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	West Virginia	01.15.2025
License Number	Licensing State	Date

March 8, 2023
Document Number: APO087.0003

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

3/9/2023

April 4, 2024
Document Number: APO087.0006

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

Kentucky Power Company
Mitchell Plant
Bottom Ash Pond (WV ID# 05108)

Hazard Potential Classification Assessment

AEP has performed an evaluation to classify the above CCR Surface Impoundment in accordance with FEMA's Hazard Potential Classification System for Dams. These guidelines evaluate the consequences of a potential failure not the likelihood of a failure. Guidelines that were developed and utilized are included below.

Hazard Potential Classification Systems (from FEMA 333, April 2004)

1. **Low Hazard Potential**
   Dams assigned the low hazard potential classification are those where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the owner's property.
2. **Significant Hazard Potential**
   Dams assigned the significant hazard potential classification are those dams where failure or mis-operation results in no probable loss of human life but can cause economic loss, environmental damage, disruption of lifeline facilities, or can impact other concerns. Significant hazard potential classification dams are often located in predominantly rural or agricultural areas but could be located in areas with population and significant infrastructure.
3. **High Hazard Potential**
   Dams assigned the high hazard potential classification are those where failure or mis-operation will probably cause loss of human life.

The Mitchell Plant's Bottom Ash Pond is situated along State Route 2 adjacent to the Mitchell Power Plant and the Ohio River. Failure or mis-operation of the dikes would not result in probable loss of human life but could cause economic loss, environmental damage. The Mitchell Bottom Ash Pond is regulated by the West Virginia Department of Environmental Protection Dam Safety and is considered a Class 2 structure which is equivalent to a Significant Hazard FEMA classification. The US EPA CCR Impoundment Assessment Report also listed this ash pond as Significant Hazard.

There has been no changes in classification by the State Dam Safety nor has there been any other physical changes that would warrant a change in the classification.

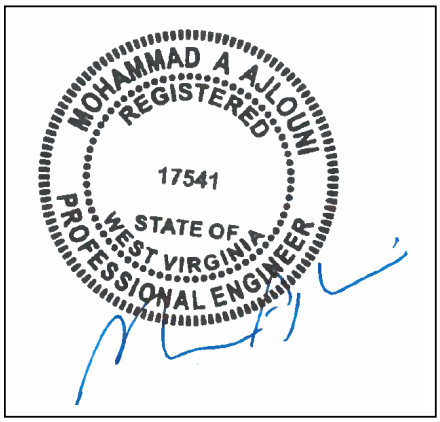
Based on the FEMA Hazard Potential Classification Systems for Dams and on the above discussion, The Mitchell Bottom Ash Pond is classified as a **Significant Hazard Potential Dam**.

Professional Engineer's Certification:

I certify that this Hazard Potential Classification Assessment is in accordance with the requirements of section 40 CFR 257.73 (a)(2)(i).

Mohammad A. Ajlouni, Ph.D., P.E.

7/26/2021



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