2023 Annual Landfill Inspection Report

Landfill

Mitchell Plant
Wheeling Power Company
Moundsville, West Virginia

September 2023

Prepared for: Wheeling Power Company – Mitchell Plant

Prepared by: American Electric Power Service Corporation
1 Riverside Plaza
Columbus, OH 43215



Document ID: GERS-23-023

2023 Annual Landfill Inspection Report

Mitchell Plant

Landfill

Document Number: GERS-23-023

PREPARED BY

DATE 9/29/2023

lohammad A. Ajlouni, Ph.D.,P.E

REVIEWED BY

DATE 10-06-2023

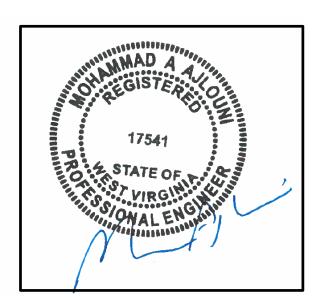
Shahriyar S. Baig, P.E.

APPROVED BY

DATE 10/10/2023

Bryan W. Brunton, P.E.

Manager – AEP Geotechnical Engineering



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).

Table of Contents

1.0 Introduction	4
2.0 Description of Landfill	
3.0 Review of Available Information	
4.0 Inspection	
4.1 Changes in Geometry since Last Inspection	
4.2 Volume	
4.3 Definitions of Observations and Deficiencies	5
4.4 Visual Inspection	7
4.5 Changes that Effect Stability or Operation	8
5.0 Summary of Findings	9
5.1 General Observations	9
5.2 Maintenance Items	9
5.3 Items to Monitor	9
5.4 Deficiencies	9

List of FiguresFigure 1

Attachments

Attachment A – Photos

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 Mitchell Plant an evaluation of the facility.

Mr. Mohammad Ajlouni, P.E. and Mr. Mazin Al-Zou'bi performed the 2023 inspection of the Landfill at Mitchell Plant. This report is a summary of the inspection and an assessment of the general condition of the facility. Mr. Dennis C Henderson was the Plant contact along with Mrs. Tammy M. Wade was present for the inspection. The inspection was performed on August 31, 2023. Weather conditions were sunny, and the temperature was in the upper 70's (°F). There was 0.35 inches of rainfall in the area over the seven days prior to the inspection. Most of the landfill outer slopes had been recently mowed.

2.0 DESCRIPTION OF LANDFILL

The overall features of the landfill were categorized into the following components as a means of organizing the inspection and reporting:

- Inactive Landfill Disposal Areas (Phases 1, 2)
- Active Landfill Disposal Areas (Phases 3)
- Clay Berms
- Leachate Collection System (Leachate Sump & Lift Station, and Pond)
- Storm Water Control Features (South Pond, South Pond forebay West and East Pond)

These features, including the approximate limits of each area, are shown on the Figure 1. Selected photographs taken during the inspection and used to illustrate the visual observations presented in the report are included in Attachment A. Additional inspection photos can be made available to the Plant upon request.

In general, the Mitchell Landfill is a lined valley fill landfill with a leachate collection system. At the completion of the project, leachate and runoff will flow to the south end (downhill) of the landfill area. Leachate is then pumped uphill to a detached leachate collection pond on top of an adjacent ridgeline.

Phases 1, 2 and 3 are located near the northern limits of the site. Phases 3 is actively receiving CCR materials while phases 1 and 2 were covered with a temporary cover. Chimney drains constructed out of bottom ash material were observed inside the Phase 3 area. These bottom ash chimney drains are connected to the leachate collection system to handle contact water runoff into the landfill area. A temporary clay berms exist immediately to the south of Phases 1, 2 and 3.

Leachate collection pipes for Phase 1, Phase 2 and Phase 3 flow by gravity to the south and discharge into a concrete sump. Leachate water is then pumped to the leachate collection pond for recirculation back to the plant.

Non-contact storm water from the north end of the site is directed to the west sedimentation pond. Non-contact storm water from the east end of the site is directed to the east sedimentation pond. Non-contact storm water from the south end of the site is directed to the south sedimentation pond.

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 has been conducted. Based on the review of the data there were no signs of actual or potential structural weakness or adverse conditions.

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

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

There were no changes in the geometry of the landfill since the 2022 annual inspection.

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

The total volume of CCR material disposed at the landfill through August 2023 is summarized in the table below. This is based on information from previous annual inspection reports and information received from Mitchell Plant personnel.

CCR	CCR Quantities to Mitchell Landfill (tons)										
Description	2014	2015	2016	2017	2018	2019	2020	2021	2022	20231	Total
Fly Ash	244,944	114,725	383,522	383,295	298,640	215,250	150,949	257,203	175,990	160,885	2,385,403
Bottom Ash			31,758*	33,328*	36.165*	21,804*	14,295	27,599	250,006	12,248	391,074
Soil				3,711	3,968	12,533	5,744	7,391	7100.38	14,069	54,516
CPS Cookies			7,818	13,059	7,725	9,716	7007	7,1356	9,908	4,147	64,517
Gypsum	13,278	5,468	11,960	2,630	906	0	1,400	652	35,881	1072.77	73,248
Combined	258,222	120,193	403,300	402,695	311,239	237,499	179,395	295,270	464,309	358,068	2,968,757

¹ = From January 2022 through August 31, 2023.

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

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.

^{* =} Bottom ash used for construction and not considered part of disposal quantities.

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:

1. 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, CCR material placement, drainage features, storm water ponds/dams, leachate ponds, open cells, and appurtenances such as chimney drains and underdrains.

Overall the facility is in good 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 Attachment A. Additional pictures taken during the inspection can be made available to the owner upon request. The locations of the inspection observations are included on Figure 1.

Phase 1 Area

1. 6-inch-thick layer of the temporary cover was placed in the Phase 1 Area. The area is not actively receiving CCR material for disposal. There was no evidence of standing water, slope instabilities or uncontrolled seepage. Minor sediments collected in outer ditch north and northwest of phase 1. Minor erosion of the temporary cover, north of phase 1. (Photographs 1 through 4).

Phase 2 Area

1. 6-inch-thick layer of the temporary cover was placed in the Phase 2 Area. The area is not actively receiving CCR material for disposal. There was no evidence of standing water, erosion, slope instabilities or uncontrolled seepage. (Photograph 5 and 6).

Phase 3 Area

1. During the inspection, Phase 3 area was actively receiving CCR material for disposal. CCR material is dumped, spread out with a dozer and compacted with a smooth drummed roller. There was no evidence of standing water, slope instabilities or uncontrolled seepage. Few erosion gullies are present along the eastern slope and the western groin of the area within the protective bottom ash cover (Photographs 7 through 11).

Clay Berms

- 1. At the time of inspection, the clay berm south of phases 1 and 2 was recently mowed with good established grass cover. At some areas, the clay from phases 1 and 2 clay berm was harvested to be used in constructing the phase 3 Berm (photograph 12 and 13).
- 2. There was no evidence of uncontrolled leachate, slope instability or ponding water on the clay berms area.

Leachate Collection System

- 1. The leachate collection pipes are exposed at the ground surface in the area between the toe of the clay berm and the leachate lift station. There was no evidence of leachate leaking through defects or imperfections in the leachate collection pipes in this area where the pipes were exposed for visual inspection.
- 2. The leachate lift station was observed to be in good condition. The pumps and backup power generator appeared to be in good working order.
- 3. The water level in the leachate sump was more than 10 feet below the elevation of the overflow structure.

Leachate Collection Pond

- 1. The water level in the leachate collection pond was approximately El. 1220 feet above mean sea level.
- 2. The geomembrane liner at the leachate pond appeared to be in good condition, with no evidence of tears, rips, holes or signs of flotation.
- 3. The overflow pipe at the leachate collection pond was observed to be unobstructed.

South Sedimentation Pond

- 1. The water level in the south pond was approximately El. 1030 feet above mean sea level.
- 2. The principal spillway riser appeared unobstructed. The trash rack and anti-vortex plate were in good condition and securely fastened to the riser structure.
- 3. Some minor vegetation was starting to grow amongst the riprap on the upstream slope of the south pond.
- 4. The principal spillway outlet was observed to be in good condition. Some brush vegetation was becoming established in the riprap around the principal spillway outlet area.
- 5. There are two, 12-inch-diameter perforated HDPE underdrain pipes which outlet at the downstream toe of the south pond dam. A section of corrugated plastic pipes had been secured to the HDPE pipes with screws to extend the outlet of these underdrain pipes.

West Sedimentation Pond

- 1. The pool level in the west pond is about 7 feet below the top of the principal spillway riser. The trash rack and anti-vortex plate were in good condition and securely fastened to the principal spillway riser.
- 2. The grass cover on the downstream slope of the west pond embankment was observed to be in satisfactory conditions.
- 3. The emergency spillway of the west pond was observed to be unobstructed.
- 4. It should be noted that the riprap armoring for the west pond emergency spillway does not protect the downstream slope of the embankment, however the height of the embankment in this area does not appear to be more than 5 feet.
- 5. A surface drainage culvert is extended down the sloping natural ground to the waterline, on the eastern edge of the pond.

East Sedimentation Pond

- 1. The pool level in the east pond is about 10 feet below the top of the principal spillway riser. The trash rack and anti-vortex plate were in good condition and securely fastened to the principal spillway riser.
- 2. The grass cover, at areas where there is no riprap, on the downstream slope of the east pond embankment was observed to be in satisfactory conditions.

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 or the operation 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 landfill cells, leachate pipes and collection pond, and storm water controls are in good condition. The Plant is performing regular maintenance and inspections as required.

5.2 MAINTENANCE ITEMS

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

- 1. Periodically remove the vegetation growing in the riprap-lined areas on the upstream slope and downstream toe area of the south pond dam.
- 2. Periodically dress the slope surface in order to minimize the erosion of the bottom ash protective cover.
- 3. Continue to perform routine maintenance on the leachate pump system components and remove any debris accumulation (leaf litter, sticks, etc.) as necessary for proper operation of the pumping system.
- 4. Clean sediments in outer ditch phase 1 area.
- 5. Fix Minor erosion in phase 1 area.

5.3 ITEMS TO MONITOR

The following items were identified during the visual inspection as items to be monitored, see inspection map for locations:

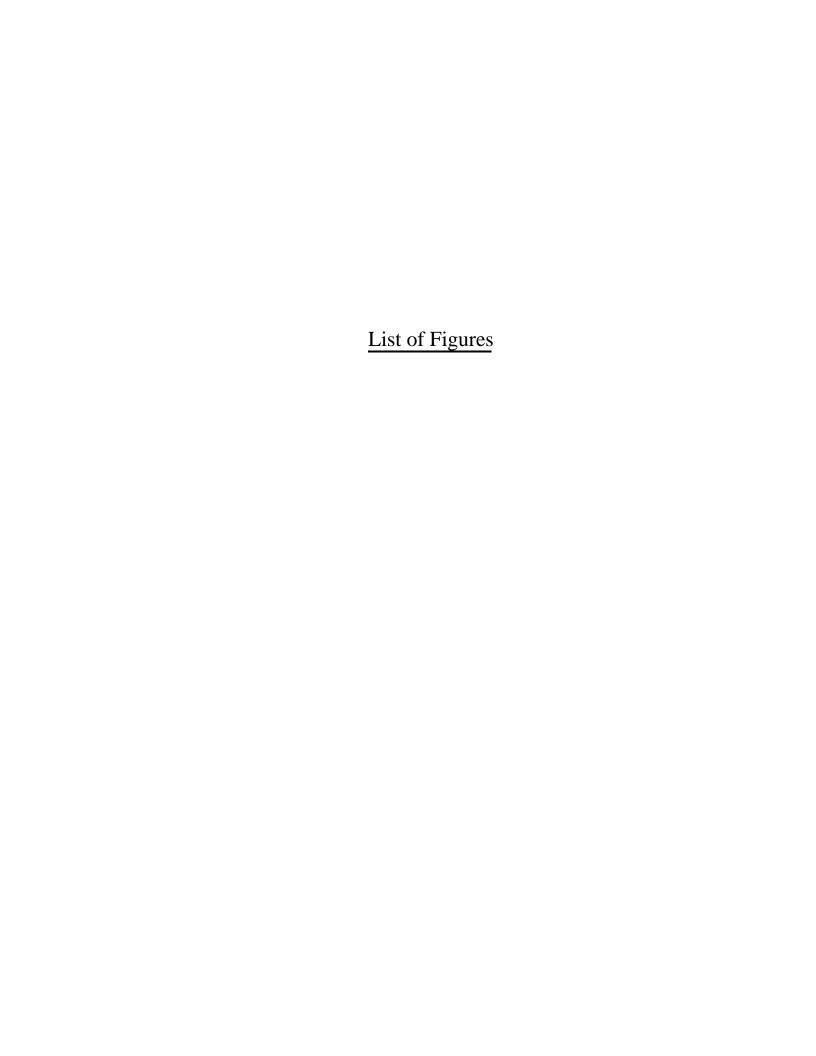
1) None.

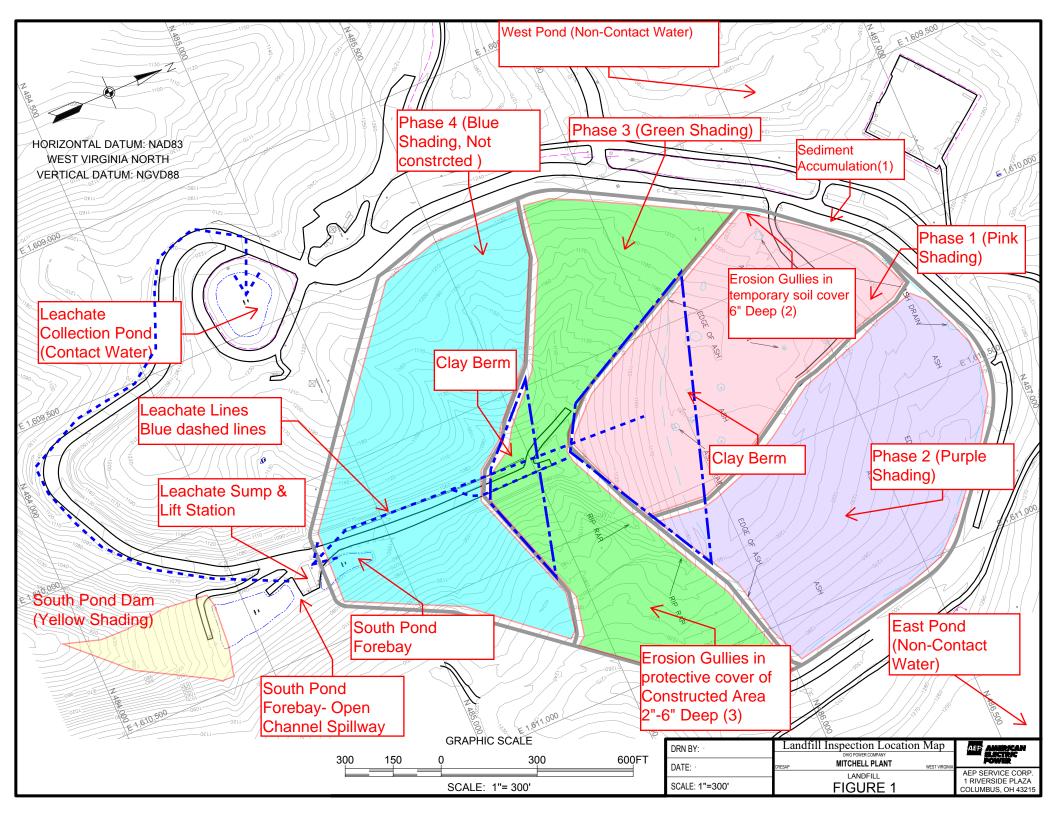
5.4 DEFICIENCIES (257.84(b)(2)(iii))

There were no 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 were no deficiencies noted during this inspection or during any of the periodic 7-day inspections. A deficiency is defined as either:

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

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





ATTACHMENT A

Photos

Observation 1: General Conditions:

temporary soil cover

Location: Phase 1

Recommendations: N/A.



Photo No. 2

Observation 1: Minor Sediment

Accumulation

Location: Outer Ditch Phase 1

Recommendations: Clean ditch.



Photo No. 3

Observation 1: Minor Sediment

Accumulation

Location: Outer Ditch Phase 1

Recommendations: Clean ditch.



Observation 2: Minor Erosion in the temporary soil cover

Location Phase 1.

Recommendations: place and seed temporary soil cover.



Photo No. 5

Observation 2: General Conditions: temporary soil cover

Location Phase 2.

Recommendations: N/A.



Photo No. 6

Observation 2: General Conditions: temporary soil cover

Location Phase 2.



Observation 3: General Conditions: Fly ash placement in phase 3.

Location: Floor area of Phase 3.

Recommendations: N/A.



Photo No. 8

Observation 3: General Conditions

Location: left edge of east inboard slope of Phase 3 looking West.

Recommendations: N/A.



Photo No. 9

Observation 3: General Conditions

Location: Right edge of east inboard slope

of Phase 3.



Observation 3: General Conditions:

Location: left edge of west inboard slope

of Phase 3

Recommendations: N/A



Photo No. 11

Observation 3: General Conditions:

Location: Right of east inboard slope of

Phase 3.

Recommendations: N/A



Photo No. 12

Observation 4: Clay Berm

Location: Phase 1&2.



Observation 4: Clay Berm.

Location: Phase 3.

