

Former Riverton Ponds A and C Legacy CCR Surface Impoundment Applicability Extension Report

Potomac Edison Company
Former Riverton Power Station
Warren County, Virginia

May 2025

Table of Contents

Operator Statement..... ii

1.0 Introduction..... 1

2.0 Applicability Extension Report Requirements at §257.100(f)(1)(iii)(A)(1) 1

3.0 Field Investigation Work Plan [§ 257.100(f)(1)(iii)(A)(3)]..... 1

Figure

Attachment 1 – Field Investigation Work Plan

Operator Statement

In accordance with the applicable requirements §257.100(f)(1)(iii)(A)(2) of the United States Environmental Protection Agency's 40 Code of Federal Register (CFR) Part 257, Criteria for Classification of Solid Waste Disposal Facilities and Practices (CCR Rule), to the best of my knowledge or belief, existing and available information does not provide a sufficient basis to determine that former Riverton Ponds A and C contained free liquids on or after October 19, 2015.



Dave Frederick
Director, Environmental

5/8/2025

Date

1.0 Introduction

Former Riverton Ponds A and C (Ponds A and C) are potential legacy coal combustion residuals (CCR) surface impoundments located on the south bank of the Shenandoah River across from the former Riverton Power Station (Station), an inactive electric utility located in the town of Front Royal in Warren County, Virginia (VA).

This Legacy CCR Surface Impoundment Applicability Extension Report was prepared in accordance with the applicable requirements §257.100(f)(1) of the United States Environmental Protection Agency's 40 Code of Federal Register (CFR) Part 257, Criteria for Classification of Solid Waste Disposal Facilities and Practices (CCR Rule).

2.0 Applicability Extension Report Requirements at §257.100(f)(1)(iii)(A)(1)

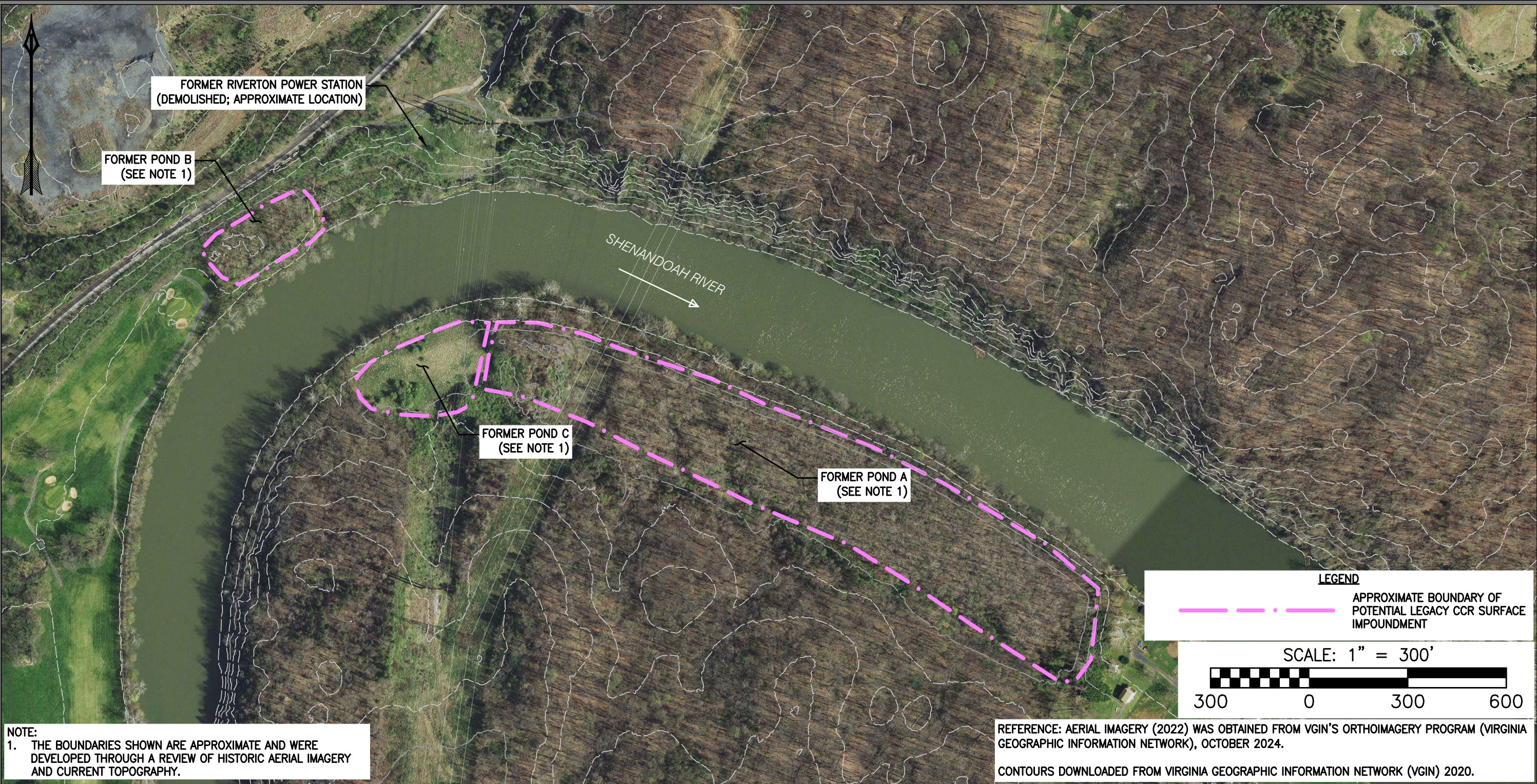
Regulatory Requirement / Reference	Description
Owner and Operator. The name and address of the person(s) owning and operating the legacy CCR surface impoundment with their business phone number and email address. <i>40 CFR §257.100(f)(1)(i)(A)</i>	Potomac Edison Company 800 Cabin Hill Drive Greensburg, PA 15601 (724) 837-3000 CCR@firstenergycorp.com
Impoundment Name. The name associated with the legacy CCR surface impoundment. <i>40 CFR §257.100(f)(1)(i)(B)</i>	Former Riverton Pond A and Former Riverton Pond C
Impoundment Identification. Information to identify the legacy CCR surface impoundment, including a figure of the facility and where the unit is located at the facility, facility address, and the latitude and longitude of the facility. <i>40 CFR §257.100(f)(1)(i)(C)</i>	700 Rockland Road, Front Royal, VA 22630 Latitude: 38.963833 Longitude: -78.179083 See the attached Figure for a plan view of the facility and former units.
Identification Number. The identification number of the legacy CCR surface impoundment if one has been assigned by the state. <i>40 CFR §257.100(f)(1)(i)(D)</i>	Available Station records reviewed prior to the date of posting do not contain record of an identification number assigned to former Pond A or former Pond C by the state.

3.0 Field Investigation Work Plan [§ 257.100(f)(1)(iii)(A)(3)]


Please see Attachment 1 for the Field Investigation Work Plan.


FIGURE

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 PLOT FILE: GAI.stb



NO.:	DATE:	DRAWN BY:	CHECKED BY:	APPROVED BY:	DESCRIPTION:
REVISION RECORD					

DRAWING TITLE		
FORMER RIVERTON POWER STATION		
PROJECT	 gai consultants	CLIENT
APPLICABILITY EXTENSION REPORT		POTOMAC EDISON COMPANY
LEGACY CCR SURFACE IMPOUNDMENT		800 CABIN HILL DRIVE
FORMER RIVERTON POWER STATION		GREENSBURG, PA 15601
WARREN COUNTY, VA		

ISSUE DATE:	DRAWN BY:
10/25/2024	WOLFESM
SCALE:	CHECKED BY:
AS SHOWN	ROUNCLL
REVISION 	APPROVED BY:
	DITULAL
	SHEET NO.:
	001 OF 001

ATTACHMENT 1

Former Riverton Ponds A and C Field Investigation Work Plan

Potomac Edison Company
Former Riverton Power Station
Warren County, Virginia

May 2025

Table of Contents

Certification / Statement of Professional Opinion ii

1.0 Introduction 1

2.0 Characterization Approach [§257.100(f)(1)(iii)(A)(3)(i)] 1

 2.1 Characterization of Material Properties 2

 2.2 Determination of Emplaced CCR Extents 2

3.0 Description of Tools and Methods [§257.100(f)(1)(iii)(A)(3)(ii)] 2

4.0 Determination of Groundwater Elevations [§257.100(f)(1)(iii)(A)(3)(iii)] 4

5.0 Stormwater Evaluation [§257.100(f)(1)(iii)(A)(3)(iv)] 5

6.0 Estimated Timeline [§257.100(f)(1)(iii)(A)(3)(v)] 6

7.0 Work Plan Results [§257.100(f)(1)(iii)(A)(3)(vi)] 7

8.0 Anticipated Problems [§257.100(f)(1)(iii)(A)(3)(vii)] 8

Figures

Certification / Statement of Professional Opinion

The Field Investigation Work Plan (Work Plan) for former Riverton Ponds A and C at the former Riverton Power Station was prepared by GAI Consultants, Inc. (GAI). It is my professional opinion as a Professional Engineer licensed in the Commonwealth of Virginia that this Work Plan has been prepared in accordance with good and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances, and at the same time and in the same locale. It is my professional opinion that the Work Plan was prepared consistent with the requirements at Section 257.100(f)(1)(iii)(A)(3) 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 and amended on May 8, 2024 with an effective date of November 8, 2024.

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 be interpreted or construed as a guarantee, warranty, or legal opinion.



1.0 Introduction

Former Riverton Ponds A and C (Ponds A and C) are potential legacy coal combustion residuals (CCR) surface impoundments located in Warren County, Virginia and owned by the Potomac Edison Company. This Field Investigation Work Plan (Work Plan) outlines the actions to be taken to determine through a field investigation whether former Ponds A and C contained both CCR and liquids on or after October 19, 2015, and as a result, may meet the definition of legacy CCR surface impoundments. This Work Plan was prepared in accordance with the applicable requirements at Section 257.100(f)(1)(iii)(A)(3) of the United States Environmental Protection Agency's 40 Code of Federal Register (CFR) Part 257, Criteria for Classification of Solid Waste Disposal Facilities and Practices (CCR Rule).

This Work Plan represents the second report completed for former Ponds A and C (the initial Work Plan was completed in November 2024). This Work Plan has been revised to reflect the work completed in the last six months (from November 2024 until May 2025) and to describe the work that still remains to fully characterize the former units. The subsections below have been revised from the initial Work Plan to incorporate new information where available.

2.0 Characterization Approach [§257.100(f)(1)(iii)(A)(3)(i)]

Characterization of the potential legacy CCR surface impoundments, as well as native geologic materials beneath and surrounding the potential units, is important to investigate the presence of free liquids within the potential legacy CCR surface impoundments. Relevant site features, such as topography, geology, hydrogeology, hydraulic, and physical properties of materials, characteristics of the CCR, and other factors are used to develop a plan for identification of free liquids. To evaluate relevant factors as they relate to former Ponds A and C, a Conceptual Site Model (CSM) will be developed. The first steps to develop the CSM consist of two general components:

- Characterization of physical, hydraulic, geotechnical, and chemical properties of CCR deposits and other layers in and immediately surrounding the potential legacy CCR surface impoundments (Section 2.1).
- Determination of the extent, spatial position, and volume of emplaced CCR (Section 2.2).

To characterize the above items, geologic borings will be performed in strategic locations throughout the potential legacy CCR surface impoundments and beyond the boundaries, if necessary. Borings will be advanced until native geologic materials beneath the potential legacy CCR surface impoundments are encountered, and borings will be completed outside of the boundaries of the potential units where needed to confirm the absence of CCR and classify geologic materials in the vicinity of the potential units. Based on a review of available historic documentation, current site knowledge, and engineering judgement, eight auger borings in conjunction with Standard Penetration Testing (SPT) and seven auger probes are proposed to be completed within the vicinity of former Ponds A and C. The locations of these proposed SPT borings and auger probes are shown on Figure RIV004. The type, number, and location of proposed borings may change based on the field conditions or observations made during the investigation. Should additional information be necessary following the completion of the initial subsurface investigation, additional borings can be completed. Section 3.0 below discusses the tools and methods that will be employed to complete the borings and other aspects of the Work Plan.

The CSM will also include information about the presence of liquids (if any) that are in the vicinity of the potential legacy CCR surface impoundments, including both groundwater and surface water that may infiltrate the potential units from the bottom, sides, and top. Groundwater considerations for the CSM are discussed in Section 4.0. Stormwater considerations for the CSM are discussed in Section 5.0.

2.1 Characterization of Material Properties

The material within and immediately surrounding the potential legacy CCR surface impoundments must be classified and characterized in order to understand its propensity for retaining liquids. To characterize the material within and surrounding the potential legacy CCR surface impoundments, geologic borings will be completed in strategic locations throughout former Ponds A and C, eight SPT borings and seven auger probes are proposed as discussed above. The following tests and evaluations will be performed and included in the CSM as necessary to characterize the CCR and geologic materials within and surrounding the potential legacy CCR surface impoundments:

- Geotechnical laboratory data such as grain size distribution, moisture content, Atterberg limits, hydrometer analysis and Unified Soil Classification System (USCS) classification.
- Hydraulic data such as permeability including spatial distribution of permeability if necessary.
- Paint Filter Liquids Test to determine the presence of free liquids in the CCR samples.
- Identification of any impermeable and highly permeable layers or zones in CCR or in geologic materials surrounding the potential legacy CCR surface impoundments.
- Identification of preferential pathways related to geologic materials or engineered structures in CCR or in geologic materials surrounding the potential legacy CCR surface impoundments.
- Groundwater levels and porewater pressure distribution in CCR and geologic materials surrounding the potential legacy CCR surface impoundments (as described in Section 4.0).

2.2 Determination of Emplaced CCR Extents

To understand whether former Ponds A and C contain free liquids, the extents of the CCR must first be delineated. The CSM will include information about the spatial position, elevation, and general shape of the CCR within former Ponds A and C. This information will be obtained through drilling borings in strategic locations throughout the potential legacy CCR impoundments and beyond the boundaries of the potential units as discussed above. Borings will be advanced until the native geologic materials beneath the CCR are encountered to establish the bottom elevation of CCR within the potential units for comparison with groundwater elevations.

Visual inspection of the material obtained from each boring will be used to classify CCR and determine its lowermost and uppermost depths. Inspection of the material will provide information about whether or what type of cap material was placed on the potential legacy CCR surface impoundments after closure. If necessary, polarized light microscopy (PLM) analysis may be used to assist with material characterization. Information gained from visual inspection of the borings will be used to create cross sections of the potential legacy CCR surface impoundments to refine and update the CSM as needed. From these cross sections, high-points and low areas of CCR can be identified (if any) and the geologic features surrounding the CCR can be characterized.

Samples of material obtained throughout the drilling process can be classified as explained in Section 2.1 above. Classification of each type of material within and surrounding the potential legacy CCR surface impoundments will provide insight about the nature and physical and hydraulic characteristics of both the CCR and the surrounding geologic materials.

3.0 Description of Tools and Methods [§257.100(f)(1)(iii)(A)(3)(ii)]

Various tools and methods are available for assessment of free liquids within the potential legacy CCR surface impoundments. These include tools for characterizing both the CCR and the groundwater using direct and indirect methods.

Geophysical surveys are an indirect method of delineating the extent of coal ash disposal and differentiating native soils from CCR. Geophysical methods such as Electromagnetic Induction, Electrical Resistivity, Ground Penetrating Radar, Seismic Refraction, and Multi/Hyper-Spectral Imaging can be useful at for sites for which little or no previous subsurface investigations have been performed

or where access may be limited due to dense vegetation, topography, or incompatible land use. Some methods may also be useful for identifying areas of water saturation, pore fluid conductivity, and the interface between soil and rock. Compared to conventional investigation methods that require intrusive sampling, geophysical methods are not invasive, can cover large areas over a relatively short time span, and may be more cost effective than intrusive investigations.

Although geophysical surveys can't replace conventional site characterization methods, they can be used to fill data gaps between more direct measurements or be used to identify areas to target with follow-up subsurface investigations. The use of geophysical surveying methods is not proposed at this time but will be further evaluated based on site-specific conditions and the quality and amount of currently available hydrogeologic and geotechnical data obtained from the SPT and auger borings once they are drilled.

Both Cone Penetration Testing (CPT) and Standard Penetration Testing (SPT) methods may be used, as necessary, to characterize the potential legacy CCR surface impoundments and surrounding area. SPT, a direct investigation method, is proposed for site characterization at this time to obtain high quality, undisturbed samples for laboratory testing as needed, as well as for installation of piezometers at various boring locations specific to former Ponds A and C and the surrounding area (more details on piezometers are provided in Section 4.0).

SPT drilling operations may include using a hollow stem auger rotary drilling method, or any other appropriate method depending on site-specific conditions. The drilled boreholes will be useful to assess subsurface conditions by visual inspection, logging and classifying the materials, and determining the material boundary by direct inspection. SPT is a standardized, widely accepted test which provides a measure of penetration resistance (called blow counts or N-values) which can be correlated to the engineering properties of soils such as strength and density and can also provide information on saturation of encountered soil samples (dry, moist, wet, etc.) for initial qualitative assessment. The use of the CPT method is not proposed at this time but may be further evaluated based on the site-specific conditions as implementation of the Work Plan progresses.

In addition to CPT and SPT, test pits can be excavated as needed for direct visual inspection of materials and to determine if CCR is exposed on the test pit sidewalls. These can also prove useful in assessing whether free liquid is present in the potential legacy CCR surface impoundments by direct observation of whether water is infiltrating into the test pit. Presently, no test pits are proposed as part of the Work Plan; however, test pits may be excavated as necessary in any areas of interest as implementation of the Work Plan progresses.

In addition to site characterization and initial qualitative assessment of free liquids using the above methods, conventional vertical standpipe piezometers (small diameter monitoring wells) are proposed for direct assessment of the presence or absence of free liquids within the potential legacy CCR surface impoundments. The subsurface characterization and material boundary information obtained from SPT will provide the information necessary to install screens at appropriate depths to best capture the free liquids (if present) from various geologic layers and CCR within the potential legacy CCR surface impoundments. Standpipe piezometers will also be used to obtain groundwater levels, if applicable. Similarly, after developing an understanding of the geological features of the potential legacy CCR surface impoundments, in situ testing like standard slug testing, field pump testing, and/or packer testing can be performed for more robust characterization of hydrogeological features of the potential units, as needed.

Along with the standpipe piezometers, nested, rapid response, pneumatic or vibrating-wire piezometers may be used to measure any porewater pressures that may be present in the CCR and other geologic materials. Standpipe piezometers can take a long time to respond if screened in low permeability materials, and rapid response piezometers can be useful in such materials to get more timely understanding of the groundwater conditions and assess for the presence of free liquids.

The field methods will be supplemented by laboratory testing, and samples collected from SPT drilling will be analyzed to update the CSM and help strengthen the knowledge of the potential legacy CCR surface impoundments, including whether free liquids are present.

Some of the laboratory tests that could be performed are:

- Moisture content;
- Grain size distribution;
- Atterberg Limits;
- Hydrometer analysis;
- USCS classification;
- Paint Filter Liquids Test; and
- Hydraulic conductivity.

Laboratory tests to determine additional physical, geotechnical, and hydraulic parameters can be performed, as needed, based on the information necessary to characterize the site as implementation of the Work Plan progresses.

4.0 Determination of Groundwater Elevations **[§257.100(f)(1)(iii)(A)(3)(iii)]**

One potential source of free liquids within the potential legacy CCR surface impoundments is groundwater that may intersect CCR within an impoundment. As such, it is necessary to understand the location and extents of the water table and uppermost aquifer and/or whether any perched aquifers are in the vicinity of the potential legacy CCR surface impoundments. This information will be incorporated into the CSM as needed to accurately depict site conditions. To obtain information about groundwater in the vicinity of the potential legacy CCR surface impoundments, borings will be completed at strategic locations as discussed in Section 2.0. Visual inspection of the material removed for each boring can be used to estimate the elevation associated with the uppermost aquifer and identify impermeable layers or perched zones (if any) above the aquifer.

To further characterize groundwater flow in the vicinity of the site, piezometers are proposed to be installed. Locations of piezometers will be chosen based on information obtained during the subsurface investigation, historic documentation (if any), topography, and engineering judgement. Similarly, elevations of screened intervals and instrumentation will be chosen based on information obtained during the subsurface investigation, historic documentation (if any), and professional judgement.

Water levels and porewater pressures obtained from the piezometers will be reviewed throughout the Work Plan implementation to gain an understanding of the flow patterns and how they may vary seasonally. From this data, contour maps of groundwater flow can be created as necessary to represent groundwater flow beneath and around the potential legacy CCR surface impoundments and assess whether groundwater intersects the CCR within the potential units.

As part of this effort, various external factors that have the potential to influence water levels and porewater pressures will also be assessed. These factors include items related to surface water, man-made infrastructure within, surrounding, or in the vicinity of the potential legacy CCR surface impoundments, topography, industrial operations nearby, and preferred pathways in/out of the CCR.

The following items will be completed as necessary to characterize the liquids distribution in the vicinity of the potential legacy CCR surface impoundments:

- Providing details of piezometer monitoring including locations, depths, screened intervals, or measurement intervals of different types of piezometers (which may include monitoring wells, vibrating wire piezometers, pressure transducers or any other device and will be finalized as implementation of the Work Plan progresses).

- Identifying a sufficient number of monitoring points, which will be installed at appropriate locations and depths depending on complexity of the potential legacy CCR surface impoundments and CCR identified during characterization. These monitoring points will be screened or instrumented at vertical intervals close enough to capture different layers that may contribute to free liquids (if any).
- Identifying if additional water level measuring devices are needed at units where groundwater may intersect the potential legacy CCR surface impoundments, and to identify if any preferential pathways exist.
- Identifying any perched or hydraulically isolated zones within the potential legacy CCR surface impoundments.
- Identifying the possibility of upward vertical gradients beneath the CCR material.
- Identifying surface water features, including impounded water, rivers, streams, wetlands, etc., at locations above and adjacent to the potential legacy CCR surface impoundments, and their impact on water levels and hydraulic head pressure within the CCR.
- Identifying presence and magnitude of any groundwater mounding.
- Identifying seasonal or temporal variations of groundwater levels and porewater pressures.

5.0 Stormwater Evaluation [§257.100(f)(1)(iii)(A)(3)(iv)]

As part of the field investigation, stormwater flow processes at former Ponds A and C will be evaluated to understand how these processes may result in the formation of free liquids in the potential units. Stormwater processes to be evaluated include flow over the surface of the potential units, drainage from the potential units, and infiltration into the potential units. The CSM will be updated to include relevant findings from the evaluation of stormwater flow processes. The attached figures RIV005 and RIV006 include current topographic maps of former Ponds A and C with arrows to indicate the general flow of surface water over former Pond A and former Pond C. These figures also include labels for natural or man-made features pertinent to stormwater drainage, infiltration, and related processes, if any.

To better understand the site conditions and gather information for the stormwater evaluation, a site visit will be conducted to inspect for evidence of drainage onto or off of the potential legacy CCR surface impoundments and surrounding area, view and verify terrain and topographic features, and identify any signs of erosion or other markings which may indicate stormwater flow patterns. If drainage features are observed, the locations of each feature will be noted. If possible, design details of drainage features, such as dimensions, will be recorded.

Stormwater flow over the surface of the potential units and drainage from the potential units will be evaluated using the Soil Conservation Service (SCS) Runoff Curve Number (CN) method or similar process. Drainage areas at the site will be delineated based on current topography, aerial imagery, and additional knowledge gained from the site visit. Drainage area delineation will provide insight into sources and quantity of stormwater flowing onto and away from the site and identify any low points where stormwater may collect. CNs will be developed for each drainage area identified based on aerial imagery, cover type knowledge gained from the site visit, and soil data obtained from Natural Resources Conservation Service (NRCS) Web Soil Survey. CN development will further refine knowledge of the potential units, stormwater flows in the vicinity of the potential units, and the potential for infiltration.

Results of the stormwater evaluation will be used to identify areas where stormwater is likely to infiltrate and result in the formation of free liquids in the potential legacy CCR surface impoundments. This information may be used in part to determine the location of soil borings as described in Section 2.0 above.

If needed, additional evaluation of stormwater surface flows to and from the potential units can be completed to assess erosion potential or the effectiveness of existing drainage features. In this instance, stormwater flows to and/or from the potential units could be calculated using the United States Department of Agriculture's Technical Report 55, Urban Hydrology for Small Watersheds (TR-55) or similar method. Times of concentration (TOCs) for each drainage area could be developed based on current topography, aerial imagery, and additional knowledge gained from the site visit. Peak flows for select precipitation events could be obtained using Hydraflow Hydrographs Extension for Autodesk® Civil 3D® or similar method.

The potential for stormwater infiltration into the potential units can be modeled to assess whether it may contribute to the formation of free liquids. Any model used to assess stormwater infiltration potential will be created using site-specific data gained from the site characterization efforts described in Section 2.0 and the site visit described above.

6.0 Estimated Timeline [§257.100(f)(1)(iii)(A)(3)(v)]

The project includes components related to site characterization, monitoring, calculations, and data evaluation. Engineering efforts for design of the site characterization program are also anticipated to be required. The major phases of the project in the anticipated order of completion are discussed below. Where applicable, these items have been revised to reflect work completed since November 2024 and the anticipated schedule moving forward.

1. **Secure Engineering Design Firm (6 months).** GAI Consultants, Inc. (GAI) was retained to execute the work plan, including design of the geotechnical investigation.
2. **Engineering Design for Geotechnical Investigation (1-2 months).** A desktop review of available data will be completed, and a preliminary CSM will be developed. The preliminary CSM will be used to develop a design for the drilling investigation.
3. **Internal File Review (ongoing, concurrent with Items 1 and 2).** Internal historic files (both hard copy and digital, if applicable) are reviewed to gain an understanding of former Ponds A and C.
4. **Initiate File Review with State Agency (1 month, concurrent with Items 2 and 3).** A file review request was initiated with the Virginia Department of Environmental Quality (VA DEQ) to obtain and review any historic files relevant to former Ponds A and C managed by the state.
5. **Establish Site Access, Clear Vegetation, and Coordinate with Property Owners (1-3 months; concurrent with Items 1 – 4).** Access to the potential units will be established by clearing vegetation and establishing roadways into and out of the site. Existing access roads may be evaluated and improved as necessary to allow for access to the site. Coordination will occur with property owners to negotiate and obtain agreements as needed to provide access to the site.
6. **Secure Drilling Contractor (1 month, concurrent with Items 2 – 5).** A bid package with the preliminary engineering design for the geotechnical investigation will be sent out to drilling contractors to select one for the geotechnical investigation. GAI has begun coordination to schedule drilling with preferred vendors.
7. **Stormwater Site Visit (1 week, concurrent with Items 2 – 6).** Representatives will visit the site and conduct a review of existing topography and drainage features as described in Section 5.0.
8. **Geotechnical Investigation and Piezometer Installation (1-2 months).** The selected drilling contractor will complete the subsurface geotechnical investigation as designed in Item 2 above. The subsurface investigation tools and methods are described in Section 3.0.

9. **Stormwater Evaluation (2 months, concurrent with Items 2 – 7).** Calculations and assessments to evaluate stormwater flow over the potential units, from the potential units, and infiltration into the potential units will be completed as described in Section 5.0.
10. **Geotechnical Report and CSM Update (4-6 months, concurrent with Item 9).** A report summarizing the drilling program, piezometer installation, monitoring program, and boring information will be prepared. An update to the preliminary CSM will also be completed to include all relevant information gathered from the subsurface investigation.
11. **Piezometer Data Collection (10 months, concurrent with Items 9 and 10).** Data will be collected from the piezometers and other instrumentation installed as part of the Work Plan implementation. Ten months of data is anticipated to be collected to reflect the groundwater levels during all four seasons and demonstrate that groundwater level fluctuation does not create free liquids within the emplaced CCR.
12. **Groundwater Evaluation (10 months, concurrent with Items 8 – 11).** As data is collected from the installed piezometers and other instrumentation, it must be evaluated. Data evaluation will occur concurrently with data collection. Resources such as groundwater contour maps will be created to help interpret the data and for use in determining whether free liquids exist within the potential legacy CCR surface impoundments.
13. **Determination if Potential Units Contain Free Liquids (10 months, concurrent with Items 8 – 12).** Results from Items 8 through 12 above will be incorporated into the CSM and evaluated to make a determination about whether the potential units contain free liquids.

7.0 Work Plan Results [§257.100(f)(1)(iii)(A)(3)(vi)]

Implementation of the Work Plan will result in observations that can be made about the potential legacy CCR surface impoundments based on the field investigations and calculations performed. Individual Work Plan results are anticipated to be as follows:

- Classification of subsurface materials obtained during the subsurface investigation.
- Boring logs indicating the characterization of the encountered materials, and presence or absence of moisture or free liquids during the subsurface investigation.
- Groundwater elevations in piezometers throughout the full monitoring period.
- Identifying the possibility of upward vertical gradients beneath the CCR material.
- Calculations providing insight about the direction of stormwater flow and cover types.
- Evaluation of the potential for infiltration of stormwater through the potential units.

Results of the Work Plan will be reviewed first individually and then in conjunction with one another to determine whether the potential legacy CCR surface impoundments contain free liquids. A CSM consisting of characterization of physical, hydraulic, geotechnical and chemical properties of CCR deposits and other layers in and immediately surrounding the potential legacy CCR surface impoundments, as well as determination of the shape, spatial position, and volume of emplaced CCR will be developed. This will aid in looking at the wholistic picture of the site and determining the presence or absence of free liquids. Since the monitoring is anticipated to take place at least over the period of several months after the installation of the monitoring points, this will be useful in making assessments over short time frames, as well as over a long period of time so that the relevant performance standard has been met if no free liquid is encountered.

8.0 Anticipated Problems [§257.100(f)(1)(iii)(A)(3)(vii)]

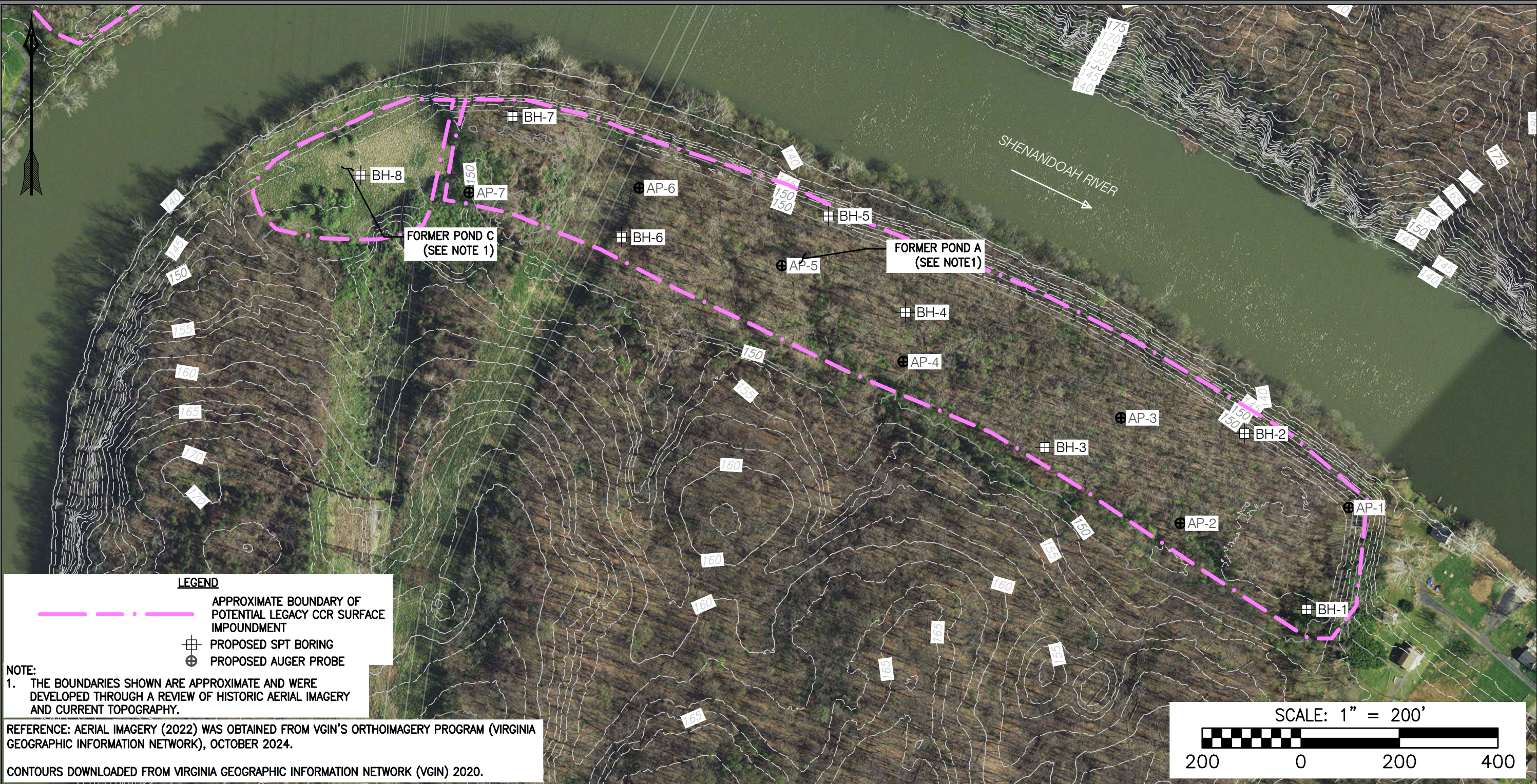
Problems that could arise during the implementation of this Work Plan include:

- **Time to secure engineering design firm (extra 6 months).** Securing an engineering design firm to assist with implementation of the Work Plan is a critical early step in the overall project schedule. Approximately six months was necessary to implement administrative portions of the project to select an engineering design firm (GAI). During this time, a Request for Proposal was prepared and advertised, contractor proposals were developed and submitted, contractor proposals were evaluated, and a contract was awarded.
- **Negotiate with Landowners for Site Access (extra 1-3+ months).** Obtaining the necessary agreements to allow for site access is crucial to allow for safe site access. Properties not currently owned by the Potomac Edison Company will need to be crossed to access the Ponds from a public roadway.
- **Availability of drilling contractor (extra 1-2+ months).** Securing a drilling contractor to complete the subsurface investigation and piezometer installation is a critical part of the overall project schedule. The availability of drilling contractors depends on a variety of factors, including time of year, previously contacted engagements and demand from other clients. Implementation of CCR Legacy Rule may cause short-term driller shortages as multiple facilities attempt to characterize potential legacy CCR surface impoundments or comply with future requirements of the CCR Legacy Rule for additional units. Additionally, the type of drill rig required for a site may influence the availability of the driller. Should availability of a driller or drill rig become an issue to the schedule, other drilling contractors can be contacted to inquire about whether the work can be completed more quickly with another company.
- **Drill rig malfunction or inadequacy (extra 1+ months).** The drill rig used for the subsurface investigation is critical to the implementation of the Work Plan; as such, a malfunctioning drill rig has the potential to delay the project. Similarly, sometimes subsurface conditions encountered after drilling has already started require that a different method for drilling be used. Should an issue with the drill rig arise, the contractor will be asked to provide a replacement rig. If a replacement rig cannot be provided, other drilling contractors can be contacted to determine whether a different company could complete the subsurface investigation more quickly.
- **Piezometer / instrumentation malfunction (extra 1+ months).** Piezometers installed as part of the Work Plan may malfunction. This may cause a need to reinstall an additional piezometer and/or repair the existing equipment to collect data. Should an issue with a piezometer or other instrumentation arise, effort will be made to engage the contractor to replace the piezometer or repair the existing one as soon as practical.
- **Delays or other issues with analytical laboratory testing (extra 2+ weeks).** Samples of material collected during the subsurface investigation will be sent to a laboratory for testing services. Laboratory analysis issues, such as malfunctioning equipment or a lost sample, can cause delays in the range of one day to multiple weeks. Similarly, securing a laboratory to complete the sample testing depends on a variety of factors, including previously contracted engagements and demand from other clients. Should an issue with obtaining analytical laboratory results arise, samples may be sent to a different laboratory that is able to complete the required testing without delay.
- **Weather delays (extra 1+ weeks).** Weather conditions can significantly affect project schedules. While some weather conditions can be predicted and accounted for in the schedule, the weather in Virginia is variable, and conditions can change on a daily or weekly basis. Frozen ground and freezing temperatures may prevent or slow drilling efforts. Heavy rains, winds, and fog may occur periodically, and these weather events can also prevent or slow drilling efforts. The safety of all individuals involved with the project is paramount and, as such,

field work efforts will be delayed if a potentially dangerous weather event arises. In the event of a weather delay, the schedule for work will be reviewed and updated as necessary to accommodate the delay without impact to the overall project schedule.

FIGURES

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 PLOT FILE: GAI.stb





LEGEND

- APPROXIMATE BOUNDARY OF POTENTIAL LEGACY CCR SURFACE IMPOUNDMENT
- PROPOSED SPT BORING
- PROPOSED AUGER PROBE

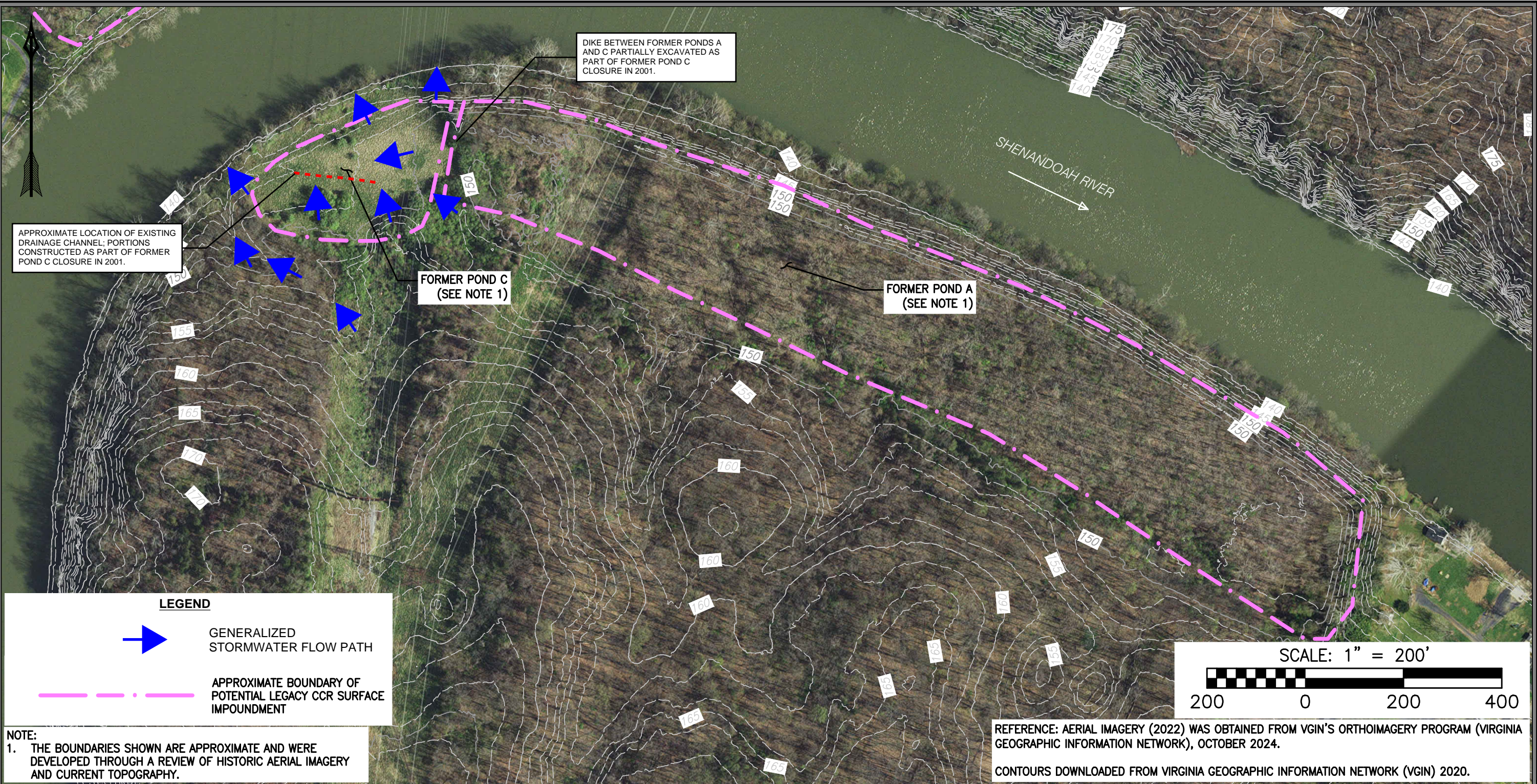
NOTE:
1. THE BOUNDARIES SHOWN ARE APPROXIMATE AND WERE DEVELOPED THROUGH A REVIEW OF HISTORIC AERIAL IMAGERY AND CURRENT TOPOGRAPHY.



REFERENCE: AERIAL IMAGERY (2022) WAS OBTAINED FROM VGIN'S ORTHOIMAGERY PROGRAM (VIRGINIA GEOGRAPHIC INFORMATION NETWORK), OCTOBER 2024.

CONTOURS DOWNLOADED FROM VIRGINIA GEOGRAPHIC INFORMATION NETWORK (VGIN) 2020.

						DRAWING TITLE		ISSUE DATE:	DRAWN BY:			
						PROPOSED BORING LOCATION PLAN		5/2/2025	APELKR			
						PROJECT	 gai consultants	CLIENT	SCALE:	CHECKED BY:		
						APPLICABILITY EXTENSION REPORT		POTOMAC EDISON COMPANY	AS SHOWN	APPROVED BY:		
						LEGACY CCR SURFACE IMPOUNDMENT					800 CABIN HILL DRIVE	
						FORMER RIVERTON POWER STATION						GREENSBURG, PA 15601
						WARREN COUNTY, VA						
NO.:	DATE:	DRAWN BY:	CHECKED BY:	APPROVED BY:	DESCRIPTION:			<div>REVISION</div> 	SHEET NO.:			
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GAI CAD FILE PATH: Z:\Energy\2015\C150917.54 – FE CCR Legacy Rule Initia\CAD\ACAD\Production Drawings\APPLICABILITY REPORT FIGURES\C150917–54–000–00–RIV004.dwg												

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 PLOTTED BY: Taylor Boring
 PLOT FILE: GAI.stb



						DRAWING TITLE		ISSUE DATE:	DRAWN BY:
						STORMWATER PLAN - FORMER POND C		5/2/2025	BORINTR
						PROJECT	CLIENT	SCALE:	CHECKED BY:
						APPLICABILITY EXTENSION REPORT	 gai consultants	AS SHOWN	ROUNDCLL
						LEGACY CCR SURFACE IMPOUNDMENT		REVISION 	APPROVED BY:
						FORMER RIVERTON POWER STATION			DITULAL
NO.:	DATE:	DRAWN BY:	CHECKED BY:	APPROVED BY:	DESCRIPTION:	WARREN COUNTY, VA	POTOMAC EDISON COMPANY	SHEET NO.:	
							800 CABIN HILL DRIVE	001 OF 001	
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