



BUCKEYE POWER GENERATING I, INC.

July 13, 2026

Closure Extension – FAR II
Cardinal Upland Disposal Facility

In accordance with 40 CFR 257.102 (f)(2)(i) Cardinal submits the following two-year extension to extend the closure period for the FAR II CCR surface impoundment, located at Cardinal's Upland Disposal Facility. Cardinal ceased waste streams and initiated closure on the impoundment on July 13, 2021, and is approaching year five (5) of construction work.

Factors and Causes for Extending Closure Timeframe

- **Size** – The surface area of the impoundment, when in operation was approximately 161 acres. The deposited material required extensive regrading and earth work to promote positive drainage. For safety reasons, these operations could only be performed in stable conditions, which required sufficient dewatering and dry weather conditions.
- **Dewatering** – The Ohio Department of Natural Resources, Dam Safety Regulations limit the drawdown of the impoundments free pool by removing stop logs, no more than one foot per week. The dewatering of the free pool, interstitial liquids and the associated sediment controls to minimize suspended solids in effluent discharge, created significant delays.
- **Geology and terrain surrounding CCR Unit** – The terrain surrounding the impoundment naturally directs stormwater runoff towards the dam. As such, extensive efforts were taken to prevent stormwater runoff from flowing onto the working surface by installing containment berms and pumping arrangements.

Lastly, the soil borrow areas used to acquire soil for the caps protective cover and infiltration layer had extensive mine spoils mixed throughout. This required the contractor to screen the soil and remove the larger mine spoil fragments, prior to use.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Tom Alban

Tom Alban
Vice President – Power Generation