

# Emergency Action Plan

40 CFR 257.73(a)(3)

Ash Pond

Poston Site

Athens, Ohio

May, 2026

Prepared for: Ohio Franklin Realty

Prepared by: American Electric Power Service Corporation

1 Riverside Plaza

Columbus, OH 43215



# Poston Site – Ash Pond Emergency Action Plan

PREPARED BY \_\_\_\_\_ DATE \_\_\_\_\_

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REVIEWED BY \_\_\_\_\_ DATE \_\_\_\_\_

Dan Murphy, 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).

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## Introduction

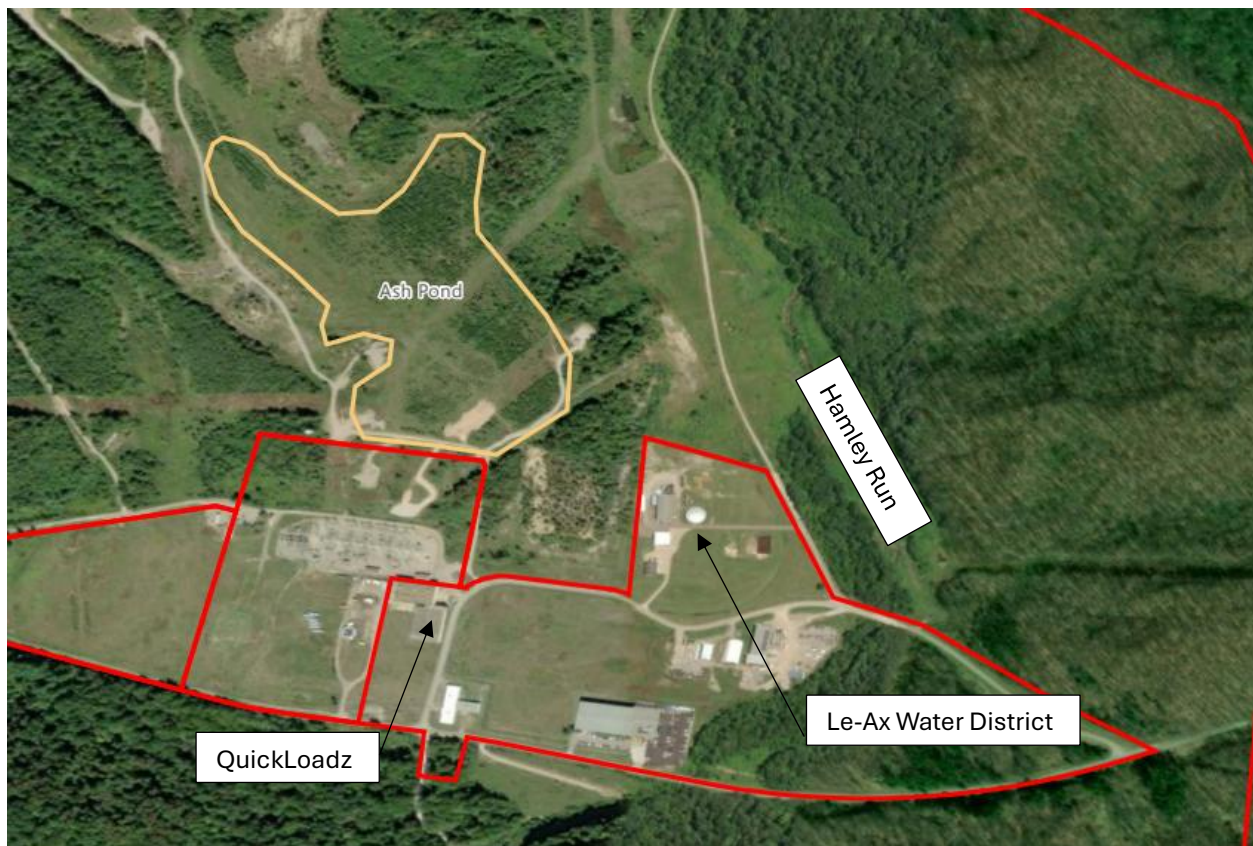
The “Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Legacy CCR Surface Impoundments”, 89 Fed. Reg. 38950 (May 8, 2024) (amending 40 C.F.R. §257) requires owners and operators of facilities with a legacy coal combustion residual (CCR) surface 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 Poston 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 Poston Site is located approximately 2 miles west of The Plains, Ohio. The latitude/longitude of the facility is: 39°23'10" N / 82°10'39" W. The facility address is: Intersection of Poston Rd. and Industrial Dr., Athens, OH 45701. The site can be reached from the North via State Route 33, turning on to State Route 681 south. From SR 681 west (right) onto Poston Rd. The site entrance is on the right side of Industrial Drive.



*Figure 1: Site Vicinity Map*

The Poston Plant was placed in service in 1949 and subsequently retired in 1987. The Ash Pond Dam was designed by Burgess and Niple, Limited in 1956. The Ash Pond Dam was constructed by H.R. Holderman, Inc. and construction inspection performed by Burgess and Niple, Limited.

The Ash Pond is located north of the former plant. The Ash Pond is formed by cross valley embankment dam and saddle dam. The embankment dam is 100 foot tall and 950 feet in length and the saddle dam is approximately 15 feet tall and 900 feet long. The embankment dam is located on the east side of the reservoir and the saddle dam to the south side of the reservoir. The Ash Pond is approximately 23 acres in surface area.

The crest width of the embankment is 20 feet wide; the upstream slope is 3 Horizontal on 1 Vertical (3H:1V) and the downstream slope varies between 2.5H:1V to 3H:1V. The embankment is zoned with an impervious core with a cutoff trench and a blanket/toe drain.

The spillway is a rectangular concrete chute that discharges into a stilling basin and subsequently to an excavated earthen channel left of the abutment. The stilling basin

has a catch basin with an 18-inch pipe to discharge low flow events. The decant water from the Ash Pond discharged into Hamley Run before flowing into the Hocking River.

The pond was graded to drain to the spillway and capped with 2 feet of clay in the 1980s when the Poston Power Plant was closed.

## 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.

<b>Alert Level Table</b>		
<b>Event</b>	<b>Situation</b>	<b>Alert Level</b>
Embankment Overtopping	No overtopping flow but water level within 6 inches of crest	Monitor
	Minor overtopping	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

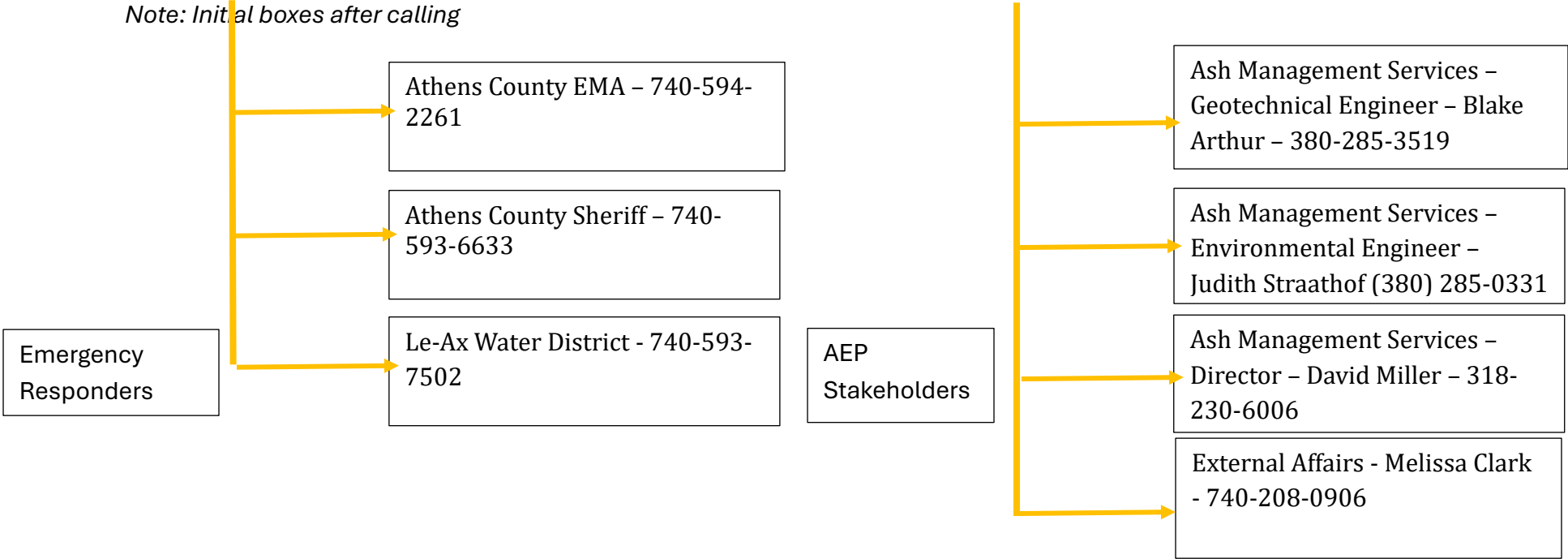
Watch or Warning Alert Level

Poston Site  
Ash Pond

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



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 Poston 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 Poston 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 maps. The Poston CCR Impoundment retains ash that is capped and covered. The breach model assumes that the ash is saturated, flowable, and develops a full breach of the south and east dams. Inundation areas vary based on potential flow characteristics of the ash, resulting in different potential inundation areas.

*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 Materials (740) 423-9803
  - Riprap – Shelly Materials (740) 438-8837
  - Sand bags – OK Coal (740) 452-3036
  - Equipment rental – Sunbelt Rental 740-593-7368

- Pumps – Sunbelt Rental 740-593-7368
- Turbidity curtains – Ferguson Waterworks (740) 373-3456
- Concrete – Hocking Valley Concrete (740) 592-5335

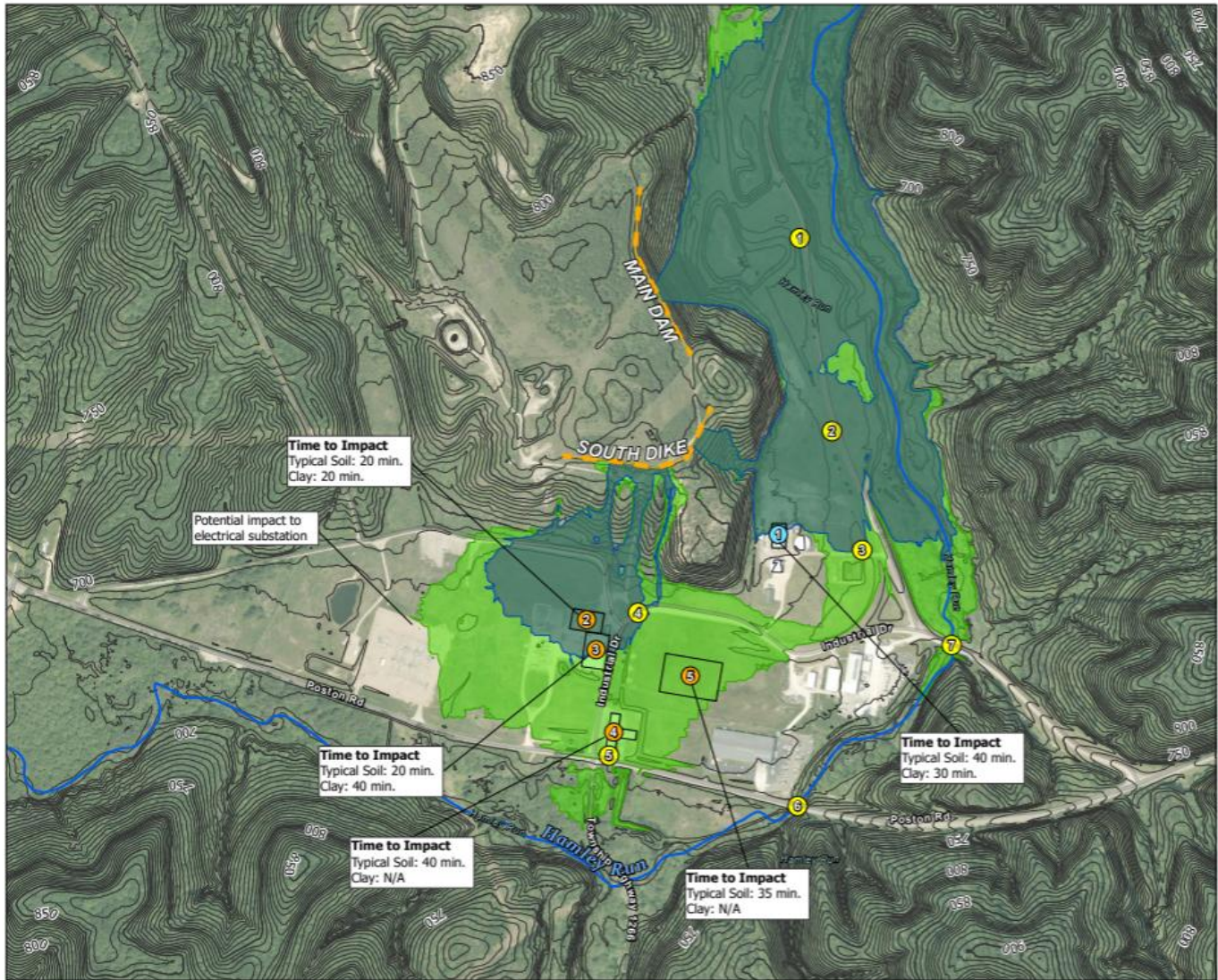
### Controlled Copy Distribution List

- AEP
  - David Miller, PE – Director AMS
  - Blake Arthur, PE – Geotechnical Engineer
  - Corporate Communications
- Athens County EMA
  - Teresa Fouts-Imer - Director

### Log of Revisions

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

## **Appendix A – Inundation Map**



### POSTON FLY ASH DAM BREACH INUNDATION MAPPING ATHENS COUNTY, OHIO

Panel 1 of 2

#### PANEL LOCATOR

#### LEGEND

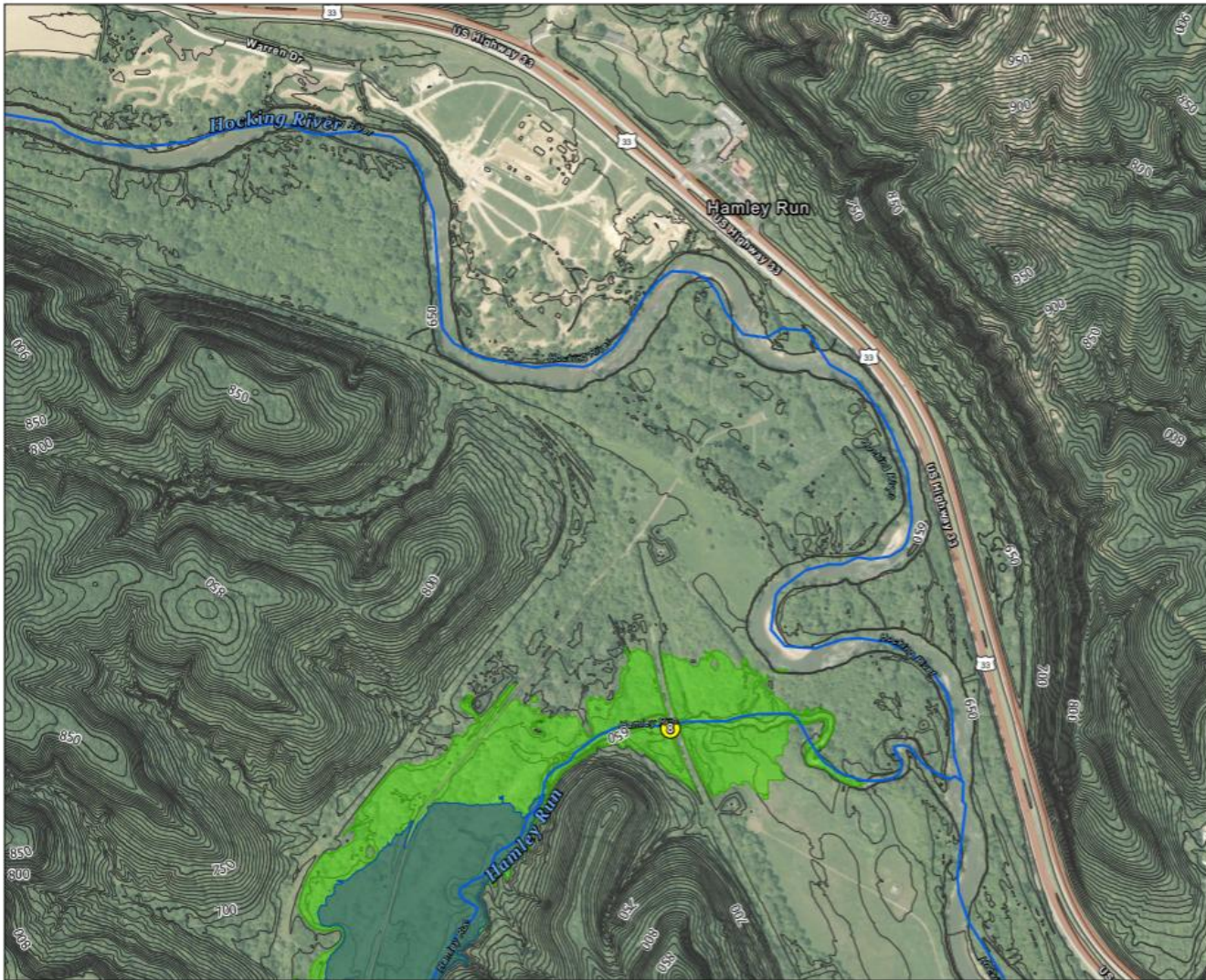
- Dam Centerline
- Sunny Day Breach - Clays
- Sunny Day Breach - Typical Soils
- ~ NHD Flowline
- Road Crossings

Potential Impact Locations

- Commercial/Industrial
- Water District Office

*Refer to Breach Model Report tables for detailed results at pertinent locations/road crossings.*

*The methods used to develop inundation zones and flood wave arrival times are approximate and should only be used as guidance for establishing evacuation zones. Actual areas inundated will depend on actual failure and pre-failure hydrologic conditions and may differ significantly from information shown on maps.*



**POSTON FLY ASH DAM  
BREACH INUNDATION MAPPING  
ATHENS COUNTY, OHIO**  
Panel 2 of 2

**PANEL LOCATOR**

**LEGEND**

- Dam Centerline
- Sunny Day Breach - Clays
- Sunny Day Breach - Typical Soils
- NHD Flowline
- Road Crossings

Potential Impact Locations

- Commercial/Industrial
- Water District Office

*Refer to Breach Model Report tables for detailed results at pertinent locations/road crossings.*

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0      0.1      0.2 Miles

0      250      500      1,000 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**

