



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

CERTIFIED

December 20, 2013

Mr. Dana Sheets
Gavin Plant Residual Waste Landfill
1 Riverside Plaza
Columbus, OH 43215

RE: Gavin Plant Residual Waste Landfill
Draft Permit to Install
PTI # 06-08447

Dear Mr. Sheets:

The application for a Permit to Install (PTI) with accompanying plans and specifications for the above referenced facility has been reviewed by the staff of the Ohio EPA. It is the recommendation of the staff that the director issue a PTI since your proposal appears to comply with applicable Ohio solid waste rules.

Therefore, enclosed please find a Permit to Install which is being issued to you today in draft form pursuant to Ohio Revised Code Chapter 3734 and the rules adopted thereunder.

A public notice concerning the issuance of this draft Permit to Install will appear in the Gallipolis Daily Tribune newspaper. A combined public information session and public hearing on the proposed project and draft permits has been scheduled for Thursday, February 6, 2014 at 6:00 p.m. at the Cheshire Village Hall, 119 State Route 554, Cheshire, Ohio. The public hearing will end when everyone in attendance has had an opportunity to provide testimony related to the project. Written comments will be accepted for the director's consideration through February 7, 2014. The application may be reviewed in accordance with Ohio EPA's file review procedures by contacting Ohio EPA Southeast District Office, 2195 Front Street, Logan, Ohio, Tel: (740) 382-8501.

Following the close of the public comment period, the director may issue a final Permit to Install upon such terms and conditions as he finds necessary to ensure that the operation of your facility is in accordance with Ohio's solid waste rules.

Mr. Dana Sheets
Gavin Plant Residual Waste Landfill
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Please be advised that the detailed plans which you had submitted with your application will be transmitted with the issuance of the final permit. If you have any questions concerning this draft Permit to Install, please contact the Ohio EPA Southeast District Office at the above address and telephone number.

Sincerely,



Georgia Frakes
Division of Materials and Waste Management

Enclosures: Draft Permit

cc: Brad Mitchell, DMWM, CO
Scott Hester, DMWM, CO
Amber Finkelstein, PIC
Rich Fox, DMWM, SEDO
Daniel Messerly, DSW, SEDO

**OHIO ENVIRONMENTAL PROTECTION AGENCY
PERMIT-TO-INSTALL**

Application Number: 06-08447
Application Received: August 29, 2011
Permit Fee: \$80,000.00
Permit Fee Balance: \$79,600.00

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Applicant: American Electric Power/Ohio Power Company
Address: 1 Riverside Plaza
Columbus, Ohio 43215

Name: Gavin Plant Residual Waste Landfill (Gavin Landfill)

Location: 1.25 miles northwest of the Gavin Power Plant. The plant is located next to Cheshire, Ohio on the Ohio River at river mile 258. The facility is within Addison Township, Gallia County.

PTI: Lateral and Vertical Expansion

Issuance Date:

Effective Date:

The above-named entity is hereby issued a permit-to-install (permit) for the above-described source pursuant to Ohio Administrative Code (OAC) Rule 3745-27-02. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed and/or modified in accordance with the plans, specifications, and/or information accompanying the permit application, the above-described source of environmental pollutants will operate in compliance with applicable state and federal laws, rules, and regulations, and does not constitute expressed or implied assurances that, if constructed and/or modified in accordance with those plans, specifications, and/or information accompanying the permit application, the above-described source of environmental pollutants will be granted the necessary operating permits and/or licenses. This permit is issued subject to the attached conditions which are hereby incorporated and made a part hereof.

Ohio Environmental Protection Agency

Scott J. Nally, Director

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PERMIT SUMMARY

This is a draft permit (PTI No 06-08447) which, if issued as a final permit, authorizes a lateral and vertical expansion of the Gavin Plant Residual Waste Landfill (Facility), an existing residual waste landfill in Gallia County. American Electric Power/Ohio Power Company (AEP) is the applicant for the permit to install.

The approved disposal area will increase by 149 acres to a total of 404 acres and the approved disposal capacity will increase by 45.5 million cubic yards to 94.2 million cubic yards. The anticipated life expectancy is 22 years based on the anticipated average daily waste receipt of 8,900 tons.

The Facility's design includes a composite liner system, which consists of a twenty-four inch thick recompacted soil liner and a thirty mil polyvinylchloride (PVC) geomembrane; a leachate collection system; a surface water management system; a ground water monitoring system; and a final closure cap system. The permit also incorporates fifteen years of post-closure care and financial assurance for closure and post-closure care.

This summary is provided solely for informational purposes and does not constitute a part of, or otherwise affect, the attached permit.

PERMIT CONDITIONS

1. The director of the Ohio Environmental Protection Agency (Ohio EPA), or an authorized representative, may enter upon the premises of the above-named applicant (permittee) at any reasonable time during construction and operation for the purpose of making inspections, conducting tests, or examining records or reports pertaining to the construction, modification, or installation of the above-described source of environmental pollutants (residual solid waste disposal facility).
2. The Facility shall be constructed in strict accordance with the plans, specifications, and information submitted to Ohio EPA which constitute this permit. There shall be no deviation from the approved permit or permit conditions without the express written approval of Ohio EPA. Any deviation from the approved permit or the permit conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the Facility will operate in compliance with all Ohio laws and regulations. Additional landfill components shall be installed upon orders of Ohio EPA if the Facility is inadequate or cannot meet applicable standards.

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3. Issuance of this permit does not relieve the permittee of the duty to comply with all applicable federal, state, and local laws, ordinances, and regulations.
4. This permit shall apply only to the Facility shown on the plans submitted as part of PTI Application Number 06-08447, as received on August 29, 2011, with subsequent revisions received on April 17, 2012, August 3, 2012, and December 12, 2012.
5. This permit approval may be modified, or alternatively revoked and reissued, to comply with any revisions to OAC Chapter 3745-30 applicable to this residual solid waste disposal facility.
6. The permittee shall provide for the proper maintenance and operation of the residual solid waste disposal facility in accordance with the provisions of OAC Chapter 3745-30.
7. Nothing in this permit shall be construed to authorize any waiver from the requirements of any applicable federal or state laws or regulations except as specified herein. This permit shall not be interpreted to release the permittee from responsibility under Ohio Revised Code (ORC) Chapters 3704, 3714, 3734, or 6111; under the Federal Clean Water Act, the Resource Conservation and Recovery Act, or the Comprehensive Environmental Response, Compensation, and Liability Act; or from other applicable requirements for remedying conditions resulting from any release of contaminants to the environment.
8. This permit does not authorize the acceptance of any hazardous or infectious wastes.
9. This permit does not authorize the acceptance of any asbestos or asbestos-containing waste material that is subject to the provisions of NESHAP, 40 CFR, Part 61, Subpart M.
10. Not later than seven (7) days prior to starting any construction authorized by this permit, the permittee shall submit to Ohio EPA, Southeast District Office (SEDO), Division of Materials and Waste Management (DMWM) and the Gallia County Health Department (GCHD) written notification of the anticipated construction start date so that construction of this Facility can be routinely inspected by Ohio EPA, SEDO, DMWM and GCHD before the Facility is placed into operation.

11. The permittee shall perform the following activities during construction and operation of the Facility in accordance with the cited provisions of OAC Chapter 3745-30 as follows:
 - a. The test pad required by OAC Rule 3745-30-07(F)(1) shall be constructed, as necessary, and a report containing the test results shall be submitted to Ohio EPA SEDO not later than fourteen (14) days prior to the initial construction date of the landfill component that the test pad models. Each lift of the test pad shall be tested not less than twice for the maximum dry density and optimum moisture content according to ASTM D698-00a (standard proctor), or ASTM D1557-00 (modified proctor), grain size distribution using ASTM D422-63 (sieve and hydrometer), and Atterberg limits using ASTM D4318-00.
 - b. The pre-construction tests required by OAC Rule 3745-30-07(D) shall be performed and the test results submitted to Ohio EPA, SEDO, DMWM not later than seven (7) days prior to the intended use of the materials in construction.
 - c. The construction certification report required by OAC Rule 3745-30-07(B) shall be submitted to Ohio EPA, DMWM, SEDO and GCHD not later than forty-five (45) days prior to the anticipated date of waste receipt in newly constructed areas. The permittee shall not accept waste in a sequence until Ohio EPA, DMWM, SEDO provides written concurrence of the construction certification report for that sequence.

12. The permittee shall provide for the following inspections and facility maintenance:
 - a. The permittee shall provide for daily inspection of the Facility and completion of the Daily Inspection Checklist and the daily log of Operations as specified in the PTI application. Written results of the inspections, including any corrective measures employed, shall be made available to Ohio EPA, SEDO or the GCHD.
 - b. Surface water control structures, including sedimentation basins, sedimentation basin discharge structures, pipes, ditches, and culverts, shall be inspected at least monthly for erosion, clogging, or failure and prompt corrective action shall be taken if necessary. A log documenting inspection results, any corrective measures taken, any water quality samples taken, and the date and weather conditions during any water quality sampling shall be maintained on site and submitted to Ohio EPA,

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SEDO or the GCHD upon request.

- c. To ensure proper operation of sedimentation basin(s), the basin(s) shall be cleaned out when the sediment storage volume, as measured at the principal spillway, has reached sixty percent of the height of the principal spillway. This height shall be measured from the base of the sedimentation pond to the inlet elevation of the principal spillway.
13. Protective cover and granular drainage layer shall be placed from the bottom of the slope to the top of the slope and not across slope or down slope on all slopes that exceed 15 percent.
14. The permittee shall fund a new financial assurance instrument or increase the amount listed on the existing financial assurance instrument in accordance with OAC Rules 3745-27-15, 3745-27-16, and 3745-27-17 for the current cost estimates of the facility including the costs for the newly authorized disposal area. Funding shall be completed prior to waste acceptance in any disposal area newly authorized by this permit to install.
15. Prior to or concurrent with the issuance of this permit as a final action, AEP must receive all applicable National Pollutant Discharge Elimination System permit(s) and permits required by Sections 401 and 404 of the Clean Water Act.
16. The permittee shall not conduct leachate recirculation at the Facility without prior written approval from Ohio EPA.
17. The permittee shall continue to comply with all existing applicable authorizing documents for the Facility. However, the design, construction, operation, closure, and post-closure activities authorized by this permit (PTI No 06-08447), as set forth in the plans, specifications and information submitted in the application for this permit and the conditions set forth in this permit, shall take precedence over any conflicting plans, specifications, information, or conditions.

END OF PERMIT CONDITIONS

Date of Notice: December 20, 2013

Gallia County

**PUBLIC NOTICE
NOTICE OF RECEIPT OF APPLICATION, DRAFT PERMITS, PUBLIC INFORMATION
SESSION, AND PUBLIC HEARING
ANTIDegradation**

Public notice is hereby given that the Ohio Environmental Protection Agency (Ohio EPA)-Division of Surface Water (DSW) has received an application for the renewal of a National Pollutant Discharge Elimination System (NPDES) permit (Ohio EPA Permit No. 0IB00006*ND) for the discharge from the existing facility and from new treatment ponds serving the expansion of the Gavin Plant Residual Waste Landfill for The Ohio Power Company-General James Gavin Power Plant collection, treatment and/or disposal system. Public Notice is also given that the Ohio EPA-Division of Materials and Waste Management has received a Permit-to-Install (PTI) application (No. 06-08447) for vertical and lateral expansion of the existing Gavin Plant Residual Waste Landfill, including new treatment ponds serving the landfill complex. The NPDES and PTI applications were submitted by American Electric Power, 1 Riverside Plaza, Columbus, Ohio 43215.

The Ohio Power Company-General James Gavin Power Plant facility, landfill and collection/disposal/treatment system is located at 7397 North State Route 7, Cheshire, Cheshire Township, Gallia County, Ohio. Treated wastewaters are proposed to be discharged at the same location. The proposed discharges from the additional treatment ponds serving the landfill expansion are to Stingy Run and Turkey Run and subsequently Kyger Creek and the Ohio River.

The discharges from this facility, if approved, would result in degradation to, or lowering of, the water quality Stingy Run and Turkey Run and subsequently Kyger Creek. However, the chemical-specific water quality criteria developed to protect aquatic life and human health, set forth in OAC 3745-1, will not be exceeded. In accordance with OAC 3745-1-05, an antidegradation review of the application will be conducted before deciding whether to allow a lowering of the water quality.

The contents of the above stated applications indicate that an exclusion from various portions of the antidegradation review and information submittal requirements apply as outlined by section 3745-1-05(D)(1) of the antidegradation rule (effective as of October 1, 1996). The exclusion relates to a source discharging to limited quality waters. Due to the nature of the streams in question, a proposed or increased discharge is anticipated to result in minimal environmental concern.

In response to the above stated applications, Ohio EPA has made a preliminary recommendation related to the proposed project in issuing draft Ohio EPA NPDES Permit No. 0IB00006*ND on November 29, 2013 and draft residual waste landfill Permit to Install No. 06-08447 on December 20, 2013.

Copies of the pending NPDES and residual waste landfill PTI applications, draft NPDES and residual waste landfill PTI and related documents are available for review at Ohio EPA's Southeast District Office, 2195 Front Street, Logan, Ohio, (740) 385-8501.

Ohio EPA has scheduled a combined public information session and public hearing on the proposed project and draft permits for Thursday, February 6, 2014 at 6:00 p.m. at the Cheshire Village Hall, 119 State Route 554, Cheshire, Ohio. The public hearing will end when everyone in attendance has had an opportunity to provide testimony related to the project.

All interested persons are entitled to attend or be represented and give written or oral comments on the project and all persons who do so may, in the discretion of the presiding officer, be questioned by other persons present. The purpose of the hearing is to obtain additional information that will be considered by the director of Ohio EPA prior to any further action on the application(s).

Persons wishing to 1) be on Ohio EPA's interested parties mailing list for this project, or 2) submit comments for Ohio EPA's consideration must do so in writing to the following: for the draft NPDES permit, to Ohio EPA-DSW, Attention: Permits Processing Unit, P.O. Box 1049, Columbus, Ohio 43216-1049; for the draft residual waste landfill permit, to Ohio EPA-DMWM, Attention: Processing and Records Management Unit, P.O. Box 1049, Columbus, Ohio 43216-1049. Comments must be received by the close of business on Friday, February 7, 2014. Comments received after this date may not be considered as part of the official record.