

## **Closure Completion Notification for Closure by Removal**

February 20, 2025

Closure Completion Notification

Mountaineer Plant

Bottom Ash Pond Complex

On February 20, 2025, the Mountaineer Power Plant's Bottom Ash Pond Complex transitioned to closed status in accordance with 40 CFR 257.102(c)(2). 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 relevant operating record documents are no longer required going forward:

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

**CLOSURE CERTIFICATION BY QUALIFIED PROFESSIONAL ENGINEER**

I certify that the Mountaineer Bottom Ash Pond Complex has been closed in accordance with the most recent written closure plan specified by paragraphs §257.102(c)(2)(iv) and the requirements of section §257.102.

David Anthony Miller

Printed Name of Licensed Professional Engineer

*David Anthony Miller*

Signature



22663

License Number

West Virginia

Licensing State

02.20.2025

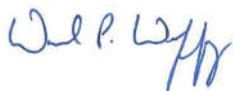
Date

### VERDANTAS CERTIFICATION

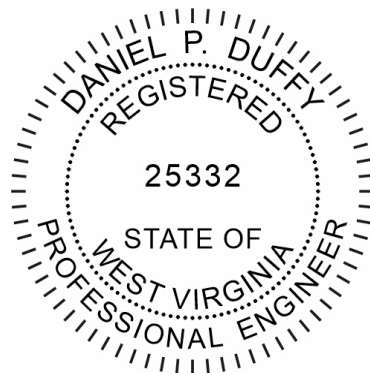
Based on the construction observations performed by Verdantas representatives and confirmation laboratory analyses conducted, I hereby certify that the Bottom Ash Pond East Basin at the Mountaineer Plant in New Haven, West Virginia, as shown on the record drawing located in Appendix D, has achieved removal of all CCR material and soil with constituent concentrations above relevant background standards (i.e. closed by removal) in substantial compliance with the Mountaineer BAP Written Closure Plan (November 30, 2020), Construction Quality Assurance Plan for Pond Closure and Repurposing, Construction Drawings for the CCR/ELG closure by removal project, Bottom Ash Pond Closure and Repurposing Contract as provided by Worley (December 3, 2021), as per 40 CFR 257.102(c), and as clarified herein. The groundwater monitoring and compliance aspect of CCR Unit closure by removal criteria, as required by 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.



Trent S. Hathaway, PE  
Quality Assurance Officer/CQA Manager



Daniel P. Duffy, PE  
Certifying Engineer  
25332



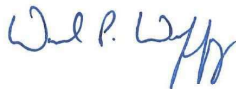
12/6/2022

### VERDANTAS CERTIFICATION

Based on the construction observations performed by Verdantas representatives and confirmation laboratory analyses conducted, I hereby certify that the Bottom Ash Pond West Basin at the Mountaineer Plant in New Haven, West Virginia, as shown on the record drawing located in Appendix D, has achieved removal of all CCR material and at least an additional one foot of underlying non-CCR material. Soil testing of the underlying non-CCR soil validate that the residual soil concentrations are below relevant de minimis remedial standards presented in the West Virginia Department of Environmental Protection's Voluntary Remediation and Redevelopment Rule (60CSR9, effective 12/2/2021) (i.e. closed by removal) in substantial compliance with the Mountaineer Bottom Ash Pond Written Closure Plan (August 31, 2023), Construction Quality Assurance Plan for Pond Closure and Repurposing, Construction Drawings for the CCR/ELG closure by removal project, Bottom Ash Pond Closure and Repurposing Contract as provided by Worley (December 3, 2021), as per 40 CFR 257.102(c), and as clarified herein. The groundwater monitoring and compliance aspect of CCR Unit closure by removal criteria, as required by 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 and relies upon R.B. Jergens' verification for the data's validity.



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1/3/2024