

Coal Combustion Residual 2024 Annual Inspection Report Fort Martin CCB Landfill

Monongahela Power Company (A FirstEnergy Company)
Fort Martin CCB Landfill
Maidsville, Monongalia County, West Virginia

GAI Project Number: C150917.52
January 2025



Prepared by: GAI Consultants, Inc.
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Prepared for: Monongahela Power Company
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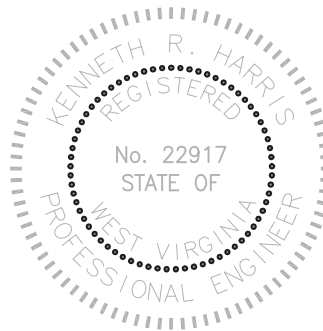
Certification/Statement of Professional Opinion

The Annual Inspection of the Fort Martin Landfill was performed by GAI Consultants, Inc. (GAI) on Tuesday, October 22, 2024. The Inspection was based on information described in Section 3.0 that GAI has relied on, but not independently verified and the visual observations made by GAI personnel at the Site during specific site visits. Therefore, this Certification/Statement of Professional Opinion is limited to the information available to GAI at the time the Inspection was performed. Based on and subject to the foregoing, it is my professional opinion as a Professional Engineer licensed in the State of West Virginia, that the Inspection has been performed in accordance with standard and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances and at the time and in the same locale. It is my professional opinion the Annual Inspection Report was prepared consistent with the requirements of the United States Environmental Protection Agency's "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments," published in the Federal Register on April 17, 2015, with an effective date of October 19, 2015.

The use of the words "certification" and/or "certify" in this document shall be interpreted and construed as a Statement of Professional Opinion and is not and shall not to be interpreted or construed as a guarantee, warranty, or legal opinion.

Kenneth R. Harris

Kenneth R. Harris, PE



1.0 Purpose

Pursuant to Federal Coal Combustion Residuals (CCR) Rule 40 Code of Federal Regulations (CFR) 257.84, each CCR unit must have an annual inspection and report prepared by a qualified professional engineer. The inspection is to include:

- ▶ A review of available information regarding the status and condition of the CCR unit, including, but not limited to, files in the operating record.
- ▶ A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit.

The Inspection Report must include:

- ▶ Changes in geometry of the structure since the previous annual inspection.
- ▶ Approximate volume of CCR contained in the unit at the time of the inspection.
- ▶ Appearances of an actual or potential structural weakness of the CCR unit, in addition to existing conditions disrupting or have the potential to disrupt the operation and safety of the CCR unit.
- ▶ Other change(s) which may have affected the stability or operation of the CCR units since the previous annual inspection.

2.0 Introduction

The Fort Martin Power Station (Station) is a coal-fired electric generating station in Maidsville, in the Cass District of Monongalia County, West Virginia (WV). The captive landfill facility at the site accepts CCRs from the Station. The facility accepts gypsum, fly ash, bottom ash, and other approved ancillary materials. The Fort Martin Landfill (Landfill) is owned and operated by Monongahela Power Company. The approximate center of the Landfill is at coordinates 39° 42' 46" north latitude, and 79° 56' 33" west longitude. The Landfill currently operates under WV Department of Environmental Protection (WVDEP) Solid Waste/National Pollutant Discharge Elimination System (NPDES) Water Pollution Control Permit No. WV0075752.

The Landfill consists of two separate areas: the original area south of the haul road, the Fort Martin Landfill (Original Landfill), and the expansion area north of the haul road, the Fort Martin Expansion Area Landfill [Flue Gas Desulfurization (FGD) Landfill]. The Original Landfill area is constructed with benches at 25-foot intervals and rises to an approximate elevation of 1,193 feet mean sea level (msl). The FGD Landfill was permitted to be developed in two phases, Phase 1 and Phase 2. The Phase 1 disposal area was constructed with a liner system and represents the active portion of the expansion area. It has a top elevation of approximately 1,142 feet msl.

The area around the Original Landfill contains four sedimentation ponds (Numbers [Nos.] 3, 4, 5, and 6) and various stormwater controls. The area around the FGD Landfill contains a gypsum loading area, Sedimentation Pond No. 2, and various stormwater controls. A channel system is installed on and around both the Original Landfill and the FGD Landfill that collects stormwater run-off from the landfills and conveys it to one of the ponds. Force mains from each sedimentation pond connect to a main pipe southeast of the Original Landfill area and drain to the Station's cooling towers. Drainage from the haul road flows into a series of channels and culverts that drain into Sedimentation Pond No. 25. This sedimentation pond discharges through an NPDES Outlet into an unnamed tributary of the Monongahela River.

3.0 Information Review

CCR Rule §257.84(b)(1)(i) states an inspection includes "a review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (the results of inspections by a qualified person, and results of previous annual inspections)."

GAI Consultants, Inc. (GAI) reviewed the following available information prior to performing the inspection:

- ▶ 2024 Seven-day CCR Inspection Reports.
- ▶ 2023 Annual Inspection Report.
- ▶ Site Record Drawings.
- ▶ WVDEP Permit Documents.

GAI reviewed the following information after performing the inspection, as it became available to GAI:

- ▶ 2023 Annual Operations Report.

The reports are listed under the References section. Conversations were held with the landfill operators before the inspection to obtain additional information such as current state of the landfill and repairs and maintenance that occurred since the 2023 annual inspection.

No structural integrity problems were documented in the 2024 seven-day inspection reports or the 2023 Annual Operations Report.

4.0 Visual Inspection

4.1 General Information

The inspection was performed on Tuesday, October 22, 2024, by Malik Smith and Ron Harris, P.E. of GAI. They were accompanied by FirstEnergy representatives Jeff Kapolka, Elbert Rohrbough, Zach Milanak, and Chad Wolfe. The weather conditions were cloudy to mostly cloudy, and the temperature ranged between 64- and 73-degrees Fahrenheit.

4.2 Inspection Strategy and Route

The GAI team inspected the landfill and its facilities by making visual observations, recording site conditions, and talking to plant personnel. The site was walked to view the critical structures of the landfill.

The inspection of the Landfill area began at the haul road located to the north of the Original Landfill. The inspection of the Original Landfill began along the north facing embankment. The embankment slopes and benches were observed by traversing on foot around the Landfill. The top of the Landfill was observed by walking the haul road, then walking along the perimeter and across the Landfill. Stormwater channels surrounding the Landfill were observed while walking along the benches. Sedimentation Pond Nos. 4, 5, and 6 were observed during the inspection of the Landfill. The inspection concluded with an inspection of Sedimentation Pond No. 3 and the associated riser and outlet structure.

Inspection of the FGD Landfill began at Sedimentation Pond No. 2. The collection channels along the perimeter were traversed for the inspection. Leachate cleanouts and groundwater underdrain cleanouts were visually observed. All participants walked across the top of the landfill and performed a visual inspection. The gypsum loading area was observed after the landfill and perimeter channels.

4.3 Facility Conditions

The facility conditions are noted in the Annual Inspection Checklist provided in Appendix A with the observations described in detail below.

The areas observed at both landfills appeared stable, and no signs of structural instability such as scarps, cracking, sloughing, surface movements, depressions, or wet areas were observed. Permanent erosion controls were in-place and functioning. No signs of erosion were observed along the landfill slopes nor around the pond embankment slopes.

No wet areas or ponding were observed along the landfill benches, along the toe of the Landfill, along downstream pond embankments for Sedimentation Pond Nos. 2, 3, 4, 5 and 6, nor within drainage channels at the time of inspection.

Vegetation and cattails were observed growing along the bottom of Sedimentation Pond Dam No. 3. To increase pond capacity, the vegetation and cattails should be removed.

Vegetation was observed within the slope drain on the southeastern facing slope. This vegetation should be removed to increase slope drain capacity.

The culverts, manholes, drop boxes, and ponds observed at both landfill areas appeared to be working properly. Culverts and channels observed along the haul road appeared to be functioning properly.

The fugitive dust control system was functioning. Water quality monitoring is conducted on a regular basis. A contact stormwater collection system is installed at the Landfill area.

Several animal burrows were observed on the slopes and benches of the Original Landfill and along the perimeter channel of FGD Landfill. The animal burrows should be backfilled with cover soil.

The woody vegetation previously observed growing along some landfill benches and slopes has been removed. A significant amount of trees and brush have been removed since the 2019 inspection; as of the 2024 inspection, the remaining trees and brush have been removed.

The landfill benches and slopes had been mowed prior to the inspection, providing for better visual observation of the ground. It is recommended that this mowing continue to take place prior to future annual inspections.

At the FGD Landfill area, surface water channels were observed to be functioning properly. The leachate collection system appeared to be properly maintained and protected from potential damage due to equipment. Leachate outlet pipes were observed flowing into Sedimentation Pond No. 2 with no signs of clogging.

4.4 Geometry

Pursuant to 40 CFR §257.84(b)(2)(i), “changes in geometry of the structure since the previous annual inspection” are reported.

The Original Landfill area consisted of 20-foot-wide benches built approximately every 25 vertical feet with side slopes of 2.5H:1V. The benches surround the active area on the southwest top of the landfill.

The FGD Landfill area is in Phase 1 and no benches have been developed.

Based on a visual inspection and a review of design drawings, no changes to the geometry were observed at either landfill since the 2023 annual inspection.

4.5 Approximate Volume of CCR

Pursuant to 40 CFR §257.84(b)(2)(ii), “the approximate volume of CCR contained in the unit at the time of inspection” is reported.

The approximate volume of CCR contained in the Landfill area at the time of the inspection was 3,093,030 cubic yards. The approximate volume of CCR contained in the FGD Landfill area at the time of the inspection was 401,970 cubic yards.

4.6 Structural Appearance

Pursuant to 40 CFR §257.84(b)(2)(iii) and (iv), “any appearance of an actual or potential structural weakness of the CCR unit, in addition to existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit;” and “other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection” are reported.

Based on a visual inspection, both landfills appeared to have no structural weaknesses, no existing conditions that were disrupting, or conditions that have the potential to disrupt the operation and safety of the landfill, at the time of the inspection. No observable changes have occurred to the landfill since the 2023 annual inspection that would affect the stability or operation of the CCR unit.

4.7 Unit Performance

Based on a visual inspection, there did not appear to be other changes that would affect the stability or operation of either landfill beyond what was mentioned in the Facility Conditions section.

4.8 Completed Repairs

A considerable amount of mowing and woody vegetation/tree removal has been completed along the benches and slopes of the Original Landfill.

5.0 Conclusions and Recommendations

During the 2024 visual inspection of the landfills, GAI did not identify signs of distress or malfunction that would affect the structural condition of the landfills. No releases of CCR were observed during the 2024 inspection.

New woody vegetation growth should continue to be removed and vegetation should continue to be mowed to facilitate observations from all slopes of the Landfill. Vegetation and cattails should be removed from Sedimentation Pond Dam No. 3. Vegetation should be removed from the slope drain along the southeastern facing slope of the Original Landfill. The animal burrows along the Original Landfill benches and slopes and along the perimeter channel of the FGD Landfill should be backfilled.

6.0 References

- Environmental Protection Agency. 2015. *40 CFR Parts 257 and 261, Hazardous and Solid Waste Management System, Disposal of Coal Combustion Residuals from Electric Utilities*. April 17, 2015.
- FirstEnergy Corporation. *Federal CCR 7-Day Inspection Forms*; January 2024 through December 2024.
- GAI Consultants, Inc. *2023 Annual Inspection Report, Fort Martin CCB Landfill*. January 2024.
- GAI Consultants, Inc. 2013. *Permit Renewal Application, Solid Waste/NPDES Water Pollution Control Permit No. WV0075752*. February 2013.
- GAI Consultants, Inc. 2011. *Active Landfill Permit Compliance Evaluation, Fort Martin Power Station*. July 8, 2011.
- Monongahela Power Company. *2023 Annual Operations Report, Fort Martin Power Station*.
- RMC Environmental Services, Inc. 1993. *Supporting Document for Class F Industrial Landfill Facility Application, Application No. WV0075752*. April 1993.

APPENDIX A

Annual Inspection Checklist

CCR Landfill Annual Inspection Checklist

Project Name Ft. Martin Original Landfill Inspection
 Project No. C150917.52
 Inspector Name(s) Ron Harris P.E. and Malik Smith
 Time 10:00 AM to 12:30 PM

Landfill No. WV0075752
 Date. 10/22/2024
 Weather Conditions Mostly Cloudy
 Temperature 64° to 73°

Inspection	CCR Volume (CY)
Previous Annual Inspection	3,093,030
Current Annual Inspection	3,093,030
Difference	-

Mark "Yes" or "No" if the condition is observed.

	Yes	No	Comments
Review Available Information (Preamble and 257.84)			
Status and condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Reviewed prior to inspection
Operating record	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Reviewed after inspection
Previous inspection forms	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Reviewed prior to inspection
Proper waste placement (Preamble)	Yes	No	
Waste appears to be placed in stable manner	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Loose piles of waste or other debris staged at site	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Slope Stability (Preamble and 257.84)	Yes	No	
Existing slopes and embankments appear stable	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Surface cracking	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Signs of surface movement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Sloughing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Slides	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Unusual depressions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Erosion Control (Preamble)	Yes	No	
Controls in-place and functioning	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Erosion damage (gullies/rills/deep channels) observed within the slopes of the landfill	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Gullies over nine inches	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Surface Water (Preamble)	Yes	No	
Wet areas/ponding	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Evidence of water percolation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Surface run-on	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Surface water channels functioning properly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Culverts/manholes/drop boxes for surface water management functioning properly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Liner System (Preamble)	Yes	No	
Liner system installed	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Damage to liner system	<input type="checkbox"/>	<input type="checkbox"/>	Not applicable - no liner system installed
Liner system protected from damage from CCR transport and placement equipment	<input type="checkbox"/>	<input type="checkbox"/>	Not applicable - no liner system installed
Liner system properly maintained	<input type="checkbox"/>	<input type="checkbox"/>	Not applicable - no liner system installed
Liner designed, constructed and maintained as required to prevent lateral migration of leachate off-site	<input type="checkbox"/>	<input type="checkbox"/>	Not applicable - no liner system installed

CCR Landfill Annual Inspection Checklist

Project Name	Ft. Martin Original Landfill Inspection
Project No.	C150917.52
Inspector Name(s)	Ron Harris P.E. and Malik Smith
Time	10:00 AM to 12:30 PM

Landfill No. WV0075752
Date. 10/22/2024
Weather Conditions Mostly Cloudy
Temperature 64° to 73°

[illegible]

CCR Landfill Annual Inspection Checklist

Project Name Fort Martin FGD Landfill Inspection
 Project No. C150917.52
 Inspector Name(s) Ron Harris P.E. and Malik Smith
 Time 10:00 AM to 12:30 PM

Landfill No. WV0075752
 Date. 10/22/2024
 Weather Conditions Mostly Cloudy
 Temperature 64° to 73°

Inspection	CCR Volume (CY)
Previous Annual Inspection	Approx. 392,180
Current Annual Inspection	Approx. 401,970
Difference	Approx. 9,790

Mark "Yes" or "No" if the condition is observed.

Review Available Information (Preamble and 257.84)	Yes	No	Comments
Status and condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Reviewed prior to inspection
Operating record	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Reviewed after inspection
Previous inspection forms	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Reviewed prior to inspection
Proper waste placement (Preamble)	Yes	No	
Waste appears to be placed in stable manner	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Loose piles of waste or other debris staged at site	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Slope Stability (Preamble and 257.84)	Yes	No	
Existing slopes and embankments appear stable	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Surface cracking	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Signs of surface movement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Sloughing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Slides	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Unusual depressions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Erosion Control (Preamble)	Yes	No	
Controls in-place and functioning	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Erosion damage (gullies/rills/deep channels) observed within the slopes of the landfill	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Gullies over nine inches	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Surface Water (Preamble)	Yes	No	
Wet areas/ponding	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Evidence of water percolation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Surface run-on	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Surface water channels functioning properly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Culverts/manholes/drop boxes for surface water management functioning properly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Liner System (Preamble)	Yes	No	
Liner system installed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Damage to liner system	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Liner system protected from damage from CCR transport and placement equipment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Liner system properly maintained	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Liner designed, constructed and maintained as required to prevent lateral migration of leachate off-site	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

CCR Landfill Annual Inspection Checklist

Project Name Fort Martin FGD Landfill Inspection
Project No. C150917.52
Inspector Name(s) Ron Harris P.E. and Malik Smith
Time 10:00 AM to 12:30 PM

Landfill No. WV0075752
Date. 10/22/2024
Weather Conditions Mostly Cloudy
Temperature 64° to 73°

Leachate Collection/Detection System (Preamble)	Yes	No	
Leachate collection/detection system installed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Leachate collection system flowing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Evidence of clogged piping or drainage materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Leachate system properly maintained	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Leachate detection zone discharge pipes monitored weekly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Leachate detection zone flowing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Dust Control (Preamble)	Yes	No	
Fugitive dust being controlled	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Contingency Plan (Preamble)	Yes	No	
Plan in place to correct any deficiencies identified during the inspection	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Water Quality Monitoring System (Preamble)	Yes	No	
Water quality monitoring systems properly maintained and functioning	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Other Issues (257.84)	Yes	No	
Other issues identified during the inspection which are disrupting or have the potential to disrupt the operation or safety of the landfill	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Backfill animal burrows.