

# HAZARD POTENTIAL CLASSIFICATION

**CFR 257.73(a)(2)**

Ash Pond

Poston Site

Athens, Ohio

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Prepared for: Ohio Franklin Realty

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POSTON ASH POND  
LEGACY CCR SURFACE IMPOUNDMENT  
HAZARD POTENTIAL CLASSIFICATION

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

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APPROVED BY David A. Miller DATE 04.10.2026

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 Ash Pond at the Poston 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 Poston Ash Pond main dam is located within 800 feet of Hamley Run, a tributary of the Hocking River. The impact of the failure or mis-operation of the pond main dam would likely be bounded by the banks of Hamley Run and the Hocking River. Failure or mis-operation of the pond main dam could cause environmental damage but would not be expected to cause loss of human life. The Poston Ash Pond southern saddle dam is located within 800 feet of an industrial park. The impact of the failure or mis-operation of the pond saddle dam could cause loss of human life. Maps of the inundation area from the Poston Ash Pond is provided in the Emergency Action Plan.

Based on the Hazard Potential definitions in 40 CFR 257.53 and the above discussion, the Poston Ash Pond is classified as **High Hazard Potential**.