEPCO will cease coal combustion by March 31, 2023, in order to meet the CCR rule</p>

<p>electric generating unit will permanently cease the combustion of coal by December 31, 2028;</p>	<p>pond closure deadline of October 17, 2023; however, the actual date by which coal combustion will cease may vary, as long as the plant meets the CCR Rule deadline of October 17, 2023. Consequently, to avoid confusion, we will use “no later than October 17, 2023” as the date by which coal combustion will cease.</p>
<p>A timeline to achieve the permanent cessation of coal combustion, with interim milestones and the projected dates of completion;</p>	<p>Pirkey Power Plant intends to cease combustion of coal on or before October 17, 2023 by consuming all the usable lignite located on-site and not restarting the generating unit. SWEPCO will submit annual progress reports, as required by 40 CFR 423.19(f)(3), by October 13 of each year, beginning in 2022. The annual progress reports will update the status of the CCR Unit closure progress in meeting the requested CCR Unit Closure date of October 17, 2023.</p>

Southwestern Electric Power Company will submit annual progress reports, as required by 40 CFR 423.19(f)(3), by October 13 of each year, beginning in 2022.

By submitting this NOPP indicating that, pursuant to 40 CFR 423.19(f)(2), Pirkey Power Plant (facility has only one generating unit-Unit 1) intends to cease combustion of coal by October 17, 2023, Southwestern Electric Power Company 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.

Please contact Frank Mills of AEP at (214) 436-1559 or at fmills@aep.com if you have any questions concerning the facility or the contents of this letter.

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 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.

Sincerely,



Monte McMahon
Vice President, Generating Assets
Southwestern Electric Power Company

Enclosure

C: Monte McMahon – SWEPCO
Robert Schmidt - AEP Legal
Jay Toungate – SWEPCO Generation Regulatory
Samantha McDonald - (Pirkey)

Kathy Milenkovski - AEP Legal
Brian Rupp - AEP Regulatory
Alan Wood – AEP Service Corp
Frank Mills – AEP Service Corp.

Henry W. Pirkey Power Plant

Notice of Intent to Comply With the Site-Specific Alternative to Initiation of Closure

CCR Units – East Bottom Ash Pond and West Bottom Ash Pond

As required by 40 CFR 257.103(f)(2)(viii), this is a notification that on November 30, 2020 Henry W. Pirkey Power Plant (Pirkey Plant) submitted a site-specific alternative to initiation of closure due to permanent cessation of a coal-fired boiler by a date certain to US EPA. The submission has been placed in Pirkey Plant's operating record and posted to the CCR Rule Compliance Data and Information website.



American Electric Power
1 Riverside Plaza
Columbus, OH 43215
aep.com

November 30, 2020

Submitted Electronically via Email

Mr. Andrew R. Wheeler, EPA Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code 5304-P
Washington, DC 20460

RE: Southwestern Electric Power Company
Henry W. Pirkey Power Plant Alternative Closure Demonstration

Dear Administrator Wheeler,

Southwestern Electric Power Company (SWEPCO) Henry W. Pirkey Power Plant (Pirkey Plant), hereby submits this request to the U.S. Environmental Protection Agency (EPA) for approval of a site-specific alternative deadline to initiate closure pursuant to 40 C.F.R. § 257.103(f)(2) for the East Bottom Ash Pond (EBAP) and West Bottom Ash Pond (WBAP) located at the Pirkey Plant near Hallsville, Texas. Pirkey Plant is requesting an extension pursuant to 40 C.F.R. § 257.103(f)(2) to allow the EBAP and WBAP to continue to receive CCR and non-CCR wastestreams after April 11, 2021. Enclosed is a demonstration prepared by American Electric Power and Burns & McDonnell that addresses all of the criteria in 40 C.F.R. § 257.103(f)(2)(i)-(iv) and contains the documentation required by 40 C.F.R. § 257.103(f)(2)(v). As allowed by the agency, in lieu of hard copies of these documents, electronic files were submitted to Kirsten Hillyer, Frank Behan, and Richard Huggins via email. If you have any questions regarding this submittal, please contact me at 614-716-2281 or damiller@aep.com.

Sincerely,

David A. Miller, P.E.
Director, Land Environment & Remediation Services
Environmental Services Division

Attachments

cc: Kirsten Hillyer – USEPA
Frank Behan – USEPA
Richard Huggins – USEPA

BOUNDLESS ENERGY

Southwestern Electric Power Company

Henry W. Pirkey Power Plant



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Documentation of No Alternative Disposal Capacity and Risk Mitigation Plan for Permanent Cessation of Boiler(s) by a Date Certain

Prepared by:

American Electric Power Service Corporation
1 Riverside Plaza
Columbus, OH 43215

and

Burns and McDonnell
9400 Ward Parkway
Kansas City, MO 64114

Submitted

11/30/2020

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