

Closure Completion Notification for Closure by Removal

September 26, 2024

Closure Completion Notification

John E. Amos Plant

Bottom Ash Pond Complex

On September 4, 2024, the John E. Amos Plant Bottom Ash Pond Complex was transitioned to closure status in accordance with 40 CFR 257.102. This notice of completion of closure is being placed in the operating record in accordance with 40 CFR 257.102(h).

Effective with the Closure Completion Notification, the former ash storage site is no longer a CCR unit. The following operating record documents are no longer required going forward:

- Hazard Potential Classification
- Emergency Action Plan
- Face to Face Meeting Documentation for EAP
- History of Construction and Revisions for Surface Impoundments
- Structural Stability Assessments
- Safety Factor Assessments
- Fugitive Dust Plan
- Inflow Design Flood System Control Plan

CLOSURE CERTIFICATION BY QUALIFIED PROFESSIONAL ENGINEER

I certify that the John E. Amos Bottom Ash Pond Complex has been closed in accordance with the most recent written closure plan specified by paragraph §257.102(b) and the requirements of section §257.102.

David Anthony Miller

Printed Name of Licensed Professional Engineer

David Anthony Miller

Signature



22663

License Number

West Virginia

Licensing State

09.26.2024

Date



Charleston Office
500 Lee Street, East, Suite 700
Charleston, West Virginia 25301

T 304.926.8100
F 304.926.8180

August 5, 2024
Project No. R210487.00

Mr. Brian G Palmer, PE
Principal Engineer
AEP
1 Riverside Plaza
Columbus, Ohio 43215

**AEP – John E. Amos
Bottom Ash Complex
Pond Closure - Completion
Putnam County, West Virginia**

Dear Mr. Palmer:

GAI Consultants, Inc. (GAI) appreciates the opportunity to provide American Electric Power Service Corporation (AEP) with the Quality Assurance / Quality Control and certification services for the closure of the Bottom Ash Complex at the John E. Amos Plant located in Putnam County, West Virginia.

This letter documents that removal of the coal combustion residual material from the bottom ash complex was completed in substantial compliance with the Construction Documents completed by Worley, the Closure Plan and 40 CFR 257.102(c).

The areas of the bottom ash complex were certified as they were completed. The following presents the areas and certification date:

- Pond 1B – April 21, 2023
- Clearwater and Reclaim Ponds – July 24, 2023
- Pond 1A – August 5, 2024

If you have any questions or require additional information, please contact me at 681.245.8866 (c.straley@gaiconsultants.com).

Respectfully submitted.,

GAI Consultants, Inc.

Charles F. Straley, PE

Digitally signed by Charles F. Straley, PE
DN: C=US,
E=c.straley@gaiconsultants.com, O="GAI
Consultants, Inc.", CN="Charles F. Straley,
PE"
Date: 2024.08.05 15:16:48-04'00'

Charles F. Straley, PE, PLS
Quality Assurance Officer / Certifying Engineer
Engineering Director / Senior Associate

CFS

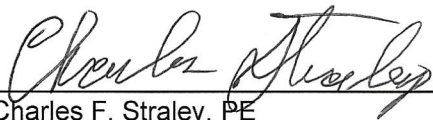
5.0 PE Certification

Based on the observations performed by GAI Consultants, Inc. personnel, I hereby certify that the removal of CCR material to be visually removed and one-foot additional undercut within Pond 1B and along the southern edge of Pond 1A of the CCR/ELG Project Bottom Ash Pond Closure and Repurposing Project at the John E. Amos Plant near Winfield, West Virginia (WV), as shown on the Worley Construction Drawings has been completed in substantial compliance with the Construction Documents, the Closure Plan and 40 CFR 257.102(c).

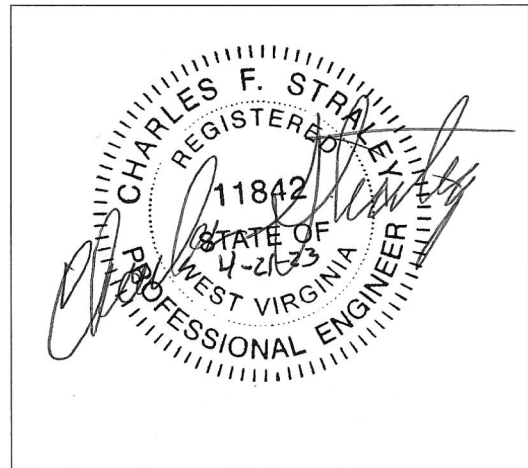
This document clarifies "certification" for the excavation of CCR material to be visually removed and an additional one-foot of undercut within Pond 1B and along the southern edge of Pond 1A of the CCR/ELG Project Bottom Ash Pond Closure and Repurposing Project. This certification is strictly limited to CQA observations of CCR removal and does not include the groundwater monitoring and compliance aspect of the CCR Unit closure by removal criteria, as required by 40 CFR 257.102(c).

The definition of certify as used herein is: Certify means to state or declare a professional opinion of conditions whose true properties cannot be known at the time such certification was made, despite appropriate professional evaluation. A design professional's certification in no way relieves any other party from meeting requirements imposed by contract or other means, including commonly accepted industry practices.

Bearing the above in mind and based on the results of monitoring of construction efforts during the project and review of the survey points; GAI's professional opinion is that the CCR material within Pond 1B and along the southern edge of Pond 1A and additional one-foot undercut of the CCR/ELG Project Bottom Ash Pond Closure and Repurposing Project meets the requirements as set forth by the project documents and the CCR Rule.



Charles F. Straley, PE
West Virginia Number 11842



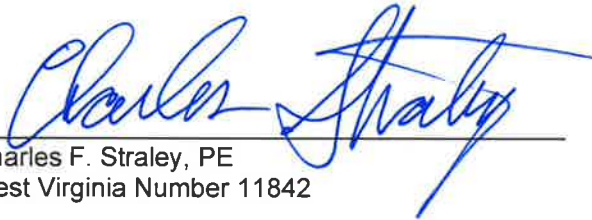
5.0 PE Certification

Based on the observations performed by GAI Consultants, Inc. personnel, I hereby certify that the removal of CCR material to be visually removed and one-foot additional undercut within Clearwater & Reclaim Ponds of the CCR/ELG Project Bottom Ash Pond Closure and Repurposing Project at the John E. Amos Plant near Winfield, West Virginia (WV), as shown on the Worley Construction Drawings has been completed in substantial compliance with the Construction Documents, the Closure Plan and 40 CFR 257.102(c).

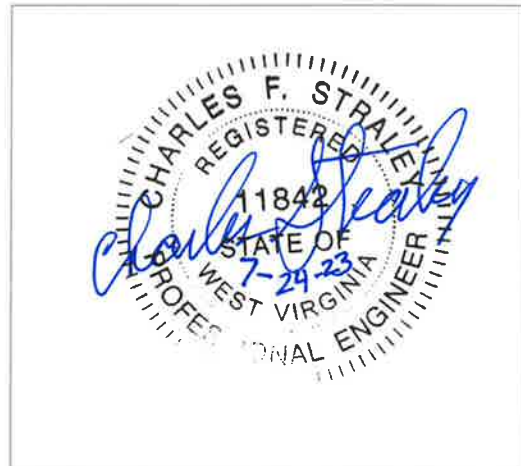
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Bearing the above in mind and based on the results of monitoring of construction efforts during the project and review of the survey points; GAI's professional opinion is that the removal of CCR material within Clearwater & Reclaim Ponds and additional one-foot undercut of the CCR/ELG Project Bottom Ash Pond Closure and Repurposing Project meets the requirements as set forth by the project documents and the CCR Rule.



Charles F. Straley, PE
West Virginia Number 11842



5.0 PE Certification

Based on the observations performed by GAI Consultants, Inc. personnel, I hereby certify that the removal of CCR material to be visually removed and one-foot additional undercut within Pond 1A of the CCR/ELG Project Bottom Ash Pond Closure and Repurposing Project at the John E. Amos Plant near Winfield, West Virginia (WV), as shown on the Worley Construction Drawings has been completed in substantial compliance with the Construction Documents, the Closure Plan and 40 CFR 257.102(c).

This document clarifies "certification" for the excavation of CCR material to be visually removed and an additional one-foot of undercut within Pond 1A of the CCR/ELG Project Bottom Ash Pond Closure and Repurposing Project. This certification is strictly limited to CQA observations of CCR removal and does not include the groundwater monitoring and compliance aspect of the CCR Unit closure by removal criteria, as required by 40 CFR 257.102(c).

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Bearing the above in mind and based on the results of monitoring of construction efforts during the project and review of the survey points; GAI's professional opinion is that the CCR material within Pond 1A and additional one-foot undercut of the CCR/ELG Project Bottom Ash Pond Closure and Repurposing Project meets the requirements as set forth by the project documents and the CCR Rule.



Charles F. Straley, PE
West Virginia Number 11842



APPALACHIAN POWER CO.
Amos Bottom Ash Complex (WV DEP DAM PERMIT # 07019)
Hazard Potential Classification Assessment

AEP has performed an evaluation to classify the above CCR Surface Impoundment in accordance with FEMA's Hazard Potential Classification System for Dams. These guidelines evaluate the consequences of a potential failure not the likelihood of a failure. Guidelines that were developed and utilized are included below.

Hazard Potential Classification Systems (from FEMA 333, April 2004)

1. Low Hazard Potential

Dams assigned the low hazard potential classification are those 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 owner's property.

2. Significant Hazard Potential

Dams assigned the significant hazard potential classification are those dams 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 can impact other concerns. Significant hazard potential classification dams are often located in predominantly rural or agricultural areas but could be located in areas with population and significant infrastructure.

3. High Hazard Potential

Dams assigned the high hazard potential classification are those where failure or mis-operation will probably cause loss of human life.

The Amos Bottom Ash Complex is situated along Bills Creek, a tributary of Kanawha River. The impact of the failure or mis-operation of the dam will result in no probable loss of human life but can cause minor economic loss and/or environmental damage. The West Virginia Dam Safety Group has classified this facility as a Significant Hazard Potential. The US EPA Assessment report also identified this facility as Significant Hazard.

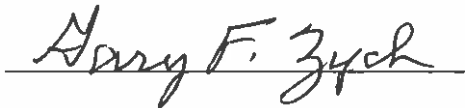
There has been no changes in classification by the State Dam Safety nor has there been any other physical changes that would warrant a change in the classification.

Based on the FEMA Hazard Potential Classification Systems for Dams and on the above discussion, The Amos Bottom Ash Complex is classified as a **Significant Hazard Potential Dam**.

Professional Engineer's Certification:

I certify that this Hazard Potential Classification Assessment is in accordance with the requirements of section 40 CFR 257.73 (a)(2)(i).

Gary F Zych, PE,



7/28/2021