

**Annual Report-04
Alternative Closure Requirements
Bottom Ash Pond**

**Northeastern Power Station
Public Service Company of Oklahoma
Oologah, OK**

April 2023

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1.0 BACKGROUND

The Northeastern Power Station (NPS) is owned and operated by the Public Service Company of Oklahoma (PSO), a subsidiary of American Electric Power (AEP). The power station operates a 72-acre coal combustion residual (CCR) surface impoundment for the management of bottom ash and non-CCR wastewaters. The surface impoundment, referenced as the Bottom Ash Pond (BAP), fails the Location Requirements as per the Oklahoma Department of Environmental Quality (ODEQ) CCR regulations OAC 252:517 and would be subject to the closure requirements of OAC 252:517-15-6(b)(1).

However, on December 5, 2018, AEP/PSO submitted to ODEQ a demonstration to close the bottom ash pond according to the Alternate Closure Requirement (ACR) in OAC 252:517-15-8(f)(2), Permanent Cessation of a Coal Fired Boiler(s) by a date certain. On February 8, 2013, a settlement agreement was signed between AEP/PSO and the Department of Justice which set a closure date of December 31, 2026, for the coal-fired boiler Unit 3. The ACR was accepted by ODEQ on April 11, 2019, and a copy of the decision was placed into the facility's operating record and on the facility's publicly accessible CCR internet site in accordance with OAC 252:517-15-8(f)(2)(I).

2.0 PURPOSE

This annual report is required by OAC 252:517-15-8(f)(2)(J) to be submitted no later than twelve (12) months after completing the first annual progress reports, which was submitted April 30, 2020. This report reaffirms PSO's statements that there is no alternative disposal capacity for the bottom ash and non-CCR wastewaters generated by the power plant.

This Report-04 covers the period from: April 12, 2022 – April 11, 2023.

3.0 PROGRESS

The bottom ash handling system operates as a wet-slucice of bottom ash to the BAP for settling of the bottom ash. Non-CCR wastewaters and industrial storm water runoff are also discharged to the BAP for treatment.

The existing ponds, excluding the BAP, on the plant site do not meet the requirements of OAC 252:517 regulations and cannot be used as a CCR surface impoundment. Additionally, these ponds do not have the treatment capacity required for the volume of non-CCR wastewaters and industrial storm water runoff generated at the power plant site.

There is no piping/pumping system present 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 wet sluicing and treatment of industrial wastewaters. Additionally, the on-site CCR ash landfill is not permitted to accept the process waters.

AEP/PSO certifies that NPS will cease operation of Unit 3 coal-fired boiler by December 31, 2026 and that the BAP will be closed no later than October 17, 2028.

AEP/PSO was in compliance with all relevant requirements of OAC 252:517, including the semi-annual groundwater sampling and testing during this report period. The results are summarized in the report, "Annual Groundwater Monitoring Report" which was submitted to ODEQ on January 31, 2023 and is currently under review by ODEQ. NPS recommended no corrective action is required at this time.

No alternative capacity for the CCR and non-CCR wastewater to replace that of the BAP has been found. AEP/PSO continues to work towards completing the permitting process for the BAP.

4.0 PLANNED WORK

On August 2, 2022 ODEQ issued a notification that surface impoundments with waste below the water table cannot be closed with waste in-place. September 9, 2022, NPS issued a revised Closure Plan for the BAP outlining the steps for closure by removal. ODEQ issued a Notification of Deficiency on February 28, 2023 for the September 2022 Closure Plan and requested clarification on some aspects of the closure procedures. NPS is in the process of revising the Closure Plan to address ODEQ's NODs.

AEP/PSO will continue to ensure that the BAP remains in compliance with all relevant requirements of OAC 252:517 including the sampling and analyses for all the monitoring wells as part of OAC 252:517 Subchapter 9 requirements

AEP will submit the next annual progress report by April 30, 2024.