

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



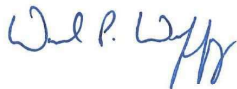
12/6/2022

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.



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



Daniel P. Duffy, PE
Certifying Engineer
25332



1/3/2024

Appalachian Power Company (APCo)
Mountaineer Power Plant
Mountaineer Bottom Ash Complex (WV ID#05307)
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 Mountaineer Power Plant is located near the City of New Haven, Mason County, West Virginia. The dikes are constructed along a state highway. Failure or mis-operation of the dikes would not result in probable loss of human life but could cause damage to the state highway and railroad, economic loss, and environmental damage to an adjacent stream. The Mountaineer 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.

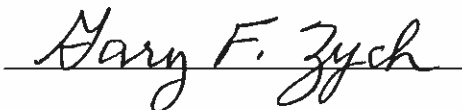
There has been no changes in classification by the State Dam Safety nor has there been any other physical changes that would warrant a change in the classification.

Based on the FEMA Hazard Potential Classification Systems for Dams and on the above discussion, The Mountaineer 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).

Gary F. Zych, P.E.





7/28/2021