

Former Mad River Ash Pond  
Initial Hazard Potential Classification Assessment Report

Ohio Edison Company  
Former Mad River Power Station  
Clark County, Ohio

May 2026

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## Certification/Statement of Professional Opinion

The Initial Hazard Potential Classification Assessment Report (Report) for the former Mad River Ash Pond was prepared by GAI Consultants, Inc. (GAI). The Report was based on certain information that, other than for information GAI originally prepared, GAI has relied on, but not independently verified. Therefore this Certification/Statement of Professional Opinion is limited to the information available to GAI at the time the Report was written. On the basis of and subject to the foregoing, it is my professional opinion as a Professional Engineer licensed in the State of Ohio, that the Report 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, at the time, and in the same locale. It is my professional opinion that the Initial Hazard Potential Classification Assessment was prepared consistent with the requirements of § 257.73(a)(2) 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 to be interpreted or construed as a guarantee, warranty or legal opinion.



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Arica L. DiTullio, P.E.  
Engineering Director



## 1.0 Purpose

This Initial Hazard Potential Classification Assessment Report (Report) was prepared in accordance with the applicable requirements at § 257.73(a)(2) and § 257.100(f)(2)(iii) of the United States (US) Environmental Protection Agency's (EPA's) 40 Code of Federal Regulations (CFR) Part 257, Subpart D, *Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments* (CCR Rule). The purpose of this Report is to document the initial hazard classification determined for the former Mad River Ash Pond (Ash Pond) as well as the basis for this determination.

## 2.0 Introduction

The former Ash Pond is located approximately 0.15 miles southeast of the former Mad River Power Station (Station) which is an inactive electric utility located in Springfield, Clark County Ohio. The former Station began operating in 1926 as a coal-fired generating station consisting of four coal-fired boilers. It ceased generating electricity through the combustion of coal in 1982 and was demolished around 2010. While the former Station was operational, the former Ash Pond was used for the management, storage, and disposal of coal combustion residuals (CCR).

Current topography indicates that the former Ash Pond once contained a center berm that may have been used to create two separate areas for management of CCR when the former unit was operational. When it was operational, the former Ash Pond contained a sump pit at the northern edge. In 1985, the former Ash Pond was graded and vegetation was established.

The approximate area of the former Ash Pond is 21 acres. The available storage capacity of the former Ash Pond, assuming that the current topography represents an empty pond, is approximately 105 acre-feet (4,590,000 cubic feet). The former Ash Pond receives stormwater runoff only from precipitation landing within its embankments. The embankments that impound and store stormwater and past CCR disposed of when the former Station was operational stand at an approximate elevation (El.) 906 feet. A portion of the former Ash Pond's embankments appear to be breached or removed in the northwest portion at El. 904 feet.

## 3.0 Hazard Classification

According to § 257.53 of the CCR Rule, the hazard potential classifications are:

- Low hazard, which means that “failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the surface impoundment owner’s property.”
- Significant hazard, where “failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.”
- High hazard, where “failure or mis-operation will probably cause loss of human life.”

The initial hazard classification of the former Ash Pond, pursuant to the CCR Rule, is assigned as a “significant hazard potential CCR surface impoundment” [40 CFR § 257.73(a)(2)]. This significant hazard potential classification was assigned because failure or mis-operation may cause environmental damage or impact other concerns.

## 4.0 Basis for Classification

GAI Consultants, Inc. (GAI) personnel performed a site reconnaissance of the former Ash Pond to verify site conditions and reviewed the documents listed in the References (Section 5.0) of this Report to make this initial “significant hazard” classification.

GAI simulated an embankment failure analysis (*Reference 3*) to determine the predicted inundation due to a static failure during a condition in which the former Ash Pond is full of water on a day when

zero precipitation occurs. The analysis indicated that all material and water released by the former Ash Pond during a breach event would remain contained within the embankments of the Mad River.

There is a potential for environmental damage to the Mad River due to the release of CCR material through a breach. A breach flowing into the adjacent properties via the Mad River is not expected to cause a loss of human life or economic damage because the water is not anticipated to overtop the banks of the Mad River. However, a breach may cause environmental damage to the Mad River itself. These criteria correspond to classification of the former Ash Pond as a significant hazard potential designation per the CCR Rule.

## 5.0 References

1. Resource Management International, Inc., *Preliminary Site Assessment – Ohio Edison Mad River Generating Facility Site*, January 11, 1993.
2. Google Earth. Imagery for former Mad River Ash Pond Legacy CCR Surface Impoundment, Clark County, Ohio. Dated October 21, 2024.
3. GAI Consultants, Inc., *Calculation Brief: Ohio Edison Company – Former Mad River Ash Pond – Inundation*, August 26, 2025.
4. GAI Consultants, Inc., *Former Mad River Ash Pond History of Construction*, February 2026.