2023 Annual Landfill Inspection Report

Little Broad Run Landfill

Mountaineer Plant New Haven, West Virginia

October 2023

Appalachian Power Wheeling, WV

Prepared by: American Electric Power Service Corporation

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2023 Annual Landfill Inspection Report (CCR Landfill)

Mountaineer Plant

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I certify to the best of my knowledge, information and belief the information contained in this report meets the requirements of 40 CFR § 257.84(b).

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1.0 INTRODUCTION

This report was prepared by AEP- Geotechnical Engineering Services (GES) section, in part, to fulfill requirements of 40 CFR 257.84 and to provide the Mountaineer Plant an evaluation of the facility.

Mr. Brian Palmer, P.E. performed the 2023 inspection of the Landfill at the Mountaineer Plant. This report is a summary of the inspection and an assessment of the general condition of the facility. Mr. Chris Purdum, P.E. of the plant was the facility contact. The inspection was performed on August 29, 2023. Weather conditions were cloudy with temperatures in the low to mid 70's (°F). There was 0.5 inches of rainfall recorded by the plant over the seven days prior to the inspection. All portions of the landfill had been recently mowed.

2.0 DESCRIPTION OF LANDFILL

The Landfill is permitted for nine disposal areas (Areas 1 through 9) and a vertical expansion that is designed over the existing landfill area of approximately 209 acres. Areas 1-7 of the landfill are filled to the permitted grades. Areas 8 and 9 are permitted but not constructed. The vertical expansion is currently divided into four development phases (Phase 1-4) and could be adjusted in acreages based on the operational needs. Figure 1 illustrates major components of the landfill facility that includes landfill, leachate collection ponds, bottom ash pond complex and gypsum stacker pad. Figure 2 provides general overview of the Landfill and breakdown of areas (1-9) and vertical expansion Phases 1-4.

The landfill inspection included all the fill areas (1-7) including vertical expansion, storm water management system, leachate collection management system, access roads and ditches, and conveyance channels.

At the time of the landfill inspection, operational activities were performed in the vertical expansion area. The landfill work was performed in accordance with the approved permit. Landfill areas outside of the current active fill area were generally covered with soil cover.

3.0 REVIEW OF AVAILABLE INFORMATION (257.84(b) (1)(i))

A review of available information regarding the status and condition of the Landfill, which include files available in the operating record, such as design, and construction information, previous 7-day inspection reports, and previous annual inspections reports. Based on the review of the data there were no new signs of actual or potential structural weakness or adverse conditions. There is an open deficiency, and the evaluation of permanent remedial measures to address the open deficiency are ongoing.

4.0 INSPECTION (257.84(b)(1)(ii))

4.1 CHANGES IN GEOMETRY SINCE LAST INSPECTION (257.84(b)(2)(i))

No modifications have been made to the geometry of the Landfill since the 2022 annual inspection. The geometry of the landfill has remained essentially unchanged, except for the change in topography of the active disposal area.

4.2 VOLUME (257.84(b)(2)(ii))

The total volume of CCR waste disposed at the landfill as of August 2023 was estimated by Chris Purdum with Mountaineer Plant as 25.75 million cubic yards.

4.3 DEFINITIONS OF VISUAL OBSERVATIONS AND DEFICIENCIES

This summary of the visual observations uses terms to describe the general appearance or condition of an observed item, activity or structure. The meaning of these terms is as follows:

Good: A condition or activity that is generally better or slightly better than what is

minimally expected or anticipated from a design or maintenance point of view.

Fair/: A condition or activity that generally meets what is minimally expected or

Satisfactory anticipated from a design or maintenance point of view.

Poor: A condition or activity that is generally below what is minimally expected or

anticipated from a design or maintenance point of view.

Minor: A reference to an observed item (e.g., erosion, seepage, vegetation, etc.) where the

current maintenance condition is below what is normal or desired, but which is not

currently causing concern from a structure safety or stability point of view.

Significant: A reference to an observed item (e.g., erosion, seepage, vegetation, etc.) where the

current maintenance program has neglected to improve the condition. Usually, conditions that have been identified in the previous inspections, but have not been

corrected.

Excessive: A reference to an observed item (e.g., erosion, seepage, vegetation, etc.) where the

current maintenance condition is above or worse than what is normal or desired, and which may have affected the ability of the observer to properly evaluate the structure or particular area being observed or which may be a concern from a

structure safety or stability point of view.

This document also uses the definition of a "deficiency" as referenced in the CCR rule section §257.84(b)(5) Inspection Requirements for CCR Landfills. This definition has been assembled using the CCR rule preamble as well as guidance from MSHA, "Qualifications for Impoundment Inspection" CI-31, 2004. These guidance documents further elaborate on the definition of deficiency. Items not defined by deficiency are considered maintenance or items to be monitored.

A "deficiency" is some evidence that a landfill has developed a problem that could impact the structural integrity of the landfill. There are four general categories of deficiencies. These four categories are described below:

Uncontrolled Seepage (Leachate Outbreak)
 Leachate outbreak is the uncontrolled release of leachate from the landfill.

2. Displacement of the Embankment

Displacement of the embankment is large scale movement of part of the landfill. Common signs of displacement are cracks, scraps, bulges, depressions, sinkholes and slides.

3. Blockage of Control Features

Blockage of Control Features is the restriction of flow at spillways, decant or pipe spillways, or drains.

4. Erosion

Erosion is the gradual movement of surface material by water, wind or ice. Erosion is considered a deficiency when it is more than a minor routine maintenance item.

4.4 VISUAL INSPECTION (257.84(b)(1)(ii))

A visual inspection of the landfill was conducted to identify any signs of distress or malfunction of the landfill and appurtenant structures. Specific items inspected included all structural elements of the landfill perimeter berms, temporary and final covers, drainage features, open cells, and appurtenances such as chimney drains, etc.

Overall, the facility is in satisfactory condition. The landfill is functioning as intended with no signs of potential structural weakness or conditions which are disrupting to the safe operation of the landfill. Inspection photos are included in Appendix A. Additional pictures taken during the inspection can be made available upon request. A site map presenting locations of the inspection observations is included in Figures 3 and 4.

- 1. The leachate ponds discharge into the leachate surge pond located at the pond complex. The two discharge HDPE pipes (8" and 16" in diameter) are located on the west dike of the pond appeared in good functional condition. The exposed geomembrane liner of the leachate surge pond appeared in good condition, with no signs of tears, punctures or other damage.
- 2. There are numerous cleanouts for the discharge pipes between the leachate surge pond and leachate pond. All the cleanouts were accessible inside the manhole and appeared in satisfactory. There were no signs of leakage noted.
- 3. The leachate collection ponds were observed to be in overall good condition. There were some accumulated sediments observed near the gravity feed leachate influent line into Leachate Pond #2.
- 4. The leachate collection system of the landfill is collected in a manhole at the east side of the landfill. The leachate pipes were observed to be flowing and free of any obstructions. Some minor iron-stained sediments were accumulating at the outlet in the manhole, but this did not appear to restrict the flows.
- 5. The ground water interceptor drain outlets were observed to be flowing free and clear of any obstructions.
- 6. Landfill Area 7 sediment pond appeared to be functioning as designed and in satisfactory condition. Spillways were observed to be unobstructed and in satisfactory condition.
- 7. Overall, landfill Areas 6 and 7 appeared in satisfactory and stable condition with adequate vegetative cover. The centerline drainage ditch through Areas 6 and 7 is in satisfactory

- condition. The perimeter ditches were observed to be in satisfactory and functional condition. No standing water was observed in the perimeter ditches.
- 8. Overall Area 4 appeared in satisfactory and stable condition. The soil cover, vegetation and rip rap drainage channel appeared to be in satisfactory condition.
- 9. The northwest sediment pond appeared to be functioning as designed, and the dikes were in satisfactory and stable condition. Cattail overgrowth noted in 2022 has been removed, however new cattail growth is developing. The spillways appeared functional and not obstructed.
- 10. Landfill Area 5 and the perimeter access road were in satisfactory and stable condition with controlled vegetation.
- 11. Overall, Area 3 appeared in satisfactory and stable condition with good vegetative cover and the perimeter ditches around Area 3 were in satisfactory and functioning condition with no standing water. The area of bare soils upslope from sump #2 noted during the 2022 inspection is mostly vegetated.
- 12. Toe drains and sump collection pits were installed along the bottom of Area 3 slopes to address the ongoing deficiency pertaining to leachate buildup. These elements appeared to be in satisfactory and functional condition. There were no signs of seepage or wetness along the outside slope areas.
- 13. The 10 dewatering wells installed in Area 3 in 2022 to address the ongoing deficiency pertaining to leachate buildup were generally operational with no issues noted. The dewatering wells discharge to a frac-tank with secondary containment. A few of the dewatering wells need to have seals replaced.
- 14. Area 2 slopes appeared in satisfactory and stable condition. The soil cover and vegetation on top of Area 2 are in satisfactory and stable condition. The erosion rill noted in 2022 at the groin of the embankment with tree line appeared to be stable.
- 15. Landfill Area 1 appeared in satisfactory and stable condition. A minor slip located on the outside earthen berm of Area 1 that was repaired in years in 2019 appears to be stable with no apparent change in the scarp or depression from previous inspections. There were no signs of seepage observed along the toe in this area. Erosion gullies on the southern slope of the earthen perimeter berm continue to appear stable, as noted in 2022.
- 16. The perimeter ditch around Area 1 is in satisfactory and stable condition. The gabion check dams along the groin ditch showed minor damage to the wire mesh, but there were no signs of active erosion.
- 17. The outside side slope areas of vertical expansion of Phase 1A/B were observed to be in good condition with dense grass cover, The perimeter ditches and access road were in satisfactory and stable condition with controlled vegetation.
- 18. The upper area of Phase 1A and 1B was inactive and have temporary cover and vegetation starting to be established.

- 19. Phase 1C was active. The surface was shaped to drain towards the chimney drains. This area appeared satisfactory and in compliance with the permit requirements.
- 20. The gypsum stackout pad was inspected during this inspection. The radial stacker was not in operation at the time of inspection. The stacker pad has some accumulation of gypsum in and around the sump structure which will need continuous maintenance.

4.5 CHANGES THAT EFFECT STABILITY OR OPERATION (257.84(b)(2)(iv))

Based on interviews with plant personnel and field observations there were no changes to the landfill since the last annual inspection that would affect the stability of the landfill.

5.0 SUMMARY OF FINDINGS

5.1 GENERAL OBSERVATIONS

The following general observations were identified during the visual inspection:

1. In general, the landfill is functioning as intended and the active cell, inactive cells, closed areas, and storm water ditches are in satisfactory condition. The Plant is performing regular maintenance and inspections as required. Several maintenance items have been noted and are described in Section 5.2.

5.2 MAINTENANCE ITEMS

The following maintenance items were identified during the visual inspection, see site map for locations. Contact GES for specific recommendations regarding repairs:

- 1. Remove the accumulated sediments by the leachate influent pipe in Leachate Pond #2.
- 2. Continue maintenance to limit cattail growth on the interior slopes of the dikes of the northwest sediment pond.
- 3. Continued monitoring and maintenance as need on the dewatering wells in Area 3 and replace as needed.
- 4. Overseed areas of final and temporary cover to establish.
- 5. Perform maintenance on the Area 1 outside slope berm slip area. Regrade and seed as necessary to establish good vegetation.
- 6. Repair the erosion gullies on the exterior slope of Area 1. Consider constructing a riprap let down channel.
- 7. Repair the erosion rill along the groin of Area 2.

5.3 ITEMS TO MONITOR

The following items were identified during the visual inspection as items to be monitored:

- 1. Continue to perform weekly readings of the piezometers, flow meters and dewatering wells in Area 3 to measure the effectiveness of the permanent remedial measure.
- 2. Monitor the scarp area on the Area 1 outside slope berm until it has been completely stabilized.
- 3. Monitor the gypsum stackout pad sump for sediment accumulation and remove as needed.

5.4 DEFICIENCIES (257.84(b)(2)(iii))

There were no new signs of structural weakness or disruptive conditions that were observed at the time of the inspection that would require additional investigation or remedial action.

There is, however, a noted deficiency pertaining to leachate seepage and buildup in Area 3 of the existing landfill. The deficiency related to seepage from the cover soils of Area 3 was identified as part of regular monitoring and inspections on July 9, 2020.

An interim seepage control plan for Area 3 was developed that consisted of installing several shallow toe drains and sump structures to intercept the seepage before it could daylight through the toe areas of the cover soils. The sump structures pump the collected seepage to a storage tank that is then emptied back into the landfill leachate collection system. A study into the thickness and permeability of the final soil cap in Area 3 was completed in March, 2022.

The remediation plan for the seepage build up in Area 3 that consisted of 10 dewatering wells that discharge into a storage tank. The system was installed from June to July 2022 and began dewatering on August 4, 2022. Weekly piezometer readings continue to be collected to monitor the effectiveness of the system.

After the pumping system reached a steady state with limited progress in lowering the leachate levels a geophysical investigation was undertaken in May 2023 with the intent of clarifying the water source and identifying any issues with the leachate collection system. Those results are being evaluated to identify the best technical option.

A deficiency is defined as either:

- 1) Uncontrolled seepage (leachate outbreak),
- 2) Displacement of the embankment,
- 3) Blockage of control features, or
- 4) Erosion, more than minor maintenance.

If any of these conditions occur before the next annual inspection, contact AEP Geotechnical Engineering immediately.

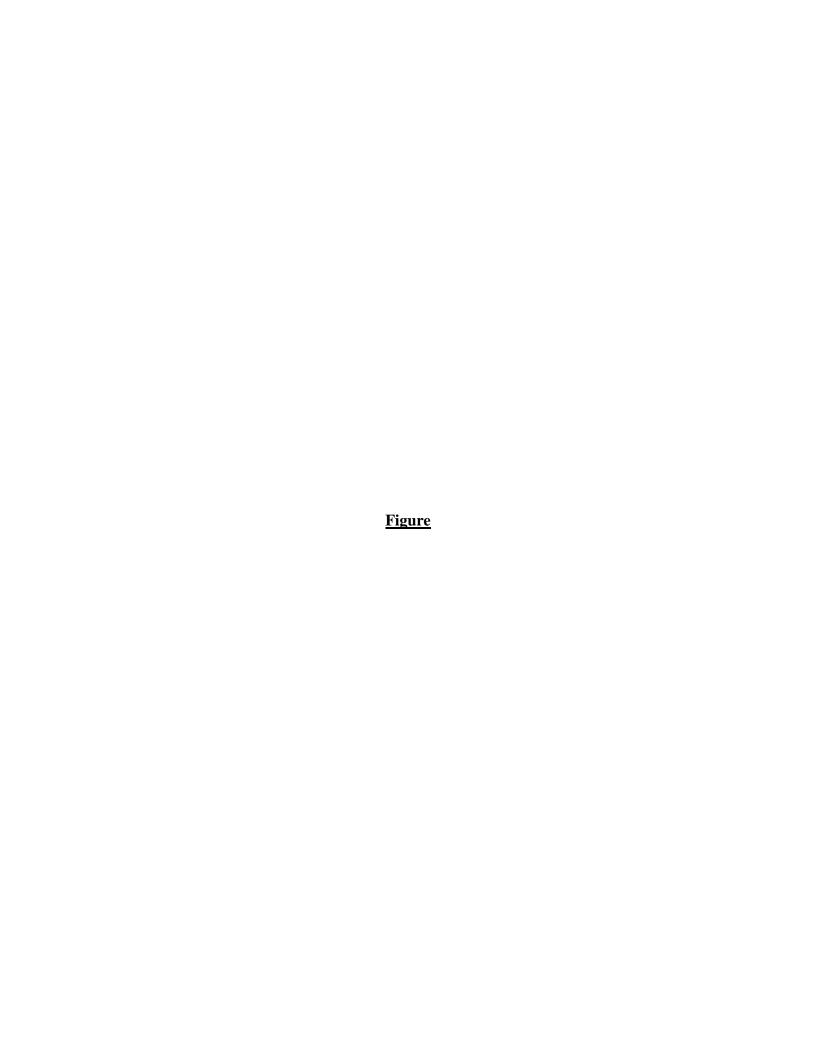


Figure 1 – Site Location Map

Little Broad Run Landfill, Mountaineer Plant

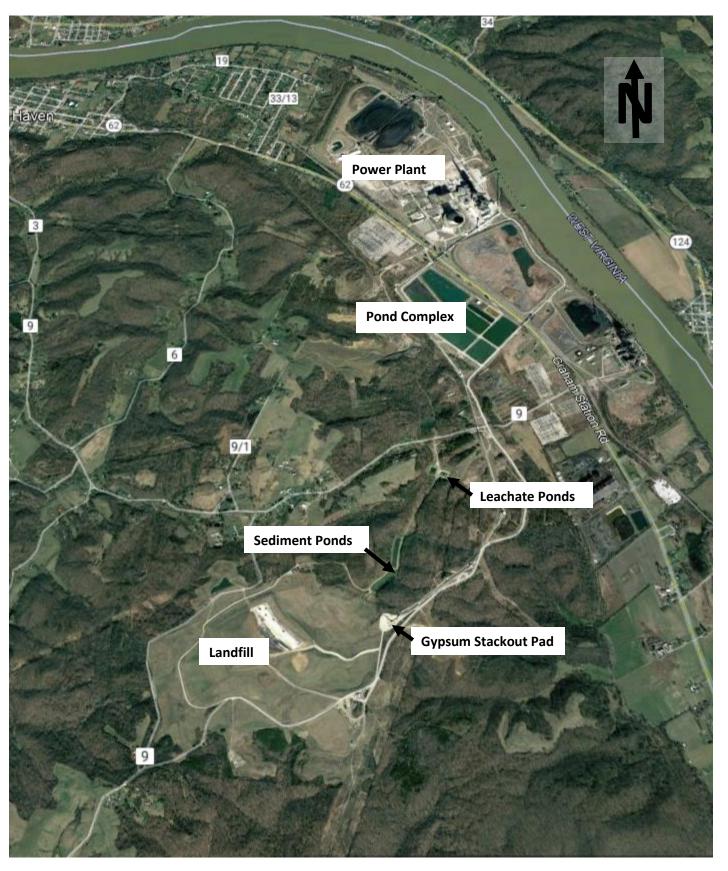
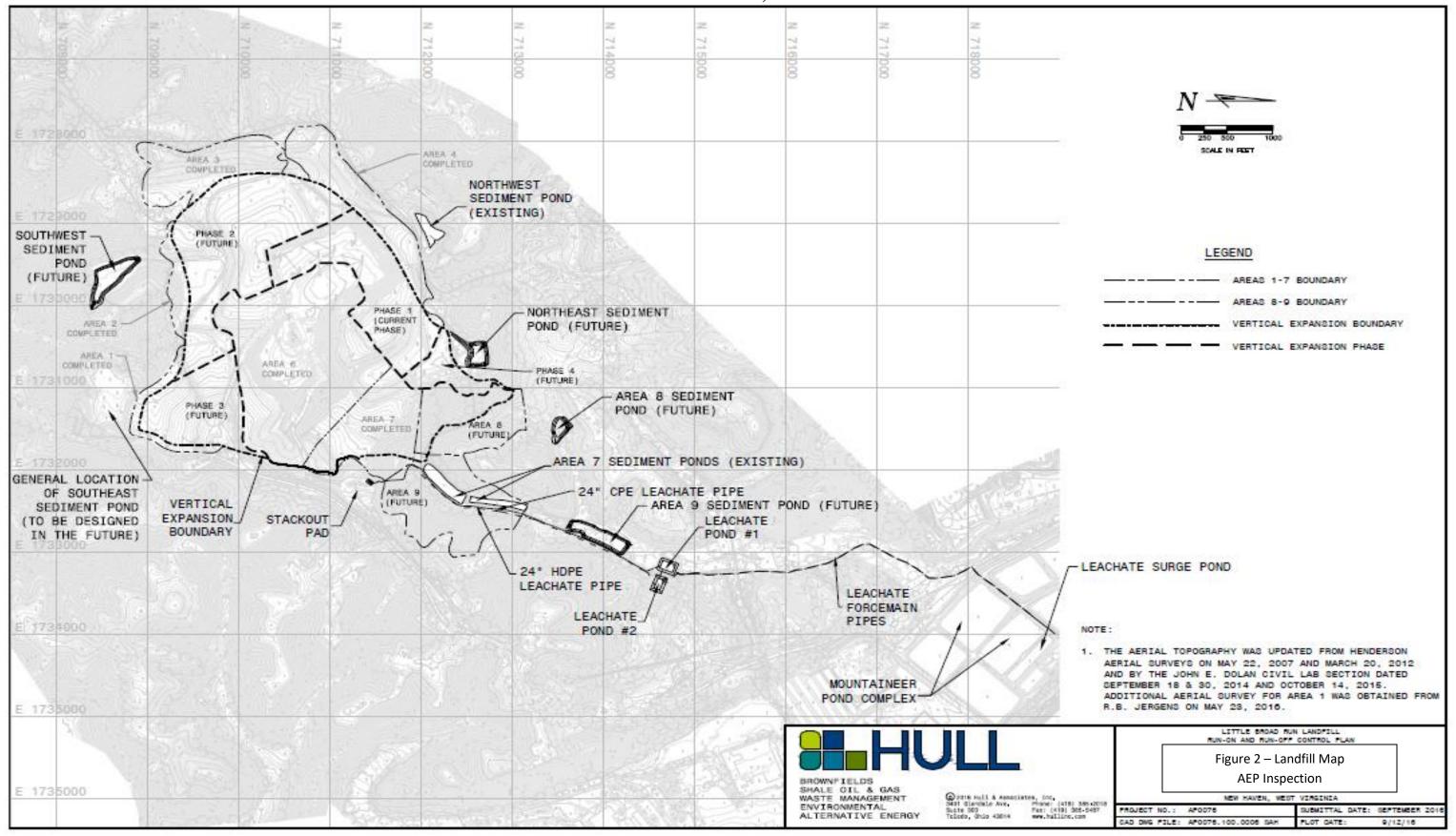


Figure 2 – Landfill Map

Little Broad Run Landfill, Mountaineer Plant







KEY PLAN - ALL PHOTOS



LEGEND:

O PHOTO LOCATION

PHOTO DIRECTION

FIGURE 3

POWER COMPANY

MOUNTAINEER PLANT PHOTO FIGURE

AEP SERVICE CORP. 1 RIVERSIDE PLAZA COLUMBUS, OH 43215





KEY PLAN - ALL PHOTOS



FIGURE 4

POWER COMPANY

MOUNTAINEER PLANT
PHOTO FIGURE

PHOTO DATE:

AEP SERVICE CORP. 1 RIVERSIDE PLAZA RIC COLUMBUS, OH 43215

STATE SORP.

Appendix A

Inspection Photos

Plant Name:

Mountaineer

Inspector:

B Palmer

Unit:

Little Broad Run Landfill

Date:

August 29, 2023

Photo #:

1

Notes:

General condition of Leachate Surge Pond.



N38 58.161 W81 56.019

Photo #:

2

Notes:

Leachate discharge into Leachate Surge Pond



N38 58.240 W81 56.090

Page:

Plant Name:

Mountaineer

Inspector:

B Palmer

Unit:

Little Broad Run Landfill

Date:

August 29, 2023

Photo #:

3



General condition of Leachate Pond #1



N38 57.557 W81 56.270

Photo #:

4

Notes:

General condition of Leachate Pond #2



N38 57.538 W81 56.229

Page:

Plant Name:

Mountaineer

Inspector:

B Palmer

Unit:

Little Broad Run Landfill

Date:

August 29, 2023

Photo #:

5



Area 7 Sediment Pond outfall

N38 57.291 W81 56.425

Photo #:

6



Leachate collection sump. Leachate drain lines combine and drain to the leachate ponds.



N38 57.096 W81 56.532

Page:

Plant Name:

Mountaineer

Inspector:

B Palmer

Unit:

Little Broad Run Landfill

Date:

August 29, 2023

Photo #:

7



Groundwater underdrain from areas 4, 6, and 7 discharge into area 7 sediment pond.



N38 57.104 W81 56.540

Photo #:

8

Notes:

General condition of exterior toe of Area 7 final cover



N38 57.089 W81 56.549

Page:

Plant Name:

Mountaineer

Inspector:

B Palmer

Unit:

Little Broad Run Landfill

Date:

August 29, 2023

Photo #:

9

Notes:

General condition of Phase 1 temporary cover



N38 57.070 W81 57.034

Photo #:

10

Notes:

General condition of NW sediment pond. Cattails noted in 2022 have been removed but are returning.



N38 57.109 W81 57.093

Page:

Plant Name:

Mountaineer

Inspector:

B Palmer

Unit:

Little Broad Run Landfill

Date:

August 29, 2023

Photo #:

11

Notes:

General condition of final cover over Area 4



N38 56.970 W81 57.206

Photo #:

12

Notes:

General condition of Area 5 final cover (foreground) and Phase 1 temporary cover in background.



N38 56.854 W81 57.287

Page:

Plant Name:

Mountaineer

Inspector:

B Palmer

Unit:

Little Broad Run Landfill

Date:

August 29, 2023

Photo #:

13



General condition of toe drain sump #3



N38 56.778 W81 57.374

Photo #:

14

Notes:

General condition of stormwater culvert under County Road 9 from Area 3



N38 56.770 W81 57.370

Page:

Plant Name:

Mountaineer

Inspector:

B Palmer

Unit:

Little Broad Run Landfill

Date:

August 29, 2023

Photo #:

15

Notes:

General condition of Area 3 final cover.



N38 56.722 W81 57.332

Photo #:

16

Notes:

Area 3 area above toe drain sump #2 that was identified in 2022 as needing seeded.



N38 56.727 W81 57.335

Page:

Plant Name:

Mountaineer

Inspector:

B Palmer

Unit:

Little Broad Run Landfill

Date:

August 29, 2023

Photo #:

17



Typical Area 3 dewatering well (#4)



N38 56.693 W81 57.300

Photo #:

18

Notes:

General condition of FRAC tanks used for leachate storage and secondary containment for dewatering wells.



N38 56.721 W81 57.260

Page:

Plant Name:

Mountaineer

Inspector:

B Palmer

Unit:

Little Broad Run Landfill

Date:

August 29, 2023

Photo #:

19

Notes:

General condition of Area 2 exterior slope lower portion earthen berm



N38 56.641 W81 57.057

Photo #:

20

Notes:

General condition of Area 1 exterior slope.



N38 56.647 W81 56.835

Page:

Plant Name:

Mountaineer

Inspector:

B Palmer

Unit:

Little Broad Run Landfill

Date:

August 29, 2023

Photo #:

21

Notes:

Area 1 scarp area that has been monitored for several years.



N38 56.620 W81 56.782

Photo #:

22

Notes:

General condition of active working area Phase 1C. Area graded to drain to chimney drains



N38 57.047 W81 56.891

Page:

Plant Name:

Mountaineer

Inspector:

B Palmer

Unit:

Little Broad Run Landfill

Date:

August 29, 2023

Photo #:

23

Notes:

Phase 1A & 1B temporary cover



N38 56.934 W81 57.064

Photo #:

24

Notes:

General condition of gypsum stackout pad



N38 57.009 W81 56.487

Page:

Plant Name:

Mountaineer

Inspector:

B Palmer

Unit:

Little Broad Run Landfill

Date:

August 29, 2023

Photo #:

25



General condition of stackout pad water accumulation sump



N38 57.007 W81 56.499

Photo #:

26

Notes:

General condition of Area 7 slope and letdown



N38 57.009 W81 56.501

Page: