

HAZARD POTENTIAL CLASSIFICATION

CFR 257.73(a)(2)

Bottom Ash Pond Complex

Philo Site

Philo, Ohio

May, 2026

Prepared for: Ohio Franklin Realty

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PHILO BOTTOM ASH POND COMPLEX
LEGACY CCR SURFACE IMPOUNDMENT
HAZARD POTENTIAL CLASSIFICATION

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David A. Miller, P.E.
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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) (2).

1.0 OBJECTIVE

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 inactive electric generating facilities with legacy surface impoundments to conduct initial and periodic hazard potential classification assessments for each legacy CCR surface impoundment at the facility.

The Bottom Ash Pond Complex (BAP) at the Philo Site is subject to this rule.

2.0 HAZARD POTENTIAL DEFINITIONS

The Hazard Potential Classification System is defined according to 40 CFR 257.53 “Hazard potential classification”

[Hazard potential classification means the possible adverse incremental consequences that result from the release of water or stored contents due to failure of the diked CCR surface impoundment or mis-operation of the diked CCR surface impoundment or its appurtenances. The hazardous potential classifications include high hazard potential CCR surface impoundment, significant hazard potential CCR surface impoundment, and low hazard potential CCR surface impoundment, which terms mean:

(1) High hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation will probably cause loss of human life.

(2) Low hazard potential CCR surface impoundment means a diked surface impoundment 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 surface impoundment owner's property.

(3) Significant hazard potential CCR surface impoundment means a diked surface impoundment 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 impact other concerns.]

3.0 HAZARD DETERMINATION

The Philo BAP is located immediately adjacent to the Muskingum River. The impact of the failure or mis-operation of the pond would likely be bound by the banks of the Muskingum River. Failure or mis-operation of the pond could cause environmental damage but would not be expected to cause loss of human life.

Based on the Hazard Potential Classification definitions in 40 CFR 257.53 and the above discussion, the Philo BAP is classified as **Significant Hazard Potential**.