Emergency Action Plan

40 CFR 257.73(a)(3)

Fly Ash and Bottom Ash Pond Complex

Philo Site

Philo, OH

May, 2026

Prepared for: Ohio Franklin Realty

Prepared by: American Electric Power Service Corporation

1 Riverside Plaza

Columbus, OH 43215

Former Philo Power Plant Site – Fly Ash and Bottom Ash Pond Complex

Emergency Action Plan

PREPARED BY Dan Murphy Digitally signed by Dan Murphy DN: cn=Dan Murphy, c=US, email=dsmurphy1@aep.com Date: 2026.05.04 14:54:50 -04'00' DATE _____

Dan Murphy, P.E.

REVIEWED BY Blake Arthur, PE Digitally signed by Blake Arthur, PE DN: cn=Blake Arthur, PE, c=US, email=barthur@aep.com Date: 2026.05.06 11:24:31 -04'00' DATE _____

Blake Arthur, P.E.

APPROVED BY David A. Miller DATE 05.04.2026

David A. Miller, P.E.
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).

Contents

List of Appendices

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 Fly Ash and Bottom Ash Pond Complex at the Former Philo Power Plant 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 Philo Site is located approximately 0.25 miles east of the Village of Philo, Ohio. The latitude/longitude of the facility is: 39°51'43.69"N/81°54'10.97"W. The facility address is: Intersection of Bridge St and Circular St., Philo, OH 43771. The site can be reached from the North via I-70, turning on to State Route 60 south. From SR 60 turning onto Bridge St. The site entrance is on the south side of Bridge St immediately adjacent to the bridge across from ODNR Lock #9 Park.

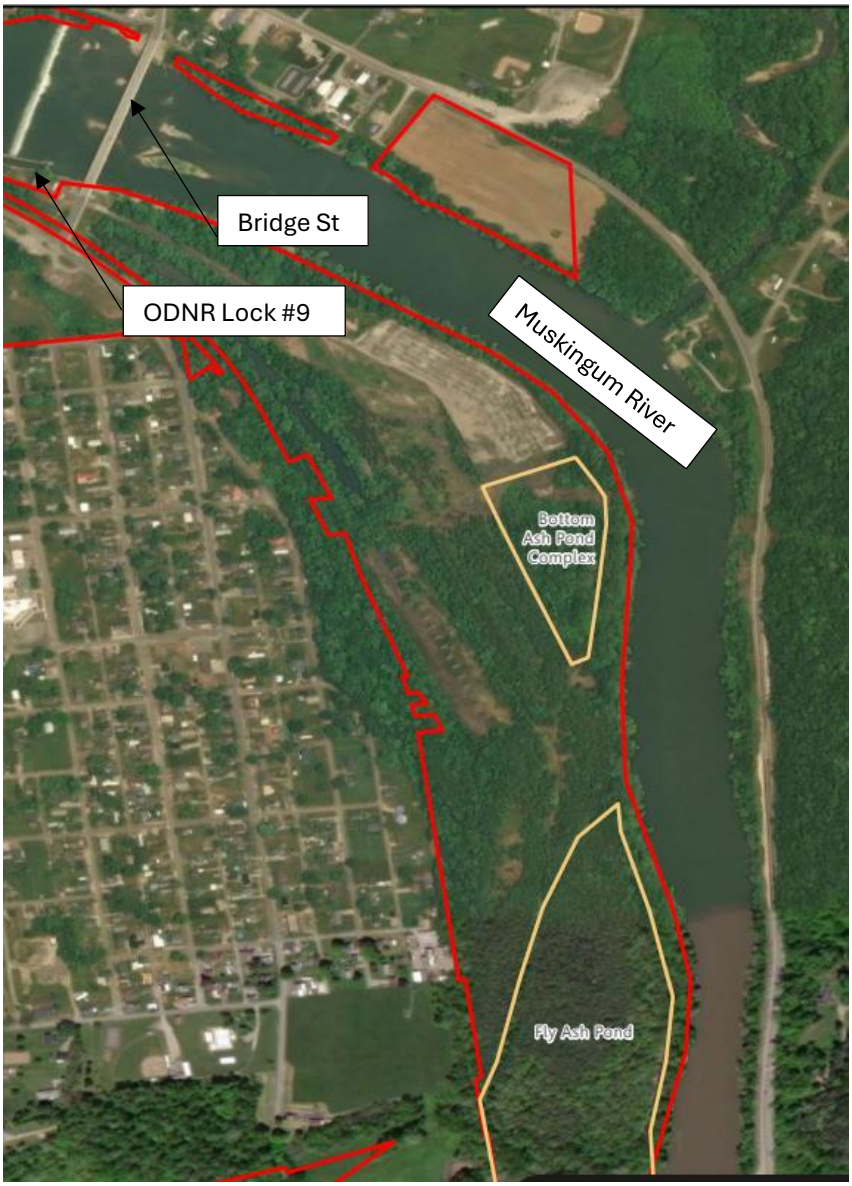


Figure 1: Site Vicinity Map

The Philo Plant was placed in service in October 1924 and subsequently retired in 1975.

The Fly Ash Pond is formed by a 25-foot-tall earthen embankment along the banks of the Muskingum River and along the northern bank of Duncan Run. The embankment is approximately 2,200 feet long. The downstream slope of the berm is close to 2H:1V. The Fly Ash Pond is approximately 17 acres.

When the Fly Ash Pond was operational, Ash was sluiced into the north end of the pond. Bottom Ash was hauled to the Fly Ash Pond via railcar and placed in northern end the Fly Ash Pond. At some point prior to 1981, the bottom ash storage on the northwestern side

of the pond was removed, which also removed the dike within the footprint of the storage area.

The spillway for the Fly Ash Pond is a corrugated metal pipe and riser located near the southeastern corner of the pond. Since the removal of the northwestern dike, water is no longer able to impound to a level that will flow through the riser.

The Bottom Ash Pond Complex is formed by a 27-foot-tall earthen embankment along the banks of the Muskingum River. The surrounding grades in the areas to the North, West and South of the Bottom Ash Pond Complex were filled in to elevate the site out of the floodplain with a variety of materials for fill.

The embankment is approximately 900 feet long. The downstream slope of the berm varies between 1.6 H:1V to 2H:1V. The interior slopes are approximately 2H:1V. The Bottom Ash Pond Complex encompasses approximately 5 acres.

Emergency Action Plan (EAP)

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

No later than April 17, 2017, the owner or operator of a CCR unit determined to be either a high hazard potential CCR surface impoundment or a significant hazard potential CCR surface impoundment under paragraph (a)(2) of this section must prepare and maintain a written EAP. At a minimum, the EAP must:

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;

Action	Responsibility
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

Former Philo Power Plant Site
Bottom Ash Complex and Fly Ash Dams

AEP/Franklin Realty

Title	*Name*	*Work Phone*	*Cell Phone*	*Email*
Construction Coordinator	*Bruce Adkins*		*304-812-6860*	*badkins@aep.com*
(EAP Alt) Site Construction Mgr	*Mike McCoy*		*903-305-8790*	*mlmccoy@aep.com*
(EAP Alt)				

Note: Initial boxes after calling

Emergency Responders

- Muskingum County EMA – 740-453-1655
- Harrison Township Volunteer Fire Department – 740-674-4325
- Village of Philo – (740) 674-4895
- Muskingum County Sheriff – 740-452-3637
- ODNR Division of Parks and Watercraft – 614-265-6561

AEP Stakeholders

- Ash Management Services – Geotechnical Engineer – Blake Arthur – 380-285-3519
- Ash Management Services – Environmental Engineer – Judith Straathof (380) 285-0331
- Ash Management Services – Director – David Miller – 318-230-6006
- External Affairs - Melissa Clark - 740-208-0906

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 Former Philo Power Plant 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 Former Philo Power Plant 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 Philo Bottom and Fly Ash ponds are immediately adjacent to the Muskingum River and do not impound water. It is expected that an impoundment dam breach or failure would be immediately attenuated within the Muskingum 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. (CSED D.1)

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 (CSED D.4) 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 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 – Shelly and Sands (740) 453-0316
    - Riprap – Shelly Materials (740) 438-8837
    - Sand bags – OK Coal (740) 452-3036
    - Equipment rental – CAT 1 740 455-8400

- Pumps – Goss Tool Rental (740) 454-2577
- Turbidity curtains – Ferguson Waterworks (740) 373-3456
- Concrete – Adams Bros (740) 452-7566

Controlled Copy Distribution List

- AEP
  - David Miller, PE – Director AMS
  - Blake Arthur, PE – Geotechnical Engineer
  - Corporate Communications
- Muskingum County EMA
  - Jeff Jadwin - Director

Log of Revisions

Date	Revision Number	Summary of Change
May 8, 2026	0	Initial Publication

Appendix A – Inundation Map

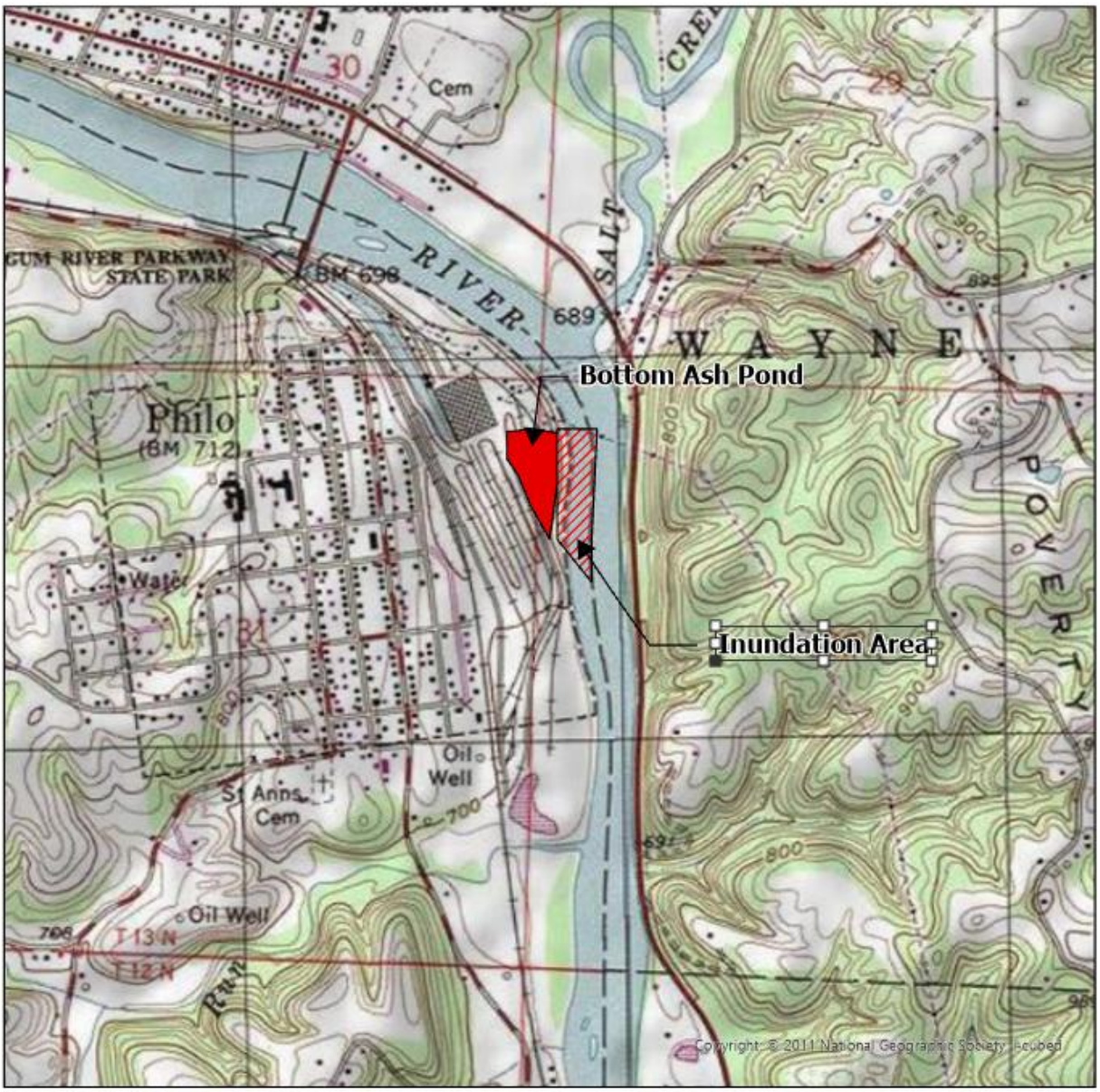
Philo Fly Ash Pond Inundation Map

Emergency Action Plan 2026

0 500 1,000 2,000 Feet

N

Philo Bottom Ash Pond Inundation Map



Emergency Action Plan 2026

0 500 1,000 2,000 Feet

N

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

CCR Emergency Action Plan Activation Documentation

Use this form to create the required operating record document for an unusual or emergency event (Activation) of the CCR unit Emergency Action Plan. Use multiple pages to document all events or actions taken.

CCR unit designation where event occurred: _____

_____

When and how was the event detected? _____

_____

General description of the unusual or emergency situation: _____

_____

_____

ACTIONS AND EVENT PROGRESSION

Date	Time	Event or Action Progression	Taken by

Report prepared by: _____ Date: _____