Stantec Consulting Services Inc.
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October 12, 2016
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Revision 0

Initial Hazard Potential Classification Assessment
EPA Final CCR Rule
Coal Pile Runoff Pond
Zimmer Power Station
Clermont County, Ohio

1.0 PURPOSE

This report documents Stantec's certification of the initial hazard potential classification assessment for the Zimmer Power Station Coal Pile Runoff Pond.

40 CFR 257.73(a)(2) requires the owner or operator of an existing CCR surface impoundment to conduct an initial hazard potential classification assessment and document the hazard potential classification, and the basis for the classification, of the CCR unit as either a high hazard potential CCR surface impoundment, a significant hazard potential CCR surface impoundment, or a low hazard potential CCR surface impoundment.

2.0 FINDINGS

A visual analysis was performed to evaluate potential hazards associated with a failure of the Coal Pile Runoff Pond perimeter containment dike. Breach failure scenarios were analyzed at the southern, western, and northern faces of the embankment. Breach locations were selected based on locations of nearby downstream structures and locations that could be potentially impacted. Potential for impacts were evaluated by determining probable breach flow paths using available elevation data and imagery of the impoundment along with the surrounding area.

The analysis suggests that a breach along the southern embankment could potentially impact Basin C. A breach of the western embankment would likely be conveyed directly to the Ohio River. A breach of the northern embankment could potentially impact the Wastewater Pond. Based on the visual analysis of the breach scenarios, it does not appear likely that such an event would result in probable loss of human life. However, it is anticipated that a breach failure at critical locations of the containment dike would result in the release of the stored CCR materials into downstream areas and waterways which could cause environmental damage.

40 CFR 257.53 defines a "significant hazard potential CCR surface impoundment" as a diked surface impoundment 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.

Based on the results of the analysis summarized above, the Coal Pile Runoff Pond was assigned a Significant hazard potential classification per 40 CFR 257.53.

3.0 QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

I, David Hayson, being a Professional Engineer in good standing in the State of Ohio, do hereby certify, to the best of my knowledge, information, and belief that;

1. the information contained in this report and the underlying data in the operating record was prepared in accordance with the accepted practice of engineering and is accurate as of the date of my signature below; and

2. the initial hazard potential classification assessment for the Zimmer Power Station Coal Pile Runoff Pond was conducted in accordance with the requirements specified in 40 CFR 257.73.

SIGNATURE _____ DATE 10/12/16

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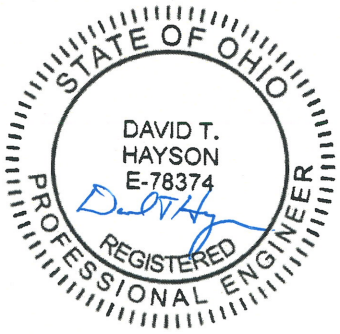

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