



American Electric Power
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VIA EMAIL: Mike.Lindner@tceq.texas.gov; Shannon.Gibson@tceq.texas.gov
VIA CERTIFIED MAIL: 7019 1120 0001 6740 9576

October 11, 2021

Mr. Mike Lindner & Ms. Shannon Gibson
Texas Commission on Environmental Quality
Industrial Wastewater Permitting Team (MC 148)
12100 Park 35 Circle
Austin, TX 78753

**RE: Notice of Planned Participation
Welsh Power Plant (Welsh) (TPDES Permit No. 01811)
Southwestern Electric Power Company (SWEPCO)
dba American Electric Power (AEP)**

Dear Mr. Lindner and Ms. Gibson:

Southwestern Electric Power Company (SWEPCO) hereby submits this Notice of Planned Participation (NOPP) seeking to qualify Welsh Power Plant Units 1 and 3 as electric generating units 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:	SWEPCO response:
Identification of the electric generating units intended to achieve the permanent cessation of coal combustion;	Welsh Units 1 and 3

40 CFR 423.19(f)(2) requirement:	SWEPCO response:
The expected date that each electric generating unit is projected to achieve permanent cessation of coal combustion;	October 17, 2028
Whether each date represents a retirement or a fuel conversion;	As of the date of this submittal, the facility plans to cease coal combustion for both units by October 17, 2028. It is currently unknown whether Units 1 or 3, or both, will be retired or converted to an alternative fuel source.
What the relevant regulatory body is;	Welsh Units 1 and 3 are regulated by the Arkansas Public Service Commission (APSC), the Louisiana Public Service Commission (LPSC), 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;	<p>SWEPCO has filings before all three of its state regulatory commissions (AR, LA, TX) that support the planned retirement date for Units 1 and 3 of the Welsh Generating station. No Final Orders have been received in those proceedings.</p> <p>Arkansas Docket No. 21-070-U Louisiana Docket No. U-35441 Texas PUC Docket No. 51415</p>

40 CFR 423.19(f)(2) requirement:	SWEPCO response:
<p>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 electric generating unit will permanently cease the combustion of coal by December 31, 2028;</p>	<p>As required by 40 CFR 257.103(f)(2)(viii), Southwestern Electric Power Company submitted a site-specific alternative to initiation of closure with the intention to permanently cease use of coal-fired boilers. The submission has been placed in Welsh Plant’s operating record and posted to the CCR Rule Compliance Data and Information website. The title page to this document is enclosed. The complete document can be provided upon request, and is also available at the link below as supporting documentation of the intent to cease combustion of coal no later than December 31, 2028. That submission anticipates that SWEPCO will 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. Consequently, to avoid confusion, we will use “no later than October 17, 2028” as the date by which coal combustion will cease.</p> <p>https://www.aep.com/Assets/docs/requiredpostings/ccr/2020/12-2-2020/WH-PBAP-SIPermanentCessationofBoilerNotice-11302020.pdf</p>
<p>A timeline to achieve the permanent cessation of coal combustion, with interim milestones and the projected dates of completion;</p>	<p>Welsh Power Plant intends to cease combustion of coal on or before October 17, 2028 by consuming all the usable coal located on-site and not restarting the generating units. 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, 2028.</p>

SWEPCO 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), Welsh Units 1 and 3 will cease combustion of coal by October 17, 2028, SWEPCO does not waive, and expressly reserves, all rights or options available to it pursuant to 40 CFR Part 423, including 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 persons 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,



Monte McMahon,
Vice President, Generating Assets
Southwestern Electric Power Company

Enclosures

C: Michael Redda (TCEQ)
Donnie Duffee (SWEPCO)
Jasmine Gilbert (SWEPCO)
Alan Wood (AEP Service Corp)
Jay Toungate (AEP Generation Regulatory)
Kathy Milenkovski (AEP Legal)
Emily Veteto (AEP Service Corp)
File Copy: WSH.180.45.30.2021

J. Robert Welsh Power Plant

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

CCR Unit – Primary Bottom Ash Pond

As required by 40 CFR 257.103(f)(2)(viii), this is a notification that on November 30, 2020 J. Robert Welsh Power Plant (Welsh 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 Welsh 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
Welsh Power Plant Alternative Closure Demonstration

Dear Administrator Wheeler,

Southwestern Electric Power Company (SWEPCO) Welsh Power Plant (Welsh 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 Primary Bottom Ash Pond (PBAP) located at the Welsh Plant near Pittsburgh, Texas. Welsh Plant is requesting an extension pursuant to 40 C.F.R. § 257.103(f)(2) to allow the PBAP 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
J. Robert Welsh Power Plant



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

Prepared by:

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

and

Burns & McDonnell Engineering Inc.
9400 Ward Parkway
Kansas City, MO 64114

Submitted

11/25/2020

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