

Inflow Design Flood Control System Plan

May 8, 2026

Former Philo Power Plant Site

Fly Ash Pond - Legacy CCR Surface Impoundment

Ponded water is defined as water that collects above the ground surface, is visible, and hydraulically behaves as a free-surface hydrostatic body. The Inflow Design Flood Control System Plan demonstrates that CCR surface impoundments can safely manage ponded water flows during design storms.

Long term observations of the Former Philo Power Plant Site have demonstrated that Fly Ash Pond does not impound ponded water.

Therefore, the Inflow Design Flood Control System Plan is not applicable based on recognized and generally accepted engineering practices.

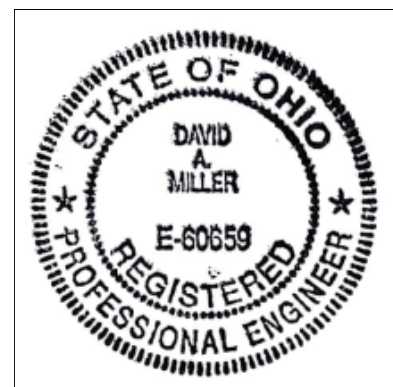
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I certify to the best of my knowledge, information and belief that this document meets the requirements of section 40 CFR § 257.82.