



VIA EMAIL: Matthew.Kennington@tceq.texas.gov

October 10, 2024

Mr. Matthew Kennington
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 (2024)
Welsh Power Plant (Welsh); TPDES Permit No. 01811
Southwestern Electric Power Company (SWEPCO)
dba American Electric Power (AEP)**

Dear Mr. Kennington:

Southwestern Electric Power Company (SWEPCO) hereby submits this Notice of Planned Participation (NOPP) Annual Progress Report for the Welsh Power Plant as required by 40 CFR 423.19(g)(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 to initiation of closure with the intention to permanently cease use of coal-fired boilers. The submission was placed in Welsh's operating record and posted to the CCR Rule Compliance Data and Information website. This document provides supporting documentation of the intent to cease combustion of coal no later than December 31, 2028. The submission also anticipated that SWEPCO would cease coal combustion by March 31, 2028, in order to meet the CCR Rule pond closure deadline of October 17, 2028; 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, 2028. U.S. EPA deemed the submission complete on January 11, 2022, but to date, has taken no further action on the pending demonstration application. SWEPCO intends to achieve the cessation of coal combustion by consuming all usable coal located on-site and not restarting the generating units.

Pursuant to 40 CFR 423.19(g)(4)(iii), AEP/SWEPCO will make the appropriate filings to the Southwest Power Pool detailing its future intentions for the facility (i.e. fuel conversion or retirement). It is expected that the filing will be submitted by December 31, 2028.

Interim Milestones	Completed/ Missed/ Delayed?	Narrative Discussion	Updated Milestone (if applicable)
Cessation of coal combustion by March 31, 2028	In progress and on schedule	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 is still anticipated that SWEPCO will cease coal combustion by March 31, 2028, in order to meet the CCR rule pond closure deadline of October 17, 2028 for the Primary Bottom Ash Pond.	No further updates at this time.
CCR pond closure by October 17, 2028	In progress and on schedule	The facility has two CCR units that will be closed in accordance to the CCR Rule: the Primary Bottom Ash Pond and the Bottom Ash Pond. Closure of both ponds is scheduled to be completed on or before October 17, 2028.	The facility has initiated closure of its bottom ash pond. Closure by removal of this pond is on-going and on schedule to be completed by April 2026. The facility plans to initiate closure of the primary bottom ash pond by January 2025.

SWEPCO 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,

A handwritten signature in blue ink that reads "Timothy W. Lohner". The signature is written in a cursive style with a large initial 'T'.

Timothy Lohner, PhD
Environmental Manager
Water and Ecological Resource Services
American Electric Power

C: Andrew Brannan (SWEPCO)
Michael Brice (SWEPCO)
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