

Annual Report-02
Alternative Closure Requirements
Primary Bottom Ash Pond

J. Robert Welsh Power Plant
Southwestern Electric Power Company
1187 Country Road 4865
Titus County
Pittsburg, Texas

November 2022

Prepared by:

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



1.0 BACKGROUND

The J. Robert Welsh Power Plant is owned and operated by the Southwestern Electric Power Company (SWEPCO), a subsidiary of American Electric Power (AEP). The power plant operates a 65-acre coal combustion residual (CCR) surface impoundment for the management of bottom ash and non-CCR wastewaters. The surface impoundment, referenced as the Primary Bottom Ash Pond (PBAP), fails the Location Requirements as per Environmental Protection Agency's (EPA's) CCR regulations 40 CFR 257.60(a)/30 TAC 352.601 and is unlined according to 40 CFR 257.71/30 TAC 352.711. Therefore, the PBAP is subject to the closure requirements of both 40 CFR 257.101(a)(1) and (b)(1)(i)(August 28, 2020), and 30 TAC 352.1211(a) and (b)(1).

However, under 40 CFR 257.101(a)(3) and (b)(4)/30 TAC 352.1211(b)(3), the timeframe specified in paragraph 40 CFR 257.101(a) and (b)/30 TAC 352.1211 do not apply if the owner or operator complies with the alternative closure procedures specified in 40 CFR 257.103/30 TAC 352.1231 **Alternative Closure Requirements**.

AEP/SWEPCO has elected to close under 40 CFR 257.103(f)(2) *Permanent cessation of a coal fired boiler(s) by a date certain* which was adopted by Texas Commission on Environmental Quality (TCEQ) in 30 TAC 352.1231. On November 30, 2020, as required by 40 CFR 257.103(f)(3)(i)(C) *Process to Obtain Authorization*, AEP/SWEPCO submitted to EPA a demonstration to close the PBAP according to 40 CFR 257.103(f)(2)(v).

On October 23, 2020, AEP/SWEPCO submitted a letter to TCEQ requesting an extension to continue to operate the surface impoundment for CCR and non-CCR wastewaters beyond October 31, 2020 while EPA reviews the alternative closure demonstration. In correspondence dated October 30, 2020, TCEQ granted the facility approval of the extension, pending EPA's approval of the demonstration.

The bottom ash handling system operates as a wet-slucice of bottom ash to the PBAP for settling of the bottom ash. Various non-CCR wastewaters, coal pile and industrial storm water runoff are also discharged to the PBAP for treatment.

There are no other existing ponds on the plant site. There is no piping in which this wastewater stream could be transported to an offsite treatment facility and transporting this volume of CCR wastewater via trucking is not physically possible. There are no off-site ponds that could be used for the treatment of industrial CCR and non-CCR wastewaters. Additionally, process wastewaters are not allowed to be disposed in the on-site landfill.

On November 30, 2021, AEP/SWEPCO posted the first annual progress report for the permanent cessation of a coal fired boiler by a date certain.

On January 11, 2022, AEP/SWEPCO received notification from the EPA that the demonstration was considered administratively complete and is pending EPA's final decision.

Annual Report-02
Alternative Closure Requirements-PBAP
Solid Waste Permit No: none
J. Roberts Welsh PP, Pittsburg, Texas

2.0 PURPOSE

This annual report, documenting the continued lack of alternative capacity and the progress towards the closure of the CCR surface impoundment, is required to be prepared by 40 CFR 257.103(f)(2)(x)/30 TAC 352.1231. The owner or operator has completed the progress report when the report has been placed in the facility's operating record as required by 40 CFR 257.105(i)(20)/30 TAC 352.1301.

This Report-02 covers the period from December 1, 2021 – November 30, 2022.

3.0 PROGRESS

AEP/SWEPCO certifies, through its Closure Plan (November 2020) presented to EPA in the demonstration documentation, that J. Roberts Welsh Power Plant will cease operation of its coal-fired boilers and initiate closure of the PBAP by January 2025 and that the PBAP will be closed by removal no later than October 17, 2028.

AEP/SWEPCO remains in compliance with all relevant requirements of 40 CFR 257 Subpart D/30 TAC 352 and no corrective action is required at this time.

This report reaffirms AEP/SWEPCO's statements that there continues to be no alternative disposal capacity to replace that of the PBAP for the management of CCR and non-CCR wastewaters generated by the power plant.

The Means and Methods Study initiated in 2021 has identified a conceptual path forward for closure by removal, which is being presented to upper management.

4.0 PLANNED WORK

AEP/SWEPCO will continue to make progress towards achieving the schedule defined in the Closure Plan (November 2020) for the PBAP.

AEP/SWEPCO will continue to ensure that the PBAP remains in compliance with all relevant requirements of 40 CFR 257 Subpart D/30 TAC 352 including the sampling and analyses all of the monitoring wells associated with the certified groundwater monitoring well network as part of 40 CFR 257.90-98/30 TAC 352 Subchapter H requirements.

AEP/SWEPCO intends to start the engineering, preconstruction planning, and scheduling work related to the closure of the PBAP in 2023-24.

AEP/SWEPCO will place in its operating record an annual progress report covering the time period of December 1, 2022 – November 30, 2023, by November 30, 2023.