

**CONESVILLE ASH POND COMPLEX  
HAZARD POTENTIAL CLASSIFICATION ASSESSMENT**

**Prepared for:**



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**CEC Project 196-318 Task 0114**

**INITIAL PLAN PREPARED: October 2016  
Updated January 2022**



**Civil & Environmental Consultants, Inc.**

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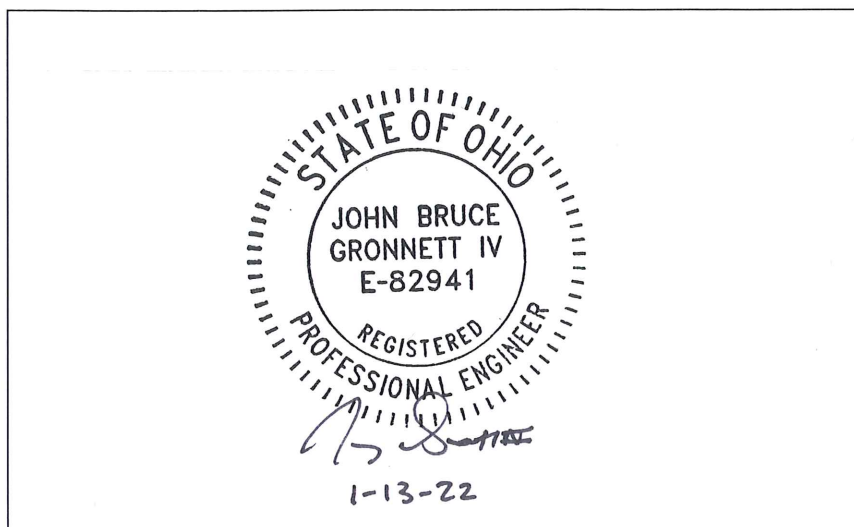
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## ENGINEER'S CERTIFICATION STATEMENT

I hereby certify that the contents of this Periodic Hazard Potential Classification Assessment for the Conesville Ash Pond Complex and its appurtenances owned by Conesville Industrial Park, LLC (CIP) meets the requirements of Federal Regulations Title 40, Part 257.73(a)(2).



John B. Gronnett IV, P.E.  
Civil & Environmental Consultants, Inc.

## 1.0 INTRODUCTION

The Ash Pond Complex was previously owned and operated by American Electric Power (AEP), and has since been transferred to Conesville Industrial Park, LLC (CIP). CIP is currently in the process of closing this impoundment as part of the re-development of the Conesville Power Plant. The ash pond complex is located directly east of the Conesville Power Generation Plant in Coschocton County, Ohio. The Ash Pond Complex is comprised of multiple components consisting of Pond Nos. 1 through 5, a Bottom Ash Pond and a Clearwater Pond that are separated by interior dikes. As of the time in preparing this “Periodic Hazard Potential Classification Assessment,” the Ash Pond Complex has been dewatered, with an ongoing effort to excavate Coal Combustion Residual (CCR) material and transport it offsite.

The United States Environmental Protection Agency (USEPA) established Code Federal Rules (CFR) Title 40, Part 257 (Rule §257) for CCR disposal facilities. In accordance with §257.73(a)(2), the owner or operator of the CCR unit must conduct initial and periodic hazard potential classification assessments of the CCR unit. A periodic assessment of this system is required every 5 years per §257.73(f). AEP performed the initial hazard potential classification assessment of the ash pond complex. On behalf of CIP, Civil & Environmental Consultants, Inc. (CEC) is providing this periodic assessment of the hazard potential classification. This assessment addresses the following requirement of Rule §257.73(a)(2):

- The owner or operator must document the hazard potential classification of each CCR unit as either a high hazard potential CCR surface impoundment; a significant hazard potential CCR surface impoundment, or a low hazard potential CCR surface impoundment. The owner or operator must also document the basis for the hazard potential classification.

## 2.0 PERIODIC HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

From the FEMA Federal Guidelines for Dam Safety “Hazard Potential Classification System for Dams” dated April 2004, the following are the hazard potential classification system categories and their respective meaning based on the probable loss of human life and the impacts on economic, environmental and lifeline interests:

### 1) Low Hazard Potential

- Dams assigned the low hazard potential classification are those where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the owner’s property.

### 2) Significant Hazard Potential

- Dams assigned the significant hazard potential classification are those dams where failure or mis-operation results in no probable loss of human life but can cause economic loss, environmental damage, disruption of lifeline facilities, or can impact other concerns. Significant hazard potential classification dams are often located in predominantly rural or agricultural areas but could be located in areas with population and significant infrastructure.

### 3) High Hazard Potential

- Dams assigned the high hazard potential classification are those where failure or mis-operation will probably cause loss of human life.

The Ash Pond Complex embankments are classified by the Ohio Department of Natural Resources (ODNR) as Class II dams. ODNR defines Class II dams with potential downstream hazards that include: flood water damage to homes, businesses, industrial structures, public utilities and railroads with no loss of life envisioned. Further, the United States Environmental Protection Agency (USEPA) CCR Impoundment Assessment Report identified the Ash Pond Complex as a Significant Hazard Potential.

Given our assessment of the FEMA Federal Guidelines for Dam Safety, the ODNR dam classification as a Class II dam and the USEPA report identification of a Significant Hazard

Potential, the Ash Pond Complex should remain classified as a Significant Hazard Potential CCR surface impoundment.

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**APPENDIX A**  
**PLAN REVIEW LOG**

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**CONESVILLE ASH POND COMPLEX  
 PERIODIC HAZARD POTENTIAL CLASSIFICATION ASSESSMENT  
 REVIEW LOG**

| Action   | Performed by: | Date      |
|--|---------------|-----------|
| Initial Hazard Potential Classification Assessment | AEP           | 10/7/2016 |
| Periodic Review (5-Year) Completed                 | CEC           | 1/13/2022 |
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Note:

1. In accordance with §257.73, this Hazard Potential Classification Assessment shall be reviewed periodically, at a minimum of every 5 years