

Emergency Action Plan

40 CFR 257.73(a)(3)

Ash Pond

Kammer Site

Moundsville, WV

May, 2026

Prepared for: Franklin Realty

Prepared by: American Electric Power Service Corporation

1 Riverside Plaza

Columbus, OH 43215



Kammer Site – Ash Pond Emergency Action Plan

PREPARED BY _____ DATE _____
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Director – Ash Management Services



I certify to the best of my knowledge, information, and belief the information contained in this report meets the requirements of 40 CFR § 257.73(a)(3).

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Introduction

The “Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Legacy CCR Surface Impoundments”, 89 Fed. Reg. 38950 (May 8, 2024) (amending 40 C.F.R. §257) requires owners and operators of facilities with a legacy coal combustion residual (CCR) surface impoundment to prepare an Emergency Action Plan document for each legacy CCR surface impoundment at the facility that meet hazard potential requirements. The Ash Pond at the Kammer Site is subjected to this rule.

Statement of Purpose

An Emergency Action Plan (EAP) is a formal document that identifies potential emergency conditions at a dam and specifies preplanned actions to be followed to minimize property damage and loss of life, if applicable. The Legacy CCR rule does not require a specific format, so this EAP was generated to comply with the requirements of the rule and incorporate applicable elements from other EAPs, including Interagency Committee on Dam Safety (ICODS) format, State Dam Safety formats, and other AEP operating facilities. The scope may vary across the Legacy CCR sites depending on the complexity and risk of the individual facility.

Project Description & Location

The Former Kammer Site is located at 7897 Energy Road, Moundsville West Virginia. The latitude/longitude of the facility is: 39°50'25"N / 80°49'22" W. The facility address is: 7897 Energy Road, Moundsville, WV, 26041. The site can be reached from the North via I-470 on to State Route 7. Turn on to the State Route 2 bridge at Dilles Bottom/Moundsville, and continue South on State Route 2. The site entrance is on the right approximately 1 mile before the Mitchell Power Plant site. From the South take State Route 2 north to the site entrance on the left, 1 mile after the Mitchell Power Plant site.



Figure 1: Site Vicinity Map

The Kammer Power Plant was placed in service in 1958 and subsequently retired in May of 2015.

The Ash Pond is located near the Ohio River on the south side of the plant property. The Ash Pond is created by dikes on three sides of the impoundment. The Ash Pond abuts a 345 kV substation on the northern side. The exterior slopes are generally 2 horizontal: 1 vertical or flatter while the interior slopes are generally 1.75 horizontal on 1 vertical or flatter. The crest of the dike is at elevation 640 ft-msl and the bottom of the pond is noted as elevation 612.5 ft-msl on record drawings. Original grades varied across the Ash Pond site between 625 and 638 ft-msl.

In its current configuration, the Ash Pond is separated into a northern portion and a southern portion by a splitter dike for controlling flow and to create a working surface for excavation equipment. The splitter dike has a concrete flume at the eastern end of the dike which allows water to pass to the southern portion of the pond.

The discharge structure is a pipe and riser type structure located at the southern end of the Ash Pond. The riser structure is made of reinforced concrete and sloped to match the interior slope of the dike. The outlet pipe is a 36" concrete pipe that outlets 10 feet below the navigational pool of Hanibal Lock and Dam. The pond water surface elevation is

controlled by stop logs that are inserted into groove on the riser structure. The main inflow into the Ash Pond would have come from the north when the plant was operational.

Emergency Action Plan (EAP)

40 CFR 257.73 (a) (3) (i) Development of the plan.

40 CFR 257.73 (a) (3) (i) (A) Define the events or circumstances involving the CCR unit that represent a safety emergency, along with a description of the procedures that will be followed to detect a safety emergency in a timely manner;

The preamble to the 2015 CCR final rule provides examples of potential indicators of structural weaknesses (Operating Criteria- Inspection Requirements for CCR Surface Impoundments Section). These signs of potential structural weaknesses may range from minor items that will be added to the routine maintenance plan to deficiencies that could have the potential to disrupt the operation and safety of the structure.

1. Excessive, turbid, or sediment-laden seepage
2. Signs of piping and other internal erosion
3. Transverse, longitudinal, and desiccation cracking
4. Slides, bulges, boils, sloughs, scarps, sinkholes, or depressions
5. Abnormally high or low pool levels
6. Excessive or lacking vegetative cover
7. Slope erosion
8. Debris

During normal operation of the facility inspections at least every 7 days. Facility inspections are reviewed along with instrumentation readings every 30 days. Annual inspections are performed by a professional engineer. These inspections ensure potential safety emergencies are detected in a timely manner.

This EAP will follow the alert levels as established by the Interagency Committee on Dam Safety Format. Specifically, three alert levels of increasing urgency are identified as 1- Monitor, 2- Watch and 3- Warning.

- Monitor = Unusual event, slowly developing, not an immediate threat to the dam.
- Watch = Unsafe situation that may lead to failure of the dam but not an immediate threat.
- Warning = Urgent situation. Failure is occurring or about to occur. Or, areas downstream are flooding due to spillway flow. Evacuation of downstream area necessary.

The alert level table included in this document can be used as a general guide to determining the proper alert level. Additional consultation with AEP Ash Management Services engineer for subject matter expertise.

Alert Level Table		
Event	Situation	Alert Level
Embankment Overtopping	No overtopping flow but water level in lake within 6 inches of crest or backflow through outlet structure.	Monitor
	Minor river overtopping/toe scour	Watch
	Major overtopping flow eroding the embankment slope	Warning
Seepage	New seepage areas in or near the dam with clear flow	Monitor
	New seepage areas with cloudy discharge or increasing flow rate	Watch
	Heavy seepage with active erosion. Muddy flow and/or sand boils.	Warning
Sinkholes	Observation of new sinkhole in reservoir area or on embankment.	Watch
	Rapidly enlarging sinkhole on the embankment with visible flow or whirlpool in the lake.	Warning
Embankment Cracking	New cracks in the embankment greater than 1/4-inch wide without seepage	Monitor
	Cracks in the embankment with seepage	Watch
Embankment Movement	Visual movement/slippage of the embankment slope	Monitor
Earthquake	Measurable earthquake felt or reported on or within 50 miles of the dam	Monitor
	Earthquake resulting in visible damage to the dam or appurtenances	Watch
	Earthquake resulting in uncontrolled release of water from the dam	Warning
Security Threat	Verified bomb threat that, if carried out, could result in damage to the dam	Watch
	Detonated bomb that has resulted in damage to the dam or appurtenances	Warning
Sabotage	Damage to dam or appurtenances with no impacts to the functioning of the dam	Monitor
	Damage to dam or appurtenances that has resulted in seepage flow	Watch
	Damage to dam or appurtenances that has resulted in uncontrolled water release	Warning

40 CFR 257.73 (a) (3) (i) (B) Define responsible persons, their respective responsibilities, and notification procedures in the event of a safety emergency involving the CCR unit;

<u>Action</u>	<u>Responsibility</u>
Alert level determination	AMS Engineer
Emergency notifications	AEP
Notify impacted residents	AEP, EMA, and Local Law Enforcement
Establish incident command	AEP, EMA
Traffic control and security	Local Law Enforcement
Evacuation	EMA

Notification Procedures

AEP will consult with subject matter experts in Ash Management Services to determine the alert level at the dam according to this EAP and notify emergency responders and AEP Stakeholders.

Notification chart is included within this emergency action plan.

40 CFR 257.73 (a) (3) (i) (C) Provide contact information of emergency responders.

See notification chart.

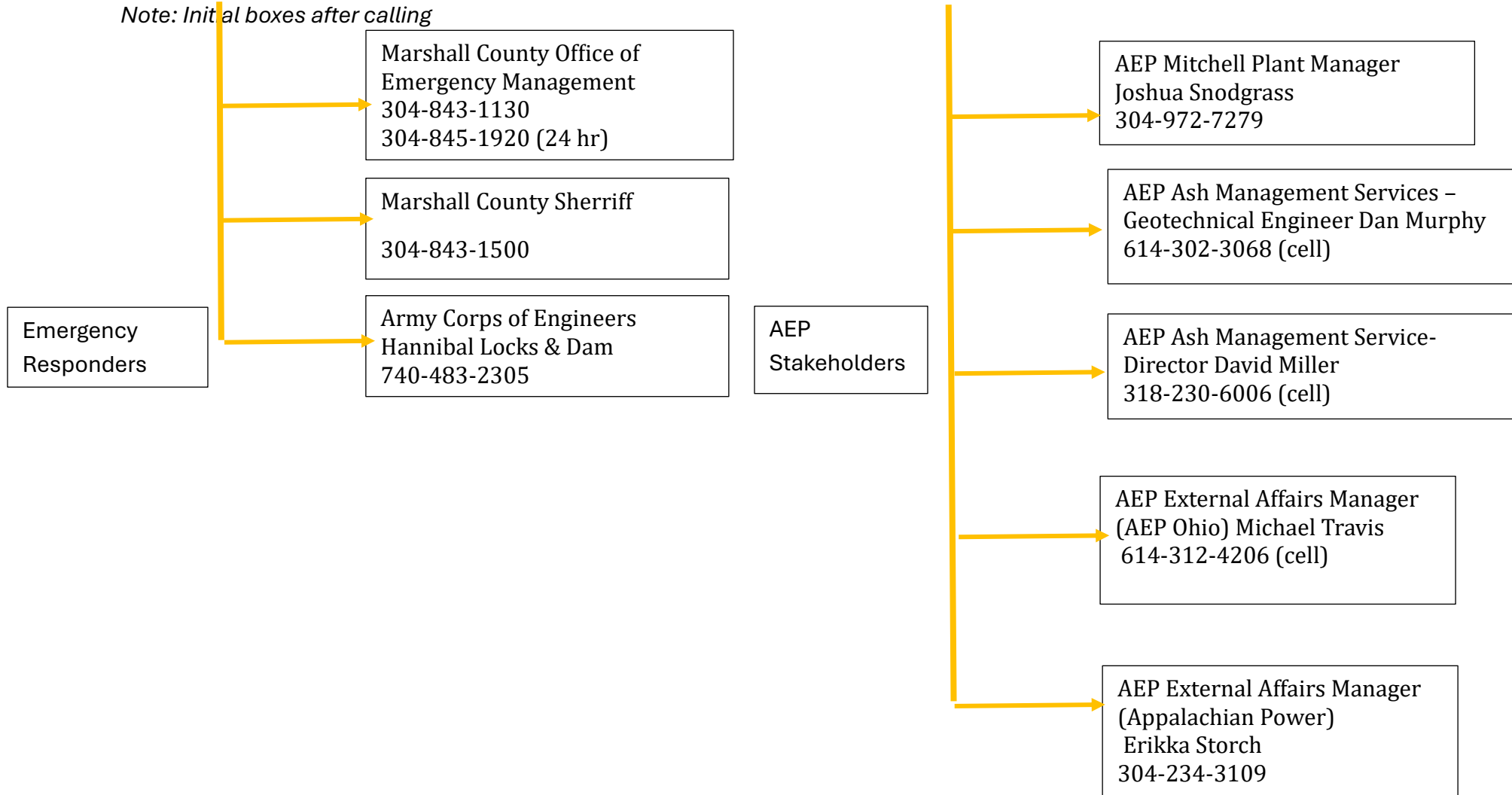
Notification Flowchart

Watch or Warning Alert Level

Kammer Site
Ash Pond
AEP/Franklin Realty

Title	Name	Work Phone	Cell Phone	Email
Energy Production Supervisor Sr	G. Matt Palmer		304-559-4538	
Process Supervisor Senior	Ryan Huff (alternate)		304-559-2836	

Note: Initial boxes after calling



PERSONNEL SHOULD NOT DEVIATE FROM THIS SCRIPT TO PREVENT THE PASSAGE OF INCORRECT OR MISLEADING INFORMATION

Use this script for notifications to emergency responders: "This is ____ (name and position). A ____ (Watch or Warning) level situation exists involving a ____ (Describe Situation) of the (Specify the Dam Name and Type) at the Kammer Site. We will advise when the situation is resolved or if conditions change. I can be contacted at the following number _____. My alternate phone number is _____.

(Select one):

We DO need offsite assistance, and this is what we need _____. Please relay this information to your Emergency Management Director as soon as possible." OR

We DO NOT need any offsite assistance at this time, we are just calling to keep you informed. However, please relay this information to your Emergency Management Director as soon as possible." Ask Operator to repeat message back for confirmation.

Use this script for notifications to AEP Stakeholders: "This is ____ (name and position). A ____ (Watch or Warning) level situation exists at ____ the Kammer Site due to ____ (Describe Situation). A status call will occur at ____ (time and date). Please notify appropriate staff to join the call for additional information."

40 CFR 257.73 (a) (3) (i) (D) Include a map which delineates the downstream area which would be affected in the event of a CCR unit failure and a physical description of the CCR unit; and

See appendix A for inundation map. The Kammer Ash pond is immediately adjacent to the Ohio River. It is expected that an impoundment dam breach or failure would be immediately attenuated within the Ohio River. The inundation area is assumed to be no larger than the length of the ash pond dikes along the river extending to the centerline of the river.

40 CFR 257.73 (a) (3) (i) (E) Include provisions for an annual face-to-face meeting or exercise between representatives of the owner or operator of the CCR unit and the local emergency responders.

AEP is required to hold an annual face-to-face meeting with local responders or ensure their participation in an EAP exercise. To address this requirement, AEP will have documented annual meeting with local emergency responders. The form in Appendix B (CSED D.3) must be filled out to provide the necessary documentation of this annual meeting. The meeting could take the form of one of the following:

- Orientation Seminar
- Table top exercise
- Full- Scale exercise

40 CFR 257.73 (a) (3) (ii) Amendment of the plan.

(A) The owner or operator of a CCR unit subject to the requirements of [paragraph \(a\)\(3\)\(i\)](#) of this section may amend the written EAP at any time provided the revised plan is placed in the facility's operating record as required by [§ 257.105\(f\)\(6\)](#). The owner or operator must amend the written EAP whenever there is a change in conditions that would substantially affect the EAP in effect.

(B) The written EAP must be evaluated, at a minimum, every five years to ensure the information required in [paragraph \(a\)\(3\)\(i\)](#) of this section is accurate. As necessary, the EAP must be updated and a revised EAP placed in the facility's operating record as required by [§ 257.105\(f\)\(6\)](#).

AEP is required to review and update the Emergency Action Plan. To address this requirement the Emergency Action Plan will be reviewed annually and documented by filling out the form in Appendix C.

40 CFR 257.73 (a) (3) (iii) Changes in hazard potential classification.

If the hazard potential classification changes for this site, then the EAP will be updated accordingly.

40 CFR 257.73 (a) (3) (v) Activation of the EAP.

The EAP must be implemented once events or circumstances involving the CCR unit that represent a safety emergency are detected, including conditions identified during periodic structural stability assessments, annual inspections, and inspections by a qualified person.

AEP will document any activation of the Emergency Action Plan using the form in Appendix D. The form will document any unusual or emergency events including any event progression or deescalation of the event.

Termination Responsibilities

When the impoundment is closed or hazard classification changes such that an EAP is no longer required, the operating record will be updated noting the change and termination of the EAP.

Emergency Preparedness

The following preparedness plan is a general starting point for emergency response at the site. Details may vary depending on the circumstances.

- Potential Emergency Response Contractors
 - Luburgh Inc. (740) 452-3668
 - ERC (Environmental Remediation Contractors) (614) 769-6535
- Construction Coordinator, AMS Engineer, and Environmental Representative for the site will provide coverage for necessary site surveillance.
- A TEAMS channel or similar will be established for file sharing, meeting setup, and general notifications of developments.
- An example daily meeting schedule could be:
 - 8:00 AM Internal call
 - 9:00 AM External call with emergency response or incident command
 - 10:00 AM Public/Media Briefing
- Emergency Resources available
 - Security Cameras – Stallion (480) 620-2307
 - Sand and gravel – Mulzer Crushed Stone - Moundsville (740) 516-5614
 - Riprap – National Lime and Stone – Martins Ferry (330) 415-6456
 - Sand bags – Tractor Supply – Glen Dale (304) 843-5126
 - Equipment rental – ICR Supply – Bellaire (740) 676-1917
 - Pumps – ICR Supply – Bellaire (740) 676-1917

- Turbidity curtains – Ferguson Waterworks (740) 373-3456
- Concrete – Heidelberg Materials – McMechan (304) 771-6619

Controlled Copy Distribution List

- AEP
 - David Miller, PE – Director AMS
 - Dan Murphy, PE – Geotechnical Engineer
 - G. Matt Palmer- Mitchell Plant
 - Erikka Storch- Appalachian Power External Affairs
 - Michael Travis- AEP Ohio External Affairs

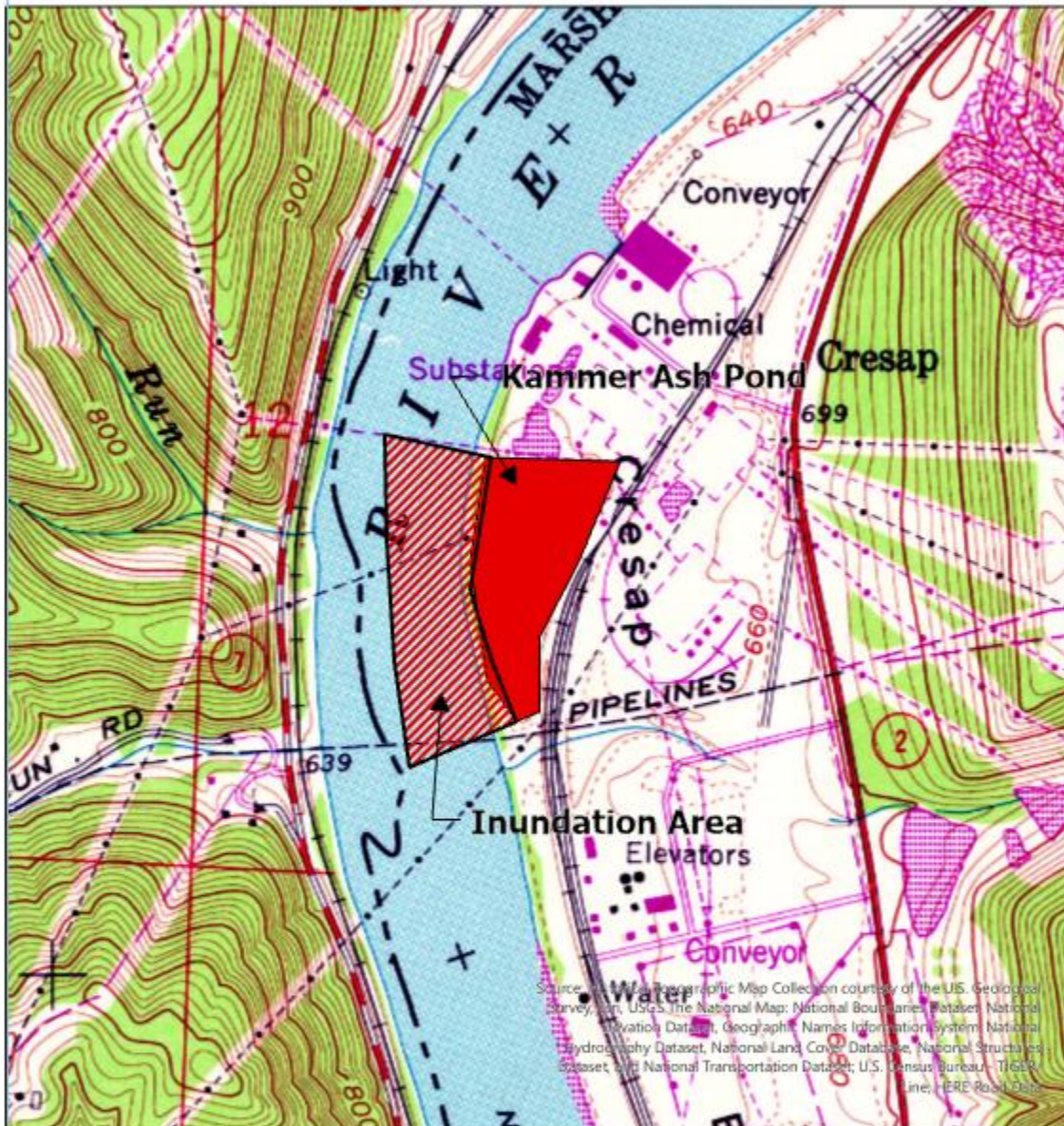
- Marshall County EMA
 - Tom Hart - Director

Log of Revisions

Date	Revision Number	Summary of Change
5/8/2026	0	Initial publication

Appendix A – Inundation Map

Kammer Power Plant Ash Pond



Inundation Area

0 382.5 725 1,450 Feet



Appendix B – Annual Meeting Documentation

CCR Emergency Action Plan Annual Meeting Documentation

Use this form to document the CCR Rule required annual face to face meeting.

Meeting was held to discuss the Emergency Action Plan for the following CCR unit(s): _____

Plant Personnel conducting the meeting: _____

Date: _____ Time Held: _____

Attending Organization: _____

Print Name: _____ Sign: _____

Print Name: _____ Sign: _____

Print Name: _____ Sign: _____

Attending Organization: _____

Print Name: _____ Sign: _____

Print Name: _____ Sign: _____

Print Name: _____ Sign: _____

Attending Organization: _____

Print Name: _____ Sign: _____

Print Name: _____ Sign: _____

Print Name: _____ Sign: _____

Attending Organization: _____

Print Name: _____ Sign: _____

Print Name: _____ Sign: _____

Print Name: _____ Sign: _____

Use multiple pages to document additional organizations or attendees.

Appendix C – Annual Review Form

CCR Emergency Action Plan Annual Review

CCR unit Emergency Action Plan designation: _____

The Emergency Action Plan above was reviewed and there were no changes identified to any part of the Plan that required revision or modification to the Plan. This will serve as the operating record that such a review has been conducted for the year _____.

Date review was concluded: _____

Certified by: _____ Date: _____

Position Title: _____

Appendix D – EAP Activation Form

