

## Cousins, Sarah

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**From:** Miller, Roger  
**Sent:** Thursday, March 13, 2014 1:27 PM  
**To:** Cousins, Sarah  
**Subject:** RE: AEP/SWEPCO Flint Creek - Response to Information Request Regarding Groundwater Discharge Clean-up Permit

Thanks-

That clears up my questions; as I indicated earlier, most of these discharges are fairly routine and since the groundwater contamination assessment and the remedial design are already completed by the time we see the application, there is rarely anything for me to comment on regarding effects on groundwater. Any potential impact from the treated discharge would affect surface water, so I always defer to other (better qualified) reviewers on that issue. In any event, as far as groundwater is concerned, it looks as if this one (if ever needed) will be a fairly standard implementation, so I don't have any further questions or comments.

Roger

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**From:** Cousins, Sarah  
**Sent:** Thursday, March 13, 2014 9:43 AM  
**To:** Miller, Roger  
**Subject:** FW: AEP/SWEPCO Flint Creek - Response to Information Request Regarding Groundwater Discharge Clean-up Permit

Here's what they sent me.

Thanks!

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**From:** Randy Solomon [<mailto:rbsolomon@aep.com>]  
**Sent:** Tuesday, March 11, 2014 1:13 PM  
**To:** Cousins, Sarah  
**Cc:** Scott Carney; Carl F Handley II  
**Subject:** AEP/SWEPCO Flint Creek - Response to Information Request Regarding Groundwater Discharge Clean-up Permit

Sarah

Attached is the information you requested via email last week regarding Flint Creek's general permit application for the contaminated groundwater discharge permit. Should you have any additional questions, please let me know.

Thanks

Randy Solomon  
Principal Environmental Specialist  
Water & Ecological Resource Services  
American Electric Power  
Phone: 214.777.1043



February 11, 2014

Electronic Mail

Jamal Solaimanian, P.E., Ph.D.  
Water Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

**RE: Southwestern Electric Power Company  
Flint Creek Power Plant  
Permit Number: AR0037842  
Notice of Intent for Coverage under General Permit ARG790000, Operators  
Discharging Groundwater Clean-up**

Dear Dr. Solaimanian:

On behalf of Southwestern Electric Power Company (SWEPCO), American Electric Power (AEP) is submitting a Notice of Intent (NOI) for coverage under General Permit ARG790000, Operators Discharging Groundwater Clean-up, to potentially discharge contaminated groundwater at the above referenced facility.

AEP/SWEPCO is constructing a new air emissions control device at the Flint Creek Power Plant, and has discovered contaminated groundwater during geological test borings at the facility. AEP/SWEPCO is planning to manage this groundwater in a manner that will prevent its release to the facility's primary settling basin; however, we would like to have the permit in place in the unlikely event it is necessary to treat and discharge this groundwater. As the general vicinity of the contaminated groundwater is near the primary settling basin, transporting treated groundwater to any other location for discharge will add unnecessary costs to the construction project. Therefore, AEP/SWEPCO is requesting permission from ADEQ to discharge treated groundwater to the primary settling basin, should that become necessary.

Under normal conditions, AEP/SWEPCO plans to capture this groundwater on-site, mix it with a portion of the facility's fly ash such that it can be properly disposed in an appropriately permitted landfill.

The enclosed application contains the following:

- Completed NOI;
- Site map showing the locations of the anticipated discharge and treatment area; and,
- Internet address of American Electric Power's Annual Report and most recent SEC Form 10K have been sent to Sarah Cousins at ADEQ.

The five hundred dollar (\$500) application fee will be been paid electronically to the State of Arkansas Treasury Department.

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, 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.

Should you have any questions regarding our comments, please call Randy Solomon at 214-777-1043.

Respectively,



Bruce W. Moore, P.E, Manager  
Air and Water Quality

Attachments: Contaminated Groundwater Discharge - Notice of Intent

C: Carl Handley (w/o)  
Scott Carney (w/)  
Randy Solomon (w/)  
Sarah Cousins - ADEQ (w/)  
File: FLC.180.45.10.2014



March 11, 2014

Electronic Mail

Ms. Sarah Cousins  
Water Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

**RE: Southwestern Electric Power Company  
Flint Creek Power Plant  
Permit Number: AR0037842  
Coverage under General Permit ARG790000, Operators Discharging Groundwater  
Clean-up**

Dear Ms. Cousins:

The purpose of this letter is to respond to your request for information in an email dated March 6, 2014, to Randy Solomon of my staff, pertaining to the above-referenced facility's application for coverage under General Permit ARG790000. The information requested and AEP/SWEPCO's responses follow:

1. ADEQ – Identify the types and extents of groundwater contamination at the site.

AEP/SWEPCO Response – In 2013, AEP/SWEPCO conducted geotechnical borings for the footprint of the new scrubber foundation. Groundwater contamination was discovered and appears to be the remnant of a historical diesel or fuel oil pipe leak, which was remediated using a groundwater pump and treat system. This historical cleanup project was authorized and subsequently terminated with the approval of ADEQ.

At this time, AEP/SWEPCO does not know the extent of the groundwater contamination outside of the footprint of the proposed scrubber system. Preliminary analytical data collected to date indicates a total petroleum hydrocarbon concentration of 2.41 mg/L, and BTEX concentration below detection levels. Additional samples have been submitted to a laboratory for analysis, but the analyses have not been completed.

2. ADEQ – ADEQ requests a diagram of the proposed extraction and treatment system, depicting the arrangement and sizing of its components.

AEP/SWEPCO Response – At this time, the facility does not have a treatment system on-site for treating and releasing contaminated groundwater. The facility plans to utilize a vacuum truck to

capture any contaminated groundwater that surfaces from the construction of the scrubber footings, mix it with fly ash, and properly dispose of the resulting waste in the Waste Management Eco-Vista landfill. The facility has not disposed of contaminated groundwater using this method to date; however, Waste Management has pre-approved this waste stream for disposal in their landfill.

If the facility begins to accumulate a larger quantity of contaminated groundwater, the groundwater will be accumulated in a frac tank, then rent an appropriate treatment system from a vendor based upon the results of the analytical data. AEP/SWEPCO believes the proposed treatment system will consist of an oil/water separator, and possibly an activated carbon filtration system. The general permit may never be utilized for discharge of treated groundwater, but AEP/SWEPCO wants to be prepared for timely treatment of groundwater should the need arise.

3. ADEQ – Identify the approximate composition of the wastewater, its residual contaminant concentration(s) and the anticipated average flow rate.

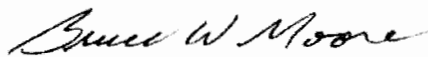
AEP/SWEPCO Response – As stated earlier, this groundwater contamination is believed to be from a historical diesel or fuel oil pipe leak. At this time, AEP/SWEPCO does not know the extent of the groundwater contamination outside of the footprint of the proposed scrubber system foundations. Preliminary analytical data collected to date indicates a total petroleum hydrocarbon concentration of 2.41 mg/L, and BTEX below detection levels. Additional samples have been submitted to a laboratory for analysis, but the analyses have not been completed.

Facility personnel estimate that the facility will not accumulate more than 20,000 gallons for storage in a frac tank, and eventual treatment using an appropriate treatment system. This volume would be treated at approximately 10 gpm, and discharged over approximately 2-3 days.

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, 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.

Should you have any questions regarding our comments, please call Randy Solomon at 214-777-1043.

Respectively,



Bruce W. Moore, P.E, Manager  
Air and Water Quality

C: Carl Handley  
Scott Carney  
Randy Solomon  
File: FLC.180.45.10.2014



ARKANSAS  
Department of Environmental Quality

## MEMORANDUM

TO: Sarah Cousins, Engineer, General Permits

FROM: Roger Miller, Professional Geologist, Planning Branch *RAM*

SUBJECT: Proposed Treated Groundwater Discharge, AEP Flint Creek Power Plant

DATE: March 6, 2014

I have reviewed the materials provided regarding the above-referenced application. However, they lack the following information that would enable a more in-depth review:

- The types and extents of groundwater contamination at the site.
- A diagram of the proposed extraction and treatment system, depicting the arrangement and sizing of its components.
- The approximate composition of the wastewater, its residual contaminant concentration(s), and the anticipated average flow rate.

Therefore my ability to fully assess the potential effect(s) of the proposed discharge is limited. However, I assume that the contaminant is one or more types of LNAPL (gasoline or possibly diesel fuel). Based on that, and given that most LNAPL "pump-and-treat" systems generally share common design principles, I can speculate that the proposed treatment system would be a typical dual-phase hydrocarbon extraction system. If so, and provided that it is designed and operated in accordance with sound practices followed at other such installations (i.e., discharge containing only small residual levels of dissolved LNAPL at or below drinking water MCLs for benzene and/or other hydrocarbon constituents of concern), the outcome should be no different than other successful implementations and I would have no concerns about the effects of the treated discharge on the designated surface water body.

I have checked PDS using the permit numbers referenced in the included cover letter from AEP, but have not found any specific information of the type described above. In the event such details become available, I would be able to provide a more definite assessment.

## Cousins, Sarah

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**From:** Randy Solomon <rbsolomon@aep.com>  
**Sent:** Tuesday, February 11, 2014 2:20 PM  
**To:** Solaimanian, Jamal; Cousins, Sarah  
**Cc:** Scott Carney; Bruce W Moore  
**Subject:** SWEPCO Flint Creek Power Plant - Contaminated Groundwater Discharge Application  
**Attachments:** SWEPCO Flint Creek Contaminated Groundwater Discharge Permit Application 2-11-14.pdf

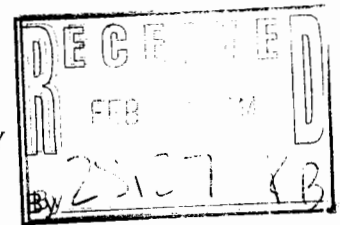
Dr. Solaimanian – Attached is an application for the SWEPCO Flint Creek Power Plant to discharge contaminated groundwater. I have also attached a link to the American Electric Power financial reports that we are required to submit as the financial disclosure statement for utilities.

<http://www.aep.com/investors/FinancialFilingsAndReports/>

Should you have any questions or need additional information, please let me know.

Randy Solomon  
Principal Environmental Specialist  
Water & Ecological Resource Services  
American Electric Power  
Phone: 214.777.1043

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY  
NOTICE OF INTENT  
GROUNDWATER CLEAN-UP DISCHARGE  
NPDES GENERAL PERMIT ARG790000**



Application Type: New  Renewal  (Permit # ARG79 \_\_\_\_\_)

**I. PERMITTEE/OPERATOR INFORMATION**

Permittee (Legal Name): Southwestern Electric Power Company Operator Type:  
 Permittee Mailing Address: 21797 SWEPCO Road  State  Partnership  
 Permittee City: Gentry  Federal  Corporation\*  
 Permittee State: Arkansas Zip: 72734  Sole Proprietorship/Private  
 Permittee Telephone Number: 479-444-4711 \*State of Incorporation: Delaware  
 Permittee Fax Number: 479-444-4719 The legal name of the Permittee must be  
 Permittee E-mail Address: cfhandley@aep.com identical to the name listed with the  
 Arkansas Secretary of State.

**II. INVOICE MAILING INFORMATION**

Invoice Contact Person: Randy Solomon City: Dallas  
 Invoice Mailing Company: American Electric Power State: Texas Zip: 75266  
 Invoice Mailing Address: P. O. Box 660164 Telephone: 214-777-1043

**III. FACILITY INFORMATION**

Facility Name: Flint Creek Power Plant Facility Contact Person: Scott Carney  
 Facility Address: 21797 SWEPCO Road Telephone Number: 479-444-4726  
 Driving Directions to Facility: From Hwy. 59 in the City of Gentry, turn west on West 3<sup>rd</sup> St. (Hwy. 12). Turn south on  
 Pioneer Lane, then west on SWEPCO Road. Proceed to front gate of the plant.  
 Facility County: Benton Facility City, State & Zip: Gentry, Arkansas 72734  
 Facility Latitude: 36 Deg 15 Min 24.703Sec Facility Longitude: 94 Deg 30 Min 59.407 Sec  
 Accuracy: unknown Method: GPS- Unspecified Datum: WGS84 Scale: Unknown Description: entrance  
 Facility SIC Code: 4911 Facility NAICS: 221112

**IV. DISCHARGE INFORMATION**

Outfall Number: GWP-001 Estimated Flow: <0.1 MGD (Million Gallons per Day)  
 Outfall Description: Culvert under railroad track to the facility's primary settling basin.  
 Stream Segment: 3J Hydrologic Basin Code: 11110103  
 Outfall Latitude: 36 Deg 15 Min 12.9522 Sec Outfall Longitude: -94 Deg 31 Min 25.8924 Sec  
 Accuracy: Unknown Method: GPS- Unspecified Datum: WGS84 Scale: Unknown Description: from pipe  
 Receiving Stream: Flint Creek bottom ash pond, thence SWEPCO Lake, thence Little Flint Creek, thence Illinois  
 River, and thence the Arkansas River.  
 Outfall Number: NA Flow: NA MGD (Million Gallons per Day)  
 Stream Segment: NA Hydrologic Basin Code: NA  
 Outfall Latitude: NA Deg NA Min NAsSec Outfall Longitude: NA Deg NA Min NAsSec

WATER DIVISION  
 5301 NORTSHORE DRIVE / NORTH LITTLE ROCK, ARKANSAS 72118  
 PHONE 501-682-0623 / FAX 501-682-0880  
 www.adeq.state.ar.us



Accuracy: NA Method: NA Datum: NA Scale: NA Description: NA  
Receiving Stream: NA

**V. FACILITY PERMIT INFORMATION**

NPDES Individual Permit Number (If Applicable): AR0037842  
NPDES General Permit Number (If Applicable): ARG N/A  
State Construction Permit Number: ARG16 N/A  
NPDES General Construction Stormwater Permit Number (If Applicable): ARR154057  
NPDES Industrial Stormwater General Permit Number: ARR00B277  
Other Department Permits: 276-AOP-R6; 273-S4N, AR0037842C

**VI. OTHER INFORMATION:**

Additional Location Description: NA  
SWEPCO Lake is listed on the state's 2008 303(d) list as being impaired for turbidity from unknown sources. The discharge of treated groundwater will not contribute to turbidity in the lake, and SWEPCO does not believe any pollutants are on-site that contribute to the turbidity in the lake. \$500 fee will be paid electronically to the  
Additional Comments: Arkansas Treasury Dept.  
Consultant Contact Name: Randy Solomon  
Consultant Email Address: rsolomon@aep.com  
P. O. Box  
Consultant Address: 660164 City: Dallas State: TX Zip: 75266  
Consultant Phone Number: 214-777-1043. Consultant Fax Number: 214-777-1138

**VII. CERTIFICATION OF OPERATOR**

"I certify that, if this facility is a corporation, it is registered with the Secretary of the State of Arkansas. I certify that the cognizant official designated in this Application is qualified to act as a duly authorized representative under the provisions of 40 CFR 122.22(b). If no cognizant official has been designated, I understand that the Department will accept reports signed only by the Applicant. 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 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."

Responsible Official Printed Name: Paul Franklin Title: VP - Generating Assets, SWEPCO  
Responsible Official Signature: Paul Franklin Date: 2-10-14  
Responsible Official Email: pwfranklin@aep.com

Cognizant Official Printed Name: Carl Handley Title: Plant Manager  
Cognizant Official Signature: Carl Handley Telephone: 479-444-4711  
Cognizant Official Email: cfhandley@aep.com

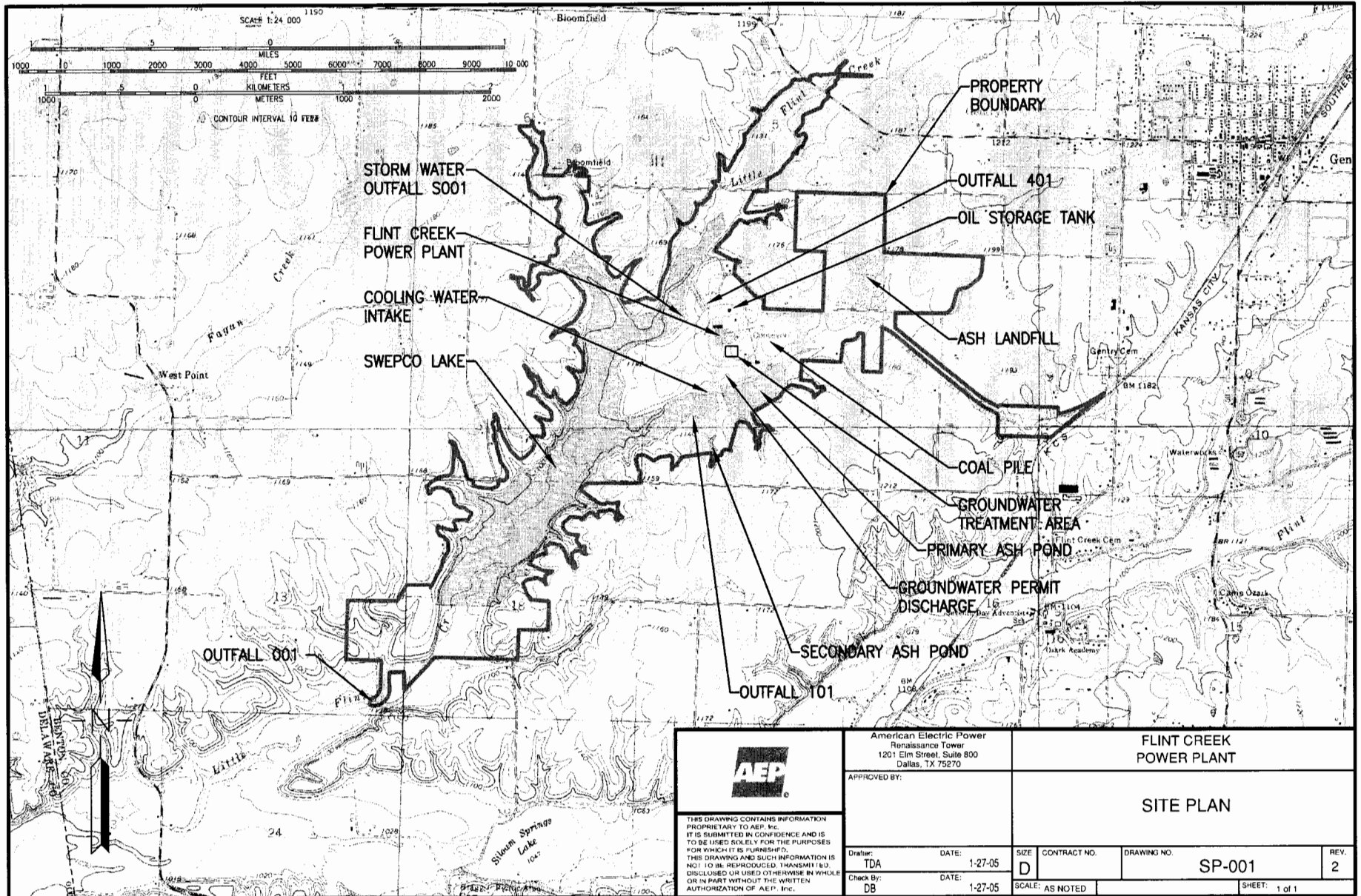
**X. PERMIT REQUIREMENT VERIFICATION**


Please check the following to verify completion of permit requirements. If you answer "NO" to any of questions below

WATER DIVISION  
5301 NORTHSORE DRIVE / NORTH LITTLE ROCK, ARKANSAS 72118  
PHONE 501-682-0623 / FAX 501-682-0880  
www.adeg.state.ar.us

the application will be considered incomplete and cause a delay in the permitting process.

	Yes	No		
Submittal of Complete NOI?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Submittal of Required Permit Fee?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>New Permittees Only</b> Check Number:	Submitted electronically to ADEQ Finance Section
Submittal of Topographic Map?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Submittal of Disclosure Statement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Submitted electronically to Sarah Cousins, ADEQ
Industrial Operator's License Number:			009818 and 009676	



	American Electric Power Renaissance Tower 1201 Elm Street, Suite 800 Dallas, TX 75270		<b>FLINT CREEK POWER PLANT</b>			
	APPROVED BY:		<b>SITE PLAN</b>			
<small>THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO AEP, Inc. IT IS SUBMITTED IN CONFIDENCE AND IS TO BE USED SOLELY FOR THE PURPOSES FOR WHICH IT IS FURNISHED. THIS DRAWING AND SUCH INFORMATION IS NOT TO BE REPRODUCED, TRANSMITTED, DISCLOSED OR USED OTHERWISE IN WHOLE OR IN PART WITHOUT THE WRITTEN AUTHORIZATION OF AEP, Inc.</small>	Drafter: TDA	DATE: 1-27-05	SIZE: D	CONTRACT NO.:	DRAWING NO.: SP-001	REV. 2
	Check By: DB	DATE: 1-27-05	SCALE: AS NOTED		SHEET: 1 of 1	



ARKANSAS  
SECRETARY OF STATE

*Mark Martin*

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Corporation Name	SOUTHWESTERN ELECTRIC POWER COMPANY
Fictitious Names	AEP SOUTHWESTERN ELECTRIC POWER COMPANY AEP SWPCO
Filing #	100066219
Filing Type	Foreign For Profit Corporation
Filed under Act	For Bus Corp; 958 of 1987
Status	Good Standing
Principal Address	1 RIVERSIDE PLAZA COLUMBUS, OH 43215
Reg. Agent	THE CORPORATION COMPANY
Agent Address	425 WEST CAPITOL AVE SUITE 1700  LITTLE ROCK, AR 72201
Date Filed	10/08/1912
Officers	SEE FILE, Incorporator/Organizer POLLY LUTZ , Tax Preparer VENITA MCCCELLON-ALLEN , President DAVID M. FEINBERG , Secretary MARK A. PYLE , Vice-President CHARLES E. ZEBULA , Treasurer JOSEPH M. BUONAIUTO , Controller
Foreign Name	N/A
Foreign Address	X WILMINGTON,
State of Origin	DE

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Entity Details

**File Number:** 0032233 **Incorporation Date / Formation Date:** 06/29/1912 (mm/dd/yyyy)

**Entity Name:** SOUTHWESTERN ELECTRIC POWER COMPANY

**Entity Kind:** CORPORATION **Entity Type:** GENERAL

**Residency:** DOMESTIC **State:** DE

**Status:** GOOD STANDING **Status Date:** 08/23/2013

REGISTERED AGENT INFORMATION

**Name:** THE CORPORATION TRUST COMPANY

**Address:** CORPORATION TRUST CENTER 1209 ORANGE ST

**City:** WILMINGTON **County:** NEW CASTLE

**State:** DE **Postal Code:** 19801

**Phone:** (302)658-7581

Additional Information is available for a fee of \$20.00. This information will include current franchise tax assessment, current filing history and more.

Would you like  Tax & History Information

To contact a Delaware Online Agent [click here](#).

# General Permit Route Sheet

HUC: 11110103

Facility Name		Flint Creek Lower Main	
Permit Number		ARG 790107	AFIN NO.* 04-00107
Stream Segment:	3J	Receiving Stream:	SWEPCO Lake - Cat 5 303d For
Assigned	Activity	Initials	Date Complete/Entered
Sect.	Application Logged/Assign Tracking Number/Place in red folder with appropriate route sheet and filing folders (1-day)	KB	N/A
Engineer	Completeness and Technical Review/Enter permit information into Database (3-days)	Se	3/17
AA (Max of 5 business days)	AFIN request (1-day)	NA	
	Enter AFIN and other information into PDS and NPDES database prior to requesting invoice (same day)	JPB	3/17
	Complete Invoice Request Form and submit Invoice Request (same day)	JPB	3/17
	Prepare Authorization letter and attach appropriate permit, forms (1-day)	JPB	3/17
Engineer	Review/organize folder for scanning (1-day)	sc	3/17
Engineer Supervisor	Review all the documents/permits/performs technical review for the proposed project. (1-day)	Q	3/18
Assistant Chief	Review the documents and sign the authorization letter or the permit. (1-day)		
AA	Enter Into PDS: Permit Status/Effective Date. Input effective date in access database. (1-day)	JPB	3/19
Sect.	Mail original to applicant. Scan complete folder and place in appropriate E-drive folders. Update Zylab. Be sure to include this permit in weekly report, due every Tuesday by 2:00 P.M.	KB	3-20

Turbidity from unknown source  
 (Turb not rec. from siltation)

gave to Roger Miller - 2/18  
 received from Roger - 3/6

**REMARKS:**

~~requested additional permit information~~  
 via email to Randy Solomon - 3/6  
 received information from Randy on 3/7, Roger out of office  
 Forwarded new information to Roger - 3/13  
 Received Roger's response - 3/13  
 spoke with Randy Solomon regarding DE SoS status - 3/14  
 Received DE SoS status - 3/17