



American Electric Power  
1 Riverside Plaza  
Columbus, OH 43215  
aep.com

January 10, 2018

Mr. Austin Caperton, Cabinet Secretary  
West Virginia DEP – Executive Office  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

**Subject: Amos Power Plant**

**Coal Combustion Residual Rule  
Little Scary Creek Surface Impoundment (Fly Ash Pond)  
40 CFR §257.102(f)(3) Closure Completion PE Certification  
40 CFR §257.102(h) Placement of Completion of §257.102(f)(3) in Operating Record  
40 CFR §257.105(i)(8) Completion of §257.102(h) Placed in Operating Record  
40 CFR §257.106(i)(8) Notification to State Director of Completion of §257.105(i)(8)  
40 CFR §257.107(i)(8) Notification of Completion of §257.105(i)(8) Placed on Publicly  
Accessible Site**

Dear Cabinet Secretary Caperton:

The Federal Coal Combustion Residual Rule requires the following:

- §257.102(f)(3) A Certification from a qualified Professional Engineer that the closure of a CCR Unit was completed in accordance with the Closure Plan.
- §257.102(h) Completion of a notification that the closure completion certification has been completed and placed in the operating record.
- §257.105(i)(8) Placement of the closure completion certification in the operating record.
- §257.106(i)(8) Notification to the State Director that the closure completion certification has been placed in the operating record.
- §257.107(i)(8) Placement of the notification of closure completion certification on the CCR Rule Compliance Data and Information Website.

Attached you will find the Certification that the Phase 1 through 3 activities to complete the closure of the John E. Amos Plant Fly Ash Pond were completed in accordance with the closure plan. This letter is to inform you that closure was completed and certified on December 14<sup>th</sup>, 2017 and we have placed the above information in the respective locations. The public CCR Rule Compliance Data and Information internet site is available at the following link: <http://www.aep.com/about/codeofconduct/ccrrule/>.

If there are any questions please contact me at (614) 716 – 2252, or by email at [bekepchar@aep.com](mailto:bekepchar@aep.com).

BOUNDLESS ENERGY

Sincerely,

A handwritten signature in cursive script that reads "Benjamin E. Kepchar".


Benjamin E. Kepchar  
Land Environment & Remediation Services

cc: Mr. Scott Mandirola, WVDEP  
Mr. Justin Painter, WVDEP  
Mr. Bill Sentman, WVDEP  
Mr. Jon Webster, Amos Plant

Attachments

## 6.0 CERTIFICATION

Based on the construction testing and observation performed by Terracon Consultants, Inc. personnel; and the information provided by AEP, and R. B. Jergens Contractors, Inc.(Contractor), I hereby certify that the Fly Ash Pond Closure – Phase I Construction, completed in 2015, at Amos Plant Fly Ash Pond has been completed and to the best of my knowledge is in substantial accordance with the construction documents.

  
Mohammad S. Fity, P.E.  
Certifying Engineer  
E-19070



## 6.0 CERTIFICATION

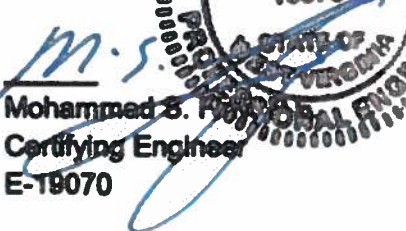

Based on the construction testing and observation performed by Terracon Consultants, Inc. personnel; and the information provided by AEP, and R. B. Jergens Contractors, Inc.(Contractor), I hereby certify that the Fly Ash Pond Closure – Phase II Construction, completed in 2016, at Amos Plant Fly Ash Pond has been completed and to the best of my knowledge is in substantial accordance with the construction documents.

\_\_\_\_\_  
Mohammad S. Finy, P.E.  
Certifying Engineer  
E-19070



## 6.0 CERTIFICATION

Based on the construction testing and observation performed by Terracon Consultants, Inc. personnel; and the information provided by AEP, and R. B. Jergens Contractors, Inc.(Contractor), I hereby certify that the Fly Ash Pond Closure – Phase III Construction, completed in 2017, at Amos Plant Fly Ash Pond has been completed and to the best of my knowledge is in substantial accordance with the construction documents.

  
  
Mohammed S. Raafiq  
Certifying Engineer  
E-19070

# 2021 Annual Dam and Dike Inspection Report

**Fly Ash Pond**

**John E. Amos Plant  
Appalachian Power Co.  
Putnam County, West Virginia**

**December 2021**

Prepared for: Appalachian Power Co.  
1530 Winfield Rd  
Winfield, West Virginia 25213

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



BOUNDLESS ENERGY™

Document Number GERS-21-082

# 2021 Annual Dam and Dike Inspection Report

**John E. Amos Plant**

**Fly Ash Pond**

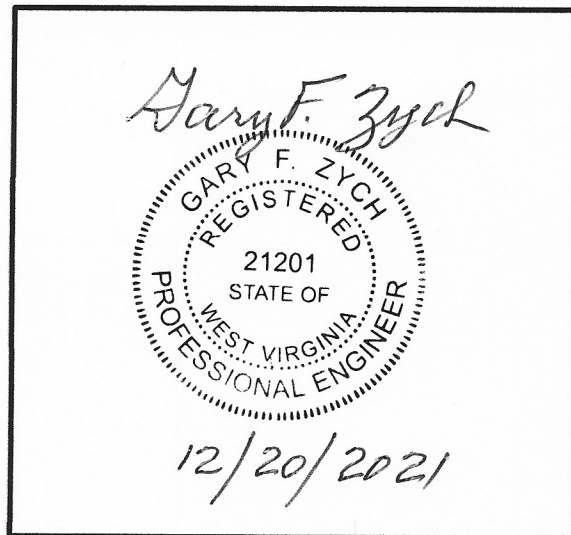
**Document Number: GERS-21-082**

**Inspection Date November 17, 2021**

PREPARED BY *Brian G. Palmer* DATE 12/16/2021  
Brian G. Palmer, P.E.(OH)

REVIEWED BY *Brett A. Dreger* DATE 12/17/<sup>2021</sup>~~1969~~  
Brett Dreger, P.E.(OH)

APPROVED BY *Gary F. Zych* DATE 12/20/2021  
Gary F. Zych, P.E.  
Manager – Geotechnical Engineering Section



I certify to the best of my knowledge, information and belief the information contained in this report meets the requirements of 40 CFR § 257.83(b).

This is the last inspection report required by the CCR Rule.

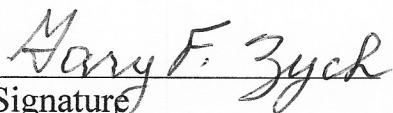
# ENGINEER'S INSPECTION VERIFICATION STATEMENT

## For Compliance with Dam Safety Rules §47-34-15.4.c

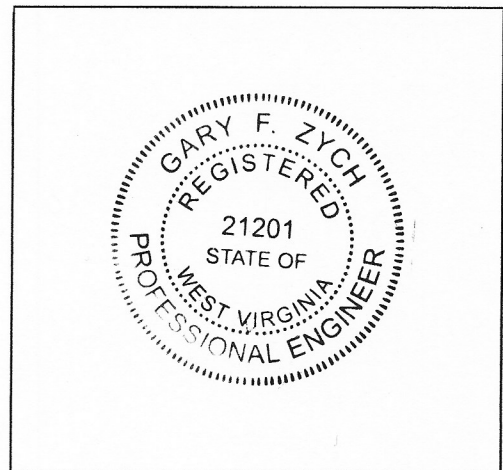
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I hereby verify that I supervised the visual inspection of the Amos Fly Ash Dam (ID# 07911) and its appurtenances on November 17, 2021. The attached signed and sealed inspection report documents:

- 1) the current conditions as observed;
- 2) any maintenance items necessary to prolong safe functioning of the dam;
- 3) any conditions observed during the inspection which indicate that the dam has a serious problem<sup>(1)</sup>;
- 4) any conditions that will not allow proper functioning of the dam during normal or maximum reservoir water level conditions.

  
Signature  
Gary F. Zych, P.E.  
Manager  
Geotechnical Engineering Services  
American Electric Power Service Corporation

12/20/2021  
Date



SEAL

<sup>(1)</sup> As defined in Section 2.47 of the Dam Safety Rules



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## Attachments

- Attachment A – Photographs
- Attachment B – Figures
- Attachment C – Instrumentation Data

## **1.0 INTRODUCTION**

This report was prepared by AEP- Geotechnical Engineering Services (GES) section, in part, to fulfill the US EPA requirements of 40 CFR 257.83 and the West Virginia Dept. of Environmental Protection, Division of Water Dam Inspection Section and to provide Appalachian Power Co. and John E. Amos (JEA) plant personnel with an evaluation of the facility.

The 2021 dam and dike inspection at the JEA fly ash pond was conducted by Mr. Brian Palmer on November 17, 2021 with Mr. Donald Duncan who served as the project facility contact. Weather conditions were mostly sunny, with temperatures in the low of 70° F during the inspection. There was no of precipitation on the day of the inspection and 0.74 inches of rainfall within the preceding seven days.

## **2.0 DESCRIPTIONS OF COAL COMBUSTION RESIDUALS (CCR) IMPOUNDMENTS**

### **2.1 FLY ASH POND**

The fly ash pond is located in Putnam County, West Virginia southwest of the John E. Amos (JEA) Power Plant between State Route 817 and Interstate I-64. The watershed for the fly ash pond drains to the Kanawha River (Figure 1). The JEA fly ash pond was used for sedimentation and storage of fly ash produced as a waste product in burning pulverized coal at the JEA Power Plant.

The John E. Amos fly ash dam is an earthen and rock fill zoned dam constructed in phases with approximately 2.5-3 Horizontal to 1 Vertical (2.5-3 H to 1 V) upstream slopes, 2-2.5 H to 1 V downstream slopes and a design crest elevation of 875 ft. The downstream slope of the dam is protected from erosion by oversize riprap. The downstream slope of the dam has a berm with a bench at Elevation 713 ft. to 716 ft., commonly referred to as 716 bench.

WV DEP dam safety approved APCo's permit application on June 10, 2013 to modify the facility to eliminate the free pool within the impoundment by grading the ash and placement of additional soil fill eventually capping it with a synthetic liner overlain with a soil cover allowing non-contact water to be discharged through a new spillway. There is no open pool of water behind the dam and precipitation that falls within the pond's watershed is conveyed via surface channels to an outlet channel cut in the ridgeline to the west of the dam. The Notice of Closure Completion was placed on January 10, 2018 in the operating record. Figures 2 (aerial image – plan view) shows the locations of closure and capping activities for the fly ash pond and dam.

## **3.0 REVIEW OF AVAILABLE INFORMATION (257.83(b)(1)(i))**

A review has been conducted of available information regarding the status and condition of the JEA fly ash pond that includes files available such as the plant's inspection reports, piezometric measurements, and surface monument surveys for deformation/settlement and previous annual inspections.

## **4.0 INSPECTION (257.83(b)(1)(ii))**

### **4.1 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 or 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.
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 previously 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 §257.83(b)(5) Inspection Requirements for CCR Surface Impoundments. 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 dam has developed a problem that could impact the structural integrity of the dam. There are four general categories of deficiencies. These four categories are described below:

1. Uncontrolled Seepage
  - a. Uncontrolled seepage is seepage that is not behaving as the design engineer has intended. An example of uncontrolled seepage is seepage that comes through or around the embankment and is not picked up and safely carried off by a drain. Seepage that is collected by a drain can still be uncontrolled, if it is not safely collected and transported, such as seepage that is not clear. Seepage that is unable to be measured and/or observed is considered uncontrolled seepage. [Wet or soft areas are not considered uncontrolled seepage, but they can lead to this type of deficiency. These areas should be monitored frequently.]
2. Displacement of the Embankment
  - a. Displacement of the embankment is a large scale movement of part of the dam. Common signs of displacement are cracks, scarps, settlement, bulges, depressions, sinkholes and slides.
3. Blockage of Water Control Features
  - a. Blockage of Control Features is the restriction of flow at spillways, decant or pipe spillways, or drains.

4. Erosion

- a. 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.

**4.2 FLY ASH POND**

**4.2.1 CHANGES IN GEOMETRY SINCE LAST INSPECTION (257.83(b)(2)(i))**

No modifications have been made to the geometry of the fly ash dam since the 2020 annual inspection.

**4.2.2 INSTRUMENTATION (257.83(b)(2)(ii))**

Location of instrumentation is included on the figures in Attachment B. With the closing of the Fly Ash Pond only critical piezometers and survey monuments will remain and have been monitored monthly. The maximum recorded readings of each piezometer since the previous annual inspection is shown in Table 3 below. A figure showing the readings since last year’s annual inspection is included in Attachment C. The piezometers not monitored on a monthly basis are planned to be closed in accordance with the requirements of West Virginia Department of Environmental Protection.

**Table 3**

<b>INSTRUMENTATION DATA Fly Ash Pond</b>			
<b>Instrument</b>	<b>Type</b>	<b>Maximum Reading since last annual inspection</b>	<b>Date of reading</b>
PP1	Piezometer	637.52	July 02, 2020
PP8F	Piezometer	666.03	June 16, 2021
PP8RA	Piezometer	683.31	July 27, 2020
PP4R	Piezometer	721.24	November 3, 2020
PP5S	Piezometer	780.09	May 15, 2021
PP5F	Piezometer	768.04	August 21, 2020
PP75	Piezometer	687.22	October 09, 2020
PP7R	Piezometer	684.83	February 9, 2021
9915	Piezometer	767.05	January 15, 2021
9913	Piezometer	763.83	Nov 2020 & Nov 2021
P1	Piezometer	664.25	November 9, 2021
8400	Piezometer	693.90	June 16, 2021
8401	Piezometer	694.03	February 9, 2021
8402	Piezometer	668.19	January 15, 2021
94-1	Piezometer	720.35	March 5, 2021

Most of piezometers readings continue to show consistent water elevations in the dam. Piezometers 8400, 8401, and 8402 have historically shown wide swings in water elevations and those observed since the last inspection are consistent with those trends. A graph of the piezometer readings is included in Attachment C. A notable departure is recorded at PP1 and PP7R that may represent erroneous measurements since subsequent measurements appear to have returned to normal conditions. A blockage was noted and repaired in P1 and there were several dates with no readings while the issue was evaluated and repaired.

In addition to the piezometers, the horizontal and vertical deformations of the Amos Fly Ash Dam have

historically been monitored using 24 permanent reference points (survey monuments). The deformation surveys were conducted on a semi-annual basis until November 2015 when 30-day monitoring was implemented in accordance with 40CFR257.83 for 12 of the permanent survey monuments. The reports provide graphs of the vertical and horizontal displacements as a function of time for the survey monuments. The deformation of all the monuments have been reviewed as a part of this annual inspection and no unusual or unexpected behavior has been observed.

**4.2.3 IMPOUNDMENT CHARACTERISTICS (257.83(b)(2)(iii, iv, v))**

Below is a summary of the minimum, maximum, and present depth and elevation of the impounded water & CCR since the previous annual inspection; the storage capacity of the impounding structure at the time of the inspection; and the approximate volume of the impounded water and CCR at the time of the inspection. At the time of the field inspection, no free pool of water was impounded.

<b>IMPOUNDMENT CHARACTERISTICS</b>	
<b>Fly Ash Pond</b>	
Water Surface Elevation at time of the inspection	Not applicable
Approximate <b>Minimum, Maximum, and Present</b> depth of impounded water since last annual inspection	Not Applicable
Approximate <b>Minimum Maximum and Present</b> depth/elevation of CCR since last annual inspection	<1.0 ft. /elev. 826.70 ft. 160 ft. /elev. 886.36 ft. Depth Varies <1.0 to 160ft Elev. Varies 826.70 ft. to 886.36ft.
Storage Capacity of impounding structure at the time of the inspection*	9,111 AC-Ft
Approximate volume of impounded water at the time of the inspection	Not Applicable
Approximate volume of CCR at the time of the inspection	9,111 AC-Ft

**\*Facility is closed and cannot store or impound any additional material or water**

**4.2.4 VISUAL INSPECTION (257.83(b)(2)(i))**

A visual inspection of the fly ash pond was conducted to identify any signs of distress or malfunction of the impoundment and appurtenant structures. The inspection also included hydraulic structures underlying the base of the dike. Specific items inspected included all structural elements of the dam such as upstream and downstream slopes, crest, and toe.

1. There were no visual signs of settlement, misalignment, or erosion along the crest. The guardrail was also observed to be in excellent condition.
2. The entire face of the downstream slope was well protected from erosion with large-boulder size sandstone and shale riprap and was generally in fair to good conditions. There were no noticeable signs of movement or slides in the oversize riprap. Most of the vegetation on the downstream slope had been controlled by the application of a herbicide.
3. The seepage areas near the right groin ditch were still present. The seeps are believed to be originated from the abutment bedrock based on the 2007 geotechnical investigations that revealed a permeable layer of sandstone at about the same elevation. The surficial slip within this seepage area has been repaired has

been stable for several annual inspections. Another seep at a higher elevation previously noted was observed dry during this inspection.

4. Another area of seepage near PZ-94-1 remains unchanged from last year's inspection.
5. The right and left groin seepage weirs (Outfall 040 and 041) were free flowing and clear.
6. The surface of the 716 bench was generally in excellent condition. There were no visual signs of settlement, misalignment or erosion that would indicate any instability with the earthen fill.
7. Seepage continues to be observed along the toe at the 716 bench and the dam's slope. The seepage appears to be consistent with respect to the location and discharge. The discharge was visually clear except for algae and no sediment was observed to be deposited at the seep's point of emergence.
8. A minor amount of seepage was observed to be discharging from the former (Stage 1 Dam Raising) decant structure.
9. The seepage collection basin at the toe was clear and appeared to be functioning as intended. A sample collection point (Outfall 024) has been added downstream to allow collection of samples per the new NPDES permit.
10. The upstream slope showed no visual signs of bulges, misalignment, or erosion. No animal burrows were noted on the upstream slope. The upstream slope was well vegetated and is controlled by timely mowing.
11. No erosion was observed along the upstream left and right groin ditches. Both of the abutments within 25 ft. from the center of any of the groin ditches have been cleared of shrubs and small trees.
12. The surface water spillway has experienced moderate erosion as it transitions to the natural channel, a preventative measure was taken to install a secant-pile wall along the edge of the erosion to improve stability.

#### **4.2.5 CHANGES THAT EFFECT STABILITY OR OPERATION (257.83(B)(2)(VII))**

All areas of the impoundment have a final cover system installed over the CCR Material. The Construction of the new spillway eliminates the possibility to impound water behind the dam. Based on interviews with plant personnel, review of inspection reports, and field observations there were no changes to the fly ash dam itself since the last annual inspection that would affect the stability or operation of the dam structure.

### **5.0 CORRECTIVE MEASURES TAKEN TO REMEDY DEFICIENCY OR RELEASE SINCE LAST INSPECTION**

Based on the plant personnel inspections, the instrumentation readings and interviews with plant personnel there have been no deficiencies or signs of distress observed during any inspection since the last annual inspection.

### **6.0 SUMMARY OF FINDINGS**

#### **6.1 DEFICIENCIES & CHANGES WHICH AFFECT STABILITY OR OPERATIONS (257.83(b)(2)(vi, vii))**

There were no significant changes to the fly ash dam since the last annual inspection that would affect the stability or operation of the structure.

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

## **6.2 ITEMS TO MONITOR**

The following items need to be monitored.

1. The seepage along the right groin and left groin pipe weirs should continue to be measured on a monthly basis.
2. The piezometers should continue to be measured for static water levels on a monthly basis.
3. The discharge from the original decant concrete discharge pipe should be monitored (flow and visual clarity) on a monthly basis to determine if this is a seasonal wet weather discharge.

## **6.3 MAINTENANCE ITEMS**

The following general maintenance items were identified during the visual inspection:

1. Control of the vegetation (i.e. mowing and spraying) should continue on its current regularly scheduled basis.
2. The piezometers previously noted to be abandoned shall continue to be monitor until the seepage/groundwater study required in the NPDES permit can be completed.

## **7.0 CONCLUSION**

Overall, the facility is in good condition. Closure of the fly ash pond is complete with no potential structural weakness or other conditions that could potentially disrupt the safety of the fly ash dam structure observed. Continue to perform the maintenance and repairs as they are noted during inspections.

**ATTACHMENT A**

**Photographs**



# AEP GES Dam Inspection

Plant Name:

Inspector:

Unit:

Date:

Photo #:

Notes:



Photo #:

Notes:



# AEP GES Dam Inspection

Plant Name:

Inspector:

Unit:

Date:

Photo #:

Notes:



Photo #:

Notes:



# AEP GES Dam Inspection

Plant Name:

Inspector:

Unit:

Date:

Photo #:

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Photo #:

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# AEP GES Dam Inspection

Plant Name:

Inspector:

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Photo #:

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# AEP GES Dam Inspection

Plant Name:

Inspector:

Unit:

Date:

Photo #:

Notes:



Photo #:

Notes:



# AEP GES Dam Inspection

Plant Name: Amos

Inspector: B. Palmer

Unit: Fly Ash Pond

Date: November 17, 2021

Photo #: 11

Notes: General condition of downstream left groin looking southeast from 716 bench



N38 27.374 W81 51.058

Photo #: 12

Notes: General condition of seep monitoring weir outfall 040 at 716 bench and left groin looking east.



N38 27.371 W81 51.070

# AEP GES Dam Inspection

Plant Name:

Inspector:

Unit:

Date:

Photo #:

Notes:



Photo #:

Notes:



# AEP GES Dam Inspection

Plant Name:

Inspector:

Unit:

Date:

Photo #:

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Photo #:

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# AEP GES Dam Inspection

Plant Name:

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# AEP GES Dam Inspection

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Photo #:

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# AEP GES Dam Inspection

Plant Name:

Inspector:

Unit:

Date:

Photo #:

Notes:



Photo #:

Notes:



# AEP GES Dam Inspection

Plant Name: Amos

Inspector: B. Palmer

Unit: Fly Ash Pond

Date: November 17, 2021

Photo #: 23

Notes: General condition of upstream slope looking northwest



N38 27.544 W81 51.070

Photo #: 24

Notes: General condition of upstream slope looking southeast



N38 27.479 W81 51.004

# AEP GES Dam Inspection

Plant Name:

Inspector:

Unit:

Date:

Photo #:

Notes:



Photo #:

Notes:



# AEP GES Dam Inspection

Plant Name:

Inspector:

Unit:

Date:

Photo #:

Notes:



Photo #:

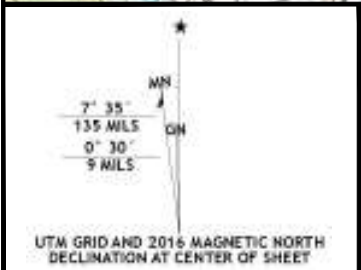
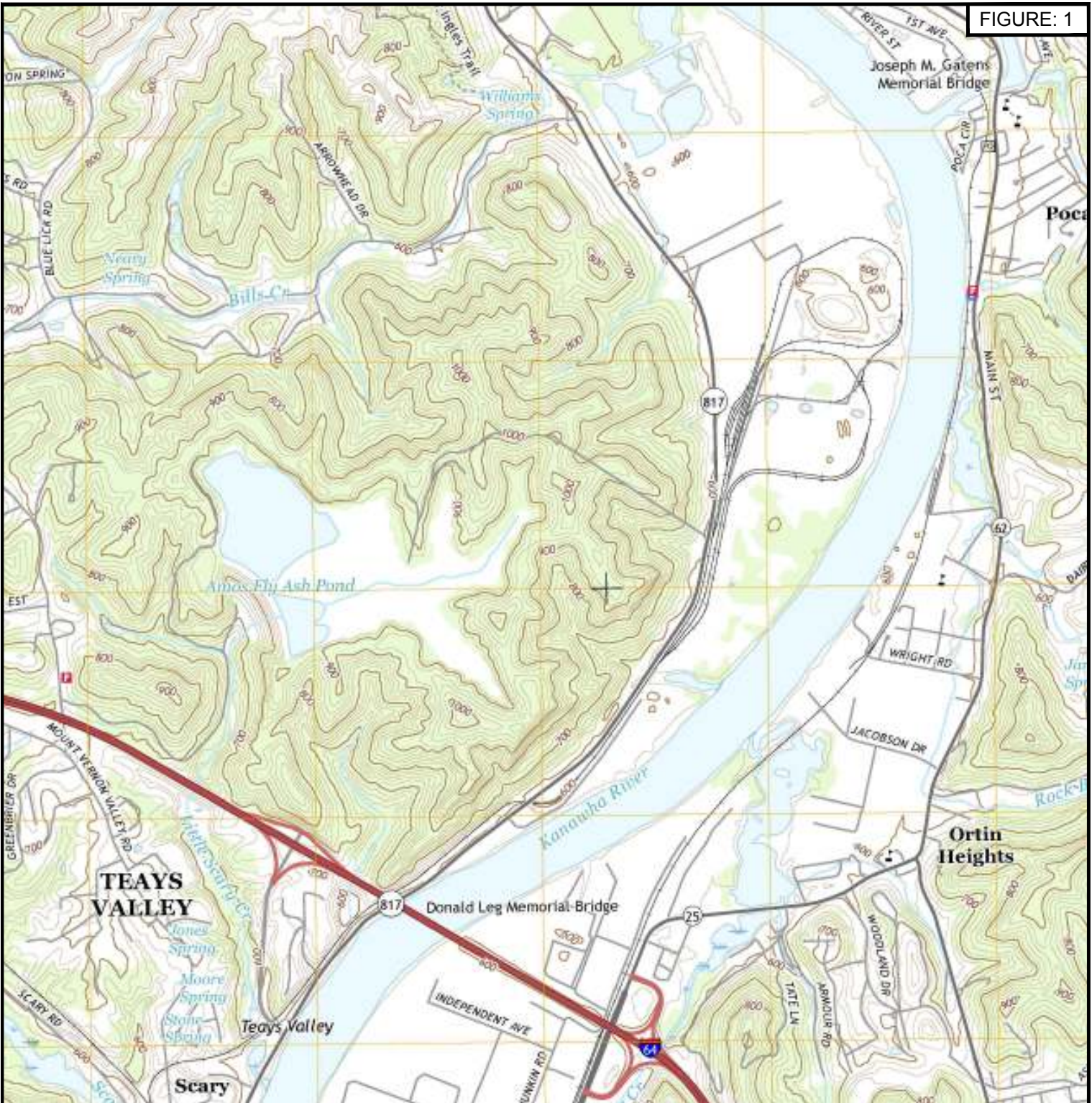
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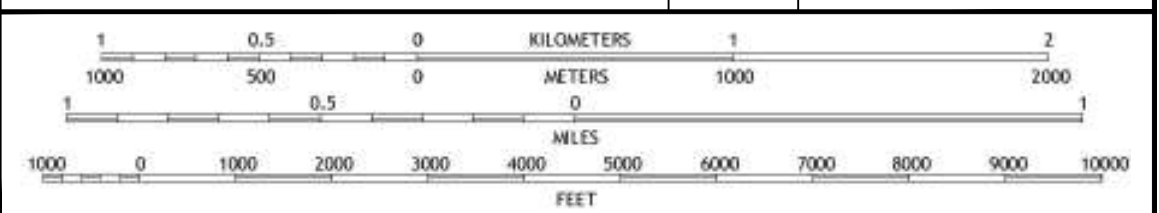
**ATTACHMENT B**

**Figures**

FIGURE: 1



AEP-JOHN AMOS FLY ASH DAM-PUTNAM COUNTY ID#07911 INSPEC. DATE: 10/18/2016







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DATE	NO.	DESCRIPTION	APPD.
REVISIONS			

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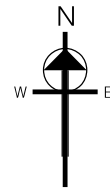
APPALACHIAN POWER COMPANY  
**AMOS PLANT**

SCARY WEST VIRGINIA

**FLY ASH POND**

UNIT:	DRAWING NUMBER: <b>FIGURE 2</b>	REV:
SCALE:		
DR:		
CH:		
SUP:		
ENG:		
DATE:		
APPROVED BY		
<b>AEP AMERICAN ELECTRIC POWER</b>		
AEP SERVICE CORP. 1 RIVERSIDE PLAZA COLUMBUS, OH 43215		

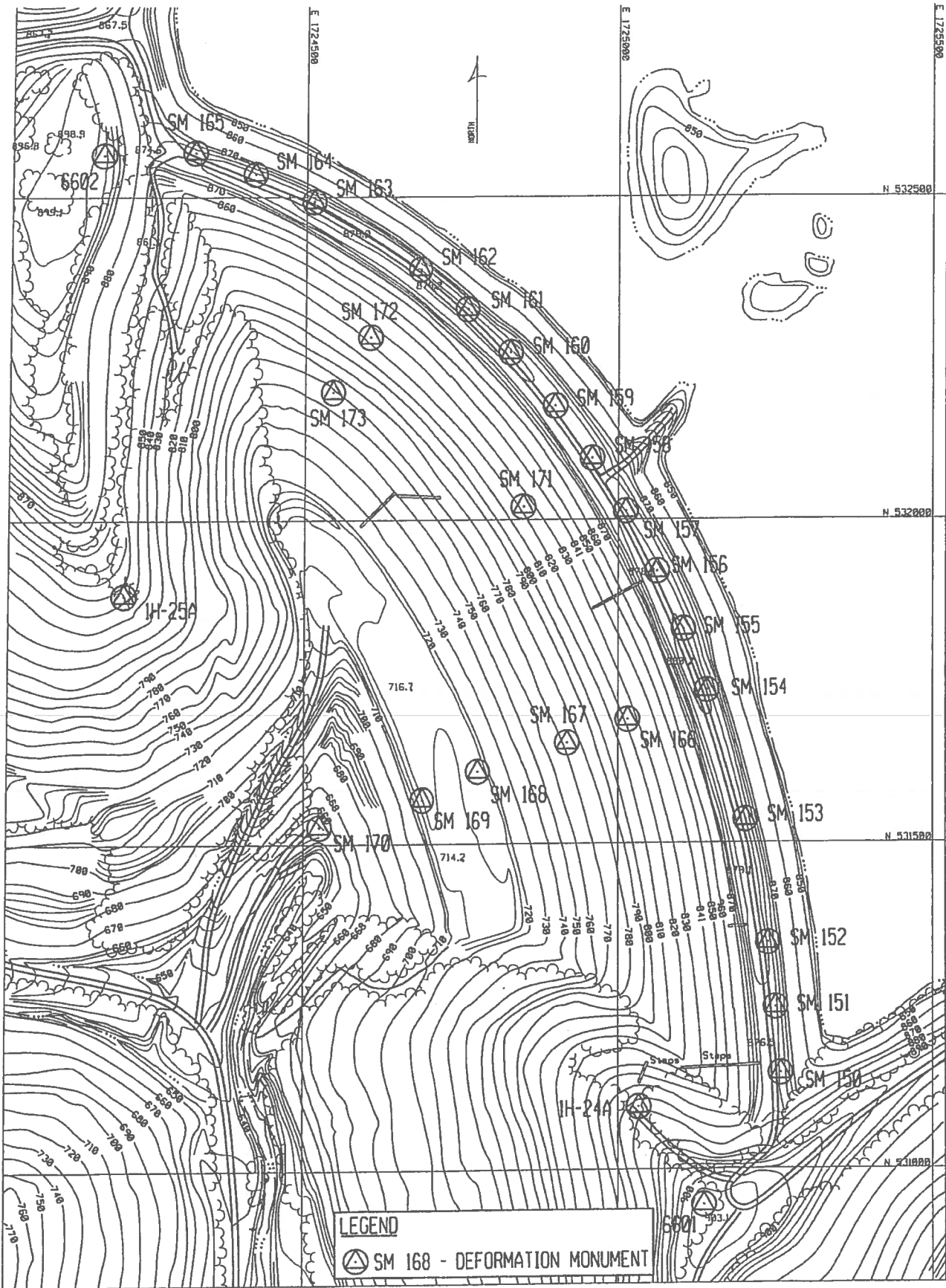
PLOT DATE: 10/20/2017  
BY: J. H. B. 1:54:33 PM  
CROSS REFS:



LEGEND	
	PHOTO LOCATION
	PHOTO DIRECTION

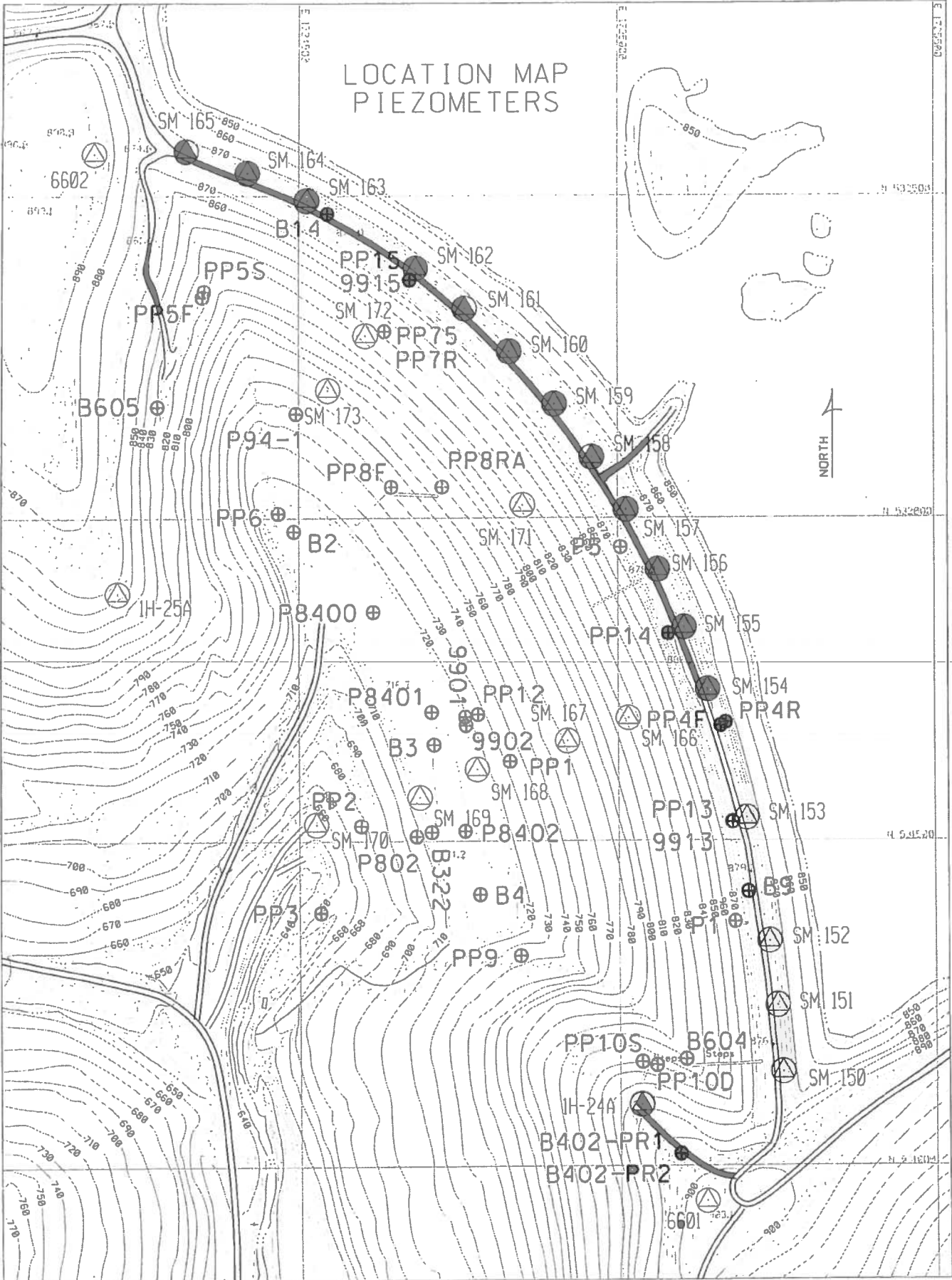
DRAWING NUMBER: <b>FIGURE 3</b>	
APPALACHIAN POWER CO.	
<b>AMOS FLY ASH POND PHOTOGRAPH MAP</b>	
WINFIELD	2021 WEST VIRGINIA
<b>AMERICAN ELECTRIC POWER</b>	<b>AEP SERVICE CORP.</b> 1 RIVERSIDE PLAZA COLUMBUS, OH 43215

PLOT TIME: HOUR:MINUTE  
 BY: USERPLOT  
 PLOT DATE: DD-MMM-YYYY  
 CROSS REF:



LOCATION MAP DEFORMATION MONUMENTS

# LOCATION MAP PIEZOMETERS



**LEGEND**

⊕ B402-PR2 - PIEZOMETER

**ATTACHMENT C**

**Instrumentation Data**

## John E Amos Plant Piezometer Readings Fly Ash Pond

