

EMERGENCY ACTION PLAN

GENERAL JAMES M. GAVIN POWER PLANT

RECLAIM (“BOTTOM ASH”) POND

[FILE NO: 8720-003]

Submitted to

Ohio Department of Natural Resources

Submitted and Owned by

Gavin Power, LLC
Cheshire, Ohio

Prepared by

Geosyntec Consultants, Inc.
134 N LaSalle St Ste 300
Chicago, IL 60602

August 2026

TABLE OF CONTENTS

1. NOTIFICATION FLOWCHART	7
1.1 General	7
1.2 Sample Messages	7
1.2.1 Watch - Nonfailure Emergency Condition	7
1.2.2 Warning - Potential Failure Situation	8
1.2.3 Warning – Dam Failure Imminent or Occurred	9
2. STATEMENT OF PURPOSE.....	12
3. PROJECT SITE DESCRIPTION.....	13
3.1 Potential Downstream Hazard.....	15
4. EMERGENCY DETECTION, EVALUATION, AND CLASSIFICATION	15
4.1 Detection	15
4.2 Evaluation.....	15
4.3 Emergency Condition Classification.....	16
4.3.1 Monitor.....	17
4.3.2 Watch	17
4.3.3 Warning.....	18
5. GENERAL RESPONSIBILITIES.....	19
5.1 On-site Incident Commander	19
5.2 EAP Coordinator Responsibilities - (Plant Landfill Process Owner).....	20
5.3 Responsibility for Notification.....	20
5.4 Responsibility for Evacuation	21
5.4.1 Primary Responsibility - Gallia County EMA Director	21
5.4.2 Primary Responsibility - Gallia County Sheriff	21
5.4.3 Secondary Responsibility - Middleport Fire Department.....	21
5.5 Responsibility for Duration, Security, Termination, and Follow-up.....	21
5.6 Organization Duties.....	22
5.6.1 Duties and Responsibilities for Monitor.....	22
5.6.2 Duties and Responsibilities for Watch	23
5.6.3 Duties and Responsibilities for Warning.....	24
6. PREPAREDNESS	25
6.1 Surveillance.....	25

Emergency Action Plan (EAP)
Gavin Power Plant
Reclaim Pond

6.2	Response During Period of Darkness.....	25
6.3	Access to Site	25
6.4	Response During Weekends and Holidays	25
6.5	Response During Adverse Weather	25
6.6	Means of Communication	25
6.7	Emergency Corrective Measures.....	26
6.7.1	High Pool Levels/Overtopping Condition.....	26
6.7.2	Leakage/Cracking Condition.....	26
6.7.3	Slumping/Sliding of Embankment Crest.....	26
6.7.4	Sinkhole Condition.....	27
6.7.5	Severe Downstream Erosion or Minor Structural Damage	27
6.8	Emergency Supplies and Resources.....	28
6.9	Training and Updating of the EAP.....	28
6.10	Annual Face-to-Face Meeting with Local Emergency Responders	28
7.	INUNDATION MAPS.....	29

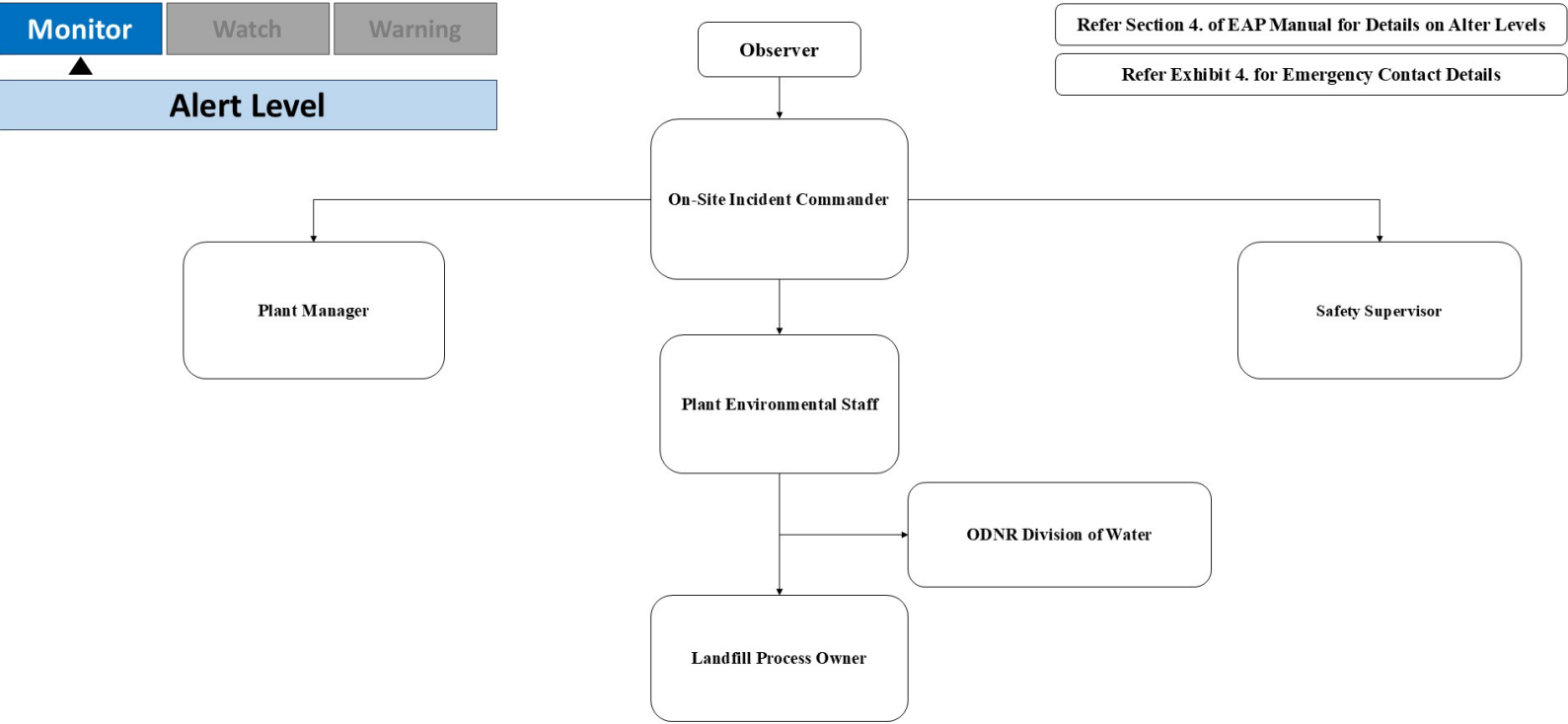
LIST OF EXHIBITS

Exhibit 1	Notification Flowchart Alert Level: Monitor
Exhibit 2	Notification Flowchart Alert Level: Watch
Exhibit 3	Notification Flowchart Alert Level: Warning
Exhibit 4	Gavin Power Plant Emergency Contact Details
Exhibit 5	Reclaim Site Pond Layout and Location

LIST OF APPENDICES

Appendix A	Training, Exercising, Updating, and Posting the EAP
Appendix B	Glossary of Terms
Appendix C	Preparation and Approval of the EAP

**Emergency Action Plan (EAP)
Gavin Power Plant
Reclaim Pond**

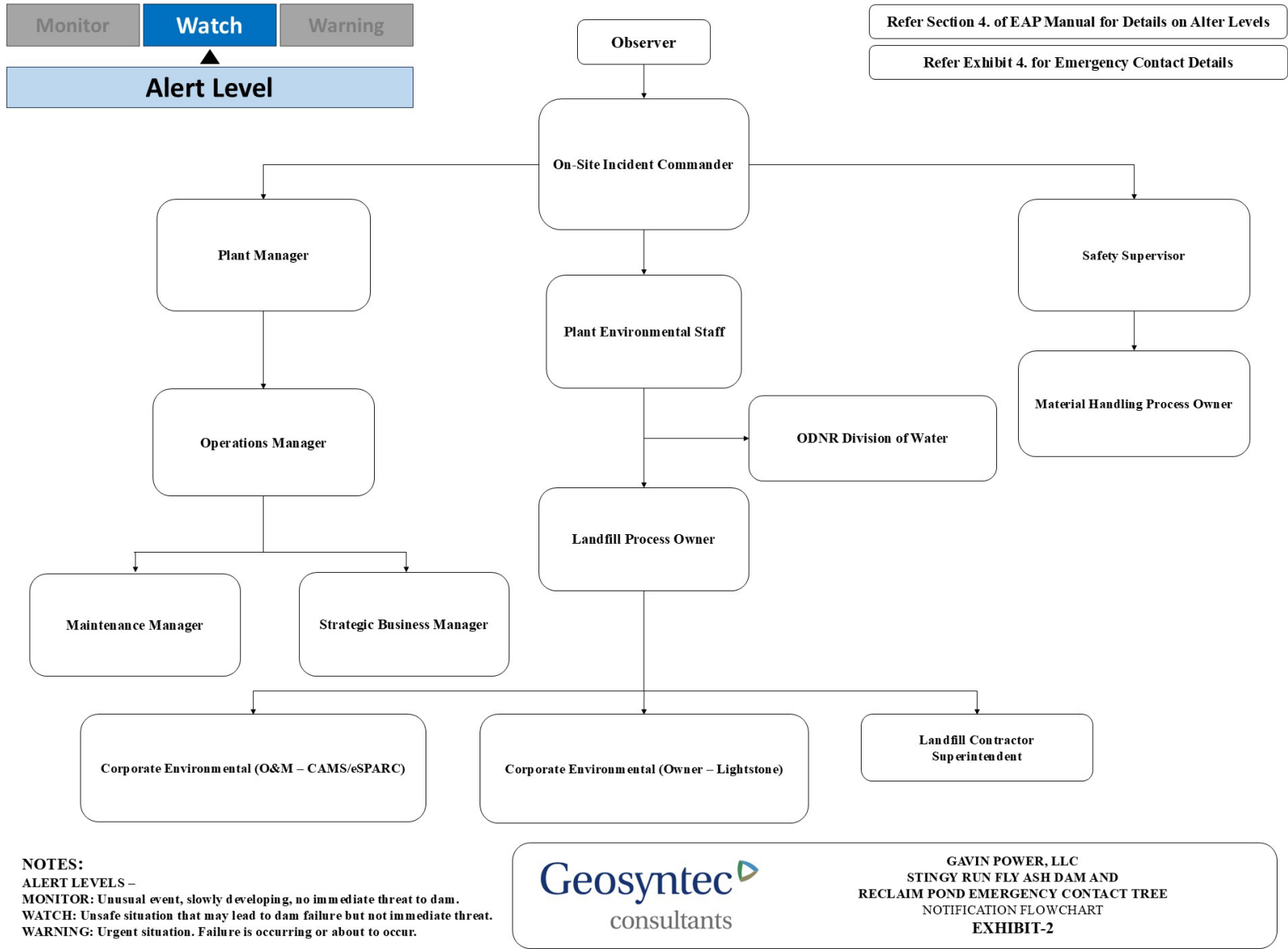


NOTES:
ALERT LEVELS –
MONITOR: Unusual event, slowly developing, no immediate threat to dam.
WATCH: Unsafe situation that may lead to dam failure but not immediate threat.
WARNING: Urgent situation. Failure is occurring or about to occur.



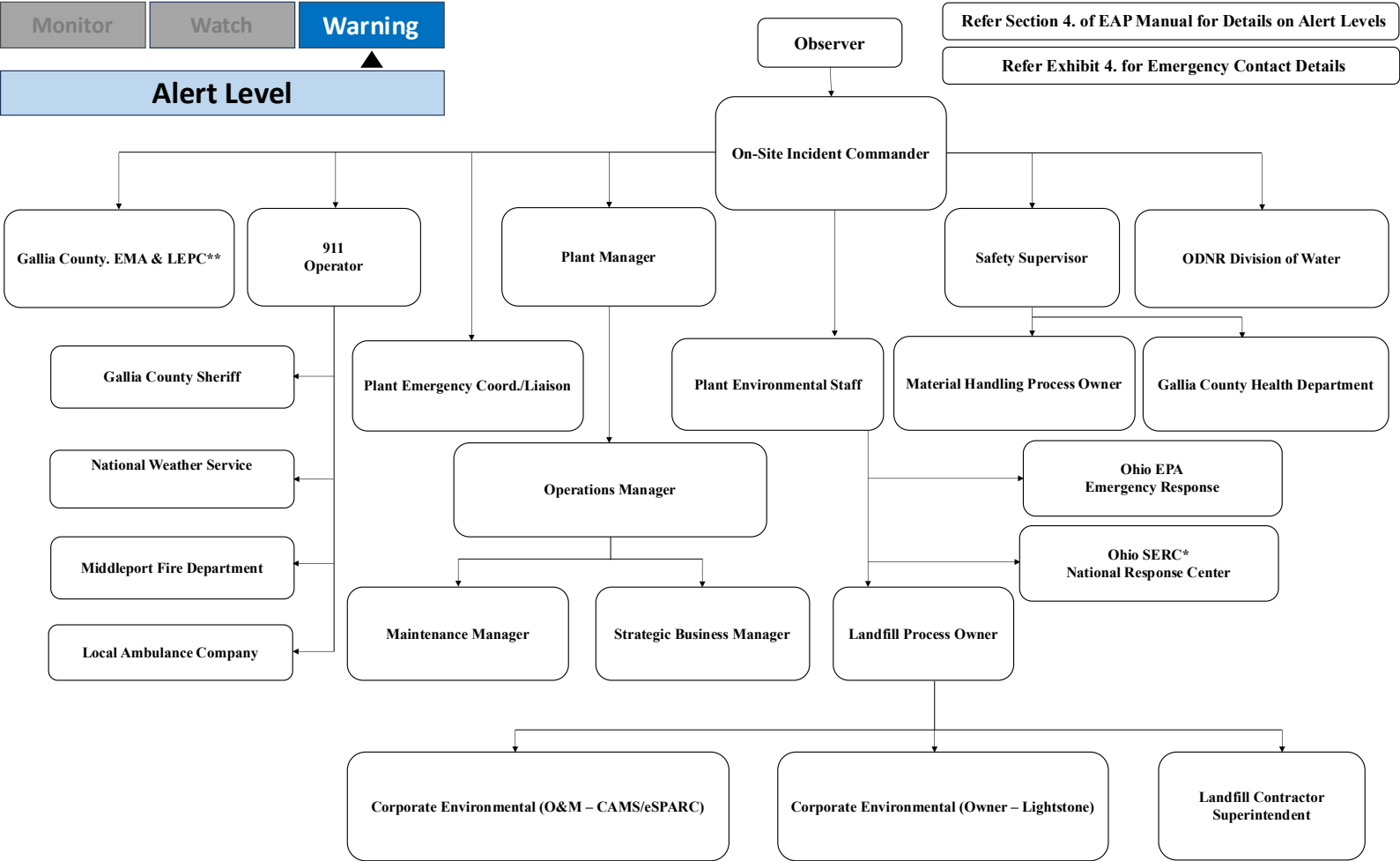
GAVIN POWER, LLC
STINGY RUN FLY ASH DAM AND
RECLAIM POND EMERGENCY CONTACT TREE
NOTIFICATION FLOWCHART
EXHIBIT-1

**Emergency Action Plan (EAP)
Gavin Power Plant
Reclaim Pond**



NOTES:
ALERT LEVELS –
MONITOR: Unusual event, slowly developing, no immediate threat to dam.
WATCH: Unsafe situation that may lead to dam failure but not immediate threat.
WARNING: Urgent situation. Failure is occurring or about to occur.

Emergency Action Plan (EAP)
Gavin Power Plant
Reclaim Pond



NOTES:
ALERT LEVELS –
MONITOR: Unusual event, slowly developing, no immediate threat to dam.
WATCH: Unsafe situation that may lead to dam failure but not immediate threat.
WARNING: Urgent situation. Failure is occurring or about to occur.

*SERC – STATE EMERGENCY RESPONSE COMMISSION
 ** EMA – EMERGENCY MANAGEMENT ASSOCIATION
 LEPC – LOCAL EMERGENCY PLANNING COMMITTEE



GAVIN POWER, LLC
 STINGY RUN FLY ASH DAM AND
 RECLAIM POND EMERGENCY CONTACT TREE
 NOTIFICATION FLOWCHART
EXHIBIT-3

Exhibit-4. GAVING POWER PLANT EMERGENCY CONTACT DETAILS			
Name/Agency	EAP Role	Office Phone Number	Cell Phone Number
Gavin Power Plant			
On Site Team Leader	On-Site Commander	740-925-3210	-
Taylor Huffman	Plant Environmental Staff	740-925-3171	740-441-7336
Garrett Watterson	Plant Manager	740-925-3100	304-593-0813
Sam Stearns	Safety Supervisor	740-925-3125	304-857-2526
David Caldwell	Material Handling Process Owner	740-925-3309	740-645-9153
Tim Staufer	Plant Emergency Coord./Laison	740-925-3303	740-339-3780
Andy Davis	Operations Manager	740-925-3101	740-645-3961
Jacob Errett	Maintenance Manager	740-925-3049	304-675-0495
Matt Mooney	Strategic Business Manager	740-925-3067	740-648-5292
Rich Fuller	Landfill Process Owner	740-925-3103	681-910-2864
Patrick Blanchard	Corporate Environmental (O&M-CAMS/eSPARC)	713-380-4790	740-612-7595
Lisa Carty	Corporate Environmental (Owner – Kindle Energy)	202-253-7181	202-253-7181

Exhibit-4. GAVING POWER PLANT EMERGENCY CONTACT DETAILS			
Name/Agency	EAP Role	Office Phone Number	Cell Phone Number
Grace Kurdian	Corporate Environmental (Owner – Kindle Energy)	202-637-1040	202-637-1040
Landfill Contractor Superintendent	Landfill Contractor Superintendent	-	-
Gallia County			
Emergency Response	Emergency Response	911	-
Local Ambulance Company	Local Ambulance Company	911	-
Gallia County EMA & LEPC	Gallia County EMA & LEPC	740-441-2036	-
Gallia County Sheriff	Gallia County Sheriff	740-446-1221	-
Middleport Fire Department	Middleport Fire Department	740-992-6663	-
Gallia County Health Department	Gallia County Health Department	740-441-2018	-
Ohio State			
Ohio Department of Natural Resources	ODNR Division of Water (Business Hours)	614-265-6731	-
Ohio Department of Natural Resources	ODNR Division of Water (Non-Business Hours)	614-265-7006	-
Ohio Environmental Protection Agency	Ohio EPA	614-224-0946	-

Exhibit-4. GAVING POWER PLANT EMERGENCY CONTACT DETAILS			
Name/Agency	EAP Role	Office Phone Number	Cell Phone Number
Ohio Environmental Protection Agency	Emergency Response	800-282-9378	
Ohio State Emergency Response Commission	Ohio SERC	800-282-9378	-
National Response Center	National Response Center	800-424-8802	
National Weather Service	National Weather Service	304-344-8427	-

1. NOTIFICATION FLOWCHART

1.1 General

Exhibit 1 through Exhibit 4 provide notification flowcharts and emergency contact details for potential hazardous or emergency conditions at the General James M. Gavin Power Plant Reclaim Pond, located just south of Cheshire, Ohio. These notification flowcharts outline the hierarchy for notification. Exhibit 4 includes contact information of personnel/agency listed in the notification flowcharts in the event of an emergency. The information in the flowcharts is for the following alert levels based on The Interagency Committee on Dam Safety (ICODS) guidelines levels:

- Monitor – A hazardous condition exists, requiring investigation and corrective action; potential for failure is being assessed. Often the owner’s engineer and ODNR Dam Safety Program are contacted.
- Watch – Potential failure situation is developing; corrective measures are underway. The ODNR Dam Safety Program is contacted, and County EMA is notified to prepare for a potential evacuation effort.
- Warning – Dam failure is occurring or imminent – contact to County Emergency Management Agency (EMA) made to ensure evacuation can occur, secondarily contact ODNR Dam Safety.

Section 4 of this Emergency Action Plan (EAP) provides further descriptions of these conditions.

1.2 Sample Messages

In the event of an emergency condition at the dam, the following notifications shall be made. Sample messages are provided below to expedite the transfer of accurate and timely information in the event of such a situation. Underlined items are provided to indicate where information specific to the caller must be given.

1.2.1 Monitor - Nonfailure Emergency Condition

Standby Alert Notification from Gavin Power Plant to Ohio Department of Natural Resources (ODNR).

“This is (your name) from the Gavin Power Plant. I am calling to advise you that we are starting constant surveillance of our Gavin facility’s Reclaim Pond Embankment according to our EAP due to a nonfailure emergency condition at the dam. At this time, we do not anticipate that the Reclaim Pond Embankment will fail but are

notifying you, so you are aware of the situation. We will call you again if the condition worsens, if a decision to evacuate is made, or when cancellation of this standby alert has been made.”

(Note, be prepared to provide additional information to ODNR regarding the nature of the emergency condition.)

1.2.2 Watch - Potential Failure Situation

Notification from Gavin Power Plant to Gallia County Emergency Management (911).

“This is (your name) from the Gavin Power Plant. I am calling to notify you that we have a potential failure condition of our Gavin facility’s Reclaim Pond Embankment. Please note that this is NOT presently an evacuation situation, and we will call again if it becomes necessary to evacuate potential flood prone areas. Again, this is NOT an evacuation condition at this time.”

Notification from Gavin Power Plant to ODNR.

“This is (your name) at the Gavin Power Plant. I am calling to notify you that a potential failure condition exists at the Gavin facility’s Reclaim Pond Embankment. We have initiated notifications according to our EAP. We will call you again to inform you if the condition worsens, if a decision to evacuate is made, or when cancellation of this standby alert has been made.”

(Note, be prepared to provide additional information to ODNR regarding the nature of the emergency condition.)

National Weather Service (NWS) Forecast Center.

If the emergency is related to a precipitation event, the 911 Operator will contact the NWS to determine NWS’s forecast of total rainfall. The telephone number for the NWS Forecast Office in Charleston, West Virginia is (304) 746-0189 and it is answered 24 hours per day, 7 days per week. If conditions at the dam worsen and the emergency changes to Warning, NWS should be contacted again because they can rapidly issue warnings for downstream evacuation over public broadcast stations.

Potential Assistance Notification from Gavin Power Plant to contractors.

“This is (your name) at the Gavin Power Plant. I am calling to notify you that a potential failure condition exists at our Reclaim Pond Embankment, which may require your assistance. I am calling to notify you so that you are aware of the potential failure condition of the dam so preparation measures can be taken. Please note this is NOT presently a failure situation and we will call again if the situation worsens.” As needed, please add “Your services are needed at this time.”

(Note, be prepared to provide additional information to the contractors regarding the nature of the emergency conditions and the types of equipment and materials that may be needed.)

Notification from “911” to Gallia County Sheriff/Middleport Fire Department.

“This is (your name) of “Gallia County Emergency Management Agency (EMA). I am calling to notify you that there is a potential failure condition at the Gavin Power Plant Reclaim Pond Embankment. We have been directed to notify you that a potential failure condition exists at the dam so that you can be prepared if an evacuation notice is issued. Please note this is NOT presently an evacuation situation and we will call again if it becomes necessary to evacuate potential flood prone areas. Again, this is NOT an evacuation condition at this time.”

1.2.3 Warning – Dam Failure Imminent or Occurred

Notification from Gavin Power Plant to “911.”

“This is (your name) at the Gavin Power Plant in Gallia County. I am calling to notify you that failure of our Reclaim Pond Embankment is imminent/has occurred. Please notify all available emergency personnel according to the EAP for the dam. Specific details can be found in the Notification Flowchart, **Exhibit 2** in the EAP. Evacuation of flood prone areas downstream of the dam as shown in the EAP should be started immediately.”

Notification from Incident Commander Material Handling Process Owner.

**Emergency Action Plan (EAP)
Gavin Power Plant
Reclaim Pond**

“This is (your name) at the plant. I am calling to notify you that failure of the Reclaim Pond Embankment is imminent/has occurred. Please get your staff out of the potentially flooded areas and come to (give location) to assist us.”

(Note, be prepared to indicate the personnel and equipment that may be needed.)

Notification from Gavin Power Plant to ODNR.

“This is (your name) at the Gavin Power Plant. I am calling to notify you that failure of our Reclaim Pond Embankment is imminent/has occurred. We have already notified “911” according to the EAP for the dam. We have told them that evacuation of flood prone areas should be started immediately.”

(Note, be prepared to provide additional information to ODNR regarding the nature of the emergency condition.)

National Weather Service (NWS) Forecast Center.

The 911 Operator will Contact the NWS to notify them of the emergency condition at the dam. Request that the NWS issue warnings over public broadcast stations (i.e., television, radio, weather radio) alerting the public to the failure condition and to immediately evacuate the area downstream of the dam along Stingy Run and Kyger Creek.

Notification from Gavin Power Plant to local contractors.

“This is (your name) at the Gavin Power Plant. I am calling to notify you that an evacuation order for the Gavin Power Plant’s Reclaim Pond downstream flooding area was given at ([time])). Your services are needed at this time. Please respond as quickly as possible.”

(Note, be prepared to provide additional information to the contractors regarding the nature of the emergency condition and the types of equipment and materials that may be needed.)

Notification from “911” to the Gallia County Sheriff/Middleport Fire Department.

“This is (your name) of the Gallia County EMA. I am calling to notify you that an evacuation order for the Gavin Power Plant’s Reclaim Pond downstream flooding area was given at ([time])). Please mobilize the emergency response services according to the

Emergency Action Plan (EAP)
Gavin Power Plant
Reclaim Pond

EAP. Again, we are asking you to begin the evacuations immediately.”

Evacuation Notification by Sheriff and Fire Department to Residents.

“An evacuation order for the Gavin Power Plant’s Reclaim Pond flood prone area (Power Plant property and SR-7) has been given. Please evacuate this area to higher ground immediately. This is an emergency. Please leave now!”

2. STATEMENT OF PURPOSE

The purpose of this Emergency Action Plan (EAP) is to safeguard lives and to reduce damage to the property of the citizens of Gallia County who live or are traveling in close proximity to the Gavin Power Plant in the event of failure of the structures (dam or embankment) or flooding caused by large flow releases from the structures. This EAP establishes the notification procedures for the rapid implementation of the emergency action to be taken prior to and following a failure of Gavin Power Plant's Reclaim Pond (herein referred to as RCP) embankment structures. The RCP is part of the Bottom Ash Complex (herein referred to as BAC), which consists of the Bottom Ash Pond (herein referred to as BAP) and RCP.

This EAP document was prepared to meet the requirements of Ohio Department of Natural Resources (ODNR) for an EAP as provided in Ohio Administrative Code (OAC) 1501:21-15-07 and 1501:21-21-04 and as further detailed in ODNR's EAP Guidelines dated September 11, 2017.

This EAP supersedes previous versions of the Gavin Power Plant EAP submitted to ODNR and addresses the comments received from ODNR on the previous versions.

3. PROJECT SITE DESCRIPTION

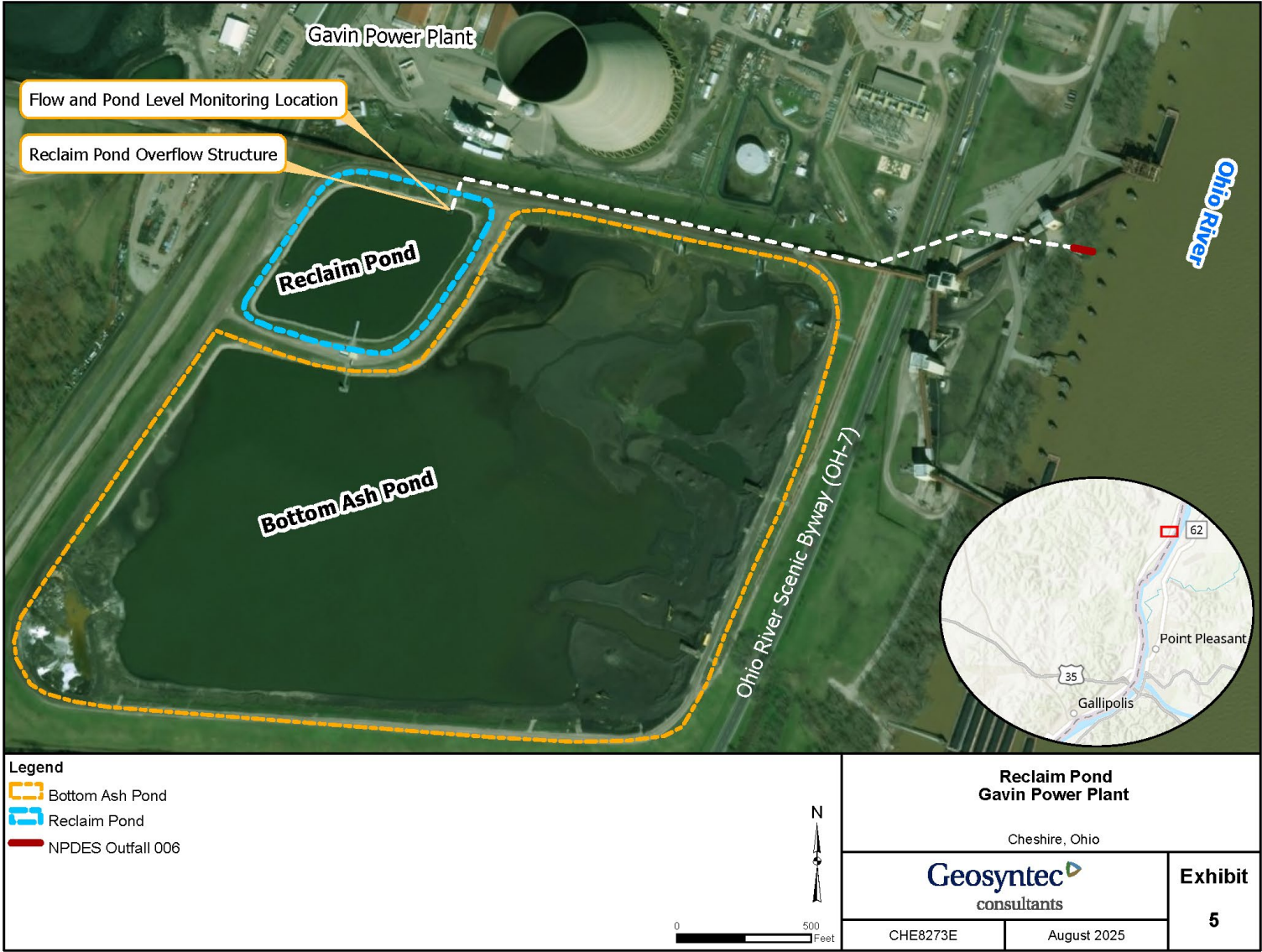
The Gavin Power Plant is located along the Ohio River in Gallia County, Ohio just south of Cheshire, Ohio. The BAC, which consists of the BAP Dam (ODNR Dam File #8720-003), the Reclaim Pond, and the outlet structure from the Reclaim Pond to the discharge to the Ohio River. The nearby towns are Addison, Ohio south on State Route (SR) 7 and Point Pleasant, West Virginia. There are no towns directly across the Ohio River from the power plant.

This EAP addresses the RCP. Gavin Power, LLC is in the process of closing the BAP in accordance with the CCR rule, 40 Code of Federal Regulations (CFR) Part 257, Subpart D. In October 2022, all sluicing of bottom ash (CCR) to the BAP was halted, and in April 2023, all non-CCR wastewater streams were diverted away from the BAP. The BAP is being closed through the removal of CCR materials by excavating, dewatering, loading, and hauling the material out of the impoundment. All non-CCR waste flows have been rerouted to a temporary water treatment system or have been diverted directly to the RCP (Permit to Install #1557665). Within the RCP, stored water is pumped to the plant for reuse or discharged to the Ohio River through a secondary temporary water treatment system or via an overflow structure from the RCP under an Ohio NPDES permit.

The RCP is located immediately downstream of the plant on the northwest corner of the BAP. The access to the RCP is via plant roads on the northwestern and southeastern corners of the BAP perimeter dikes. The access roads go up the outer slope to the gravel road along the perimeter dike crest. The access and crest roads are maintained by the plant, which consists of repairing any ruts by backfilling with gravel stone. The BAP and RCP are separated by landscaped pond embankments and a gravel access road. The location and layout of the Reclaim Pond and BAP are presented in **Exhibit 5**. A portion of the water in the RCP is reclaimed for plant use and the remainder is discharged to the Ohio River. The RCP has been provided with flow and pond level monitoring devices near the pond's overflow structure, and it has a freeboard of 10 feet. The RCP is not a CCR unit and is not being closed pursuant to the CCR rule.

The diversion of all non-CCR wastewater streams to the temporary wastewater plant or to the Reclaim Pond will remain in place until regulatory (CCR) closure of the BAP is achieved. The BAP will then be retrofitted into a Process Water Pond (PWP) to receive the non-CCR waste streams including cooling tower blowdown, pyrites, coal pile runoff and miscellaneous sump flows.

Emergency Action Plan (EAP)
Gavin Power Plant
Reclaim Pond



3.1 Potential Downstream Hazard

The ODNR dam inventory sheet, based on the inspection dated May 4, 2022 (ODNR, 2022) did not include any potential downstream hazard areas for RCP embankment. Due to the small size of RCP dam (10 ft height, 1.3 acres surface area), the downstream impacted area that is likely to be impacted by RCP embankment is the power plant property and SR-7 because of its vicinity

4. EMERGENCY DETECTION, EVALUATION, AND CLASSIFICATION

4.1 Detection

Potential emergency conditions, which are listed in Section 4.3, for the integrity of the RCP embankment may be observed by Gavin staff during regular maintenance and/or inspections, by local police during their general rounds, or by a member of the general public who reports a potential concern for the safety of the dam. The following components should be considered for detecting and classifying an emergency condition at the dam:

- Monitor exterior and interior slopes for erosion, deterioration and loss of vegetation after heavy rain.
- Monitor the integrity of the inlet and outlet structures, including the outlet conduit, emergency overflow, and freeboard.
- Monitor the bulge on the west exterior slope as well as the sloughing on the slopes of the common embankment between the BAP and RCP quarterly for signs of embankment instability.

Once the concern is relayed to Gavin Power, LLC, it shall be the On-site Incident Commander's (Team Leader) responsibility to lead the response actions. If the Incident Commander is not available or able to lead the response, then the Material Handling Process Owner, or next highest ranking on-site supervisor, shall have that responsibility. Roles and responsibilities are further defined in Section 5.

The process for detection of Emergency Conditions will be part of the annual face-to-face meeting with local first responders as described in Section 6.10. The means of communicating these Emergency Conditions are discussed in Section 6.6; the procedure is detailed in the Notification Flowcharts (Exhibit 1, Exhibit 2, and Exhibit 3).

4.2 Evaluation

The Gavin Power Plant's Incident Commander would likely be the first person notified of a potential problem and would be the first person on the scene. Upon arrival at the site, the Incident Commander will assume responsibility for the emergency condition, evaluate the

potential emergency, determine alert level and action based on emergency classification condition presented in Table 3, and continue to evaluate the condition.

Table 1. Classification of Conditions

Alert Level	Description	Action
Monitor	Unusual event, slowly developing, not an immediate threat to the dam.	Dam owner representative must inspect the dam. Document the incident and report findings to your engineer and the ODNR, Dam Safety Program. Obtain instructions regarding the next course of action from your engineer and/or ODNR.
Watch	Unsafe situation that may lead to failure of the dam but not an immediate threat.	Begin notifications according to Section I: Notification Flowchart in this EAP. Begin constant surveillance of the dam.
Warning	Urgent situation. Failure is occurring or about to occur. Or, areas downstream are flooding due to spillway flow. Evacuation of downstream area necessary.	Begin notifications according to Section I: Notification Flowchart in this EAP. Begin constant surveillance of the dam.

4.3 Emergency Condition Classification

If any of the following conditions are developing, appear imminent or have occurred, implement the notification plan (Exhibit 2 and Exhibit 3) immediately. Emergency conditions shall be classified based on following:

4.3.1 Monitor

This covers a hazardous condition that exists, requiring investigation and corrective action. The potential for failure is being assessed, and there is no immediate threat to the integrity of the dam. This includes the following scenarios:

- Reservoir water surface elevation at the spillway crest and/or water is flowing through the spillway with no active erosion.
- New seepage areas in or near the dam with clear flow.
- New cracks in the embankment greater than 1/4 -inch wide without seepage.
- Visual movement/slippage of the embankment slope.
- Instrumentation readings beyond predetermined values.
- Measurable earthquake felt or reported on or within 50 miles of the dam This refers to earthquakes of intensity V or lower on the [Modified Mercalli \(MM\) Intensity Scale](#).
- Damage to dam or appurtenances with no impacts to the functioning of the dam.

4.3.2 Watch

This condition applies to situations where a potential failure is developing, but no immediate threat to the dam's integrity exists. Corrective measures are actively being implemented, including scenarios such as the following:

- Water impounding behind the RCP impoundment embankments such that the water level from a precipitation event causes a rise in the pool level of 2 feet or more within 48 hours.
- Obstructions are present in any of the spillway structures.
- Sinkhole develops downstream with no water present.
- Structural damage to discharge structures.
- Visible and limited surficial slump of soils on face of embankment; depth of two feet or less.
- Significant erosion (greater than five feet deep) on the downstream face of the RCP impoundment embankments.
- Spillway flowing with active gully erosion.
- Spillway flow that could result in flooding of people downstream.
- No overtopping flow but water level in the pond within 6 inches of crest.
- New seepage areas with cloudy discharge or increasing flow rate.

- Observation of new sinkhole in pond area or on embankment.
- Cracks in the embankment with seepage.
- Earthquake resulting in visible damage to the dam or appurtenances.
- Verified bomb threat that, if carried out, could result in damage to the dam.
- Damage to dam or appurtenances that has resulted in seepage flow.

4.3.3 Warning

This condition applies to the situations where dam failure is either occurring or imminent, and there is no time to implement corrective measures. In such cases, evacuation should be implemented immediately. The following scenarios are included:

- Spillway flowing with an advancing headcut that is threatening the control section.
- Spillway flow that is flooding people downstream.
- Major overtopping flow eroding the embankment slope.
- Heavy seepage with active erosion. Muddy flow and/or sand boils.
- Rapidly enlarging sinkhole in reservoir area or on embankment with visible flow or whirlpool in the pond.
- Water level is within two feet of the top of the crest of the RCP impoundment embankment.
- Uncontrolled water flows through cracks in the embankment and/or the foundation, steadily increasing in size and volume.
- A significant single or multiple slide/slumps are observed and are continuing to enlarge.
- Whirlpool is observed in the impounded water.
- A large slump or slide develops in the embankment, which threatens to release the impounded water.
- Dam or embankment sections are displaced or separated.
- A turbid or muddy discharge is observed at the toe of the dam.
- Earthquake resulting in uncontrolled release of water from the dam.
- Detonated bomb that has resulted in damage to the dam or appurtenances.
- Damage to the dam or appurtenance that has resulted in uncontrolled water release.

5. GENERAL RESPONSIBILITIES

5.1 On-site Incident Commander

The On-site Incident Commander shall coordinate emergency response action in the event of an Emergency Condition at the dam. Plant personnel will report unusual observations of the embankments and associated pond facilities, whether from intentional monitoring or casual observations to the On-site Incident Commander. The Incident Commander shall take responsibility for making appropriate notifications, and to request assistance as specified in the notification flowcharts (Exhibit 1, Exhibit 2, and Exhibit 3). The Incident Commander may delegate responsibility as appropriate. The Incident Commander shall take responsibility to make appropriate notifications and to request assistance from the ODNR and/or a professional engineer. If the Incident Commander is not available or able to lead the response, then the Plant Landfill Process Owner (EAP Coordinator), or next highest ranking on-site supervisor, shall have that responsibility.

The Incident Commander shall:

1. Assume responsibility for addressing the emergency condition, determine initial emergency condition classification (monitor, watch, or warning), and continue to evaluate conditions.
2. Provide for constant surveillance of the RCP.
3. Initiate and maintain contact with state and local emergency responders according to the Notification Flowcharts shown in **Exhibit 1, Exhibit 2, and Exhibit 3**, as appropriate. See **Section 1.2** of this EAP for sample notification messages.
4. Determine the need for evacuation and initiate evacuation plan. This shall include evacuation downstream of the RCP due to an incident. Evacuation must include Gavin Power Plant and/or contractor personnel working in potentially flooded areas as well as the general public on Gavin owned property outside the Plant and non-Gavin-owned potentially flooded land.
5. Arrange for appropriate road closures within the plant and then notify the Gallia County Sheriff to allow the sheriff's department to close public roads (e.g., close SR 7 if dam embankment is anticipated to fail).
6. Initiate and direct corrective actions at the incident site in consultation with a consulting engineering firm and/or professional engineers, as needed, and ODNR.
7. Supervise Gavin personnel and contractors during the response activities.
8. Coordinate with Material Handling Process Owner, landfill staff, or outside contractor, as specified in **Exhibit 1, Exhibit 2, and Exhibit 3**.

9. Terminate, when appropriate, emergency status for the dam incident.

5.2 EAP Coordinator Responsibilities - (Plant Landfill Process Owner)

The Plant Landfill Process Owner shall be the EAP Coordinator, with assistance from plant technical and management staff. The EAP Coordinator will be responsible for:

1. Distributing copies of the Plan to appropriate and responsible recipients.
2. Establishing a training program for Gavin personnel to make them familiar with the EAP and knowledgeable of the tasks to be performed in the event of an emergency at the Gavin Power Plant dams, in accordance with **Appendix A** of this EAP.
3. Maintaining the EAP in the facility's operating record.
4. Reviewing and updating the EAP as necessary, and at a minimum annually, see **Appendix A**.
5. Making appropriate notifications as required.
6. Conducting an annual face-to-face meeting or emergency preparedness exercise between Gavin staff and local emergency responders as described in **Appendix A**.
7. Documenting and maintaining logs recording all activations of the EAP.
8. Coordinating a follow-up evaluation of emergency response activities following any Emergency Condition at either dam.
9. Serving as the EAP contact person.

5.3 Responsibility for Notification

Potential concerns for the integrity of the dams may be observed by Gavin Power, LLC staff during regular maintenance and/or inspections, by local police during their general rounds, or by a member of the general public who reports a potential concern for the safety of the dam. Once the concern is relayed to Gavin Power, LLC, it shall be the Incident Commander's responsibility to lead Gavin's response actions. If the Incident Commander is not available or able to lead the response, then the Material Handling Process Owner, or next highest ranking on-site supervisor, shall have that responsibility.

The Gavin Power Plant's Incident Commander would likely be the first person notified of a potential problem at a dam and would be the first person on the scene. The Incident Commander (or his designee) will initiate the notification procedures according to the appropriate Notification Flowchart. The Incident Commander will have key personnel proceed to the incident site for surveillance and corrective measures. The ODNR Division of Water shall be notified by Gavin Power, LLC regardless of the nature or extent of the emergency conditions.

5.4 Responsibility for Evacuation

5.4.1 Primary Responsibility - Gallia County EMA Director

Due to the short travel time of a flood wave, the Gallia County Emergency Management Agency (EMA) Director shall activate the Gallia County Emergency Operations Center in conjunction with notifying all residents of the emergency condition while safety personnel are being deployed.

5.4.2 Primary Responsibility - Gallia County Sheriff

The Gallia County Sheriff shall coordinate with the Gallia County EMA to notify all residents of evacuation by loud-speaker-equipped squad cars while safety personnel are being deployed.

In addition, the Gallia County Sheriff shall provide support personnel for road closures (if needed) and maintain communication with other emergency personnel.

5.4.3 Secondary Responsibility - Middleport Fire Department

The Middleport Fire Department will assist the Gallia County Sheriff with the evacuation of residents, as needed.

5.5 Responsibility for Duration, Security, Termination, and Follow-up

The Incident Commander shall be responsible for determining the Emergency Condition at a dam incident, coordinating with appropriate response agencies, and maintaining security and surveillance at the affected location for the duration of emergency condition.

The Incident Commander at the Gavin Power Plant will be responsible for cancellation of the Emergency Condition after determination that the threat of dam/embankment failure or any additional downstream damage has been minimized, and appropriate corrective measures have been implemented. The emergency agencies shall be notified following Notification Flowcharts, shown in Exhibit 1, Exhibit 2, and Exhibit 3 once the emergency condition has been concluded.

The EAP Coordinator shall conduct a follow-up meeting with the individuals and agencies contacted during the Emergency Condition as soon as practical to assess the effectiveness of the EAP. If some participants cannot attend a meeting, they should be requested to provide written comments on the notification and coordination that their agency received during the Emergency Condition.

5.6 Organization Duties

The following tables list potential duties that each agency may be called upon to perform should an emergency condition arise at the Gavin Power Plant dams. The hierarchy of notification can be found in the Notification Flowcharts (see Exhibit 1, Exhibit 2, and Exhibit 3).

5.6.1 Duties and Responsibilities for Monitor

Organization/Person	Duties
Gavin Power, LLC On-site Incident Commander	• Notify ODNR at beginning of emergency condition. • Coordinate response activities at the dam. • Mobilize local contractors if needed. • Notify ODNR when emergency condition ends.
Engineering Consulting Firm and/or Professional Engineer	• Provide technical analysis and design support.
ODNR	• Monitor events at the dam. • Offer technical advice to Gavin staff.
Material Handling Personnel	• Provide construction equipment, materials, and personnel to assist Gavin staff in responding to the emergency condition.

5.6.2 Duties and Responsibilities for Watch

Organization/Person	Duties
Gavin Power, LLC On-site Incident Commander	• Notify “911” emergency center and ODNR at beginning of emergency condition. • Coordinate response activities at the dam. • Mobilize local contractors if needed. • Notify ODNR, EMA, and other agencies when emergency condition ends.
1. Gallia County Sheriff 2. Middleport Fire Department	• At this level, NO EVACUATION IS REQUIRED.
Engineering Consulting Firm and/or Professional Engineer	• Provide technical analysis and design support.
ODNR	• Monitor events at the dam. • Offer technical advice to Gavin staff.
Material Handling & Local Contractors: 1. Material Handling Personnel 2. Landfill Contractor (Charah)	• Provide construction equipment, materials, and personnel to assist Gavin Power staff in responding to the emergency condition.
Gallia County EMA “911” Emergency Center	• Notify the Gallia County Sheriff of the emergency condition. • Notify the Gallia County EMA Director and the Middleport Fire Department of the emergency condition.

5.6.3 Duties and Responsibilities for Warning

Organization/Person	Duties
Gavin Power, LLC On-site Incident Commander	• Notify “911” emergency center and ODNR at beginning of emergency condition. • Coordinate response activities at the dam. • Mobilize Material Handling personnel and local contractors if needed. • Notify ODNR, EMA, and other agencies when emergency condition ends. • Complete follow-up reporting to ODNR recording activation of EAP.
1. Gallia County Sheriff 2. Middleport Fire Department	• IMMEDIATELY BEGIN EVACUATION of flood prone areas downstream of the dam • Evacuation activities may include physical evacuation, calling, knocking on doors, announcements with bullhorns, etc. • Assist in rescue of stranded residents, placing sandbags, and other duties as required.
Engineering Consulting Firm and/or Professional Engineer	• Provide technical analysis and design support.
ODNR	• Monitor events at the dam. • Offer technical advice to Gavin staff.
Material Handling Personnel & Local Contractors: 1. Material Handling Personnel 2. Landfill Contractor (Charah)	• Provide construction equipment, materials, and personnel to assist Gavin Power staff in responding to the emergency condition.
Gallia County EMA “911” Emergency Center	• Notify the Gallia County Sheriff of the emergency condition. • Notify the Gallia County Emergency Management Director and the Middleport Fire Department of the emergency condition.

6. PREPAREDNESS

6.1 Surveillance

The RCP is an unmanned facility, but it is visited regularly by security guards and inspected on a weekly basis by qualified plant personnel/qualified person (per CCR Rule). During these visits, personnel are instructed to report unusual conditions to their supervisors so that the appropriate Gavin technical and management staff are notified, and an inspection can be performed.

6.2 Response During Period of Darkness

There are no area lights at the RCP. Portable lighting is available at the plant and will be used during periods of darkness. If necessary, additional portable lighting will be rented to illuminate areas of concern.

Normal operations of the power plant do not include site visits to RCP during hours of darkness. If an emergency condition is identified or a significant weather event of concern occurs, operations will be adjusted as needed to safely illuminate and access the embankment areas for inspection during night hours.

6.3 Access to Site

Access to the RCP is via plant roads that can be reached from the plant entrances off SR 7. The eastern embankment can also be accessed through infrequently used locked gates off SR 7. The access roads go up the outer slope to the gravel road along the perimeter dike crest.

6.4 Response During Weekends and Holidays

The Gavin Power Plant is manned 24 hours per day, 365 days a year. Therefore, plant staff will be available to respond to an emergency situation at any time.

6.5 Response During Adverse Weather

The plant has four-wheel drive vehicles to be used for transportation to the RCP. The power plant also has track-mounted bulldozers that are used in the day-to-day operations of the coal yard that could be utilized to access the dams during extreme weather conditions.

6.6 Means of Communication

The primary means of internal communication is the use of two-way radios. These radios are used for day-to-day operations and for emergency events. The frequency can be changed to be in contact with the local emergency response agency. Most plant vehicles are equipped with radios.

The primary means of external communications is via cell phone and the plant wide paging system and alarm system.

6.7 Emergency Corrective Measures

All work related to the following conditions shall be coordinated with plant technical and management staff, as needed. The corrective measures shall be monitored by qualified engineering or technical staff during and after implementation for effectiveness. Supplemental measures should be incorporated as necessary to reduce potential hazards. If proposed measures appear to be ineffective, plant personnel will discontinue the current activity, promptly reassess conditions and implement alternative measures.

6.7.1 High Pool Levels/Overtopping Condition

1. If overtopping is imminent, utilize rock, impervious geomembrane, slope pipes or similar measures to reinforce the overflow area and minimize potential for water flow incising into the soil resulting in erosion of the dam or embankment.
2. Contact a consulting engineering firm and/or a professional engineer for permanent repair recommendations.

6.7.2 Leakage/Cracking Condition

1. Place earth or rock fill or other appropriate materials over the leakage area. Attempt to collect significant flows into temporary flexible slope piping and discharge water at a stable location off the dam or embankment fill. Upon temporary stabilization of the leakage condition, install silt fence, composite sock filter, or similar erosion and sediment controls as appropriate for the condition. Do not install erosion or sediment control devices on the embankment face or at the toe where water will be impounded on the leaking or cracked embankment fill. These materials are available on site or from the coal yard operation, or another contractor as listed on the Notification Flowcharts in **Exhibit 1, Exhibit-2, Exhibit 3, and Exhibit 4, and within Section 6.8.**
2. Utilize earth fill, geomembrane, geosynthetic clay liner, bentonite, etc., or a combination as required to temporarily repair or plug apparent upstream leaks and cracks in the dam or embankment that are identified after water draw down.
3. Contact consulting engineering firm and/or a professional engineer for mitigation techniques and permanent repair recommendations.

6.7.3 Slumping/Sliding of Embankment Crest

1. Fill affected area with earth, rockfill, or sandbags. These materials are available on site or from coal yard operation, or another contractor as listed on the Notification Flowcharts in **Exhibit 1, Exhibit 2, and Exhibit 3 and within Section 6.8.** If sliding

occurs, the toe of the slide should be stabilized by adding ballast weight with earth, rock, or gravel on the downgrade end of the slump.

2. If the slump reduced the dam crest elevation, place sandbags at the slump to restore dam to its original elevation. If erosion has occurred from the low point on the crest down the face of the dam, place sandbag or rip rap from the toe of slope up to the top of the dam before placing more load on the crest.
3. Attempt to collect significant flows identified within a slump/slide area into temporary flexible piping and discharge the water at a stable location off of the embankment fill.
4. Contact a consulting engineering firm and/or a professional engineer for permanent repair recommendations.

6.7.4 Sinkhole Condition

1. Fill sinkholes with earth or rockfill. These materials are available on site or from coal yard operation, or another contractor as listed on the Notification Flowcharts in **Exhibit 1, Exhibit 2, and Exhibit 3** and within **Section 6.8**.
2. Contact consulting engineering firm and/or a professional engineer for permanent repair recommendations.

6.7.5 Severe Downstream Erosion or Minor Structural Damage

1. Monitor and log condition of structures and downstream erosion.
2. Temporarily buttress identified unstable areas with soil and rock fill. Do not unnecessarily add weight to a failing area on a steep slope.
3. Install silt fence, composite sock filter or similar erosion and sediment controls as appropriate for the condition. Do not install erosion or sediment control devices where water will be impounded on identified tension cracks or saturated embankment fill.
4. Contact consulting engineering firm and/or a professional engineer for permanent repair recommendations.

6.8 Emergency Supplies and Resources

Contact	Emergency Items	Location	Phone
Material Handling Process Owner (Dave Caldwell)	Phone, radios	At the plant material handling	Off.: 740-925-3309 Cell: 740-645-4481
Main Guard House	Phone, radios	Plant entrance	Off.: 740-925-3012
Landfill Process Owner (Rich Fuller)	Bulldozers, backhoes, dump Trucks	At the plant landfill	Cell: 681-910-2864
Landfill Contractor	Bulldozers, backhoes, dump Trucks	Route 554 adjacent to the Gavin Power Plant	
External Companies	Pumps	Offsite. Gavin would reach out to a rental companies to source a pump to aid in the dewatering	

6.9 Training and Updating of the EAP

The EAP shall be reviewed and updated by Gavin Power, LLC and all affected parties at least once a year and when significant changes to the facility occur, or emergency contacts/reporting procedures change. When updating the EAP, check all contact names and phone numbers for verification. If there are significant changes to the EAP, such as dam or embankment ownership or major modifications to the dam or embankment, the EAP should be updated as soon as possible.

6.10 Annual Face-to-Face Meeting with Local Emergency Responders

An annual face-to-face meeting will be held with local emergency responders that will cover:

1. General information about the RCP.
2. Roles and responsibilities the first responders would have in assisting the facility in an emergency.
3. Potential risks the RCP pose as well as preventative measures plant staff are taking to avoid these potential issues.

The meeting will be held regardless of whether one of the three Emergency Conditions defined in this EAP **Section 4.3** has occurred. If an incident defined by one of these Emergency Conditions occurs, then the annual meeting date may be moved to discuss the incident soon after it occurs. Documentation of the annual face-to-face meeting shall be maintained in plant operating record.

7. INUNDATION MAPS

An inundation mapping study for the RCP was not conducted in accordance with ODNR's email on March 18, 2025.

Appendix A

Plans for Training, Exercising, Updating, and Posting EAP

A - 1.0 TRAINING

The EAP Coordinator (Plant Landfill Process Owner) shall be thoroughly familiar with the Emergency Action Plan (EAP) and the actions that may be required under the EAP.

The EAP Coordinator shall be responsible for training alternate Gavin Power staff to complete the Emergency Response Leader duties in the event the Incident Commander is not available during a period of emergency as described in this EAP.

In addition, the EAP Coordinator shall be responsible for training dam maintenance staff and other Gavin Power staff in the actions and responses that they may be called upon to complete in the event of an emergency at the dam.

A - 2.0 EXERCISING

The EAP Coordinator shall plan and convene an emergency exercise one-time each year. The exercise shall include appropriate administrative and maintenance personnel. Response organizations shall be invited to participate; however, their unavailability shall not be cause for canceling the exercise. The exercise shall be performed to test the procedures and determine appropriate actions in the event of an emergency.

At the conclusion of the exercise, the personnel shall review the exercise and prepare a written summary of lessons learned and items that can be improved.

A - 3.0 UPDATING THE EAP

The EAP Coordinator shall be responsible for keeping the EAP up to date. The EAP Coordinator shall review the EAP at least annually for changes that may have taken place such as:

- Names of Gavin Power staff specifically called out in the EAP.
- Names of the County Sheriff and local authorities.
- Alterations to the dam embankments and/or outlet structures.
- Additions or deletions to the list of Emergency Supplies and Resources.

In addition, the EAP shall be updated if it is found to require modification as a result of an actual emergency situation.

**Emergency Action Plan (EAP)
Gavin Power Plant
Reclaim Pond**

Upon completion of each annual review, the EAP Coordinator shall complete the form on the following page to document the review and update.

Gavin shall retain a professional engineer on a periodic basis (not to exceed five years) to review the EAP to assure that it remains viable in the event that an emergency should occur at the dam. At a minimum, the professional engineer's activities should include:

- A site visit to inspect the dam and appurtenances and to review staffing and emergency responses by Gavin Power personnel.
- Review of the written plan.
- Confirm that Emergency Supplies and Resources are current.
- Complete any necessary updates to the EAP and submit it to the Gavin Power EAP Coordinator for review and distribution.

A - 4.0 POSTING THE EAP

The EAP Coordinator shall be responsible for maintaining one copy of the EAP in the plant office and in the Gavin Power operating record and for distribution of one copy of the final EAP, as approved by the ODNR, to each of the following organizations:

Ohio Department of Natural Resources

Gallia County Engineer's Office

Gallia County Emergency Management Agency

Gallia County Sheriff

Gallia County Fire Department

In addition to the above distribution of the EAP, the Notification Flowchart (Exhibit 1, Exhibit 2, Exhibit 3) and contact list (Exhibit 4) shall be posted in a public location in the Gavin Power offices.

**GAVIN POWER PLANT RECLAIM POND EMERGENCY
ACTION PLAN
PLAN REVIEW AND UPDATE RECORD**

The EAP must be reviewed and updated (if necessary) annually for accuracy of information provided, particularly to keep contact names and telephone numbers up to date. At the conclusion of each review and update the changes shall be indicated in the following table.

Date Review Completed	Name and Title of Reviewer	Changes Made

If changes to contact information are made, copies of the revised sheets shall be provided to all holders of copies of the EAP.

Appendix B

Glossary of Terms

Abutment That part of the valley side against which the dam is constructed. The left and right abutments of dams are defined with the observer looking downstream from the dam.

Acre-foot A unit of volumetric measure that would cover 1 acre to a depth of 1 foot. One acre-foot is equal to 43,560 cubic feet or 325,850 gallons.

Appurtenant Structures The structures or machinery auxiliary to dams which are built to operate and maintain dams; such as outlet works, spillway, powerhouse, tunnels, etc.

Berm A nearly horizontal step (bench) in the upstream or downstream sloping face of the dam.

Boil A disruption of the soil surface due to water discharging from below the surface. Eroded soil may be deposited in the form of a ring (miniature volcano) around the disruption.

Breach An opening through the dam that allows draining of the reservoir. A controlled breach is an intentionally constructed opening. An uncontrolled breach is an unintended failure of the dam.

Conduit A closed channel (round pipe or rectangular box) that conveys water through, around, or under the dam.

Control section A usually level segment in the profile of an open channel spillway above which water in the reservoir discharges through the spillway.

Crest of Dam The crown of an overflow section of the dam. In the United States, the term "crest of dam" is often used when "top of dam" is intended. To avoid confusion, the terms crest of spillway and top of dam should be used in referring to the overflow section and dam proper, respectively.

Cross section A slice through the dam showing elevation vertically and direction of natural water flow horizontally from left to right. Also, a slice through a spillway showing elevation vertically and left and right sides of the spillway looking downstream.

Cutoff Wall A wall of impervious material (e.g., concrete, asphaltic concrete, steel sheet piling) built into the foundation to reduce seepage under the dam.

Dam An artificial barrier generally constructed across a watercourse for the purpose of impounding or diverting water.

Dam failure The uncontrolled release of a dam's impounded water.

Dam Operator The person(s) or unit(s) of government with responsibility for the operation and maintenance of dam.

Drain, toe or foundation, or blanket A water collection system of sand and gravel and typically pipes along the downstream portion of the dam to collect seepage and convey it to a safe outlet.

Drainage area (watershed) The geographic area on which rainfall flows into the dam reservoir.

Drawdown The lowering or releasing of the water level in a reservoir over time or the volume lowered or released over a particular period of time.

Embankment Fill material, usually earth or rock, placed with sloping sides.

Emergency A condition that develops unexpectedly, endangers the structural integrity of the dam and/or downstream human life and property, and requires immediate action.

Emergency Action Plan (EAP)

A formal document identifying potential emergency conditions that may occur at the dam and specifying preplanned actions to minimize potential failure of the dam or minimize failure consequences including loss of life, property damage, and environmental impacts.

Evacuation map

A map showing the geographic area downstream of a dam that should be evacuated if it is threatened to be flooded by a breach of the dam or other large discharge.

Failure

An incident resulting in the uncontrolled release of water from a dam.

Filter

The layers of sand and gravel in a drain that allow seepage through an embankment to discharge into the drain without eroding the embankment soil.

Foundation of Dam

The natural material on which the dam structure is placed.

Freeboard

Vertical distance between a stated water level in the reservoir and the top of dam.

Gate, slide or sluice, or regulating

An operable, watertight valve to manage the discharge of water from the dam.

Groin

The area along the intersection of the face of a dam and the abutment.

Hazard classification

A system that categorizes dams (high, significant, or low) according to the degree of their potential to create adverse incremental consequences such as loss of life, property damage, or environmental impacts of a failure or mis-operation of a dam.

Height, dam

The vertical distance between the lowest point along the top of the dam and the lowest point at the downstream toe, which usually occurs in the bed of the outlet channel.

Hydrograph, inflow or outflow, or breach

A graphical representation of either the flow rate or flow depth at a specific point above or below the dam over time for a specific flood occurrence.

On-site Incident Commander

The highest predetermined official available at the scene of an emergency situation.

Instrumentation

An arrangement of devices installed into or near dams that provide measurements to evaluate the structural behavior and other performance parameters of the dam and appurtenant structures.

Notification

To immediately inform appropriate individuals, organizations, or agencies about a potentially emergency situation so they can initiate appropriate actions.

Piping

The progressive destruction of an embankment or embankment foundation by internal erosion of the soil by seepage flows.

Primary Spillway (Principal Spillway)

The principal or first used spillway during flood flows.

Probable Maximum Precipitation (PMP) or Flood (PMF)

The theoretically greatest precipitation or resulting flood that is meteorologically feasible for a given duration over a specific drainage area at a particular geographical location.

Reservoir

The body of water is impounded or potentially impounded by the dam.

Riprap

A layer of large rock, precast blocks, or other suitable material, generally placed on an embankment or along a watercourse as protection against wave action, erosion, or scour.

Risk

A measure of the likelihood and severity of an adverse consequence.

Scarp

The nearly vertical, exposed earth surface created at the upper edge of a slide or a breached area along the upstream slope of an earthen embankment.

Seepage

The natural movement of water through the embankment, foundation, or abutments of the dam.

Slide

The movement of a mass of earth down a slope on the embankment or abutment of the dam.

Spillway (auxiliary or emergency)

The appurtenant structure that provides the controlled conveyance of excess water through, over, or around the dam.

Spillway capacity

The maximum discharge the spillway can safely convey with the reservoir at the maximum design elevation.

Spillway crest

The lowest level at which reservoir water can flow into the spillway.

Stilling Basin

A basin constructed to dissipate the energy of fast-flowing water, e.g. from a spillway or bottom outlet, and to protect the river bed from erosion.

Stoplogs

Logs or timbers, steel or concrete beams placed on top of each other with their ends held in guides on each side of a channel or conduit.

Storage

The retention of water or delay in runoff either by planned operation, as in a reservoir, or by temporarily filling the overflow areas, as in the progression of a flood crest through a natural stream channel.

Tailwater

The body of water immediately downstream of the embankment at a specific point in time.

Toe of dam

The junction of the upstream or downstream face of an embankment with the ground surface.

Top of dam (crest of dam)

The elevation of the uppermost surface of an embankment which can safely impound water behind the dam.

Trash Rack

A structure of metal or concrete bars located in the waterway at an intake to prevent the entry of floating or submerged debris.

Valve

In general, a device fitted to a pipeline or orifice in which the closure member is either rotated or moved transversely or longitudinally in the waterway so as to control or stop the flow.

Weir

A low dam or wall built across a stream to raise the upstream water level. It is termed a fixed-crest weir when uncontrolled. A structure built across a stream or channel for the purpose of measuring flow. Sometimes described as a measuring weir or gauging weir. Types of weirs include broad crested weirs, sharp-crested weirs, Ogee weirs, and V-notched weirs.

Reclaim Pond

Appendix C

Preparation and Approval of the EAP

Reclaim Pond

C - 1.0 PLAN PREPARATION

This Emergency Action Plan (EAP) was prepared by Geosyntec Consultants, Chicago, Illinois for Gavin Power, LLC, Gavin Power Plant's Reclaim Pond (RCP) within Gallia County, Ohio. The EAP was prepared based on information provided by Gavin, information obtained from Ohio Department of Natural Resources (ODNR) inspection reports, and modeling of flooding conditions as prepared by Geosyntec Consultants. The EAP was prepared to meet the requirements of the ODNR for an EAP as provided in Ohio Administrative Code (OAC) 1501:21-15-07 and 1501:21-21-04 and as further detailed in ODNR's EAP Guidelines.



August 26, 2026

(Signature)

(Date)

John Seymour, P.E. (OH)
Senior Consultant
Geosyntec Consultants



August 26, 2026

(Signature)

(Date)

Rishab Mahajan, P.E. (GA)
Principal
Geosyntec Consultants

C - 2.0 OWNER (GAVIN POWER, LLC) APPROVAL

This EAP for Gavin Power, LLC BAC Dam was prepared under my direction as Plant Manager for the Gavin facility. By signing this Approval, I certify that I have read and understand the EAP and the actions that may be required under it, and the information contained herein is accurate as of the date of my signature. In accordance with Section 1501:21-21-04 of the Ohio Administrative Code, I am certifying that I understand my responsibilities as a dam owner for the safe operation of the Reclaim Pond (RCP) and for executing this EAP. I also understand that this plan must be reviewed and updated annually.

Reclaim Pond

Reclaim Pond

C. Garrett Watterson
(Signature)

8-27-26
(Date)

C. Garrett Watterson
Gavin Power Plant Manager

C - 3.0 OHIO DNR APPROVAL

This EAP shall be submitted to the ODNR for review and approval. Upon receipt of written approval from the ODNR, a copy of ODNR's approval letter shall be attached in this EAP following this page and a copy of the approval letter shall be forwarded to each holder of a copy of the EAP.

Reclaim Pond

This EAP has been distributed to those individuals listed below:

- The distribution list should include- Gavin Power, LLC, ODNR Dam Safety Program, County EMA Office, Person or Consultant Who Prepared EAP, and Others
- The “Date” will be completed by ODNR Dam Safety upon approval of the EAP.
- Copies of the approved EAP will be sent by ODNR Dam Safety Program to the Dam Owner, County EMA Director, and the person or consultant who prepared this EAP.
- Future updated copies of the EAP are to be sent by the Dam Owner to all listed below.

Reclaim Pond

No.	Name & Title	Organization	Address	Date
1.	On-Site Incident Commander	Gavin Power LLC	7397 OH-7, Cheshire, OH 45620	
2.	Garrett Watterson , Plant Manager	Gavin Power LLC	7398 OH-7, Cheshire, OH 45620	
3.	Taylor Huffman, Plant Environmental Staff	Gavin Power LLC	7397 OH-7, Cheshire, OH 45620	
4.	Sam Sterns, Safety Supervisor	Gavin Power LLC	7397 OH-7, Cheshire, OH 45620	
5.	Andy Davis, Operation Manager	Gavin Power LLC	7397 OH-7, Cheshire, OH 45620	
6.	Jacob Errett, Maintenance Manager	Gavin Power LLC	7397 OH-7, Cheshire, OH 45620	
7.	Matt Mooney, Strategic Business Manager	Gavin Power LLC	7397 OH-7, Cheshire, OH 45620	
8.	Rich Fuller , Landfill Process Owner	Gavin Power LLC	7397 OH-7, Cheshire, OH 45620	
9.	Dave Caldwell, Material Handling Process Owner	Gavin Power LLC	7397 OH-7, Cheshire, OH 45620	
10.	Patrick Blanchard, Corporate Environmental (O&M - CAMS/eSPARC)	CAMs	7397 OH-7, Cheshire, OH 45620	
11.	Jody Thacker, Corporate Environmental (O&M - CAMS/eSPARC)	CAMs	7397 OH-7, Cheshire, OH 45620	
12.	Lisa Carty , Corporate Environmental (Kindle Energy)	Kindle Energy	7397 OH-7, Cheshire, OH 45620	
13.	Grace Kurdian, Corporate Environmental (Kindle Energy)	Kindle Energy	7397 OH-7, Cheshire, OH 45620	
14.	Tim Miller, Gallia County EMA & LEPC	Gallia County EMA & LEPC	1191 State Route 160, Gallipolis, OH 45631	

Reclaim Pond

No.	Name & Title	Organization	Address	Date
15.	Tye Schwall , OVEC Environmental Manager	Ohio Valley Electric, Inc.	5758 OH-7, Cheshire, OH 45620	
16.	Gallia County Sheriff	Gallia County Sheriff	18 Locust St, Gallipolis, OH 45631	
17.	Middleport Fire Department	Middleport Fire Department	286 Race St, Middleport, OH 45760	
18.	ODNR Division of Water	ODNR Division of Water	2045 Morse Rd Building B, Columbus, OH 43229	
19.	ODNR Division of Water Resources – Dam Safety Program	ODNR Division of Water Resources – Dam Safety Program	2046 Morse Rd Building B, Columbus, OH 43229	
20.	Gallia County Health Department	Gallia County Health Department	499 Jackson Pike D, Gallipolis, OH 45631	
21.	Ohio Environmental Protection Agency (EPA)	Ohio Environmental Protection Agency (EPA)	50 W Town St UNIT 700, Columbus, OH 43215	
22.	Ohio State Emergency Response Commission	Ohio State Emergency Response Commission	4675 Homer Ohio Lane, Groveport, OH 43125	
23.	National Response Center	National Response Center	National Response Center	
24.	John Seymour	Geosyntec Consultants, Inc.	3011 West Grand Blvd., Suite 2300, Detroit, Michigan 48202	
25.	Rishab Mahajan	Geosyntec Consultants, Inc.	1420 Kensington Road, Suite 103, Oak Brook, Illinois 60523	