

Notice of Intent to Close Coal Combustion Residuals Landfill

Cheswick Generating Station
Ash Disposal Site
Allegheny County, Pennsylvania

GAI Project Number: R220960.00
August 2025



Cheswick Lefever, LLC

Prepared by: GAI Consultants, Inc.
Pittsburgh Office
385 East Waterfront Drive
Homestead, Pennsylvania 15120-5005

Prepared for: Cheswick Lefever, LLC
4235 South Stream Blvd
Suite 180
Charlotte, North Carolina 28217

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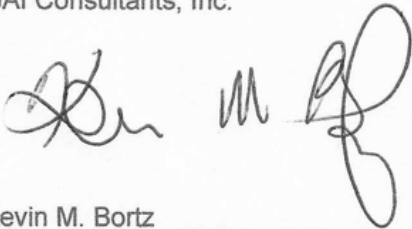
Professional Engineer's Certification

The Notice of Intent to Close (NOI) for the Cheswick Ash Disposal Site was prepared by GAI Consultants, Inc. (GAI). The NOI may contain findings and determinations that are based certain information that, other than for information GAI originally prepared, GAI has relied on but not independently verified. This Certification/Statement of Professional Opinion is therefore limited to the information available to GAI at the time the NOI was written. On the basis of and subject to the foregoing, it is my professional opinion as a Professional Engineer licensed in the Commonwealth of Pennsylvania that the NOI 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 same time, and in the same locale. It is my professional opinion that the NOI was prepared consistent with §257.102(g) 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 (40 CFR 257 Subpart D), and subsequent revisions.

Additionally, it is my professional opinion that, to the best of my knowledge, information, and belief, the final cover system for the Landfill has been designed in accordance with current good and accepted engineering practice(s) and standard(s) appropriate to the nature of the project and the technical requirements of 40 CFR §257.102(d)(3).

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.

GAI Consultants, Inc.



Kevin M. Bortz
Senior Engineering Manager 2



Date 08/20/2025

1.0 Introduction

The Cheswick Ash Disposal Site (Landfill), also known as the Lefever Ash Landfill, has historically been used for the disposal of residual waste materials produced by the coal-fired Cheswick Generating Station (Station). The Landfill is located along Lefever Hill Road in Indiana Township, Allegheny County, Pennsylvania.

The Cheswick Ash Disposal Site is a Class II residual landfill permitted through the Pennsylvania Department of Environmental Protection (PaDEP) with Solid Waste Permit No. 300720 and has been used for the disposal of Cheswick Generating Station Coal Combustion Residuals (CCR). The permitted area for the Landfill is 143 acres, although actual disposal and utilization has occurred over approximately 31 acres.

2.0 Purpose

This document has been prepared in accordance with the United States Environmental Protection Agency's 40 CFR Part 257, Disposal of Coal Combustion Residuals from Electric Utilities (CCR Rule). The Notice of Intent to Close has been prepared pursuant to §257.102(g) of the CCR Rule.

3.0 Closure of CCR Landfill

The Cheswick Ash Disposal Site will be closed as a CCR Landfill. A CCR Closure Plan has been prepared for the closure activities and sets forth the techniques that will be utilized to complete closure of the Landfill by placement of a final cover system in accordance with §257.102(d) of the CCR Rule.

As delineated in the CCR Closure Plan, the final cover system will consist of a vegetated soil cover system:

- Infiltration Layer

An eighteen-inch (minimum) soil infiltration layer will be placed on a prepared (compacted) CCR subgrade. According to §257.102(d)(3)(i)(A), "The permeability of the final cover system must be less than or equal to the permeability of any bottom liner system or natural subsoils present, or a permeability no greater than 1×10^{-5} cm/sec, whichever is less."

A GAI investigation in 2017 evaluated the likely permeability of the natural subsoils beneath the Landfill. This investigation showed that the 1×10^{-5} cm/sec criterion was the limiting factor for cover soil permeability. The infiltration layer will be used to meet the permeability requirements of the CCR Rule.

- Erosion Layer

A six-inch (minimum) soil erosion layer will be established on top of the infiltration layer. This layer will be installed to promote vegetative growth on the soil cover. Vegetation will be established according to the requirements of the PaDEP permit.

Major project milestones related to closure include:

- Spring/Summer 2025 – Receive final CCR for placement in the Landfill
- Summer 2025 – Finalize grading and place initial lifts of final soil cover infiltration layer
- Summer/Fall 2025 – Complete initial lifts of final soil cover infiltration layer
- Summer/Fall 2025 – Place final lifts of final soil cover infiltration layer; cap all perforated risers
- Fall 2025 – Place final soil cover erosion layer and vegetate.
- Fall 2025/Winter 2026 – Complete certification of Landfill Closure according to the CCR Rule and PaDEP requirements.

4.0 Record Keeping

This notification shall be placed in the Station's operating record and will be available on the Station's internet site. Cheswick Lefever, LLC will notify the relevant State Director when this notice has been placed in the operating record and the Station's internet site.