CLOSURE PLAN

CFR 257.102(b)

Fly Ash Reservoir 1 Landfill
Cardinal Plant
Brilliant, Ohio

September, 2016

Prepared for: Cardinal Operating Company - Cardinal Plant

Brilliant, Ohio

Prepared by: Geotechnical Engineering Services

American Electric Power Service Corporation

1 Riverside Plaza

Columbus, OH 43215



CLOSURE PLAN CFR 257.102(b) FLY ASH RESERVOIR FAR1 LANDFILL **CARDINAL PLANT**

GERS-16-064

PREPARED BY

9/02/2016

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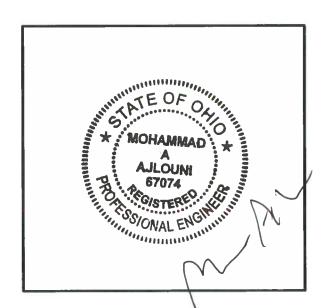
DATE

APPROVED BY

DATE

9/8/2016

Manager - AEP Geotechnical Engineering



I certify to the best of my knowledge, information, and belief that the information contained in this closure plan meets the requirements of 40 CFR § 257.102

I certify to the best of my knowledge, information and belief that design of the final cover system as described in this closure plan meets the requirements of 40 CFR § 257.102.

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1.0 OBJECTIVE

This report was prepared by AEP- Geotechnical Engineering Services (GES) section to fulfill requirements of CFR 257.102(b) for Closure Plans of CCR units.

2.0 DESCRIPTION OF THE CCR UNIT

The Cardinal Fly Ash Reservoir 1 (FAR 1) Residual Solid Waste Landfill is located in Jefferson County, Brilliant, Ohio. The landfill is owned by Buckeye Power and AEP Generation Resources (GENCO) a unit of American Electric Power. The landfill is operated by Cardinal Operating Company-Cardinal Plant. Cardinal Landfill is being constructed under Permit To Install (PTI) No. 06-07993, issued on May 11, 2007. The Cardinal Power Plant in Wells Township, Jefferson County, near the town of Brilliant in eastern Ohio.

The 127 acre landfill consists of two phases and six cells. Phase 1 overlies the bench area between the FAR 1 impoundment and the highwall and consists of Cells 1 and 2 in addition to Cell 3. Phase 2 will be developed over the FAR 1 impoundment (except for Cell 3) and consists of Cells 4 – 6. The FAR 1 landfill receives gypsum from the plant via trucks.

3.0 DESCRIPTION OF CLOSURE PLAN 257.102(b)(1)(i)

[A narrative description of how the CCR unit will be closed in accordance with this section]

The FAR 1 Landfill will be closed by closure in place. The FAR 1 Landfill will be closed periodically during the life of the facility. The closure activities are further discussed in the OEPA-approved Closure Plan in Attachment A. This Plan in Attachment A contains all of the pertinent information and requirements of Section 257.102 (b).

4.0 CLOSURE IN PLACE 257.102 (b)(1)(iii)

[If closure of the CCR unit will be accomplished by leaving the CCR in place, a description of the final cover system, designed in accordance with paragraph(d) of this section, and the methods and procedures to be used to install the final cover. The closure plan must also discuss how the final cover system will achieve the performance standards specified in paragraph (d) of this section.]

4.1 CLOSURE PERFORMANCE STANDARDS 257.102 (d)(1)

4.1.1 SECTION 257.102(d)(1)(i)

[Control, minimize or eliminate, the maximum extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate, or contaminated run-off to the ground or surface waters or to the atmosphere.]

The final cover system is designed to minimize infiltration into the landfill.

4.1.2 SECTION 257.102(d)(1)(ii)

[Preclude the probability of future impoundment of water, sediment, or slurry.]

The final surface areas will be graded to a minimum slope of 2% to prevent the ponding of surface water runoff. Drainage features will be designed to have positive drainage.

4.1.3 SECTION 257.102(d)(1)(iii)

[Include measures that provide for major slope stability to prevent the sloughing or movement of the final cover system during the closure and post-closure care period.]

The final cover system will be graded with side slopes with a minimum of 2% slope and a maximum 3:1 slope with channels provided to drain stormwater. The final configuration of the facility will meet the stability requirements to prevent the sloughing or movement of the final cover system during the closure and post-closure care period.

4.1.4 SECTION 257.102(d)(1)(iv)

[Minimize the need for further maintenance of the CCR unit.]

The facility will be vegetated to prevent erosion. Maintenance of the final cover system will include mowing.

4.1.5 SECTION 257.102(d)(1)(v)

[Be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices.]

The CCR unit will be closed in a timeframe consistent with recognized and generally accepted good engineering practices. As the fill reaches the approved final grades, periodic closure activities may occur.

4.2 DRAINING AND STABILIZING OF THE SURFACE IMPOUNDMENT 257.102(d)(2)

[The owner or operator of a CCR surface impoundment of any lateral expansion of a CCR surface impoundment must meet the requirements of paragraph (d)(2)(i) and (ii) of this section prior to installing the final cover system required under paragraph (d)(3) of this section.]

This section is not applicable to a landfill.

4.3 FINAL COVER SYSTEM 257.102 (d)(3)

[If a CCR unit is closed by leaving CCR in place, the owner or operator must install a final cover system that is designed to minimize infiltration and erosion, and at a minimum, meets the requirements of paragraph (d)(3)(i) of this section, or the requirements of the alternative final cover system specified in paragraph (d)(3)(ii) of this section.

The final cover system must be designed and constructed to meet the criteria in paragraphs (d)(3)(i)(A) through (D) of this section. The design of the final cover system must be included in the written closure plan.]

The final cover system as described in Attachment A meets the requirements of the referenced paragraphs.

5.0 ESTIMATE OF MAXIMUM CCR VOLUME 257.102 (b)(1)(iv)

[An estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit.]

The estimated maximum CCR volume ever on-site is approximately 18,943,000 yd³.

6.0 ESTIMATE OF LARGEST AREA OF CCR REQUIRING COVER 257.102 (b)(1)(v)

[An estimate of the largest area of CCR unit ever requiring a final cover

The largest area of the CCR unit ever requiring a final cover is 30 acres.

7.0 CLOSURE SCHEDULE 257.102(b)(1)(vi)

[A schedule for completing all activities necessary to satisfy the closure criteria in the section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including identification of major milestones such as coordinating with and obtaining necessary approvals and permits from other agencies, the dewatering and stabilization phases of the CCR surface impoundment closure, or installation of the final cover system, and the estimated timeframes to complete each step or phase of the CCR unit closure.

At this time, the facility will close upon retirement of the power plant. Once the CCR unit requires closure a schedule to satisfy this section will be prepared and the Plan amended.

ATTACHMENT A

Closure Plan from approved landfill permit

Final Closure/Post-Closure Plan

OAC 3745-30-05 (C)(9)(d)/OAC 3745-30-09

PERMIT-TO-INSTALL APPLICATION CARDINAL FAR 1 RESIDUAL WASTE LANDFILL FACILITY

VOLUME 5

Submitted to

Ohio Environmental Protection Agency

Submitted and Owned by

Cardinal Operating Company

Brilliant, Ohio

Prepared by

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May 2006

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Appendix A Supporting Closure and Post-Closure Care Cost Calculations

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LIST OF ACRONYMS

BAT Best Available Technology

EPA Environmental Protection Agency

FAD Fly Ash Dam

FAR Fly Ash Reservoir

FGD Flue Gas Desulfurization
HDPE High Density Polyethylene
OAC Ohio Administrative Code

QA/QC Quality Assurance/Quality Control

RSB Recompacted Soil Barrier
RSL Recompacted Soil Liner
RWL Residual Waste Landfill

1. INTRODUCTION

This residual waste facility Final Closure/Post-Closure Plan presents information for the closure and post-closure operations of the Cardinal Operating Company's Fly Ash Reservoir 1 (FAR 1) Residual Waste Landfill (RWL) Facility pursuant to Ohio Adiministrative Code (OAC) 3745-30-09 and OAC 3745-30-10. Drawings referenced herein are presented in the accompanying Permit-to-Install (PTI) drawing set.

2. FACILITY LOCATION

The Cardinal FAR 1 Residual Waste Landfill (RWL) is located approximately 1.5 miles north of the Cardinal Plant electrical generating facility located near the town of Brilliant in Wells Township, Jefferson County, Ohio. More specifically, the RWL is located approximately 6,500 feet northeast of the intersection of Riddles Run Road (Township Road 163) and Township Road 164.

Cardinal FAR 1 Residual Waste Landfill Facility

3. VARIANCES/EXEMPTIONS

At this time Cardinal Operating Company has not requested any variance or exemptions to the requirements specified in OAC 3745-30-09 or OAC 3745-30-10, for residual waste landfills.

4. FACILITY CONTACTS

Any questions regarding the FAR 1 RWL during the final closure and post-closure care period should be directed to:

American Electric Power Waste Management and Mitigation Services Manager 1 Riverside Plaza Columbus, Ohio 43215 Ph. (614) 716-1266

or

Cardinal FAR 1 Landfill Manager 306 County Road 7E Brilliant, Ohio 43913 Ph. (740) 598-6540

5. PLANS AND DETAIL DRAWINGS

The plans showing the horizontal limits and top elevations of the waste, the cover system, and the surface water control structures are shown on Drawings 4K, 4M and 4N, respectively. Drawing 4N, the stormwater management plan, shows the permanent stormwater run-on and run-off controls and as well as FAR 2 (which receives treated leachate, as necessary, and non-contact stormwater from the FAR 1 RWL). Detail drawings of the RWL stormwater controls are included on Drawings 7D and 7E. The detail drawings of the cover system are included on Drawing 7F.

6. STATIC AND SEISMIC STABILITY ANALYSIS

The static and seismic stability analyses for the proposed completed landfill are provided in the *Stability Analysis Report* (Volume 3).

All factor of safety values calculated exceed the required minimum values of 1.50 for static conditions and 1.00 for seismic conditions, which are provided in OAC 3745-30-07(C)(11)(c) and OAC 3745-30-07(C)(11)(d) respectively, indicating that the proposed RWL is stable with respect to static and seismic conditions.

7. GROUNDWATER MONITORING PLAN

The Groundwater Monitoring Plan is included in Volume 1.

8. FINANCIAL ASSURANCE

Cardinal Operating Company will annually review, adjust and submit final closure and post-closure care cost estimates for the Cardinal FAR 1 RWL in accordance with OAC 3745-30-14(E)(14). The corporate guarantee will be used annually to demonstrate financial assurance for final closure and post-closure care. A draft copy of the financial assurance instrument is included in Appendix B.

The placement of final cover soils constitutes the most significant portion of final closure costs. Although the 127 acre footprint RWL will eventually be closed, the closure costs, as presented in this document, are based on the cost of closing the site at the time the largest area would require closure. The largest closure area would be approximately 53 acres and would occur after the completion of Phase 1 (Cells 1 and 2). The primary RWL closure components include placement and testing of the recompacted soil barrier (RSB), placement of the vegetative layer and establishing a vegetative cover, installing stormwater controls and implementing erosion control measures. As summarized in Table 1, the final closure costs for the Cardinal FAR 1 RWL are estimated to be \$8,172,280. Supporting cost estimate calculations are included in Appendix A.

Post-closure care activities will begin following closure certification and will continue for 15 years. Post-closure care components will consist primarily of monitoring (groundwater, surface water and leachate) and maintenance (cover system, leachate and surface water control systems, monitoring wells and access controls). As summarized in Table 2, the total post-closure care costs for the FAR 1 RWL are estimated to be \$4,353,120. Supporting cost estimate calculations are included in Appendix A.

9. CLAY RESOURCES

The clay resources for the Cardinal FAR 1 RWL will be supplied from company owned borrow areas within a ten-mile radius of the landfill facility. It is anticipated that adequate resources will be available to satisfy the needs of the RWL through final closure and the post-closure care period. It is estimated that 489,961 cubic yards of RSB material and 604,370 cubic yards of cover soil would be required to construct a final cover system of the residual waste landfill over 165 acres of sloped and unsloped surfaces, including the extended cap over FAR 1 areas not within the limits of waste.

10. QUALITY ASSURANCE/QUALITY CONTROL PLAN

The *Quality Assurance and Quality Control Plan* is included in Volume 5. Section 5.7 of the *Quality Assurance and Quality Control Plan* addresses the material qualification, test pad construction, and material placement specifications to ensure that the cover system is constructed in a manner consistent with the performance standards established in OAC 3745-30.

11. EROSION CONTROL

Erosion and sediment control procedures are detailed on Drawings 7D, 7E and 7F. As indicated on Drawing 7E, soil erosion and sediment control practices will be implemented pursuant to the Ohio Rainwater and Land Development Manual and erosion and sediment controls will be maintained until construction is completed and/or the area is stabilized (i.e. vegetation is established). Supporting stormwater/surface water calculations are included in Volume 4.

12. MANDATORY CLOSURE CONDITIONS/NOTIFICATIONS

Final Closure will be completed in a manner that minimizes the need for maintenance activities. Final Closure will be initiated when one of the following conditions have occurred:

- 1. Cardinal Operating Company declares that no more residual waste will be accepted at the facility;
- 2. The facility's solid waste license has expired and another license has not been applied for:
- 3. All approved limits of waste placement have been reached;
- 4. The facility's solid waste license has expired and another license has been applied for and denied as a final action;
- 5. The facility's solid waste license has been revoked as a final action; or
- 6. The facility's solid waste license has been suspended as a final action.

Cardinal Operating Company will provide written notice by certified mail to Ohio EPA, the Jefferson County General Health District and the Belmont/Jefferson Regional Solid Waste Authority at least ninety (90) days in advance of commencing final closure if initiated by condition numbers 1, 2, or 3 above. Any changes to the information that identifies the facility's contact person will be provided to the Ohio EPA in writing by certified mail at least thirty (30) days prior to commencing final closure. Within seven (7) days of the date that the facility actually ceases to accept waste, written notice by certified mail will be provided to the Ohio EPA and the Jefferson County General Health District, informing the agency of the actual date.

13. FINAL CLOSURE ACTIVITIES

Final closure activities will begin within seven days of the date that the facility has ceased to accept waste. Final closure activities include:

- 1. Constructing the final cover system;
- 2. Establishing vegetative cover;
- 3. Constructing and maintaining drainage and erosion/sediment controls;
- 4. Operating and maintaining treatment and monitoring systems;
- 5. Securing the facility; and
- 6. Closure certification and deed notation.

The primary closure activity is the placement of the cover system that will consist of a minimum two (2) foot thick low permeable RSB and thirty (30) inches of soil to protect the RSB from freeze/thaw cycles and support a vegetative cover. The material used to construct the RSB will be qualified, placed and tested in accordance with the approved *Quality Assurance/Quality Control Plan* (Volume 5). The final grades of the completed cover system are shown on Drawing 4M. With the exception of the benches the cover system will have minimum slopes of five (5) percent and maximum slopes of thirty-three (33) percent to minimize the potential for standing water.

The final cover system will be constructed in a progressive manner with additional areas being completed in most years. As outer slopes reach final waste grades, the final cover system will be constructed on these areas during the summer/early fall months and seeded.

Benches, ditches and culverts will be constructed and maintained to efficiently collect and convey surface water run-off to FAR 2. Temporary sediment and erosion control measures will be installed, as necessary, until a dense vegetative cover is established. Surface water control structures will be inspected routinely to monitor erosion or blockage of flow.

The RWL's security will be maintained during the closure and post-closure period unless the facility is to be used for other purposes as deemed acceptable by the Ohio EPA. Access will be maintained to all active monitoring sites throughout the post-closure care period.

All final closure activities will be completed with one (1) year of the date that the facility ceased accepting waste unless an alternative schedule has been approved by the Ohio EPA. Within ninety (90) days of completing final closure activities, the final closure certification report will be submitted to the Ohio EPA and will include:

- 1. Documentation on the construction of the final cover system;
- 2. A topographic map of the closed facility showing the information specified in OAC 3745-30-09(H)(1):
- 3. Documentation on the groundwater monitoring system;
- 4. A copy of the plat and deed notation filed with the County Recorder; and

Final Closure/Post-Closure Plan Permit-to-Install Application

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5. Documentation that the facility is protected from unauthorized access.

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14. POST-CLOSURE CARE ACTIVITIES

Post-closure care activities will begin upon submittal of the final closure certification and will continue for a period of fifteen (15) years unless shortened or extended in accordance with OAC 3745-30-10(B). Post-closure care activities will include:

- 1. Continued operation and maintenance of the leachate management system, the stormwater/surface water management system and the groundwater monitoring program;
- 2. Maintenance of the final cover system;
- 3. Monitoring for leachate outbreaks and implementing remedial actions as necessary;
- 4. Fulfilling all inspection, monitoring, and reporting requirements; and
- 5. Submitting a post-closure care certification

Inspections of the closed RWL facility will be conducted quarterly throughout the postclosure care period. A written summary of the inspection will be submitted to the Ohio EPA within fifteen (15) days of conducting the inspection. The inspection report will document the nature and extent of any problem areas identified, as well as provide an estimated starting and completion date for required corrective measures to be taken.

The leachate and stormwater/surface water management systems, including piping, ditches, berms, and culverts, will be inspected for erosion, ponding, blockage of flow, sediment accumulation, and other evidence of improper performance. Discharge structures associated with FAR 2 will also be inspected to ensure operational performance.

Groundwater monitoring well locks, casing protectors and surface seals will be visually inspected during each sampling event and any unusual operational problems will be described in the groundwater reports submitted to the Ohio EPA.

The final cover system will be inspected for evidence of ponding, settlement and erosion, as well as damage caused by burrowing animals. Any damaged areas will be repaired by replacing the materials and restoring the site to final grade. If a condition reoccurs or persists, an investigation will be conducted to determine if a more permanent solution is warranted. Any permanent corrective measures that involve revisions to the facility's authorizing documents will be submitted to the Ohio EPA for review.

The condition of the vegetative cover will be evaluated (i.e. thickness, bare spots, invasive woody species) during each inspection. Corrective actions such as reseeding, fertilizing and selective herbicide applications will be implemented as necessary. Maintenance mowing will be conducted as necessary to discourage woody plant growth and to maintain the appearance and health of the vegetation.

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In addition to the quarterly inspection reports, the facility will continue to monitor and report stormwater/surface water discharges during the post-closure care period in accordance with the facility's NPDES permit. It is anticipated that groundwater monitoring and reporting will continue on a semiannual basis. An annual report will be submitted containing a summary of the quantity of leachate generated, characteristics of the leachate and treatment received. The annual report will also update post-closure cost estimates.

Upon completion of the post-closure care period, a written certification will be prepared and submitted to the Ohio EPA with supporting documentation that all post-closure care activities have been completed in accordance with OAC 3745-30-10(D). The certification will be signed and sealed by a professional engineer registered in Ohio.

Table 1 Closure Cost Summary

Final Closure/Post-Closure Plan Permit-to-Install Application Cardinal FAR 1 Residual Waste Landfill Facility

Closure Component		Cost
Cap System Components		\$ 6,146,300
Permanent Surface Water Structures	S	\$ 255,600
Site Access Control		\$ 257,000
Engineering (QA/QC)		\$ 130,500
	Subtotal of Closure Costs	\$ 6,789,400
Administration	10 % of subtotal:	\$ 678,940
Certification of Closure		\$ 25,000
Contingency	10 % of subtotal:	\$ 678,940

NA = Not Applicable

Table 2 Post-Closure Care Cost Summary

Final Closure/Post-Closure Plan Permit-to-Install Application Cardinal FAR 1 Residual Waste Landfill Facility

Post-Closure Care Component	Cost
Ground Water Monitoring	\$ 42,920
Leachate Monitoring	\$ 365
Surface Water Monitoring	\$ 365
Operation and Maintenance of Leachate Collection / Treatment Systems	\$ 10,000
Operation, Maintenance and Abandonment of Ground Water Monitoring Wells	\$ 11,433
Maintenance of Cover System	\$ 90,750
Operation and Maintenance of Surface Water Management System	\$ 18,000
Operation and Maintenance of Access Control Structures	\$ 57,000
Subtotal of Annual Post-Closure Care Costs	\$ 230,833
Subtotal of 15 Years of Post-Closure Care Costs	\$ 3,462,495
Administration 10 % of subtotal:	\$ 346,250
Final Certification Upon Completion of Post-Closure Care Period	\$ 25,000
Remedial Costs 15 % of subtotal:	\$ 519,375
TOTAL COST OF POST CLOSURE CARE	\$ 4,353,120

NA = Not Applicable

