



Inspection Report

To: **Norman Divers (Charah Solutions, Inc.)**
From: **Robert Stolz, PE, PG**
Re: **Cheswick Ash Disposal Site – Annual CCR Unit Inspection Report**
Inspection Date: **November 19, 2025**
Report Date: **January 7, 2026**

INTRODUCTION

Title 40 Code of Federal Regulations (CFR) Part 257 addresses, in part, the management of Coal Combustion Residuals (CCR Rule, or Rule) in regulated units, including landfills. Specific to §257.84(b) of the Rule, existing and new CCR landfills must be inspected on an annual basis by a qualified professional engineer. For the Cheswick Generating Station, this inspection requirement applies to the existing Cheswick Ash Disposal Site (Ash Disposal Site), operated by Cheswick Lefever, LLC. In support of this obligation, Mr. Robert Stolz (a qualified professional engineer with Aptim Environmental & Infrastructure, LLC [APTIM]) conducted an on-site inspection of the Ash Disposal Site on November 19, 2025. The findings from this annual inspection are summarized in the remaining sections of this correspondence.

As required, this report will be placed in the Cheswick facility's operating record per §257.105(g)(9), noticed to the State Director per §257.106(g)(7), and posted to the publicly accessible internet site per §257.107(g)(7). Placement of the prior annual inspection report into the facility's operating record was accomplished by January 16, 2025. Per §257.84(b)(4), the current report will be entered into the facility's operating record no later than January 16, 2026.

BACKGROUND

The Ash Disposal Site is a captive landfill used for the disposal of CCR materials and other residual wastes generated at the Cheswick Station and is operated/maintained in accordance with Pennsylvania Department of Environmental Protection (PADEP) Solid Waste Permit No. 300720. Active operations are ongoing in the South Valley (Phase I; 51 acres), while the North Valley (Phase II; 31 acres) remains as an unpermitted potential future phase within the Solid Waste Permit boundary. If ever constructed, the North Valley would be considered a new CCR Landfill per the Rule.

Construction of the South Valley commenced in 1980 and disposal of CCR materials began in 1982. Upon closure, the final upper surface elevation of South Valley will be no more than 1,200 feet mean sea level (ft. MSL).

Ash and residual waste placement ended on September 4, 2025. Construction of the remaining landfill cover system is underway. Prior to final grading, the active fill area was estimated to have an approximate average elevation of 1,115 to 1,116 ft. MSL, based on visual observation and knowledge of waste placed during 2025.

With respect to the Ash Disposal Site, APTIM's evaluation has focused on the following items as outlined in §257.84(b)(1)(i-ii):

- *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; and*
- *A visual inspection of the CCR unit to identify signs of distress or malfunction.*

Specific to APTIM's preparation of the annual inspection report, and per §257.84(b)(2) (i-iv), the following aspects have been addressed:

- *Any changes in geometry of the structure since the previous annual inspection.*
- *The approximate volume of CCR contained in the unit at the time of the inspection.*
- *Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit; and*
- *Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection.*

OPERATING RECORDS REVIEW

Principal items reviewed as part of this year's inspection included, but were not limited to: Design Drawings, Weekly and Periodic Landfill Inspection Reports that have been completed since the 2024 Inspection, 2024 Annual Landfill Operations Report, and Solid Waste Permit No. 300720. During the site inspection, Mr. Stolz interviewed facility personnel (Mr. Richard Ravotti) to verify the information contained within the operating record.

Environmental Control System Overview

- i. Leachate Collection System
 - a. The South Valley disposal area has a gravity underdrain system. This system consists of a below-grade piping network that facilitates leachate conveyance ultimately for treatment at the Monarch Mine Dewatering Plant (MMDP). Treated effluent from the MMDP is discharged to Little Deer Creek via Outfall 002 in accordance with the Cheswick Station's National Pollutant Discharge Elimination System (NPDES) Permit.
- ii. Stormwater Management
 - a. "Non-contact" stormwater from the South Valley disposal area is routed (via NPDES-permitted perimeter drainage channels) to the sedimentation pond located at the base of the landfill.

- b. "Contact" stormwater from within the active disposal area is collected in the leachate underdrain system and routed for treatment in the MMDP as described above.
- iii. Cover System
 - a. The eastern slope and portions of the northern and southern slopes of South Valley have final cover and established vegetation. The final cover system on the slopes includes benches to dissipate energy build-up and reduce erosion from stormwater run-off. Construction of the remaining western cover system was in progress as of the annual inspection conducted on November 19, 2025.

Summary of Landfill Construction

It is estimated that less than one foot of CCR was placed across the active fill area since the previous annual inspection. Prior to current re-grading, the active fill area was estimated to have an approximate average elevation of 1,115 - 1,116 ft. MSL. Exterior slopes have a final cover in place along with well-established and properly maintained vegetation. As applicable, contact water and non-contact stormwater risers were extended to support final grading and cover system construction.

Review of Prior Inspections

- i. Weekly inspections: A review of weekly inspections has concluded that no significant deficiencies occurred at the facility that required remedial actions.
- ii. Annual inspections: A review of the previous annual inspection report has determined that there were no deficiencies or releases, actual or potential structural weaknesses, or concern to the stability of the landform. All environmental control systems were in good operating condition and functioning as intended.

CCR Disposal

Approximately 3,857,385 tons of CCR were disposed in the landfill through December 2024. Approximately 10,467 tons of CCR were disposed in 2025, resulting in a total disposed quantity of 3,867,852 tons of CCR. CCR disposal ended at South Valley on September 4, 2025.

SITE INSPECTION

The site inspection was performed on November 19, 2025, by Mr. Stolz, during which time efforts were focused on identification of standard geotechnical signs of distress or malfunction. Specific aspects such as slumping at the toe of slope, tensile cracking, abnormal or excessive erosion on the side slopes, slope bulging, and groundwater/surface water seepage or ponding were assessed. If present, these readily visible signs are potential indicators of structural weakness of the CCR Landfill unit.

Visual Signs of Distress or Malfunction

No visual signs of distress or malfunction were observed during the inspection. Stormwater drainage features, slope appearance and stability, leachate conveyance mechanisms, and overall site conditions were assessed. Portions of the South Valley closed prior to 2025 exhibited well established vegetative cover.

Review of Environmental Control Systems

With no evidence to the contrary, the environmental control systems at South Valley are believed to be in good operating condition and functioning as intended. At the time of the inspection, leachate and stormwater conveyance systems were operating as designed.

Review of Previously Recommended Actions

The following actions were required based on the findings of the 2024 Annual Inspection:

1. Continue operation and maintenance in the active areas as currently performed.
2. Remove vegetative debris in the mid-slope portion of the Fabriform® swale at the south perimeter of the landfill.
3. Clear woody vegetation near the non-contact water basin.
4. Ensure adequate access to the closed portions of the landfill to maintain the ability to perform weekly visual site structural inspections.

Recommendations were limited to the continued operation and maintenance of the facility and maintaining access to closed portions of the landfill for inspection purposes. With the exception of vegetative debris and woody vegetation removal, these recommendations have been followed for the South Valley, based on site conditions and the review of weekly inspection logs.

CONCLUSIONS

Changes in Geometry

CCR material placement ended on September 4, 2025. Clay cover placement was essentially complete in the formerly active landfill area as of the November 19, 2025, inspection. The clay cover in the recently closed portion of South Valley is graded to slope from north-northwest to south-southeast in preparation for landfill closure.

In-Place CCR Disposal Quantities

Approximately 3,857,385 tons of CCR were disposed in the landfill through December 2024. Approximately 10,467 tons of CCR were disposed in 2025, resulting in a total disposed quantity of 3,867,852 tons of CCR. CCR disposal ended at South Valley on September 4, 2025.

Appearances of an Actual or Potential Structural Weakness of CCR Unit

At the time of inspection, there were no signs of distress or malfunction that would indicate actual or potential structural weakness at South Valley.

Changes that May Affect the Stability or Operation of the CCR Unit

There have been no changes to the South Valley area that pose a threat or concern to the stability of the landform.

RECOMMENDATIONS

1. Continue maintenance during closure activities
2. Inspect and maintain, as necessary, erosion and sediment controls at the

entrances to the Fabriflume® swales. Remove accumulated vegetative debris and sediment in the non-contact stormwater management system (Photos 17, 18, 21).

3. Inspect, repair, and stabilize the localized ground disturbance on the slope below the approximate midpoint of the second terrace.
4. Clear woody vegetation where present, especially near the non-contact water basin (see Photo 17).
5. Ensure adequate access to the closed portions of the landfill to maintain the ability to perform weekly visual site structural inspections.

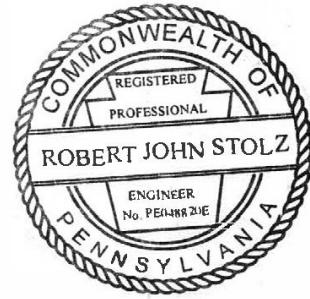
There were no deficiencies or releases identified during the annual inspection that required the owner or operator to perform corrective actions per §257.84(b)(5).

PROFESSIONAL ENGINEER'S CERTIFICATION

In accordance with §257.84(b) of the Rule, I hereby certify based on a review of available information within the facility's operating records and observations from my personal on-site inspection (including the photographs contained in Attachment 2), that the Cheswick Ash Disposal Site does not exhibit any appearances of actual/potential structural weakness that would be disruptive to the normal operations of the South Valley CCR Unit. The unit is being operated and maintained consistent with recognized and generally accepted good engineering standards and practices.

Certified by: Robert Stoltz 
Date: January 7, 2026

Robert Stoltz, P.E., P.G.
Professional Engineer Registration PE048820E
Aptim Environmental & Infrastructure, LLC



ATTACHMENTS

1. Site Map
2. Inspection Photo Log

REFERENCES

1. 2024 Cheswick Generating Station Annual Landfill Operations Report.
2. Weekly and Periodic Landfill Inspection Reports 2025
3. 40 Code of Federal Regulations, Part 257
4. Solid Waste Permit No. 300720

Attachment 1

Site Map



Attachment 2
Photo Log

Project: Cheswick Landfill 2025 Annual Inspection

Photographer: Robert Stolz

Image: 1
Date: 11/19/2025
Time: 10:23 AM
Direction: West-Southwest

Description: Re-graded area upslope of recent final cover placement.



Image: 2
Date: 11/19/2025
Time: 10:23 AM
Direction: East-Northeast

Description: Recent final cover placement.



Project: Cheswick Landfill 2025 Annual Inspection**Photographer: Robert Stolz**

Image: 3
Date: 11/19/2025
Time: 10:26 AM
Direction: West-Southwest

Description: Regraded slope and non-contact stormwater inlet in foreground.



Image: 4
Date: 11/19/2025
Time: 10:28 AM
Direction: East-Northeast

Description: Recent final cover placement.



Project: Cheswick Landfill 2025 Annual Inspection**Photographer: Robert Stolz**

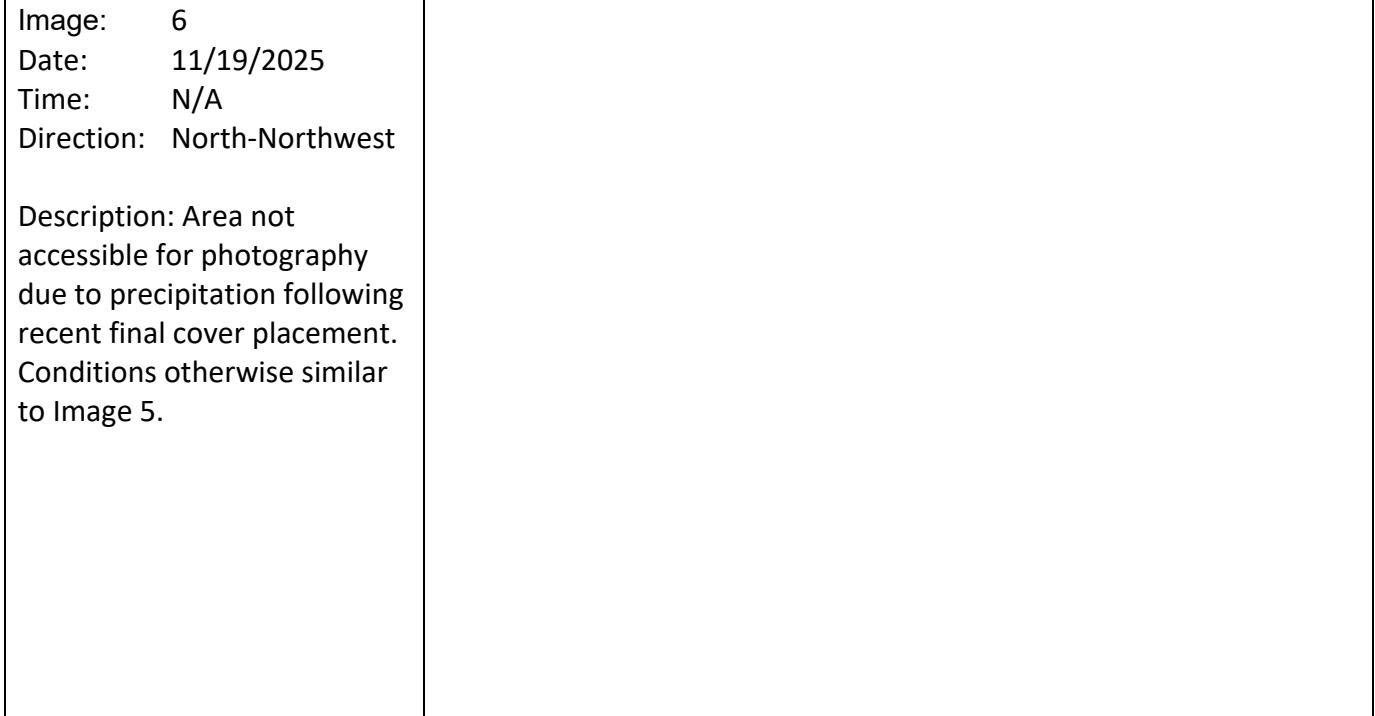
Image: 5
Date: 11/19/2025
Time: 10:30 AM
Direction: South-Southeast

Description: Recent final cover placement.



Image: 6
Date: 11/19/2025
Time: N/A
Direction: North-Northwest

Description: Area not accessible for photography due to precipitation following recent final cover placement. Conditions otherwise similar to Image 5.



Project: Cheswick Landfill 2025 Annual Inspection

Photographer: Robert Stolz

Image: 7
Date: 11/19/2025
Time: 10:33 AM
Direction: South-Southeast

Description: Recent final cover placement.



Image: 8
Date: 11/19/2025
Time: 10:35 AM
Direction: South

Description: Recent final cover placement.



Project: Cheswick Landfill 2025 Annual Inspection**Photographer: Robert Stolz**

Image: 9
Date: 11/19/2025
Time: 10:36 AM
Direction: South-Southeast

Description: Upper bench on east landfill slope.



Image: 10
Date: 11/19/2025
Time: 10:39 AM
Direction: Southeast

Description: Revetment-lined stormwater channel at the south end of the upper bench on the east landfill slope.



Project: Cheswick Landfill 2025 Annual Inspection**Photographer: Robert Stolz**

Image: 11
Date: 11/19/2025
Time: 10:17 AM
Direction: Southeast

Description: Revetment-lined stormwater channel at the north edge of the east landfill slope.



Image: 12
Date: 11/19/2025
Time: 10:45 AM
Direction: Northeast

Description: Revetment-lined stormwater channel at the south edge of the east landfill slope.



Project: Cheswick Landfill 2025 Annual Inspection**Photographer: Robert Stolz**

Image: 13
Date: 11/19/2025
Time: 10:41 AM
Direction: North

Description: Well vegetated east landfill bench.



Image: 14
Date: 11/19/2025
Time: 10:42 AM
Direction: Northeast

Description: Concrete-lined stormwater channel at the south edge of the east landfill slope.



Project: Cheswick Landfill 2025 Annual Inspection**Photographer: Robert Stolz**

Image: 15
Date: 11/19/2025
Time: 10:51 AM
Direction: South-Southeast

Description: Well vegetated mid-slope landfill bench with no indication of erosion or instability.



Image: 16
Date: 11/19/2025
Time: 11:01 AM
Direction: East

Description: Non-contact stormwater channel leading to the Sedimentation Pond.



Project: Cheswick Landfill 2025 Annual Inspection**Photographer: Robert Stolz**

Image: 17
Date: 11/19/2025
Time: 11:00 AM
Direction: West-Southwest

Description: Lower slope at the east side of the landfill. Slopes are well vegetated.



Image: 18
Date: 11/19/2025
Time: 11:17 AM
Direction: Southwest

Description: Sedimentation Pond and vicinity. Area is well vegetated.



Project: Cheswick Landfill 2025 Annual Inspection**Photographer: Robert Stolz**

Image: 19
Date: 11/19/2025
Time: 11:18 AM
Direction: Southeast

Description: Emergency spillway inlet at the Sedimentation Pond.



Image: 20
Date: 11/19/2025
Time: 11:18 AM
Direction: Northeast

Description: Emergency spillway outlet at the Sedimentation Pond.



Project: Cheswick Landfill 2025 Annual Inspection**Photographer: Robert Stolz**

Image: 21
Date: 11/19/2025
Time: 11:11 AM
Direction: Southwest

Description: Sedimentation Pond emergency spillway outlet, non-contact stormwater outlet pipes, and capped contact stormwater (leachate) pipe.



Image: 22
Date: 11/19/2025
Time: 11:07 AM
Direction: Southwest

Description: Leachate pump station.

