

POST CLOSURE PLAN

40 CFR §257.102(c) and 104(d)

Former Bottom Ash Complex
Mountaineer Plant
Letart, West Virginia

January 2025

Prepared for: Appalachian Power Company – Mountaineer Plant
Letart, West Virginia

Prepared by: American Electric Power Service Corporation
1 Riverside Plaza
Columbus, OH 43215



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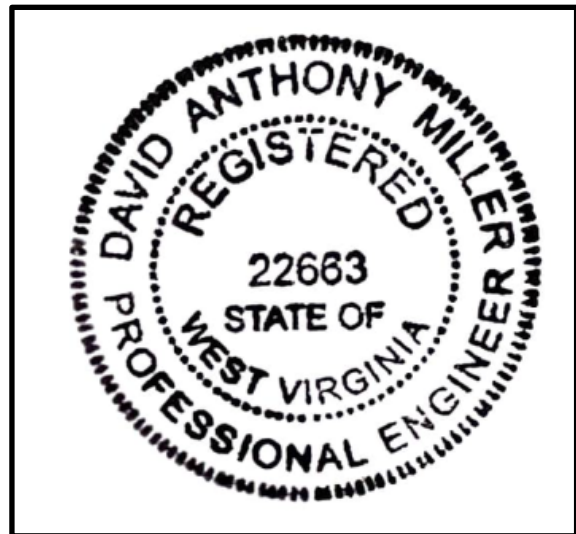
POST CLOSURE PLAN
40 CFR §257.104(c)
MOUNTAINEER PLANT
FORMER BOTTOM ASH COMPLEX

PREPARED BY *Brian G. Palmer* DATE 01/23/2025
Brian G. Palmer, P.E.

REVIEWED BY *Jill Parker-Witt* DATE 01/23/25
Jill Parker-Witt, P.E

APPROVED BY *D. Pizzino* DATE 01/27/2025
Daniel W. Pizzino, P.E.
Director Generation Engineering

APPROVED BY *David Anthony Miller* DATE 02.28.2025
David A. Miller, P.E.
Director, Environmental Ash Management Services



I certify to the best of my knowledge, information, and belief that the information contained in this post closure plan meets the requirements of 40 CFR § 257.102(c) and 104(d).

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| Revision Number | Date | Revision Description |
| 0 | | Original Document |
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1.0 OBJECTIVE

This report was prepared by AEP to fulfill requirements of 40 CFR §257.102(c)(2) for Complete removal and decontamination activities during the active life and post-closure care period of a CCR unit. The Mountaineer Power Plant's former Bottom Ash Ponds (former CCR unit) have been closed by removal however, groundwater is undergoing corrective action. 40 CFR §257 allows the Owner or operator to close a CCR unit by completing all removal and decontamination activities during the active life of the CCR unit and by completing groundwater corrective action during the post-closure care period.

2.0 DESCRIPTION OF THE CCR UNIT

The Mountaineer Power Plant is located near the town of New Haven, Mason County, West Virginia and within the unincorporated community of Letart, West Virginia. The Power Plant is owned and operated by Appalachian Power Company (APCO). The facility operated one (1) surface impoundment (SI) split into two ponds the East and West bottom ash ponds, located within the Bottom Ash Complex for the treatment CCR.

A Statistically Significant Level (SSL) was determined for the former CCR unit. Therefore, as required by 40 CFR 102(c)(2)(ii), an Assessment of Corrective Measures (ACM) was initiated on March 26, 2019, which was completed on June 24, 2019. The public meeting to discuss the proposed remedies was held on August 22, 2019, in accordance with 40 CFR §257.96, and the ACM was revised on November 30, 2020, per EPA's comments. The selection of remedy was completed on December 22, 2021, in accordance with 40 CFR §257.97. The remedy and the corrective action monitoring program were initiated within 90 days of remedy selection in accordance with 40 CFR §257.98. Additionally, all components of the groundwater corrective remedy were constructed, in place and operating as intended according to the implementation of the corrective action program and within the timeframes specified in §257.102(f).

Furthermore, as allowed by 40 CFR §257.101(a)(3) a site-specific alternative deadline to initiate closure of the SI demonstration was developed and submitted to EPA in accordance with 40 CFR §257.103(f). On December 20, 2022, the CCR unit ceased receipt of CCR and non-CCR wastestreams and commenced closure by removal of the CCR in accordance with the certified closure plan and within the time frames allowed for under 40 CFR §257.102(e). In January 2024, the CCR unit's CCR material and at least 12 inches of underlying materials was removed, and in February 2025 the closure notification was certified, well within the time frame required in 40 CFR §257.102(f)(1)(ii) and as required by 40 CFR §257.102(c)(2)(i).

The recordkeeping requirements as specified in §257.105, the notification requirements specified in §257.106, and the internet requirements specified in §257.107 were adhered for these activities.

3.0 DESCRIPTION OF POST-CLOSURE PLAN:

A SSL was determined for the former CCR Unit and a corrective action groundwater monitoring program, meeting the requirements of an assessment monitoring program under §257.95, has been established. Therefore, the former CCR unit will complete groundwater corrective action as a post-closure care requirement as allowed under 40 CFR §257.102(c)(2)(iii).

As specified in 40 CFR §257.102(c)(2)(iv) the closure plan has been revised to indicate that the former CCR unit would be closed while groundwater monitoring and corrective action will continue through a post-closure care period. This post-closure plan has been developed to address the continued groundwater corrective action until the groundwater demonstrated compliance with the groundwater protection standard pursuant 40 CFR §257.98(c).

As specified in 40 CFR §257.102(c)(2)(v) the completion of closure by removal certification was obtained within the timeframe specified in 40 CFR §257.102(f)(1)(ii).

Additionally, as specified in 40 CFR §257.102(c)(2)(vi), a notation will be filed on the deed to the property to notify any potential purchaser of the property that the land has been used as a CCR unit and its use is restricted under the post-closure care requirement in accordance with 40 CFR §257.102(i) until groundwater corrective action has been certified complete. Within 30 days of recording a notation on the deed to the property, a notification stating that the notation has been recorded will be prepared and placed in the facility's operating record as required by 40 CFR §257.105(i)(9).

As specified in 40 CFR §257.104(g) the deed can be removed upon completion of groundwater corrective action demonstrating that any areas affected by releases from the former CCR unit do not exceed the groundwater protection standards established pursuant to 40 CFR §257.95(h) for constituents listed in 40 CFR §257 appendix IV for three (3) consecutive years and completion of the notification of completion of post-closure care period required by 40 CFR §257.104(e).

3.1 SECTION 257.104(b)(3)

The groundwater monitoring system will be inspected for the general integrity of the wells, well casings and well protective casings. Any damaged portions of the monitoring wells and/or their protective casings will be replaced in-kind.

Monitoring the groundwater will be in accordance with the groundwater monitoring plan for this facility and in accordance with the requirements of §§257.90 through 257.98.

3.2 SECTION §257.104(d)(1)(i)

The former CCR unit has been closed by removal therefore there are no inspections to be performed or maintenance to be conducted as referenced in 40 CFR §257.104(b)(1) of (2) during this post-closure care period.

3.3 SECTION §257.98(c)

Remedies selected pursuant to 40 CFR §257.97 shall be considered complete when:

- (1) The owner or operator of the CCR unit demonstrates compliance with the groundwater protection standards established under §257.95(h) has been achieved at all points within the plume of contamination that lie beyond the groundwater monitoring well system established under §257.91.
- (2) Compliance with the groundwater protection standards established under §257.95(h) has been achieved by demonstrating that concentrations of constituents listed in appendix IV have not exceeded the groundwater protection standard(s) for a period of three (3) consecutive years using the statistical procedures and performance standards in §257.93(f) and (g).
- (3) All actions required to complete the remedy have been satisfied.

The recordkeeping requirements as specified in §257.105, the notification requirements specified in §257.106, and the internet requirements specified in §257.107 were adhered for these activities.

4.0 POST-CLOSURE CONTACT §257.104(d)(1)(ii)

Name: David Miller – AEP Service Corp.
Address: One Riverside Plaza
Telephone: 614-716-2281
Email: damiller@aep.com

5.0 POST-CLOSURE PLANNED USE §257.104(d)(1)(iii)

The post-closure use of the property will be a combination of non-CCR wastewater ponds and infrastructure to support power generation or the groundwater corrective action remedial monitoring system until groundwater monitoring has been certified as complete. Post-closure use of the property shall not disturb the integrity or the function of the groundwater monitoring systems unless necessary to comply with the requirements of this post-closure care plan. Any other disturbance is allowed if the owner or operator of the former CCR unit demonstrates that disturbance of the groundwater monitoring systems will not increase the potential threat to human health or the environment. The demonstration must be certified by a qualified professional engineer. This notification shall be provided to the State Director that the demonstration has been placed in the operating record and on the owners or operator's publicly accessible internet site.