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December 17, 2018

Hillary Young, P.E.
Chief Engineer
Land Protection Division
Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

RE: Muskogee Generating Station
Coal Combustion Residuals Ash Pond

Ms. Young:

As per OAC 252:517-13-4, Oklahoma Gas and Electric Services (OG&E) is submitting the required annual inspection report associated with the Muskogee Power Plant Coal Combustion Residuals (CCR) Ash Pond. The Intent to Initiate Closure was submitted to the Oklahoma Department of Environmental Quality on October 19, 2015 and was addressed to Ms. Carol Paden P.E. of the Water Quality Division.

If you have any questions concerning this report please contact Tad Dow by either his office phone (405-553-3349) or cell phone (405-708-9964).

Sincerely,

A handwritten signature in blue ink, appearing to read "Les Waller", is written over a light blue horizontal line.

Les Waller
Mgr Water Quality/Operational Chemistry

cc: Martha Grafton

Enclosures

COAL COMBUSTION RESIDUAL (CCR) IMPOUNDMENT ANNUAL INSPECTION REPORT

Facility Name: Muskogee Generating Station

Facility Location: 5501 Three Forks Road, Fort Gibson, OK 74434

Inspection Date: December 5, 2018

Inspected by:

Suraj Balan, P.E.

Lead Civil Engineer, UTS Design Engineering

balansa@oge.com Phone: (405) 553 3664

Contents

Section 1 – Overview	Page 1
Section 2 – Observations	Page 2
Section 3 – Recommendations	Page 2
Section 4 – Professional Engineer Certification	Page 2

1. OVERVIEW

A visual inspection was conducted by Suraj Balan on 12/5/2018 to identify signs of malfunction of the Emergency Ash Basin. No evident signs of malfunction were found.

At this time, the CCR Rule requires inspecting active existing CCR surface impoundments and appurtenant structures only. The Emergency Ash Basin is a dry inactive basin. A work order was issued on 10/25/2018 to haul and dispose the CCR material from the Emergency Ash Basin. The CCR material within the basin is being excavated and hauled off for disposal at the Muskogee Landfill. The target schedule is to complete the pond closure by 5/15/2019.

2. OBSERVATIONS

The following observations were made during the site visit for the Emergency Ash Basin.

- The basin has not received CCR material since October 14, 2015, when the discharge piping to the pond was disconnected from the plant.
- The Emergency Ash Basin was mostly dry at the time of the inspection. Slope stability concerns were not evident for the dry inactive Emergency Ash Basin.
- The exterior sides of the berm have well established vegetation that has been maintained throughout the life of the Emergency Ash Basin.

- Some relatively small erosion rills were observed on the interior portions of the east and north embankments.
- Approximately 27,000-tons of CCR material have been excavated and hauled off site for disposal as part of the ongoing pond closure activities.

3. RECOMMENDATIONS

There were no appearance of actual or potential structural weakness for the dry inactive Emergency Ash Basin slopes. NO conditions were observed at the time of the inspection to indicate weakness or instability along the slopes that could be a potential hazard.

Maintenance Recommendations:

- Continue to repair erosion control features, reestablish vegetation, and periodically inspect to confirm that the erosion control features are effective.
- Continue to monitor surface water drainage features and repair as needed.

4. PROFESSIONAL ENGINEER CERTIFICATION

By means of this certification, I attest that I am familiar with the requirements and provisions of Title 40 Code of Federal Regulations (CFR), Part 257, criteria for Classification of Solid Waste Disposal Facilities and Practices, Subpart D – Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments.

Suraj Balan, P.E.

Printed Name of Registered Professional Engineer

Suraj Balan 12/17/2018

Signature of Registered Professional Engineer Date



Registration Number: 24882 State: Oklahoma

OK Certificate of Authorization Number: 159