

Closure Completion Notification for Closure by Removal

January 15, 2025

Closure Completion Notification

Mitchell Plant

Bottom Ash Pond

On December 24, 2024, the Mitchell Plant Bottom Ash Pond was transitioned to closure status in accordance with 40 CFR 257.102. This notice of completion of closure is being placed in the operating record in accordance with 40 CFR 257.102(h).

Effective with the Closure Completion Notification, the former ash storage site is no longer a CCR unit. The following operating record documents are no longer required going forward:

- Hazard Potential Classification
- Emergency Action Plan (EAP)
- Face to Face Meeting Documentation for EAP
- History of Construction and Revisions for Surface Impoundments
- Structural Stability Assessments
- Safety Factor Assessments
- Fugitive Dust Plan
- Inflow Design Flood System Control Plan

CLOSURE CERTIFICATION BY QUALIFIED PROFESSIONAL ENGINEER

I certify that the AEP Mitchell Bottom Ash Pond has been closed in accordance with the most recent written closure plan specified by 40 CFR 257.102(b) and the requirements of 40 CFR 257.102.

David Anthony Miller

Printed Name of Licensed Professional Engineer

David Anthony Miller

Signature



22663

License Number

West Virginia

Licensing State

01.15.2025

Date

VERDANTAS CERTIFICATION

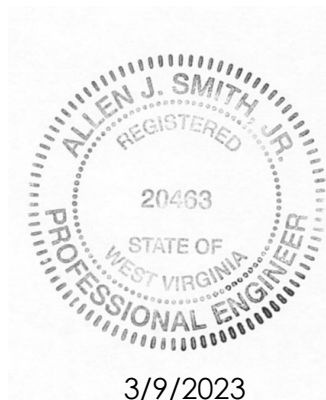
Based on the construction observations performed by Verdantas representatives, I hereby certify that the Bottom Ash Pond West Basin at the Mitchell Plant in Moundsville, West Virginia, as shown on the record drawing located in Appendix C, has achieved removal of all CCR material and soil with constituent concentrations above relevant background standards (i.e., closed by removal) in substantial compliance with the Construction Quality Assurance (CQA) Plan for Pond Closure and Repurposing, the Construction Drawings for the CCR/ELG closure by removal project, Bottom Ash Pond Closure and Repurposing Contract as provided by Worley (December 3, 2021) and as per 40 CFR 257.102, and as clarified herein. The groundwater monitoring and compliance aspect of CCR Unit closure by removal criteria, as found at 40 CFR 257.102(c), will be certified under a separate report. The Contractor (R.B. Jergens) obtained the survey data used to develop the record drawing. R.B. Jergens verified that the elevations met the closure requirements, and Verdantas also reviewed the survey data.



Chris Goddard
Quality Assurance Officer/CQA Manager



Allen J. Smith Jr., PE
Certifying Engineer
WV PE# 020463



VERDANTAS CERTIFICATION

Based on the construction observations with associated photographic records, testing performed by Verdantas representatives in the field and documented in this report, I hereby certify to the best of my knowledge and to the extent of available information that the East Wastewater Pond at the Mitchell Plant in Moundsville, West Virginia, as shown on the record drawing located in Appendix B, has achieved removal of all CCR material and one foot (minimum) of underlying native soil in substantial compliance with the Construction Quality Assurance (CQA) Plan for Pond Closure and Repurposing, the Construction Drawings for the CCR/ELG Project, the Bottom Ash Pond Closure and Repurposing Contract as provided by Worley (December 3, 2021), per 40 CFR 257.102 and as clarified herein. The groundwater monitoring and compliance aspect of CCR Unit closure by removal criteria, as found at 40 CFR 257.102(c), will be certified under a separate report. This certification is strictly limited to CQA observations and associated field testing and does not include an engineering analysis of previously approved and permitted engineering designs or subsequent approved design/field changes. The Contractor (R.B. Jergens) obtained the survey data used to develop the attached record drawing. R.B. Jergens verified that the elevations met the construction requirements, and Verdantas also reviewed the survey data.



Chris Goddard
Quality Assurance Officer/CQA Manager



Allen J. Smith Jr., PE
Certifying Engineer
WV PE# 020463



4/4/2024