



Cardinal Power Plant

FAR I RSW Landfill Federal CCR Rule Compliance Post-Closure Plan § 257.104(d)

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Issue Purpose: Use

Project No.: 13770-025

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TABLE OF CONTENTS

1.0 Purpose & Scope	1
2.0 Post-Closure Monitoring & Maintenance Activities	1
2.1 Inspection & Maintenance of Final Cover System	2
2.2 Inspection & Maintenance of Leachate Collection and Removal System	3
2.3 Groundwater Monitoring	3
3.0 Post-Closure Care Period Contact Information	3
4.0 Property Use During Post-Closure Care Period	4
5.0 Amendments to Post-Closure Care Plan	4
6.0 Certification	5
7.0 References	6

1.0 PURPOSE & SCOPE

Federal CCR Rule Reference: 40 CFR.104(d)

The FAR I Residual Solid Waste (FAR I RSW) Landfill is a coal combustion residual (CCR) landfill at the Cardinal Power Plant, which is operated by the Cardinal Operating Company, Inc. (Cardinal). As a CCR Landfill, FAR I RSW Landfill is regulated by the U.S. Environmental Protection Agency's "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments," which are codified in 40 CFR Part 257 Subpart D (Reference 1) and are also referred to herein as the "Federal CCR Rule." Pursuant to 40 CFR 257.104(d), Cardinal Operating Company must prepare a written post-closure plan for FAR I RSW Landfill to document planned actions after it has been closed in-place in accordance with the written closure plan prepared under 40 CFR 257.102(b).

This document provides Cardinal's written post-closure plan for FAR I RSW Landfill. Following completion of all closure in-place activities in accordance with 40 CFR 257.102(d), Cardinal Operating Company will conduct post-closure care for FAR I RSW Landfill in accordance with the requirements of 40 CFR 257.104(b). This plan describes the activities Cardinal Operating Company anticipates performing throughout FAR I RSW Landfill's post-closure care period.

2.0 POST-CLOSURE MONITORING & MAINTENANCE ACTIVITIES

Federal CCR Rule Reference: 40 CFR 257.104(d)(1)(i)

Pursuant to 40 CFR 257.104(b), Cardinal will conduct post-closure care for FAR I RSW Landfill following its closure. This post-closure program will minimize the need for further maintenance of the closed unit and will control the escape of CCR, CCR constituents, or impacted precipitation to the underlying groundwater or to the atmosphere. To accomplish these goals in accordance with 40 CFR 257.104(d), Cardinal Operating Company will (1) inspect and maintain the effectiveness and integrity of the final cover system, (2) maintain the integrity and effectiveness of the leachate collection and removal system, and (3) maintain the landfill's groundwater monitoring system. Land use at FAR I RSW Landfill following final closure and revegetation will be primarily for accessing the groundwater monitoring system and performing maintenance on the final cover system on an as-needed basis.

Table 2-1 – FAR I Post-Closure Care Activities

Monitoring Activity	Description	Minimum Monitoring Frequency
Final Cover System Monitoring	Visually inspect soil cover surface, run-on control, and run-off ditches for ponding, settlement, subsidence, drainage interruptions, surface erosion, and vertical cracking.	Quarterly
	Inspect soil cover for vegetation establishment and noxious weeds.	Quarterly
Leachate System	Visually inspect conveyance piping, manholes and treatment system is free of obstruction	Quarterly
Groundwater Monitoring	Monitoring groundwater quality up- and down-gradient of Landfill.	As required by 40 CFR 257.90 -98

2.1 INSPECTION & MAINTENANCE OF FINAL COVER SYSTEM

Federal CCR Rule Reference: 40 CFR 257.104(b)(1)

Cardinal will maintain the integrity and effectiveness of FAR I RSW Landfill's final cover system by performing regular inspections and making repairs as necessary to correct the effects of settlement, subsidence, erosion, or other events. In addition, efforts will be made to prevent stormwater run-on and run-off from eroding or otherwise damaging the final cover system, including maintenance of the cover vegetation (e.g., mowing and re-seeding as required) and maintenance of stormwater controls so they continue to manage run-on and run-off from surrounding areas that would otherwise impact the cover system. Vegetation will be maintained such that it does not impede an evaluator's ability to assess the final cover's integrity.

2.2 INSPECTION & MAINTENANCE OF LEACHATE COLLECTION AND REMOVAL SYSTEM

Federal CCR Rule Reference: 40 CFR 257.104(b)(2)

Cardinal will maintain the integrity and effectiveness of FAR I RSW Landfill's leachate collection and removal system throughout the post-closure care period by performing regular inspections and making repairs as necessary. At a minimum, quarterly inspections will be performed to verify that leachate conveyance piping, manholes, sumps, pumps, and other appurtenant components, as applicable, remain accessible and free of damage, blockage, sediment accumulation, or other obstructions that could impede proper system function. Inspection observations will be used to identify conditions that may affect system performance, such as reduced flow capacity, standing leachate, structural deterioration, or unauthorized discharge. Sediment, debris, and other obstructions will be removed, and any identified deficiencies will be documented and addressed in a timely manner.

2.3 GROUNDWATER MONITORING

Federal CCR Rule Reference: 40 CFR 257.104(b)(3)

Throughout the post-closure period, Cardinal will continue to maintain FAR I RSW Landfill's groundwater monitoring system in accordance with 40 CFR 257.90 through 257.98. Cardinal will continue to monitor groundwater in accordance with the established groundwater monitoring program and will ensure access to monitoring wells remains unimpeded throughout the post-closure care program by maintaining access roads and access control to the site.

3.0 POST-CLOSURE CARE PERIOD CONTACT INFORMATION

Federal CCR Rule Reference: 40 CFR 257.104(d)(1)(ii)

The name, address, email address, and telephone number of the person to contact about FAR I RSW Landfill during its post-closure care period are provided below:

Name:	Nicholas Kasper
Address:	Buckeye Power, Inc. 6677 Busch Blvd. Columbus, OH 43229
E-Mail Address:	nkasper@ohioec.org
Telephone Number:	(614) 681-5160

4.0 PROPERTY USE DURING POST-CLOSURE CARE PERIOD

Federal CCR Rule Reference: 40 CFR 257.104(d)(1)(iii)

Cardinal plans to only use the FAR I RSW Landfill property during the post-closure care period for inspecting and maintaining, on an as-needed basis, the final cover system and for accessing the groundwater monitoring system. Otherwise, Cardinal Operating Company intends for the FAR I RSW Landfill site to remain undisturbed during its post-closure care period.

5.0 AMENDMENTS TO POST-CLOSURE CARE PLAN

Federal CCR Rule Reference: 40 CFR 257.104(d)(3)

At a minimum, and in accordance with 40 CFR 257.104(d)(3), this post-closure care plan will be amended if a change in the operation of FAR I RSW Landfill would substantially affect this plan or if an unanticipated event necessitates a revision to this plan.

6.0 CERTIFICATION

I certify that:

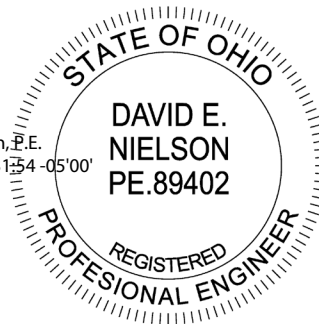
- This written post-closure plan for FAR I RSW Landfill was prepared in accordance with, and meets the requirements of, 40 CFR 257.104(d).
- This written post-closure plan was prepared by me or under my direct supervision
- I am a registered professional engineer under the laws of the State of Ohio.

Certified By: David E. Nielson, PE

Date: See Signature



David E. Nielson, P.E.
2026.08.21 15:31:54 -05'00'



7.0 REFERENCES

1. U.S. Environmental Protection Agency. "Standards for Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments." 40 CFR Part 257 Subpart D.
<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-I/part-257/subpart-D>.