# **CLOSURE PLAN**

CFR 257.102(b)

Landfill

Mitchell Power Plant Marshall County, West Virginia

October, 2016

Prepared for: Wheeling Power Company & Kentucky Power Company

Prepared by: American Electric Power Service Corporation

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**GERS-16-103** 

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CFR 257.102(b)
MITCHELL POWER PLANT
LANDFILL

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I certify to the best of my knowledge, information, and belief that the information contained in this closure plan meets the requirements of 40 CFR § 257.102

I certify to the best of my knowledge, information and belief that design of the final cover system as described in this closure plan meets the requirements of 40 CFR § 257.102.

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#### **1.0** OBJECTIVE

This report was prepared by AEP- Geotechnical Engineering Services (GES) section to fulfill requirements of CFR 257.102(b) for Closure Plans of Existing CCR Landfills.

#### 2.0 DESCRIPTION OF THE CCR UNIT

The Mitchell Landfill site is located about 2 miles east of the Mitchell Plant near Graysville, West Virginia within Marshall County. Specifically the landfill site is located on Gatts Ridge Road approximately 2 miles north of the intersection with County Road 74. The landfill is owned by Wheeling Power Company and Kentucky Power Company and is operated by Kentucky Power Company. The landfill is permitted through West Virginia Department of Environmental Protection (WVDEP) for the purpose of disposal of fly ash bottom ash and gypsum. The solid waste and NPDES Permit Number for the facility is WV0116742. The facility will comprise about 58 acres of disposal area with a capacity of about 9.9 million cubic yards and will be constructed in 5 phases.

#### 3.0 DESCRIPTION OF CLOSURE PLAN 257.102(b)(1)(i)

[A narrative description of how the CCR unit will be closed in accordance with this section]

The Mitchell Landfill will be closed periodically during the life of the facility. Once final waste grades are acheived the landfill surface will be covered with a flexible geomembrane system and 2-feet of soil fill consisting of an 18" soil infiltration layer and 6" of earthen material that is capable of supporting native plant growth. The surface soil will be seeded and mulched to promote the growth of a vegetative cover.

#### 4.0 CLOSURE IN PLACE 257.102 (b)(1)(iii)

[If closure of the CCR unit will be accomplished by leaving the CCR in place, a description of the final cover system, designed in accordance with paragraph(d) of this section, and the methods and procedures to be used to install the final cover. The closure plan must also discuss how the final cover system will achieve the performance standards specified in paragraph (d) of this section.]

The final cover system will consist of an flexible geomembrane that will have a permeability that is less than or equal to the permeability of the natural subsoils and is not greater than  $1 \times 10^{-5}$  cm/sec. The geomembrane will be installed directly over the graded CCR material. Over the geomembrane will be installed an infiltration layer consisting of 18" of earthen material and an erosion layer consisting of 6" of earthen material that is capable of sustaining native plant growth. The final cover will be seeded and mulched to promote growth of a vegetative cover. The final cover slope will be a minimum of 2% and will convey water to a NPDES permitted outfall.

#### 4.1 CLOSURE PERFORMANCE STANDARDS 257.102 (d)(1)

#### 4.1.1 SECTION 257.102(d)(1)(i)

[Control, minimize or eliminate, the maximum extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate, or contaminated run-off to the ground or surface waters or to the atmosphere.]

The final cover system will cover the CCR material and will have a permeability that is less than or equal to the permeability of the natural subsoils and is no greater than  $1 \times 10^{-5}$  cm/sec.

#### 4.1.2 SECTION 257.102(d)(1)(ii)

[Preclude the probability of future impoundment of water, sediment, or slurry.]

The final surface areas will be graded to a minimum slope of 2 % to prevent the ponding of surface water runoff. Drainage features will be designed to have positive drainage.

#### 4.1.3 SECTION 257.102(d)(1)(iii)

[Include measures that provide for major slope stability to prevent the sloughing or movement of the final cover system during the closure and post-closure care period.]

The final cover system will be gently graded with a minimum of 2% slope. The final configuration of the facility will meet the stability requirements to prevent the sloughing or movement of the final cover system during the closure and post-closure care period.

## 4.1.4 SECTION 257.102(d)(1)(iv)

[Minimize the need for further maintenance of the CCR unit.]

The landfill will be vegetated to prevent erosion. Maintenance of the final cover system will include mowing.

# 4.1.5 SECTION 257.102(d)(1)(v)

[Be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices.]

The CCR unit will be closed in a timeframe consistent with recognized and generally accepted good engineering practices. There is currently no schedule for closure of this CCR unit.

# 4.2 DRAINING AND STABILIZING OF THE SURFACE IMPOUNDMENT 257.102(d)(2)

[The owner or operator of a CCR surface impoundment of any lateral expansion of a CCR surface impoundment must meet the requirements of paragraph (d)(2)(i) and (ii) of this section prior to installing the final cover system required under paragraph (d)(3) of this section.]

This section is not applicable to a landfill.

#### 4.3 FINAL COVER SYSTEM 257.102 (d)(3)

[If a CCR unit is closed by leaving CCR in place, the owner or operator must install a final cover system that is designed to minimize infiltration and erosion, and at a minimum, meets the requirements of paragraph (d)(3)(i) of this section, or the requirements of the alternative final cover system specified in paragraph (d)(3)(ii) of this section.

The final cover system must be designed and constructed to meet the criteria in paragraphs (d)(3)(i)(A) through (D) of this section. The design of the final cover system must be included in the written closure plan.]

The final cover system will consist of a flexible geomembrane that will have a permeability that is less than or equal to the permeability of the natural subsoils and is no greater than  $1 \times 10^{-5}$  cm/sec. The geomembrane will be installed directly over the graded CCR material. Over the geomembrane will be installed an infiltration layer consisting of 18" of earthen material and an erosion layer consisting of 6" of earthen material that is capable of sustaining native plant growth. The final cover will be seeded and mulched to promote growth of a vegetative cover. The final cover slope will be a minimum of 2% to accommodate settling and subsidence and will convey water to a NPDES permitted outfall.

#### 5.0 ESTIMATE OF MAXIMUM CCR VOLUME 257.102 (b)(1)(iv)

[An estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit.]

The estimated maximum CCR volume that will ever be on-site is 9.9 million cubic yards.

## 6.0 ESTIMATE OF LARGEST AREA OF CCR REQUIRING COVER 257.102 (b)(1)(v)

[An estimate of the largest area of CCR unit ever requiring a final cover]

The landfill will be closed in phases as the landfill meets final waste grades. The largest area of the CCR unit that may ever require final cover is 58 acres.

# 7.0 CLOSURE SCHEDULE 257.102(b)(1)(vi)

[A schedule for completing all activities necessary to satisfy the closure criteria in the section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including identification of major milestones such as coordinating with and obtaining necessary approvals and permits from other agencies, the dewatering and stabilization phases of the CCR surface impoundment closure, or installation of the final cover system, and the estimated timeframes to complete each step or phase of the CCR unit closure.]

The landfill will be closed in phases as the landfill reaches final waste grades. The closure schedule will be based on disposal rates into the landfill and there are currently no projected timeframes on when the closure phases will occur. Prior to portions of the landfill requiring closure a closure plan will be submitted to WVDEP and a schedule to satisfy this section will be prepared.