



2025 Annual Inspection Report

Residual Waste Landfill

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2025 Annual Inspection Report

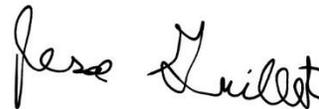
Residual Waste Landfill

0767401



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ACRONYMS AND ABBREVIATIONS

Acronym	Description
BMPs	Best Management Practices
CCR	Coal Combustion Residual
CFR	Code of Federal Regulations
Charah	Charah Solutions, Inc.
ERM	Environmental Resources Management, Inc.
FGD	Flue Gas Desulfurization
FAR	Fly Ash Reservoir
HDPE	High-Density Polyethylene
OEPA	Ohio Environmental Protection Agency
Plant	Gavin Power Plant
PTI	Permit to install
RWL	Residual Waste Landfill

1. INTRODUCTION

The Residual Waste Landfill (RWL) at the Gavin Power Plant (Plant) in Cheshire, Ohio, is subject to the Code of Federal Regulations (CFR) Title 40, Part 257, Subpart D, "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments," commonly referred to as the Coal Combustion Residuals (CCR) Rule. The CCR Rule requires an annual inspection and reporting for operating CCR landfills. In addition, any lateral expansion of the CCR unit that occurs between annual inspection reports must be examined and included in the subsequent annual inspection report.

This Annual Inspection Report of the RWL has been prepared by Environmental Resources Management, Inc. (ERM) to comply with the requirements of the CCR Rule, 40 CFR § 257.84.

1.1 SUMMARY OF CONDITIONS OF ANNUAL INSPECTION

The annual inspection of the RWL was performed on 21 October 2025 by Mr. James Hemme, P. E., the certifying Professional Engineer in the State of Ohio and Mr. Luis Velasquez, P.E. of ERM. Mr. Richard Fuller, Landfill Process Owner at Gavin Power, is the facility contact and supported the inspection activities. Other members of the Gavin Power team, including their contractors, assisted with logistics and provided data for the completion of the inspection and report. In addition, the weekly inspections required by 40 CFR § 257.84(a) were completed on the leachate collection/treatment ponds and on the residual waste landfill by Mr. Richard Fuller.

Weather ranged from cloudy to light rain with light winds and temperatures ranging from 42 degrees Fahrenheit to 66 degrees Fahrenheit.

Due to scheduled construction, flue gas desulfurization (FGD) product haul routes for the day, and maintenance activities, ERM started the inspection at Ponds 3 and 5 and associated vertical flow wetlands in the northeast of the facility to avoid potential travel conflicts. ERM then proceeded to Pond 2, the associated vertical flow wetlands and the concrete sediment basin that treats stormwater runoff from the FGD stack-out pad. ERM then traveled counterclockwise around the facility perimeter access road heading north past the eastern edge of Phases H and I. ERM observed that a portion of the slope up to the first bench in Phase H was in the process of having the closure cap installed. ERM then observed Pond 6 and continued traveling counterclockwise around the northern end of Phase I to observe operational fill activities in Phases H and I. ERM then continued south to Pond 1 and the associated vertical flow wetlands.

Upon completion of the review of the different Pond areas, ERM traversed the RWL starting on the western edge traveling to the top of the facility in Phases F2 and J. The inspection continued to the south following site access roads to the stack out pad. Observations to the north, east, south and north were made during the inspection from on top the RWL.

The Phase I protective cover area was completed on Phases H and I in June 2022 and was certified by the Ohio Environmental Protection Agency (OEPA) in a report dated 13 September 2022. The OEPA provided operational approval for the two active phases (Phases H and I) on 16 September 2022. Since the 2024 inspection, FGD material has continued to be placed in Phases H and I. Phases H and I of the landfill have noticeably increased in elevation from the placement of



FGD since the 2024 inspection. No additional liner areas were constructed in 2025, but capping activities continued on the northeast face of Phases H and I up to the first drainage bench.

Maintenance activities near the ponds and on the roadways were observed as documented in this report. Please refer to **Figure 1** for a map of the site location and **Figure 2** for the current progress of the expansion of the RWL.

1.2 REGULATORY CROSS-REFERENCE TABLE

In compliance with 40 CFR § 257.84(b)(1), this inspection and inspection report for the RWL were completed by James Hemme, a qualified Professional Engineer in the State of Ohio. **Table 1**, below, is a regulatory cross-reference table that describes the inspection requirements and the respective locations in this report demonstrating compliance to each requirement.

TABLE 1 FEDERAL REGULATORY REQUIREMENT CROSS-REFERENCE TABLE

Federal Regulatory Requirement Summary	Location in the Annual Report
§ 257.84(b)—Annual inspections by a qualified professional engineer	Sections 1.1 and 1.2
§ 257.84(b)(1)(i)—A review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (e.g., the results of inspections by a qualified person, and results of previous annual inspections)	Section 4
§ 257.84(b)(1)(ii)—A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit	Section 3
§ 257.84(b)(2)(i)—Any changes in geometry of the structure since the previous annual inspection	Section 3
§ 257.84(b)(2)(ii)—The approximate volume of CCR contained in the unit at time of the inspection	Section 2.1
§ 257.84(b)(2)(iii)—Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR	Section 3; Appendix A
§ 257.84(b)(2)(iv)—Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection	Section 5.3; Appendix A

2. GAVIN PLANT INFORMATION

2.1 FACILITY OVERVIEW

The Gavin Power Plant is located in Gallia County, Ohio, in Cheshire, Ohio, and adjacent to State Route 7. The Plant is also adjacent to the western shoreline of the Ohio River. Nearby towns include Cheshire, Ohio, and Point Pleasant, West Virginia. The RWL is located northwest of the Plant, as depicted on **Figure 1**; the currently permitted waste boundaries are also indicated on this figure.

The RWL was permitted by the OEPA to accept and dispose of CCR material in accordance with Ohio Administrative Code 3745-30. Typically, approximately 98 percent of this material is FGD by-product (consisting of scrubber cake, fly ash, and lime) while the remaining 2 percent consists of other approved disposal materials (water treatment sludge, bottom ash, lime ball mill rejects, coal pulverizer rejects, and sand/moss mixture from the vertical flow wetlands).

In 1994, the RWL was permitted for a capacity of 49 million cubic yards. In 2014, the RWL was authorized to expand horizontally and vertically, under Permit-to-Install (PTI) #06-08447, increasing the capacity of the RWL by 45.5 million cubic yards to a total of 94.5 million cubic yards. The facility reports an estimated disposal volume of 1.94 million cubic yards (2.46 million tons) of CCR during 2025. Including the added volume from 2025, the RWL currently contains approximately 68.0 million cubic yards of CCR, up from 66.1 million cubic yards of CCR in 2024.

Construction related to the expansion has been ongoing since 2016 and, to date, construction of the leachate/sedimentation Pond 5 and vertical flow wetlands associated with the landfill pond outfalls for Ponds 1, 2 and 3 have been completed. In January of 2019, the Plant received approval from OEPA to construct Phase I of the RWL prior to Phase G. Bulk excavation and liner construction activities were observed during the 2019, 2020, 2021 and 2022 inspections. Since the 2023 inspection, lateral expansion construction activities for Phase I were completed including placement of protective cover. The locations of these phases are depicted on **Figure 2**.

Since the inspection in 2024, Phase H and I, located in the northern sector of the landfill, have continued being filled uniformly with FGD. During the 2025 inspection, FGD was being placed in sequential lifts. At the time of the inspection, FGD placement was near the center of the combined Phase H and I areas (Photograph 1). The active surface of the FGD material was observed to be mildly sloped (estimated at 1 to 2%) and appeared to be maintaining positive drainage for surface-water run-off to vertical chimney drains.

The liner system utilized in Phase H and Phase I consists of the following layers in descending order:

- A minimum top protective layer of 30" of FGD to protect the leachate collection layer;
- A geonet composite leachate collection/drainage layer on the slopes, and a 12-inch thick rounded gravel leachate collection layer on flatter sections around the leachate collection piping;

- A 30-mil polyvinyl chloride geomembrane; and
- A reinforced geosynthetic clay liner overlying a prepared soil subgrade consisting of native soil materials including a top 6" minimum of "select subgrade" clay cushion layer.

During the 2025 annual inspection the eastern face of Phase H was being formed to conform with the permit grading plan. This area has been filled to approximately the level of the third final cover bench in the southeast corner of Phase H. The final closure cap has been applied up to the first bench along the southeast edge of Phase H and approximately 6 to 12 inches of soil cover has been applied, seeded, and mulched over a portion of this area as a temporary cap (Photograph 2).

2.2 RESIDUAL WASTE LANDFILL OPERATIONS

Charah Solutions of Louisville, Kentucky (Charah), is the current contractor and has been conducting daily operations at the RWL since 2017, with oversight by Gavin Power. Daily operation and site maintenance activities include hauling and distributing CCR, dredging accumulated solids from within the settling ponds and channels, placing cover material, and maintaining vegetation. These activities are documented on a daily log that is maintained by Gavin Power. Fugitive dust controls for the landfill operations are implemented based on site conditions. Fugitive dust emissions are controlled by maintaining moisture in the material and minimizing drop height during placement. After placement, these emissions are controlled by spreading and compacting material and watering as needed. Measures for controlling fugitive dust emissions due to wind erosion in open areas include placing cover and seeding, maintaining moisture content of the materials, and watering as needed. Dust emissions from roadways are controlled by watering, addition of a chemical suppressant, and vehicle speed control measures. On-site unpaved haul roads are maintained on a daily basis through the use of motor grader/roller equipment. Access roadways are maintained with a combination of imported aggregate (e.g. limestone) and bottom ash generated at the plant (applied only to roadways within the limits of the landfill). Gavin Power conducts weekly inspections and reports any deficiencies to Charah to address and repair.

3. RESIDUAL WASTE LANDFILL VISUAL INSPECTION

The 2025 annual visual inspection conducted for the RWL on 21 October 2025 is summarized below. Photographs referenced herein are located in **Appendix A**. The approximate locations where the photographs were taken are indicated in **Figure 3**. Qualitative terms used herein to describe the inspection are summarized in **Appendix B**.

Overall, the RWL was observed to be in satisfactory condition (as defined in **Appendix B**). This includes the roads and other maintained infrastructure and lateral expansion areas to the extent they were observable. Landfill development and construction activities are progressing in general conformance with the 2012 Final Permit-To-Install Application, Expansion of the Gavin Plant Residual Waste Landfill, Section C.8. ERM personnel did not observe evidence of obvious settlement, misalignment, significant erosion, tension cracks, or other signs of possible instability, movement, or significant erosion along the slopes. ERM did not observe visual evidence indicating that storm water was impounding in the designated RWL area with the exception of small sedimentation collection traps or sediment sumps along roadways. Since the completion of protective cover placement over completed liner system and the 2023 annual inspection, the combined surface of Phase H and Phase I has been the predominant location for placement of CCR. Changes in the geometry of the RWL were observed during the inspection as a result of continued operation and receipt of FGD within Phases H and I and from grading for purposes of placing intermediate or final soil cover at multiple locations.

Since the 2024 inspection, ERM observed that continued grading and placement of intermediate cover on interim slopes on the eastern, southern and western slopes of Phases F2 and J has continued. Remaining slopes where direct seeding of FGD had been previously attempted have been covered with soil and revegetated. FGD placement within the lateral expansion areas (Phases H and I) has continued upward and has reached a level ranging from approximately 100 feet above the access road on the southeastern edge of Phase H to 30 feet above the road at the northernmost point of Phase I (Photograph 1). The east facing slope of Phase H is being graded to its final configuration. Grading has been completed up to the elevation of the fourth drainage bench at the southern end and to approximately halfway between the first and second drainage bench on the northern end. Final capping up to the first bench is complete on the southern end of this slope and final cover was under construction up to the first bench on the northern end (Photographs 3 and 4). As Phase H has increased in elevation from the placement of FGD, intermediate cover soils at the northern interface slope of Phases F2/J with Phase H were observed to have been completely removed for reuse. At the time of the 2025 inspection the majority of this north facing slope was being used for operations. Haul roads have been constructed to allow for efficient access and placement of FGD across the active working area. Allowable residual materials with a higher moisture content are deposited at a designated area near the center of the operational area and adjacent to the Phase F2/J interface.

On the eastern side of the landfill above Pond 2 along the main haul road, the leachate seep identified in previous inspections is in the process of being investigated and remediated (Photograph 5 through 7). Exploratory trenches have been excavated and accumulated leachate from these seeps is being managed through runoff channels located over the RWL liner system down to the concrete headworks for Pond 2 (Photograph 8). Gavin personnel have developed a



plan for remediation of these seeps in conjunction with an engineering consultant. The current design is being updated based on observations of the exploration trenches. The design intent is to capture and redirect this leachate back into the residual material or pipe it directly to the Pond 2 treatment system and eliminate it from the surface. This plan is scheduled for implementation in 2026.

3.1 HAUL AND ACCESS ROADS

The haul roads in active areas of CCR placement use bottom ash as a base course (Photograph 9). This base course compacts well and withstands repeated heavy equipment traffic based on experience. The haul roads observed by ERM appeared to be stable during the site drive/walkthrough, and there was no visual evidence of significant distress (i.e., rutting or pumping). The roads had positive drainage from the centerline or were sloped to an adjacent drainage channel and there was no visible evidence of ponding water on the traveled roadway surface. Drainage channels paralleling the roadways also captured storm water runoff from adjacent slopes, which is directed to stable outlets that ultimately discharge to the multiple surrounding site treatment ponds. As noted in previous inspections, ERM observed sporadic evidence of erosion in the channel bottoms or at the connection point/confluence of drainage berms that collect water from the landfill side slopes to the channels (Photograph 10). Rock check dams were observed as a common best management practice (BMP) for stormwater deceleration and were located at regular intervals within the constructed channels to slow runoff rates and to capture sediments (Photograph 9). Overall, roadside channels appeared satisfactorily maintained. During the 2025 inspection, ERM observed that continued maintenance has been conducted on roadside channels. Sediment build-up behind the rock check dams in the roadside channels seemed to have been recently cleaned at various locations. Channels are inspected on a biweekly basis as part of the routine maintenance and deficiencies are addressed and repaired as needed.

There were several sections of permanent roads that have a limestone gravel base course instead of using bottom ash. These roads also were observed to be stable with no visible evidence of distress. More frequently used roadways incorporate robust drainage channels adjacent to slopes, which were positively graded and included rock check dams.

Gavin continues to maintain existing check dams and installs supplemental check dams when necessary to reduce erosion by stormwater runoff into the underlying FGD material. Channel conditions were consistent with ERM's observations in 2024 and operating in a satisfactory manner. Isolated areas of limited channel erosion were noted in the southern and western roadside channels (Photograph 10). ERM recommends that individual areas continue to be repaired and monitored in accordance with the ongoing maintenance program which has been successful in keeping the stormwater management system operating in a satisfactory condition. ERM also continues to recommend use of sediment sumps and sediment traps below areas where persistent erosion is noted in weekly inspections.

The existing channel maintenance program appears to be preventing significant incising of channels as noted in the 2023 inspection report. These incised areas were observed in 2024 to have been eliminated and no evidence of this deep incising was observed in 2025.



At approximately the halfway point to the top of the landfill on the western access road, the cross culvert having sedimentation issues in previous inspections was observed. Maintenance was performed on this culvert and downstream channel in 2024 to return unobstructed flow to the downstream drainage bench. During the 2025 inspection positive drainage conditions were observed, however, signs of continued sedimentation were evident. ERM recommends that this western culvert outlet continue to be regularly maintained and alternative configurations be considered to minimize the need for the frequent ongoing maintenance necessary to keep it functional.

3.2 SLOPES AND SLOPE COVER

It is estimated that over 95 percent of the currently inactive landfill slope surface area appears to have stable vegetation, and 5 percent of the surface area is in the process of stabilization/revegetation or was observed to have been recently seeded and mulched (Photograph 2). The slopes near the summit of Phase F2 and J were vegetating successfully and in similar condition to that noted in 2024 (Photograph 11).

There were no visual observations of structural weakness within the RWL (e.g., slips, soil tension cracks, sinkholes) noted during the annual inspection. No indications of residual waste movement that might alter the geometry of finished slopes or overall stability of the RWL were identified.

The areas with final cover included a reported minimum 3-foot-thick cap consisting of a 2-foot layer of barrier soil and a 1-foot layer of soil capable of supporting vegetation (Photograph 12). The areas that have received final cover exhibited well-established vegetation.

The area capped along the toe of the eastern face of Phase H has established satisfactory vegetation. The final cap areas under construction during the 2025 inspection were receiving rolled erosion mats to assist with seed germination and erosion protection for this autumn seeding activity. The alternate cap system being employed on Phase H (Photograph 4) is composed of three layers:

- A geomembrane to prevent infiltration into the waste;
- A double-sided geocomposite on top of the geomembrane to cushion and protect the geomembrane while collecting and draining away any surface infiltration; and
- A protective cover soil layer to reduce infiltration and support vegetative growth to prevent erosion and promote evapotranspiration.

The alternate cap on the flatter surfaces along the top of the landfill will have similar geomembrane and protective soil layers, with a middle layer composed of a geotextile to cushion and support the geomembrane.

There was an area on the southeastern RWL slope where erosion rills were observed (Photograph 13) in the surface of the intermediate cover. Sedimentation appeared to be collected in the stormwater channel along the eastern haul road with stormwater eventually being directed to the Pond 2 treatment system. There was no visible evidence that this area of erosion has the potential to disrupt the operation and safety of the RWL or that observed erosion features were creating an unstable condition. ERM recommends that this minor erosion area be repaired and reseeded in the Spring of 2026. In the interim, to the extent practical, upslope run-on should be minimized in

these areas through common industry standard maintenance practices such as run-off diversion to prevent water from flowing over the top of slope.

The RWL has been successful in the elimination of direct seeded FGD areas with no significant areas remaining. ERM understands that any remaining areas will continue to be covered incrementally with an intermediate layer of soil to aid in the establishment of vegetation. The application of this intermediate soil layer as slopes are completed or meet their interim grades.

In stormwater channels, the Plant team has successfully utilized BMPs such as riprap, periodic rock check dams, and outlet protection to reduce storm water velocity and minimize the potential for erosion. The presence of erosion rills and gullies has continued to noticeably decline in comparison to the 2024 annual inspection. The overall stability of the cover, good vegetative practices, and functioning BMPs within the storm water channels provide evidence that the Plant team is successfully controlling storm water flow on graded slopes within the RWL.

At the summit of the RWL in the center of vertical Phase F2 expansion, an interim elevation of approximately 965 feet has been reached as noted in previous inspections. The fill will remain at that elevation until FGD fill in adjacent constructed cells achieves an approximate equivalent elevation. Surface water at the summit of Phase F2 is managed by chimney drains (Photograph 14) that are connected and flow to the leachate collection system at the bottom of the landfill.

3.3 SEDIMENTATION/LEACHATE PONDS

Five pond units, specifically Ponds 1, 2, 3, 5, and 6, currently manage sedimentation and storm water and treat leachate generated by the RWL.

Pond 1 is located in the southern end of the RWL and is the oldest treatment pond at the facility. It consists of a primary treatment pond and clarifying pond. The clarifying pond discharges into an associated duplex vertical flow wetland treatment system.

Pond 2 is located on the southeast portion of the RWL facility area and also consists of a primary treatment pond and clarifying pond. The clarifying pond discharges into an adjacent duplex vertical flow wetland treatment system. Pond 2 is preceded by a dual chamber concrete headworks sedimentation basin that is utilized to capture sediments from stormwater from the FGD handling stack-out pad. The FGD stack-out pad is located to the southeast of the landfill and receives the conveyor carrying FGD from the power station. From this point, FGD is loaded into trucks and hauled to the active disposal area. The FGD stack-out pad has been designed to direct stormwater runoff to a channel system that is treated in Pond 2 after going through the concrete headworks. In addition, the original leachate inflow pipe located on the western edge of Pond 2 has been redirected through a pump station to discharge into the concrete headworks.

Pond 3 is located to the east of the RWL and to the northwest of Pond 2 and consists of a primary treatment pond and clarifying pond. The clarifying pond discharges into an adjacent duplex vertical flow wetland treatment system.

Pond 5 is a single long pond and is located directly north of the Pond 3 group. Pond 5 discharge flows into the north end of Pond 3.



The vertical flow wetland treatment systems for Ponds 1, 2 and 3/5 were installed in 2016 and 2017 and have been designed to perform as additional filtration/treatment system components to remove target pollutants not completely removed by the preceding treatment processes. Flow from the clarifying ponds is directed into the vertical flow wetlands through an inlet structure. The effluent from the various vertical flow wetland systems is discharged through a weir and flow meter station off-site in accordance with the Plant National Pollutant Discharge Elimination System permit (Permit # OIB00006*PD). Photographs 15 through 17 from Pond 1 depict the vertical wetlands, inlet structure, and flow meter station, which are of the same general construction as those used at Pond 2 and Ponds 3/5.

Pond 6, located to the northwest of Phase H and I, is the most recently constructed pond and consists of both a lined primary treatment and a lined clarifying pond (Photographs 18 through 20). Discharge from Pond 6 outlets into a stabilized riprap channel that crosses the closed former ash management reservoir.

3.3.1 POND 1

Pond 1 on the south side of the RWL was observed to be functioning in a satisfactory condition during the annual inspection (Photograph 21). The sedimentation/treatment portion of Pond 1 was observed to contain sufficient depth and capacity for retention of solids (Photograph 22). This pond is routinely cleaned of accumulated solids, typically through the use of extended-reach excavators or a floating dredge. Based on a visual assessment, Pond 1 was noted to have accumulated sediments significantly below previous levels observed in 2023 and similar to observations in 2024.

A build-up of sediments, aggregate, and vegetation continues to be observed in the north end of the pond near the two inflow channels (Photograph 22). A mobile trailer mounted temporary filter system was staged adjacent to the Pond 1 clarifying pond (Photograph 23). This filter system continues to transfer water from the clarifying pond using a suction hose, filters the water and then pumps it into the inflow structures to the vertical flow wetland system. During the 2025 inspection a supplemental aerator was seen operating in the clarifying pond (Photograph 24) with power being supplied from a cable coming from the filter trailer. The filter continues to be used as a supplemental measure to improve water quality going to the next stage of treatment. The filter system was secured in the interior of the trailer and was not observed. There were no leaks observed, and the trailer appeared to be in satisfactory condition.

Discussions with facility personnel indicated that the northern accumulation of sediment continues to be maintained for drainage of leachate into the main body of the pond. For maintenance purposes, the accumulated sediments should be removed from the surface as opportunities present themselves and be properly disposed of within the RWL. The sedimentation pond appears to be functioning satisfactorily with the available maintained volume in the main body of the pond.

Stone from the access roadway continues to be observed to be deposited in the stormwater inflow channels. It is recommended that steps continue to be taken to mitigate the displacement of stone from the roadway by vehicles and during the application of maintenance aggregate to the surface. No perforations of the geomembrane were identified during the site visit. Patching that was observed during 2024 appears to have corrected previously identified perforations. ERM

recommends that new perforations in the liner continue to be repaired by a similar procedure as part of routine maintenance.

The vertical flow wetlands for Pond 1 were observed and appeared to be in satisfactory working order (Photographs 15 through 17). Vegetation is beginning to build up in the weir area at the downstream end of the features that should continue to be removed as part of the routine maintenance of the facility. The flume shows slight algal buildup and it is recommended that it be cleaned on a routine basis. A groundwater interceptor pipe designed to maintain the natural groundwater surface below the vertical flow wetland liner system elevation was observed to have no flow during the 2025 site visit. Historic iron precipitation was observed at the outfall of the groundwater interceptor, but downstream conditions appeared to be satisfactory (Photograph 25). As relayed in the 2024 inspection, RWL staff indicated that review of analytical results from this location indicate that this is naturally occurring iron.

3.3.2 POND 2

Pond 2 on the southeast side of the RWL was observed and appeared to be functioning in a satisfactory condition during the inspection (Photograph 26). To assist with the removal of FGD solids derived from the stack-out pad and to minimize dredging, Gavin Power operates a concrete settling basin at Pond 2 (Photograph 8). This basin is routinely cleaned with an extended-reach excavator and was observed to be in the process of being cleaned during the 2025 inspection. The leachate inflow pipe located on the west side of the Pond 2 sedimentation basin has been connected to a pump station which directs the flow into the concrete headworks settling basin for initial treatment prior to entering the southern end of the geosynthetic-lined pond. During the site visit, it was observed that a new high density polyethylene (HDPE) pipeline was being fabricated as a replacement force main from the western leachate force main to the pond headworks. Discussions with RWL personnel indicated that the former pipe had significant scaling and installation of a new force main was determined to be the desired corrective action.

The primary treatment pond was observed to be in satisfactory working condition following the maintenance adjustments that continued after the 2020 annual inspection. During 2020 and early 2021, significant repairs were made to the geomembrane liner system of Pond 2. One large area of missing geomembrane was identified at the northern end of Pond 2 (Photograph 27). This area was estimated at approximately 10 to 15 square feet and is located above the normal operating level of Pond 2. The hole was covered with a geotextile secured by sandbags. In addition, as identified in previous inspections, two isolated areas within the sedimentation pond were identified as "bunching" of the geosynthetic material (Photographs 28 and 29). One of the areas has a small patch of vegetation indicative of a small hole above the pond operating level (Photograph 29). The identified hole and small perforation should be repaired as part of normal pond maintenance. The operating level in the pond should be maintained such that water will not build up to the level of these perforations. ERM further recommends that the "bunching" areas continue to be monitored in 2026.

The clarifying pond for Pond 2 was observed to have a supplemental, mobile trailer mounted temporary filter system similar to that present at other ponds (Photograph 30). There were no leaks observed, and the trailer appeared to be in satisfactory condition. The clarifying pond liner

system was observed to have two small perforations (Photographs 31 and 32) above the operating level of the pond near the crest and evidenced by the presence of vegetation growing up through them. These perforations should be repaired as part of normal pond maintenance.

The vertical flow wetland cells for Pond 2 were observed to be in satisfactory condition (Photographs 33 through 36). The easternmost wetland was functioning during the inspection. The rock lined outflow channel and flow meter for the system to the south of the vertical ponds appeared to be functioning in a satisfactory condition.

3.3.3 POND 3

Pond 3 on the northeast side of the RWL was observed to be performing in a satisfactory manner (Photograph 37). Pond 3 was identified to have undergone a significant renovation during 2025. In 2024, the pond was in an idled condition with leachate being redirected into Pond 5 through a pump system at the inlet pipe and discharging the leachate into the head of Pond 5. In 2025 the sedimentation side of Pond 3 was dredged of sediments which were removed and deposited into the RWL. The underlying geomembrane was removed and then the Pond 3 sedimentation basin was completely relined with 60 mil HDPE geomembrane. On the northwestern side of Pond 3, the damaged culvert pipe identified in previous inspections was replaced with twin HDPE pipes which discharge into Pond 3 on top of the new liner system (Photograph 38). Riprap was utilized on the upstream entrance to the twin culverts to anchor the piping and direct water into the pipes. It is recommended that a concrete or similar headwall be installed around the twin pipes to maximize the direction of stormwater through the pipes.

Riprap has been used around the rim of the sedimentation basin to protect the anchor trench area and provide protection from perimeter roadway gravel from traveling into the pond (Photograph 39). The clarifying pond liner replacement in 2024 rectified earlier inspection findings and continues to operate in a satisfactory manner (Photograph 40). The geomembrane liner systems were reported by RWL personnel to have been installed in a satisfactory manner in accordance with the engineering design plans and undergone appropriate quality control during construction. The clarifying pond utilizes a construction detail to minimize roadway gravel from entering the pond consisting of a heavy-duty erosion control blanket around the crest of the Pond's embankment (Photograph 40).

During the 2025 inspection, leachate was observed to be rerouted from Pond 3 and pumped into the head of Pond 5 (Photograph 41) for treatment which is then piped into the Pond 3 sedimentation basin and ultimately the Pond 3 clarifying pond. Similar to other ponds, a supplemental, mobile trailer mounted filter system is operating on the embankment between the Pond 3 sedimentation basin and clarification basin (Photograph 40). This filter system is being used to polish water from both Pond 3 and Pond 5 prior to discharge to the vertical flow wetland system. There were no leaks observed in the area and the trailer appeared to be in satisfactory condition.

The vertical flow wetlands for both Pond 3 and Pond 5 were observed to be functioning in a satisfactory manner (Photographs 42 and 43). The final polishing pool prior to the flow meter was observed to be covered in "duck weed" and it is recommended that this material be skimmed off the surface and disposed of in the RWL (Photograph 44). A short floating boom is being used to

prevent migration of duckweed through the flow measurement flume and should be maintained until the duckweed is removed. The flow measurement flume was observed with minor algal buildup within the channel. The receiving outfall appeared stable and was functioning in a satisfactory manner (Photographs 45 and 46).

3.3.4 POND 5

Pond 5 on the northeast side of the RWL, adjacent to Pond 3, was observed to be functioning in a satisfactory manner during the 2025 inspection. Minor accumulated sediments were visible near the inflow channel to this pond and near where rerouted leachate inflow from Pond 3 was observed (Photograph 47). Accumulated water under the Pond 5 liner system along a limited section of the southwest edge adjacent to Pond 3 identified in previous inspection reports was not present and the pipe installed for extraction of periodic accumulated water has been securely attached with a pipe boot to the geomembrane for water tightness (Photograph 48). A small portable pump is utilized to withdraw accumulated water as needed to avoid stress and uplift pressures on the liner system. The facility continues to monitor this accumulation on a weekly basis as part of routine inspections. The water continues to be reported as clear and appears to be groundwater but was not observed by ERM during the inspection. It appears, based on the continued reappearance of this condition, that a perched groundwater condition may exist with a connection to the Pond 5 area. The source of this water has not been identified but is apparently not from the pond, since it accumulates above the operating level within the pond, and groundwater results from down gradient monitoring wells do not indicate a release from Pond 5.

Perforations identified in 2024 were observed to have been repaired but several new ones were observed. One perforation was observed near the water extraction pipe (Photograph 49) and multiple small punctures were observed near the entrance channel on the western end of Pond 5 (Photograph 50). It appears that these western perforations continue to be the result of animal hoofs (i.e. white-tailed deer). Accumulated water under the western end of the pond observed in 2024 was not apparent during the 2025 inspection. ERM recommends that this area continue to be monitored similar to the southwest portion of the pond and water under the liner system removed as required and the geomembrane from the inflow channel repaired.

ERM observed the rerouted Pond 3 discharge into Pond 5 on top of the geomembrane system (Photograph 47) continues similarly to last year's inspection. No damage to the geomembrane was observed in the vicinity of this leachate inflow.

On the northern slope of Pond 5 east of the inflow channel a secondary pipe has been inserted under the liner system to remove accumulated water under the geomembrane as required (Photograph 51). This pipe enters a slit in the liner above the operating level of the pond and is monitored similar to the pipe on the southwestern slope. ERM recommends that a fabricated pipe boot similar to that installed on the southwest side of Pond 5 be installed to further secure this pipe.

Around the perimeter of Pond 5 damage to the anchor trench runout was observed on the southeast edge of the pond across from the Pond 3 clarification pond (Photograph 52). This area should be planned for repair during normal maintenance activities. Along the entire top of the northern slope thick herbaceous vegetation has developed and woody stemmed vegetation is

apparent (Photograph 53). ERM recommends that a buffer be cut/mowed as part of a routine maintenance program to prevent the development of significant vegetation or woody stemmed material from developing near the liner system.

3.3.5 POND 6

Pond 6, located to the northwest of Phase H and I, is the most recently constructed pond and was observed to be functioning in a satisfactory manner during the 2025 annual inspection. Pond 6 consists of a primary sedimentation/treatment pond and a clarifying pond (Photographs 18 through 20). Pond 6 has been constructed with a composite liner system consisting of a HDPE geomembrane over a geosynthetic clay liner with an underlying detection zone. To allow for easier cleanout of accumulated sediments during operations, the bottom of the Pond 6 liner system was also constructed with a concrete protective cover. Equipment can operate on top of this cover and will allow sediment to be removed more efficiently. The operating level of Pond 6 was above the concrete cover during the 2025 inspection, so it was not observed.

Stone from the access roadway was observed to be present on isolated portions of the pond liner. It is recommended that steps continue to be taken to mitigate the movement of stone from the roadway by vehicles and during the application of maintenance aggregate to the road surface. Minor perforations were identified in the geomembrane above the operating level of the pond on the northeast side of the primary treatment pond (Photographs 54 and 55). ERM also observed the presence of apparent black bear tracks in the vicinity of the perforations. ERM recommends that these tears be repaired as part of normal maintenance in 2026 and if wildlife is observed on top of the geomembrane that a plan be considered for prevention of wildlife access.

The outfall for Pond 6 discharges into a riprap channel on top of the recently closed former Fly Ash Reservoir (FAR) located to the north of Pond 6. This channel was constructed after the FAR cover was in place and was planned for in the RWL Expansion as well as the FAR Closure Plan. A set of wood steps and handrails has been constructed to access this outfall discharge point for observation and sampling purposes. Minimal flow was observed at this discharge during the inspection. The rock-lined outflow channel for the pond appeared to be functioning in a satisfactory manner with no signs of erosion or distress.

3.4 OPERATION

Daily landfill operations are conducted and managed by Charah and overseen by Gavin Power. During the time of the inspection, general maintenance operations were occurring within the facility limits. As required by the PTI issued by OEPA, Gavin Power maintains daily logs of operations and performs daily and weekly inspections of the RWL.

Photograph 56 depicts operating conditions at the FGD stack-out pad during the annual inspection. There was FGD production on the day of the inspection, and the material was satisfactorily handled and contained on the pad prior to being loaded into haul trucks for disposal in Phase H.

Activities during 2025 included the continued filling activities in Phase H and I and minor activities in Phase F2. Phase F2 activities focused on intermediate cover soil placement and vegetation growth. The vertical phase for Phase F2 was completed in 2020 as the FGD material met the



interim maximum height of approximately 965 feet. A soil cover was placed on the top of the FGD summit and vegetation has been adequately established. Photograph 16 depicts the condition of the soil cover at the crest of Phase F2. Former direct seeded FGD at the southern end of the RWL has been covered with soil and revegetated and appears in satisfactory condition (Photograph 57). A series of chimney drains that are connected to the leachate collection system at the bottom of the landfill were observed within the summit area to assist in draining surface stormwater.

4. REVIEW OF CCR OPERATING RECORD DOCUMENTS AND PREVIOUS INSPECTION ITEMS

As required by 40 CFR § 257.84(b)(1)(i), a review of the operating record regarding the status and condition of the CCR unit includes the results of inspections by a qualified person and results of previous annual inspections. The following documents were reviewed as part of the CCR operating record:

- Ohio EPA Phase "I" before "G" Alteration Request, approval dated 2 January 2019;
- 2019 Landfill Annual Inspection Report, ERM dated 8 January 2020;
- 2020 Landfill Annual Inspection Report, ERM dated 8 January 2021;
- 2021 Landfill Annual Inspection Report, ERM dated 7 January 2022;
- 2022 Landfill Annual Inspection Report, ERM dated 6 January 2023;
- 2023 Landfill Annual Inspection Report, ERM dated 5 January 2024;
- 2024 Landfill Annual Inspection Report, ERM dated 10 January 2025;
- Seven-day qualified person inspection checklists for the RWL from January 2025 through December 2025;
- American Electric Power Service Corporation (2016). *Gavin Plant Residual Waste Landfill Closure Plan*. Gavin Plant, Cheshire Ohio;
- Gavin Residual Waste Landfill PTI Alteration Request, dated 13 October 2014;
- 2023 OEPA Solid Waste Facility License;
- Stability and Settlement Analysis Report pursuant to Ohio Administrative Code 3745-30-05(C)(5), dated 2 November 2012; and
- Final Permit-To-Install Application Expansion of the Gavin Plant Residual Waste Landfill dated 2 November 2012

5. CONCLUSIONS AND RECOMMENDATIONS

5.1 ADDRESSING 2024 ANNUAL INSPECTION ITEMS

Periodic repairs specified in the 2024 Annual Inspection Report developed by ERM included placing the final cap where final grades have been reached as required by OEPA; repair of the seep area above Pond 2; repairing identified geomembrane perforations; placement of a new geomembrane in the Pond 3 sedimentation pond; seeding and mulching areas to establish vegetation; repairing erosional areas noted; and continuing to remove sediments from all ponds on an as-needed basis. Based on the 2025 annual inspection and a review of the 2024 weekly inspection reports, the above-identified repair items from the 2024 annual inspection were mostly completed or observed as being underway as part of on-going maintenance and repairs. In particular:

- Minor repairs to geomembranes in the treatment ponds were completed.
- Pond 3 was dredged.
- New geomembrane liner system was installed in the sedimentation portion of Pond 3.
- The degraded culvert entering Pond 3 has been replaced.
- Typical erosion along the RWL internal access roads has been repaired as part of ongoing maintenance.
- Efforts to establish vegetation on the interim slopes of Phase F2 and J Vertical Expansion have continued and are substantially complete.
- Gavin Power Plant has consistently addressed items requiring attention that were identified in the weekly inspection reports.

5.2 RECOMMENDATIONS FOR 2025

ERM provides the following recommendations for the RWL based on the 2025 inspection:

1. Continue to monitor Pond 5 for accumulations of water under the geomembrane and remove as required. During 2026, it is recommended to further assess the source of this water in order to identify potential steps to avoid accumulation of water under the liner system.
2. Methods for excluding deer from the western end of Pond 5 should be explored and implemented. The facility could also explore a redundant more durable liner system installed to minimize the chance for perforations.
3. Finalize plans for and implement the leachate seep repair plan developed for tying the exposed seeps on the eastern slope of the RWL above Pond 2 back into the residual material mass or directly piped to Pond 2. Eliminate the standing leachate on the landfill surface. This should be accomplished prior to the next annual inspection. Leachate from this seep appears to be contained overtop the RWL liner system. The facility should ensure that the current open channel flow of the leachate is maintained on top of the liner system until the remedial action is completed.
4. Deficiencies identified during weekly inspections should continue to be documented and addressed in a timely manner in accordance with BMPs. This includes but is not limited to

addressing any erosion rills, removal of check dam sediment accumulation and roadway surfacing.

5. Complete repair of erosion rilling in the intermediate cover on the southeast slope of the RWL. Continue placement of intermediate soil cover, seed, and mulch on minor remaining areas within Phases F2 and J and on the southern face of the RWL. Soil pH and nutrient tests are recommended to target appropriate amounts of lime and fertilizer application to accomplish successful vegetative growth while minimizing the potential for over application.
6. Continue to maintain check dams within channels experiencing sediment loading and continue maintenance of the sediment traps where erosion has been noted.
7. Fill developing erosional features within and at confluences of stormwater conveyance channels and berms adding rock soil and vegetating as appropriate. Add riprap armouring as needed to localized areas when FGD has been exposed.
8. Continue to schedule maintenance and replacement of media in the vertical flow wetlands for Pond 1, Pond 2, and Ponds 3 and 5. In addition, perform maintenance consisting of removing "duckweed," cleaning the weir in the polishing section and flow metering flume of each feature of developing algal mass, sediments and excessive vegetation.
9. Implement targeted cleanout of Pond 1 sediments located near the entrance of the stormwater channels and leachate in 2026. It is recommended that the facility have a contingency plan for damages to the geomembrane during cleaning operations.
10. Where small tears and minor perforations are identified in the geomembrane liners at Ponds 2, 5 and 6 maintain operating level of ponds below these levels until repairs are made. These should be repaired during suitable weather conditions in the spring of 2026 but no later than the next annual inspection.
11. Repair damage to the Pond 6 geomembrane anchor trench runout on the southeast edge of the pond.
12. Stone from the access roadway around Pond 6 was observed to be on the pond liner. It is recommended that steps be taken to mitigate the displacement of stone from the roadway by vehicles and during the application of maintenance aggregate to the surface.

5.3 CONCLUSIONS

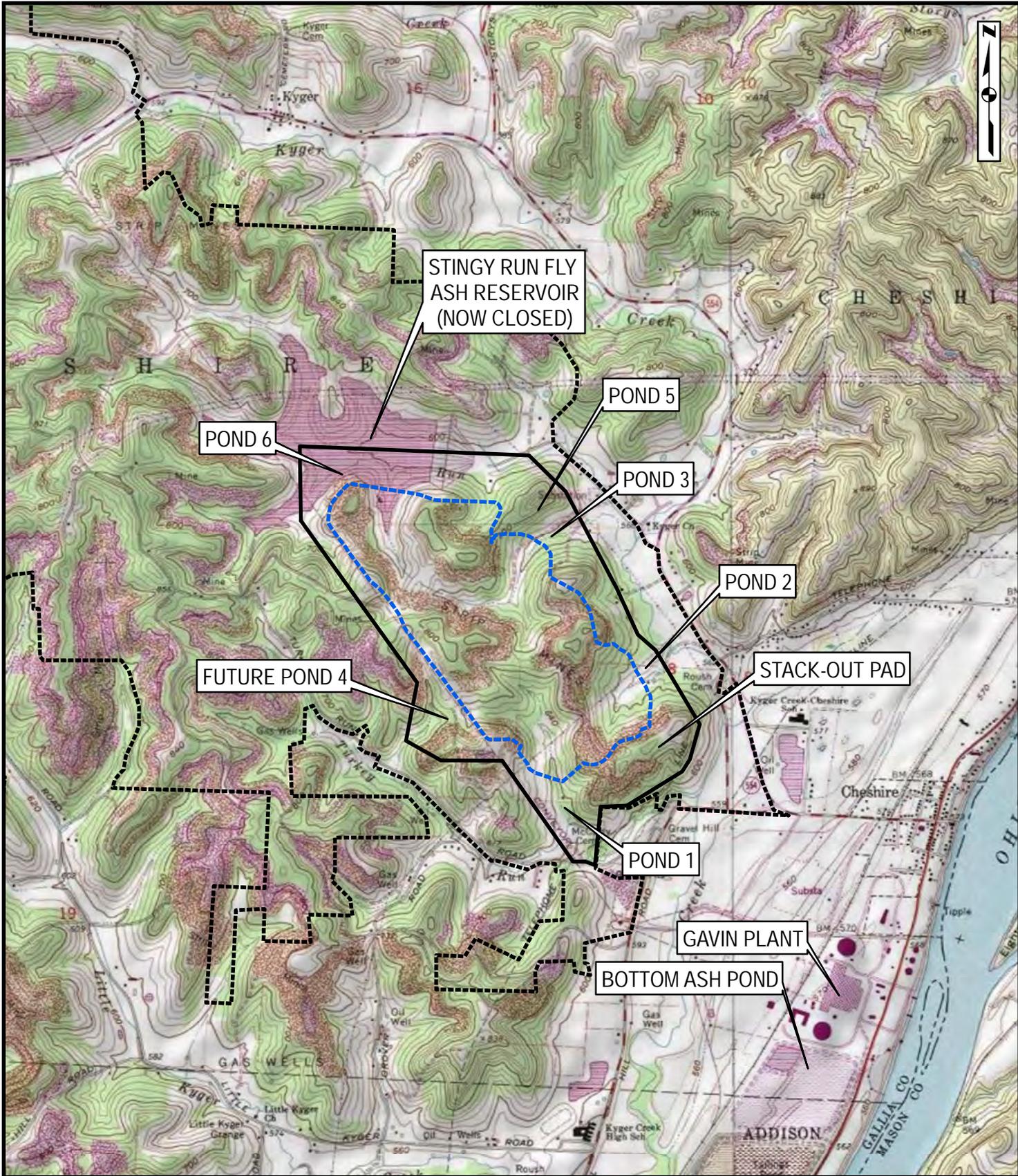
The 2025 annual inspection and document review indicated that the design, construction, operation and maintenance of the RWL is consistent with recognized and generally accepted good engineering standards, as required by 40 CFR § 257.84(b)(1). ERM observed that current operational phases are being conducted in a satisfactory manner and operators were observed to be performing satisfactory maintenance operations. No changes were observed or identified since the last annual inspection which may affect the stability of the RWL.

Repair and elimination of inflow under the Pond 5 liner system and repair of the exposed leachate seeps on the east side of the landfill should be a priority for 2026. Other repairs are less critical to the current stability of the RWL but should be addressed during 2026 under the Gavin Power Plant maintenance program or as otherwise indicated.

The facility should continue to frequently inspect all ponds for new perforations after currently proposed repairs are complete and anticipate additional geomembrane maintenance requirements in the future.



FIGURES



- Permitted Residual Waste Landfill Boundary
- Permitted Facility Boundary
- Gavin Power LLC Property Boundary

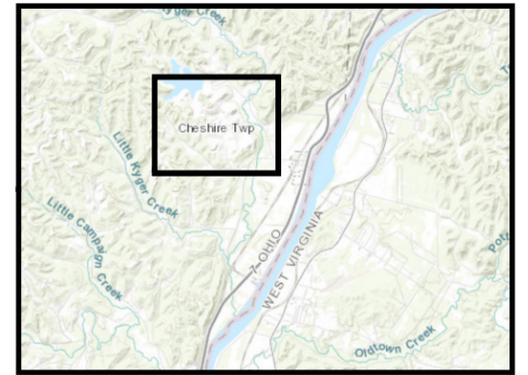
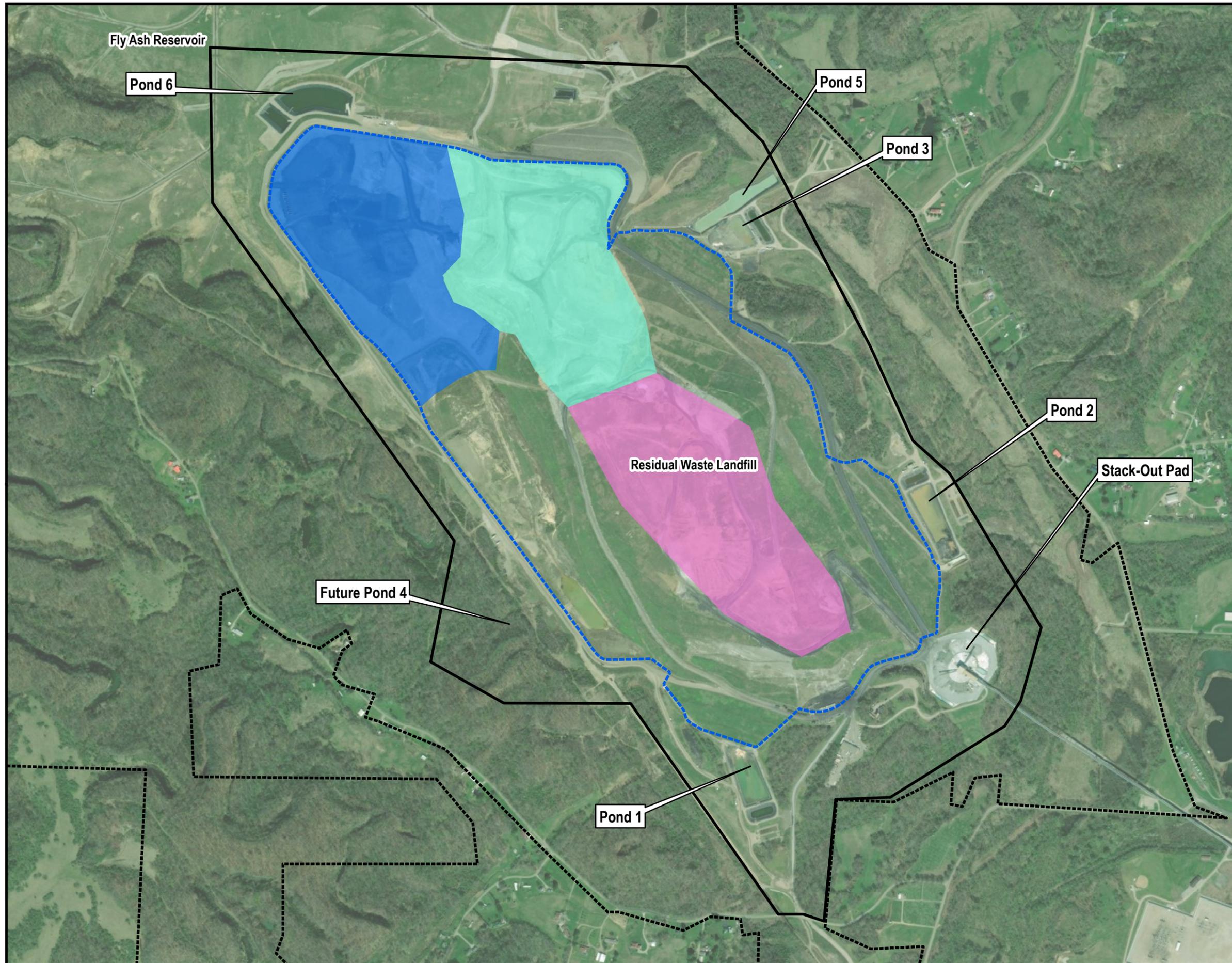


Figure 1: Site Location Map
 Gavin Power LLC
 Cheshire, Ohio



SOURCE: USGS scanned topographic quad maps provided by National Geographic Society (© 2023).

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Legend

- Phase F2 and J Vertical Expansion
- Phase H Lateral Expansion
- Phase I Expansion
- Permitted Residual Waste Landfill Boundary
- Permitted Facility Boundary
- Gavin Power LLC Property Boundary

NOTES:

1. Locations are approximate
2. Aerial Imagery: ESRI World Imagery
3. Phase H Lateral Expansion has been filled to the level of northern and eastern roadway.

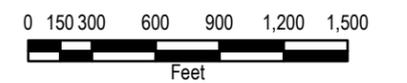
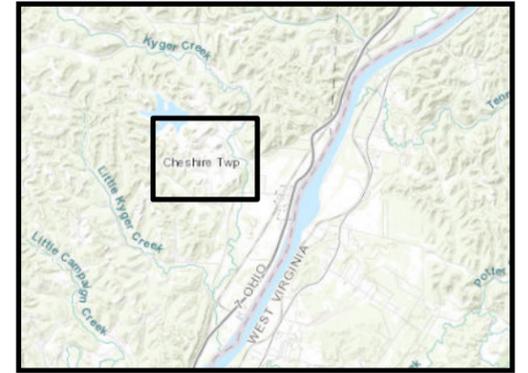


Figure 2: Current Progress Residual Waste Landfill
 Gavin Power LLC
 Cheshire, Ohio





Legend

Photo Location

NOTES:

- 1. Locations are approximate
- 2. Aerial Imagery: ESRI World Imagery

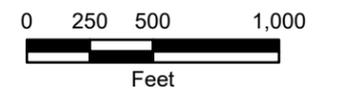


Figure 3: Visual Inspection Map
Residual Waste Landfill
Gavin Power LLC
Cheshire, Ohio





APPENDIX A

ANNUAL INSPECTION PHOTOGRAPHS

CLIENT: Lightstone Generation	SITE LOCATION: Gavin Power Plant Cheshire, Ohio	PROJECT NO.: 0767401
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PHOTO NO. 1.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN North.		
DESCRIPTION View of RWL Phases H & I from top of landfill.		

PHOTO NO. 2.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN South.		
DESCRIPTION View of RWL Phases F2 and H intersection.		

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PHOTO NO. 3.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN West.		
DESCRIPTION Surface prepared for placement of final cap on eastern face of Phase H.		

PHOTO NO. 4.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN North.		
DESCRIPTION Geomembrane cap being readied for deployment on east face of Phase H.		

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PHOTO NO. 5.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN East.		
DESCRIPTION View of leachate seep being directed into Pond 2 through surface channel on top of RWL liner system.		

PHOTO NO. 6.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN South.		
DESCRIPTION View of leachate seep on eastern slope along main haul road above Pond 2.		

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PHOTO NO. 7.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Top view.		
DESCRIPTION View of exploratory test trenches to determine path of leachate seep on Eastern slope above Pond 2.		

PHOTO NO. 8.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN East.		
DESCRIPTION View of concrete headworks settling basin adjacent to Pond 2 in the process of being cleaned.		

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PHOTO NO. 9.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN East.		
DESCRIPTION View of RWL access road along Phase F2. Ditchline repairs including fill and check dams observed in good condition.		

PHOTO NO. 10.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Southeast.		
DESCRIPTION Channel incising at confluence of slope channel with roadside channel north of stack out pad.		

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PHOTO NO. 11.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Northeast.		
DESCRIPTION View of RWL Phase F2 slope coverage near SE corner. Observed in good condition.		

PHOTO NO. 12.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN South.		
DESCRIPTION View of eastern slope of the RWL along main haul road. Final cover system is seen on slope.		

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PHOTO NO. 13.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN North.		
DESCRIPTION View of northern slope of Phase F2/J facing Phases H and I consisting of removed intermediate cover and direct seeded FGD material. Erosion rills observed along face of slope.		

PHOTO NO. 14.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN South.		
DESCRIPTION View of interim summit of landfill with intermediate soil cover and vegetation growth.		

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PHOTO NO. 15.	DATE 21 October 2025
DIRECTION PHOTO TAKEN East.	
DESCRIPTION View of Pond 1 southern vertical flow wetland, inactive during inspection. Overgrown vegetation observed.	



PHOTO NO. 16.	DATE 21 October 2025
DIRECTION PHOTO TAKEN East.	
DESCRIPTION View of Pond 1 northern vertical flow wetland, observed in good condition.	



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PHOTO NO. 17.	DATE 21 October 2025
DIRECTION PHOTO TAKEN North.	
DESCRIPTION View of Pond 1 vertical flow wetland outlet. Some overgrown vegetation observed along concrete channel.	



PHOTO NO. 18.	DATE 21 October 2025
DIRECTION PHOTO TAKEN West.	
DESCRIPTION View of Pond 6, observed in generally good condition. Some instances of road surface gravel rolled onto liner observed.	



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<p>PHOTO NO. 19.</p>	<p>DATE 21 October 2025</p>	
<p>DIRECTION PHOTO TAKEN Front view.</p>		
<p>DESCRIPTION View of newly installed water level staff gauge at Pond 6.</p>		

<p>PHOTO NO. 20.</p>	<p>DATE 21 October 2025</p>	
<p>DIRECTION PHOTO TAKEN Northeast.</p>		
<p>DESCRIPTION View of Pond 6 clarifying pond. Surface sheet flow observed flowing into pond from western side at time of inspection. Algae growth also observed. Monitoring recommended.</p>		

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PHOTO NO. 21.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN South.		
DESCRIPTION Panoramic view of Pond 1.		

PHOTO NO. 22.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Southeast.		
DESCRIPTION View of Pond 1 from NW corner inlet. Vegetation on accumulated sediment and precipitate from hydrogen peroxide treatment of leachate observed.		

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<p>PHOTO NO. 23.</p>	<p>DATE 21 October 2025</p>	
<p>DIRECTION PHOTO TAKEN Northwest.</p>		
<p>DESCRIPTION View of Pond 1 clarifying pond and water treatment process equipment.</p>		

<p>PHOTO NO. 24.</p>	<p>DATE 21 October 2025</p>	
<p>DIRECTION PHOTO TAKEN South.</p>		
<p>DESCRIPTION View of Pond 1 clarifying pond and supplemental floating aeration equipment.</p>		

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PHOTO NO. 25.	DATE 21 October 2025
DIRECTION PHOTO TAKEN Top view.	
DESCRIPTION View of Pond 1 groundwater interceptor. Mostly clear water observed at outlet. Improved condition.	



PHOTO NO. 26.	DATE 21 October 2025
DIRECTION PHOTO TAKEN Northwest.	
DESCRIPTION View of Pond 2 geomembrane lined sedimentation basin.	



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PHOTO NO. 27.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Top down.		
DESCRIPTION Area of missing geomembrane above the operating level at the northern end of Pond 2.		

PHOTO NO. 28.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Front view.		
DESCRIPTION View of Pond 2 liner. Wrinkle observed in previous inspections along slope on western side.		

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<p>PHOTO NO. 29.</p>	<p>DATE 21 October 2025</p>	
<p>DIRECTION PHOTO TAKEN South.</p>		
<p>DESCRIPTION View of Pond 2 liner. Small patch of vegetation indicative of a small hole visible near bunching of geosynthetic material.</p>		

<p>PHOTO NO. 30.</p>	<p>DATE 21 October 2025</p>	
<p>DIRECTION PHOTO TAKEN East.</p>		
<p>DESCRIPTION View of Pond 2 clarifying pond.</p>		

CLIENT: Lightstone Generation	SITE LOCATION: Gavin Power Plant Cheshire, Ohio	PROJECT NO.: 0767401
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PHOTO NO. 31.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Front view.		
DESCRIPTION View of eastern end of Pond 2 clarifying pond liner. Small perforation indicated by vegetation visible.		

PHOTO NO. 32.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN South.		
DESCRIPTION View of northern end of Pond 2 clarifying pond liner. Small perforation indicated by vegetation visible.		

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PHOTO NO. 33.	DATE 21 October 2025
DIRECTION PHOTO TAKEN Southeast.	
DESCRIPTION View of Pond 2 western vertical flow wetland. Observed inactive at time of inspection.	



PHOTO NO. 34.	DATE 21 October 2025
DIRECTION PHOTO TAKEN Southeast.	
DESCRIPTION View of Pond 2 eastern vertical flow wetland and inlet basin, observed in good condition.	



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PHOTO NO. 35.	DATE 21 October 2025
DIRECTION PHOTO TAKEN West.	
DESCRIPTION View of Pond 2 vertical flow wetland clarifying basin. Some overgrown cattail vegetation observed within basin.	



PHOTO NO. 36.	DATE 21 October 2025
DIRECTION PHOTO TAKEN East.	
DESCRIPTION View of Pond 2 Outfall 008. Newly installed access stairs observed in good condition.	



CLIENT: Lightstone Generation

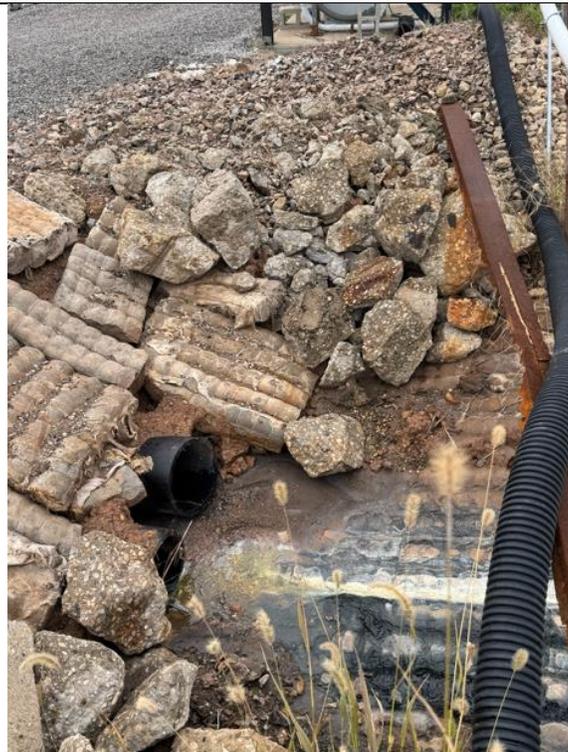
SITE LOCATION: Gavin Power Plant
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PHOTO NO. 37.	DATE 21 October 2025
DIRECTION PHOTO TAKEN North.	
DESCRIPTION Panoramic view of Pond 3 in foreground and Pond 5 behind.	



PHOTO NO. 38.	DATE 21 October 2025
DIRECTION PHOTO TAKEN Top view.	
DESCRIPTION View of Pond 3 surface water channel inlet. Former corroded pipe replaced with dual HDPE pipes using broken concrete and riprap for pipe anchoring.	



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PHOTO NO. 39.	DATE 21 October 2025
DIRECTION PHOTO TAKEN South.	
DESCRIPTION View of relined Pond 3 sedimentation basin. Entire pond relined with HDPE geomembrane. Riprap protection placed around crest.	



PHOTO NO. 40.	DATE 21 October 2025
DIRECTION PHOTO TAKEN Northwest	
DESCRIPTION View of Pond 3 clarifying pond with supplemental filter trailer on left. Erosion blanket visible at top of geomembrane slope on both sides.	



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PHOTO NO. 41.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN North.		
DESCRIPTION View of pipes containing leachate directed into the western edge of Pond 5.		

PHOTO NO. 42.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN South.		
DESCRIPTION View of Pond 3/5 (western) vertical flow wetland, observed in good condition.		

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PHOTO NO. 43.	DATE 21 October 2025
DIRECTION PHOTO TAKEN North.	
DESCRIPTION View of Pond 3/5 (eastern) vertical flow wetland. Overgrown vegetation observed within inlet basin.	



PHOTO NO. 44.	DATE 21 October 2025
DIRECTION PHOTO TAKEN Top view.	
DESCRIPTION Duckweed observed in polishing pool of Pond 3/5 vertical flow wetland.	



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PHOTO NO. 45.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Top view.		
DESCRIPTION View of flow measurement flume at outlet for Pond 3 and Pond 5 vertical flow wetlands. Flume discharges into Outfall 009.		

PHOTO NO. 46.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN South.		
DESCRIPTION Outflow channel from Pond 3/5 Vertical Flow Wetland.		

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PHOTO NO. 47.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Southeast.		
DESCRIPTION View of eastern side of Pond 5 where the Pond 3 temporary bypass system discharges.		

PHOTO NO. 48.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Southeast.		
DESCRIPTION Pipe placed under geomembrane with fabricated pipe boot on southwest side of Pond 5. Used to remove accumulated water from under geomembrane when identified.		

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PHOTO NO. 49.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Top view.		
DESCRIPTION View of Pond 5 liner northern slope. Small perforation with visible vegetation is shown.		

PHOTO NO. 50.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN North.		
DESCRIPTION View of Pond 5 liner near western end. Small perforations suggestive of animal tracks are visible at top of liner.		

CLIENT: Lightstone Generation	SITE LOCATION: Gavin Power Plant Cheshire, Ohio	PROJECT NO.: 0767401
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PHOTO NO. 51.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Top View.		
DESCRIPTION Pipe under liner on north side of Pond 5 for removal of water from under geomembrane when identified.		

PHOTO NO. 52.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Northeast.		
DESCRIPTION View of Pond 5. Anchor trench geomembrane runout damaged by equipment track. Located above operating level.		

CLIENT: Lightstone Generation	SITE LOCATION: Gavin Power Plant Cheshire, Ohio	PROJECT NO.: 0767401
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PHOTO NO. 53.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN East.		
DESCRIPTION Northern slope of the Pond 5 liner. Thick vegetation is visible adjacent to the liner.		

PHOTO NO. 54.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Top view.		
DESCRIPTION View of the Pond 6 liner. Small perforations are visible above the operating level of the pond.		

CLIENT: Lightstone Generation	SITE LOCATION: Gavin Power Plant Cheshire, Ohio	PROJECT NO.: 0767401
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PHOTO NO. 55.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN Top view.		
DESCRIPTION View of the Pond 6 liner. Small perforations are visible above the operating level of the pond.		

PHOTO NO. 56.	DATE 21 October 2025	
DIRECTION PHOTO TAKEN South.		
DESCRIPTION View of FGD stack-out pad and powerplant in background. Active access road repairs also observed near stack-out pad operations.		

CLIENT: Lightstone Generation	SITE LOCATION: Gavin Power Plant Cheshire, Ohio	PROJECT NO.: 0767401
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PHOTO NO. 57.	DATE 21 October 2025
DIRECTION PHOTO TAKEN Southeast.	
DESCRIPTION View of improved soil and vegetation cover along southern slope face near RWL office. Slope was previously direct seeded FGD.	





APPENDIX B

SUMMARY OF QUALITATIVE INSPECTION
TERMS

SUMMARY OF QUALITATIVE VISUAL INSPECTION TERMS

The terms described below are used to describe the overall condition and/or appearance of an observed embankment, structure, activity, or item. These terms are intended to give an overall qualitative judgment of the particular item. Please note, some of the terms described below were not used in this year's inspection, but are included as a comparative reference.

Satisfactory: A condition or activity that meets what would be minimally anticipated or expected from a stability, maintenance, or design viewpoint.

Poor: A condition or activity that does not meet what would be minimally anticipated or expected from a stability, maintenance, or design viewpoint. If a rating of "poor" is assigned, then corrective action is required in as timely a manner as possible.

Minor: A reference to an item or activity where the current maintenance condition is below what is normally desired, but does not cause concern from a stability of safety viewpoint. Generally, these conditions would be identified and could be remedied through the normal maintenance process.

Significant: A reference to an item or activity which would impact the stability or daily operating conditions of the CCR unit. Generally, significant features develop over time and would likely be a result of maintenance not occurring when minor deficiencies were first noted. If left unchecked, such conditions could eventually be a concern for the stability and safety of the CCR unit.

Excessive: A reference to an item or activity that is much worse than what is normal or desired and is of immediate concern to the stability or safety of the CCR unit. Such a condition may also impact the ability of the inspector to properly evaluate the particular item or area.



APPENDIX C

PROFESSIONAL ENGINEER CERTIFICATION

PROFESSIONAL ENGINEER CERTIFICATION

I hereby certify that I or an agent under my review has prepared this Annual Inspection Report for the Residual Waste Landfill, and am familiar with the provisions of the final rule to regulate the disposal of coal combustion residuals (CCR). I attest that this report has been prepared in accordance with good engineering practices and meets the intent of 40 CFR 257.84. To the best of my knowledge, the information contained in this Report is true, complete, and accurate.



James A. Hemme, P.E.

Date: 10 January 2026



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