PERIODIC HAZARD POTENTIAL CLASSIFICATION ASSESSMENT CERTIFICATION
CCR SURFACE IMPOUNDMENT: GAVIN POWER PLANT
CCR UNIT: BOTTOM ASH POND

S&ME, Inc. (Consultant) has been retained by Gavin Power to prepare the following periodic hazard potential classification assessment pursuant to 40 CFR § 257.73(a)(2) and (f)(3). Presented below are the impoundment background, assessment, and certification.

1.0 BACKGROUND

In accordance with the requirements of 40 CFR § 257.73(a)(2) and (f) and § 257.105(f)(5), the initial and periodic hazard potential classification assessment certifications of the Bottom Ash Pond at the Gavin Power Plant in Cheshire, Ohio have previously been prepared and placed in the facility's operating record. The hazard classification of the Bottom Ash Pond has been documented as a High Hazard Potential CCR surface impoundment as defined by 40 CFR § 257.53 based on the understanding that the pond consists of a "diked surface impoundment where failure or mis-operation will probably cause loss of human life". Additionally, the pond dikes are classified by Ohio Department of Natural Resources as a Class I dam, and the US Environmental Protection Agency Coal Combustion Residuals Impoundment Assessment Report identified the pond dikes as a High Hazard Potential Dam.

2.0 ASSESSMENT

Since the last periodic hazard potential classification assessment, performed by S&ME in 2021, the plant flows to the Bottom Ash Pond have ceased, and the CCR has been removed from the pond. A Notice of Intent to Close the Bottom Ash Pond was prepared on April 7, 2023 and has been placed on the facility's operating record; however, a Notification of Completion of Closure has not been placed on the facility's operating record at the time of this certification. To this end, the pond is still considered a CCR unit. Further, the hazard classification of a dam is based on the potential storage volume rather than the actual storage volume. As the pond still has the potential to be full although currently largely empty, the hazard classification has been based on this potentiality.

Based upon a review of applicable information, Consultant has identified the following information about the Bottom Ash Pond at the Gavin Power Plant in Cheshire, Ohio.

CCR Unit	Hazard Potential Classification	BASIS
Bottom Ash Pond	High	Potential hazard were the pond to be full

3.0 CERTIFICATION

I, Michael G. Rowland, being a Registered Professional Engineer within the State of Ohio, do hereby certify to the best of my knowledge, information, and belief, that this periodic hazard potential classification assessment meets the requirements of 40 CFR § 257.73(a)(2).

SIGNATURE _____

