## POST CLOSURE PLAN

CFR 257.104(d)

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



GERS-16-065

## POST CLOSURE PLAN CFR 257.104(d) FLY ASH RESERVOIR FAR1LANDFILL **CARDINAL PLANT**

GERS-16-065

PREPARED BY

DATE

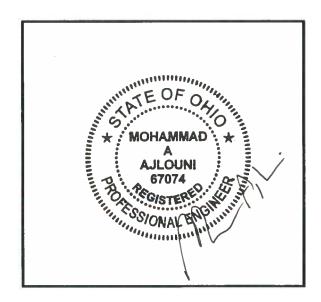
9/02/2016

**REVIEWED BY** 

APPROVED BY

Ayst. 9, 2016 9/12/2016

Manager - AEP Geotechnical Engineering



I certify to the best of my knowledge, information, and belief that the information contained in this post closure plan meets the requirements of 40 CFR § 257.104

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Attachment A: Post Closure Care Plan from approved landfill permit

#### 1.0 OBJECTIVE

This report was prepared by AEP- Geotechnical Engineering Services (GES) section to fulfill requirements of CFR 257.104(d) for Post Closure Plans of CCR units.

#### 2.0 DESCRIPTION OF THE CCR UNIT

The Cardinal Fly Ash Reservoir 1 (FAR1) 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 I landfill receive gypsum from the plant via trucks.

#### 3.0 DESCRIPTION OF POST CLOSURE PLAN 257.104(d)(1)(i)

[A description of the monitoring and maintenance activities required in paragraph (b) of this section for the CCR unit, and the frequency at which these activities will be performed.]

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), however, the post closure care period will be 30 years not 15 years as indicated in the attachment.

#### 3.1 SECTION 257.104(b)(1)

[Maintaining the integrity and effectiveness of the final cover system including making repairs to the final cover as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover.]

Inspections are performed for the items noted below. The inspection frequencies are scheduled to properly detect any issues so that repairs can be performed before significant harm occurs.

- <u>Embankment</u>: The entire waste embankment, including top surface and side-slopes, will be inspected for slides, settlement, subsidence, displacement, and cover condition (see below).
- Soil Dike: The soil dike will be inspected for slides, displacement, and erosion.
- <u>Cover</u>: The final cover will be inspected for erosion and for the condition of the vegetated cover,
  i.e., gaps in vegetation or presence of undesirable trees or brush. The integrity of the cover
  drainage system will also be inspected.
- <u>Final Cover Surface</u>: The Final Cover surface will be inspected for any ponding of water or flat areas.

- <u>Surface Drainage System</u>: The surface drainage system, including channels, culverts, slope drains, etc., will be inspected for erosion, integrity of channel lining, ponding, and accumulated sediment.
- <u>Leachate Collection Piping</u>: The discharge pipes of the Leachate Collection System at the
  Leachate Collection Pond will be inspected for clogging or damage. Other exposed portions of
  the Leachate Collection System including cleanouts will be inspected for damage. Similarly, the
  Leachate Collection Pond will be inspected for general damage to the pond and perimeter
  berms, and for accumulation of sediment in the pond.

Maintenance during the post-closure care period will be performed as discussed below, based upon the facility inspections described above.

- <u>Security Control Devices</u>: Any portions of the roadway barricades which might be damaged will be repaired or replaced as necessary.
- <u>Erosion Damage Repair</u>: Any areas exhibiting erosion will be repaired by replacing and compacting the material in-kind to design grade/specifications, and reseeding the area to the specifications. Applications of additional fertilizer, selective herbicides, rodent control measures, etc. will be implemented as necessary. In the selection of fertilizers and herbicides, ensure their use will not impact the groundwater negatively. Follow-up monitoring of the repaired area will be conducted to ascertain the integrity of the repair.
- <u>Settlement, Subsidence, Displacement</u>: Any areas at the closed site exhibiting evidence of settlement, subsidence, or displacement will be examined to determine the cause of the movement. If backfilling or placing additional fill material is needed to maintain the integrity of the closed structure, it will be performed in accordance with the site/closure specifications, including seeding. If the condition reoccurs or persists, or if the severity of the condition initially is judged to warrant it, a detailed investigation of the cause will be performed and remedial action will be performed. Similarly, any areas of the soil dike exhibiting sliding, displacement, or seepage will be investigated. Repairs will be made as necessary. Follow-up monitoring of the area will be performed to ascertain that the problem has been corrected.
- <u>Closure Cap Surface</u>: Any areas that show signs of ponding water or flat contours will be examined and rectified.
- <u>Surface Water Drainage System</u>: The channel linings are designed to withstand the design
  velocities. Maintenance of the surface water drainage system will consist of removing sediment
  and/or undesirable vegetation from the surface water runoff control system (channels and
  culverts) as required. Eroded areas will be repaired by back-filling and reseeding according to
  the specifications. Damage to culverts will be repaired; structure replacement will be performed
  if needed.
- <u>Leachate Collection System</u>: Maintenance of the leachate collection system, collection sump, and leachate pumps will consist of repairing and/or replacing in-kind any damaged or eroded portions of the system and pond, cleaning pipes, and removing leachate and sediment from the collection sump and the Leachate Collection Pond, as needed.

#### 3.2 SECTION 257.104(b)(3)

[Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of §§257.90 through 257.98.]

The groundwater monitoring system will be inspected for the general integrity of the wells, well casings and well protective casings. Any damaged portions of the monitoring wells and/or their protective casings will be replaced in-kind.

Monitoring the groundwater will be in accordance with the groundwater monitoring plan for this facility and in accordance with the requirements of §§257.90 through 257.98.

#### 4.0 POST-CLOSURE CONTACT 257.104 (d)(1)(ii)

[The name, address, telephone number and email address of the person or office to contact about the facility during the post-closure care period.]

The name, address, and telephone number of the person to contact about the Facility during the post-closure period shall be provided upon notice of closure.

#### **5.0 POST-CLOSURE PLANNED USE 257.104 (d)(1)(iii)**

[A description of the planned uses of the property during the post-closure period. Post-closure use of the property shall not disturb the integrity of the final cover, liner(s), or any other component of the containment system, or the function of the monitoring systems unless necessary to comply with the requirements in this subpart...]

The post-closure use of the property will be undisturbed vacant land space. The only activities occurring on the closed CCR unit will be related to the Post-Closure care activities.

#### ATTACHMENT A

Post Closure Care 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* 

**American Electric Power Service Corporation** 

1 Riverside Plaza, Columbus Ohio 43215

and

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May 2006

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Appendix A Supporting Closure and Post-Closure Care Cost Calculations

Appendix B Draft Financial Insurance Instrument

#### 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.

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#### 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.

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#### 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.

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#### 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

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

#### 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 Structure	es	\$ 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
	TOTAL COST OF CLOSURE	\$ 8,172,280

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

