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Coal Combustion Residuals Surface Impoundments

Hazard Potential Classification Periodic Assessment Report

Conemaugh Generating Station
Ash Filter Ponds
New Florence, Pennsylvania

GAI Project Number: C151611.14, Task 002

October 2016
Rev. 01, October 2021
Rev. 02, October 2026

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Table of Contents

Professional Engineer's Certification ii

Assessment Revisions iii

1.0 Introduction 1

2.0 Hazard Potential Classification Criteria 2

3.0 Hazard Potential Classification Activities 2
3.1 Review of Background and Design Information 3
3.2 Field Visit 4
3.3 Hazard Potential Classification Determination 4

4.0 Conclusions 5

5.0 References 6

Figure 1 Site Location Map
Figure 2 Photographic Map
Figure 3 Topographic and Flow Direction Map

Attachment A Hazard Potential Classification Forms

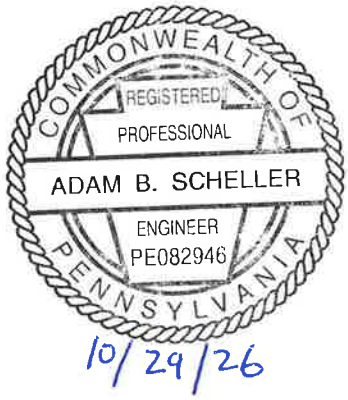
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Professional Engineer's Certification

The Periodic Hazard Potential Classification Assessment for the Conemaugh Generating Station Ash Filter Ponds was prepared by GAI Consultants, Inc. (GAI). The Assessment 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 Assessment Report 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 (PA) that the Assessment 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, and at the time and in the same locale. It is my professional opinion that the Periodic Hazard Potential Classification Assessment was prepared consistent with the requirements 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.

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.

Adam B. Scheller, P.E.
Assistant Engineering Director



Assessment Revisions

Revision	Date	Reason	Description	Reviewer
0	Oct. 2016		Original Document, Initial Assessment	NRG, CB&I Inc.
1	Oct. 2021	Comprehensive review and as-needed revisions to conduct Periodic Assessment per CCR Rule, Section 257.73(f)(3) requirements (Periodic Assessment required every five years)	Remove NRG, additional miscellaneous administrative changes, Reevaluation of Hazard Potential Rating.	Conemaugh Station, GAI Consultants, Inc
2	Oct. 2026	Comprehensive review and as-needed revisions to conduct Periodic Assessment per CCR Rule, Section 257.73(f)(3) requirements (Periodic Assessment required every five years)	Incorporation of new information to reflect Ash Filter Pond reconstruction and other site updates, reevaluation of Hazard Potential Rating.	Conemaugh Station, GAI Consultants, Inc

1.0 Introduction

On December 19, 2014, the Administrator of the United States Environmental Protection Agency signed the Disposal of Coal Combustion Residuals (CCR) from Electric Utilities final rule (the Rule). The Rule was published in the Federal Register on April 17, 2015, became effective on October 19, 2015, and is contained within amended portions of Title 40, Part 257 of the Code of Federal Regulations (CFR). The Rule establishes a comprehensive set of requirements for the disposal/management of CCR in landfills and surface impoundments at coal-fired power plants under Subtitle D of the Resource Conservation and Recovery Act. These requirements include compliance with location restrictions, design criteria, operating criteria, groundwater monitoring and corrective action criteria, and closure and post-closure care aspects.

Included with the design criteria under 40 CFR §257.73(a)(2)(i-ii) are requirements to conduct initial and periodic hazard potential classification assessments for all existing non-incised CCR surface impoundments. Pursuant to §257.53 (Definitions) of the Rule, this hazard potential classification is an assessment of "the possible adverse incremental consequences that result from the release of water or stored contents due to failure of the diked CCR surface impoundment or mis-operation of the diked CCR surface impoundment or its appurtenances." These assessments are to be certified by a professional engineer, must assign a low, significant, or high hazard potential rating to each CCR unit based on criteria provided in §257.53, and must provide the basis for the selected rating. The initial assessment must be completed no later than October 17, 2016, with subsequent periodic assessments required every 5 years.

The Conemaugh Generating Station (Station) is a coal-fired steam electric power generating station located in New Florence, Pennsylvania. The Station has four surface impoundments that are subject to this Rule, specifically identified as Ash Filter Ponds A, B, C, and D. The ponds are part of an ash water recycling system and serve the multi-purpose function of receiving, storing, settling, and supplying water for bottom ash sluicing activities. Other components of the ash water recycling system include a distribution box (also known as the receiver box), ash dewatering bins (which receive sluice water from the bottom ash hoppers), an ash water recycle sump (AWRS), and recycling and level control pumps.

Ponds A, B, and C were retrofitted in 2023 (B and C) and 2024 (A) to replace the existing clay liner with a double-lined geosynthetic system. Upon completion of retrofitting efforts, Pond D was removed from service, drained, and settled CCR and other materials were excavated and landfilled per the usual pond cleaning protocol. In 2024, Pond D was isolated from the bottom ash handling system and stabilized. Pond D is now idled and awaiting closure and retirement no later than Station retirement.

Water from the ponds drains via gravity to the AWRS, where it is subsequently pumped to the bottom ash hoppers during sluicing. Sluice water from the hoppers is sent to dewatering bins and is decanted or drained from the bins and sent back to the ponds via the distribution box. Some water is introduced into the system via precipitation falling directly into and around the ponds, and the Station maintains an ability to add circulating water to the system. These sources help to replenish losses, providing an adequate, ongoing supply of sluice water.

In 2026, the existing AWRS was partitioned to create two distinct, smaller sumps to comply with the federal effluent limitations guidelines for bottom ash transport water at 40 CFR Part 423 (ELG Rule). One of the new sumps continues to function as the AWRS for recirculating bottom ash transport water. The second sump is designated as the Level Control Sump (LCS) and serves to accept non-bottom ash transport water (such as water from sump pumps, drains, stormwater, and other plant processes) that was previously comingled with bottom ash transport water prior to the partition.

There are overflow provisions for the ponds, the AWRS, and the LCS. Accumulated bottom ash is removed from the ponds during periodic cleanout activities and transported to the Station's CCR landfill (the Ash/Refuse Disposal Site). The locations of the Station and the ponds are shown on Figure 1.

In 2016, the Station engaged the services of CB&I Environmental & Infrastructure, Inc. (CB&I) to conduct an initial review of the Ash Filter Ponds with respect to their size, configuration, and downstream features to develop respective hazard potential classifications for each of these CCR impoundments. This initial effort included the review of available background and design information and a field visit conducted on June 28, 2016 and culminated in the preparation of the Hazard Potential Classification Initial Assessment Report in October 2016.

In 2021, the Station engaged the services of GAI Consultants Inc. (GAI) to conduct a periodic review of the Ash Filter Ponds with respect to their size, configuration, and downstream features to either confirm or revise the respective hazard potential classifications for each of the Ash Filter Ponds. This effort included the review of available background and design information, including the Initial Assessment Report, and a field visit conducted on October 6, 2021.

In 2026, the Station engaged the services of GAI to conduct another periodic review of the Ash Filter Ponds with respect to their size, configuration, and downstream features to either confirm or revise the respective hazard potential classifications for each of the Ash Filter Ponds. This effort included the review of available background and design information, including the Initial Assessment Report, Revision 1 to the Assessment Report (2021), and a field visit conducted on October 13, 2026.

This Report has been prepared to identify the periodic hazard potential classification for the subject CCR impoundments, and to provide documentation required by the Rule, including the basis for the classification and certification of the findings by a professional engineer. Beyond this introductory section, Section 2.0 outlines the regulatory criteria for selection of a hazard potential classification; Section 3.0 describes the activities performed to support the hazard potential classification; and Section 4.0 provides the formal hazard rating assigned to each of the impoundments. Section 5.0 lists the references that were consulted during this assessment.

As required, this Periodic Assessment Report will be appropriately placed in the facility's operating record pursuant to §257.105(f)(5), noticed to the State Director per §257.106(f)(4), and posted to the publicly accessible internet site pursuant to §257.107(f)(4).

2.0 Hazard Potential Classification Criteria

The Rule presents hazard classification criteria as a means to categorize "the possible adverse incremental consequences that result from the release of water or stored contents due to failure or mis-operation of the diked CCR surface impoundment or its appurtenances." From §257.53, there are three potential Hazard Classifications for CCR impoundments: Low, Significant, and High. The criteria for each category are as follows:

- Low Hazard Potential – Failure or mis-operation of the diked surface impoundment 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 Potential – A failure or mis-operation of the diked surface impoundment results in no probable loss of human life, but can cause disruption of lifeline facilities, or impact other concerns.
- High Hazard Potential – Failure or mis-operation of the diked surface impoundment will probably cause loss of human life.

3.0 Hazard Potential Classification Activities

The hazard potential classification process included three main steps: review of background and design information for the impoundments; conduct a field visit to view the impoundments and surrounding area; and selection of a hazard potential rating for each impoundment using regulatory criteria presented in the Rule.

3.1 Review of Background and Design Information

Prior to the field visit, GAI collected and reviewed available background and design information regarding the impoundments and surrounding area, including mapping, aerial images, and reports and other documents provided by the Station. Mapping and aerial images were utilized to prepare Figures 1 through 3 included with this report. Pertinent information identified during development of the figures included ground surface elevations and topography, property boundary lines, structures, surface water features, and infrastructure in the vicinity of the impoundments.

The impoundments are situated toward the southern reaches of the Station property, just southwest of the primary operations area. The nearest Station property boundary is to the south and abuts the Conemaugh River. The ponds are located together in a common impoundment area and share an overall perimeter dike. This diked area is bordered by a Station haul road to the north and south, a haul road and limestone storage area to the west, and the flue gas desulfurization (FGD) system to the east. A rail corridor runs through the Station property between the impoundment area and the Conemaugh River. At its closest, the rail corridor is over 300 feet away from the toe of the basin impoundment area.

Topographic information for the subject area was obtained from a site survey by L. R. Kimball performed in 2010 (Kimball, 2010), from a site survey performed by GAI in January 2020 (GAI, 2020), and as-built elevations obtained from the Ash Filter Pond Retrofit Project in 2023 and 2024 (GAI, 2024). The overall topography in the vicinity of the ponds slopes southward toward the Conemaugh River. The common diked area has a crest elevation of approximately 1092 to 1095 feet mean sea level (ft msl). The greatest exterior embankment heights occur on the western and southern sides, while relief on the northern and eastern sides is minimal. The western and southern embankments slope to the west and south, respectively, to perimeter channels at the toe, at an approximate elevation of 1080 ft msl. These perimeter channels convey water southward and westward, respectively, to a roadside culvert. Drainage entering the culvert passes below the site access road and is then routed southward through undeveloped Station property and eventually beneath the rail corridor in the direction of the Conemaugh River (located approximately 0.2 to 0.3 miles from the impoundments). Under normal conditions, the majority of runoff following this flow path would be expected to infiltrate before ever reaching the River. Toward the north and east, the ground surface generally slopes away from the ponds, toward a grassy area and perimeter road to the north, and toward the FGD system to the east.

Infrastructure in the vicinity of the ponds is limited to the onsite access road, an elevated limestone conveyor, and the rail corridor. The closest nearby properties and structures are 0.3 to 0.5 miles southwest of the ponds and are separated from the Station property by the Conemaugh River.

Several wetlands (swamps) are present in the low-lying area between the ponds and Conemaugh River, with the majority of these occurring south of the rail corridor. A delineation of wetlands and a Pennsylvania Natural Diversity Inventory were completed in the anticipated inundation area as part of a study conducted in advance of the rail line construction in 2005. The study indicated that, in general, the wetlands in the vicinity of the rail line and downstream of the ponds are palustrine emergent (with precipitation and runoff as the only water sources) and palustrine scrub-shrub wetlands. No critical or endangered specifies were found to be present in the vicinity of the rail project (GAI, 2005). GAI reviewed these findings in 2026 as part of Revision 2 to this Assessment Report.

As part of this hazard assessment, design and operational background information for the ponds was reviewed. It is important to note that the classification required by §257.73 is based on the consequences of the impoundment failing, and not on the likelihood of a failure. Subsequently, a limited amount of design and operational information was pertinent to this evaluation. Specifically, the contents and capacities of the ponds were considered as information relevant to estimating an inundation area and further determining the associated impacts that would occur under a breach scenario.

The reconstructed ponds (A, B, and C) each have a storage capacity of approximately 5.1 ac-ft. Pond D has a storage capacity of approximately 5.5 ac-ft. All three reconstructed ponds can be in service at

any particular time. If two of the three reconstructed ponds are in use at any one time, the third is out of service for maintenance and cleaning purposes. As mentioned previously, Pond D has been isolated from the bottom ash transport water system and is no longer used for the storage or management of CCR. Pond D maintains its ability to impound and store stormwater that falls within its footprint, and this stormwater is able to drain from Pond D using the existing dewatering pipe, which conveys stormwater to the AWRS. For the purpose of this hazard assessment, each pond is considered as a separate unit, as the failure or breach of one unit would not directly translate into the failure or breach of additional units. The capacity of each pond was considered relative to the downstream areas to help identify the approximate potential inundation area. In addition, the single pond capacity was compared to a threshold value of 20 ac-ft, at which impoundments of five feet in height or more require the compilation and submittal of additional construction and stability-related information. Due to the capacity of each pond being less than 20 ac-ft, no evaluations beyond hazard potential classifications are required by §257.73.

3.2 Field Visit

On October 13, 2026, Adam Scheller (GAI Engineer) performed a site walk and visual reconnaissance of the ponds and surrounding area. GAI walked the perimeter of the ponds and confirmed that the ash water recycling features appeared to be in overall agreement with the previously reviewed reports and documents. GAI visually assessed upstream conditions for run-on potential and likely breach flow path downstream conditions, respectively. Due to the diked construction of the impoundment area, potential run-on is minimal, limited to precipitation falling directly on and in the immediate vicinity of the ponds. With respect to the most likely flow path during breach conditions, breaches to the west (for ponds A, B, C, or D) or south (pond D) were considered, as the lack of significant embankments to the north and east would preclude failure in those directions. Access roads to the west and south of the ponds, as well as an elevated limestone conveyor system to the south of the ponds, were noted to be present and potentially impacted during a breach scenario.

Stormwater channels were observed along the western and southern embankment toes, converging at the southeast corner of the embankment area at a culvert passing under the site access road. Downstream of the culvert, a series of swales, channels, and other conveyance features direct flow southward, under the rail corridor and through undeveloped wooded and brush-covered Station property, whereupon infiltration of the majority of the runoff would be expected. This area is topographically lower than a perimeter access way that runs along the Conemaugh River, preventing direct discharge from the area to the river. Other than the site access road, conveyor, and rail corridor, no notable manmade features (structures, utilities, etc.) were observed in the downstream area near the ponds.

3.3 Hazard Potential Classification Determination

The information gathered from review of background and design documents/drawings and during the site visit was utilized to complete a Hazard Potential Classification Form (Form) for each impoundment, contained in Attachment A of this report. The Form was developed to provide a comprehensive, methodical, and quantitative means to select a hazard rating. The following types of impacts were considered: loss of human life, economic losses, environmental losses, damage to lifeline facilities, and other concerns (such as impacts to critical facilities, typically represented by medical facilities, transportation facilities, etc.). A worst-case failure scenario was considered to be a catastrophic dike failure and sudden release of the impoundment contents (i.e., a breach scenario). As noted previously, the failure of one pond would not tend to cause the failure of the others; as such, each pond was considered independently. Due to similarities between the ponds, the findings and conclusions are consistent between the ponds.

During a pond breach scenario, it would be expected that solid material from the structure's berm and also settled solids contained in the pond would generally deposit in the near vicinity of the pond toe. Some of the finer sediment from the pond may be transported further, but it is anticipated that the

majority of solid material would drop out near the access road and in the large flat area north of the rail corridor. Any flow continuing to the rail corridor would be further filtered and attenuated by the elevated and ballasted rail bed. It is anticipated that flow passing the rail lines and continuing toward the River would be predominantly water, and that the flow would further dissipate across the relatively flat, undeveloped area within the boundary of the Station property. Relatively higher topography along the Conemaugh River prevents direct discharge from this area to the river. There are no foreseeable impacts to neighboring properties. Aside from possible temporary impacts to an internal Station roadway and less likely to the conveyor system, no adverse impacts to infrastructure are anticipated. Additionally, no adverse impacts to structures, utilities, lifeline or critical facilities, or natural areas are anticipated.

4.0 Conclusions

Based on the review of background and design information, observations made during the site visit, and hazard potential evaluation activities performed as part of this assessment, the following hazard ratings were selected for the Conemaugh Station CCR impoundments:

Impoundment Name	Hazard Potential Rating
Ash Filter Pond A	Low
Ash Filter Pond B	Low
Ash Filter Pond C	Low
Ash Filter Pond D	Low

These ratings are based on the determination that a failure or mis-operation of these impoundments would be unlikely to cause a loss of human life and would cause minor economic or environmental losses principally limited to the surface impoundment owner's property. In addition, a failure or mis-operation would be unlikely to impact lifeline or critical facilities or cause other significant negative effects.

5.0 References

"Critical Facilities." The National Weather Service. Web. 6 May 2016.

Federal Emergency Management Agency. "National Flood Hazard Layer." Indiana County, Pennsylvania. January 27, 2015.

Federal Register, Volume 80, No. 74. Sections 257.53 (Definitions) and 257.73 (Structural Integrity Criteria for Existing CCR Surface Impoundments). April 17, 2015.

GAI Topographic Survey of Ash Filter Ponds, Conducted January 19 through January 31, 2020.

GAI Consultants, Inc. "Wetland Delineation Report, Conemaugh Power Station, Loop Track Project Area." November 2005.

GAI Consultants, Inc. "Ash Filter Ponds Reconstruction Project" Record Drawings. November 2024.

GAI Consultants, Inc. "Bottom Ash Transport Water Recycle System Modifications Project" Construction Drawings. March 2026.

Geosyntec. "Geotechnical and Hydraulic Assessment Report, Conemaugh Generating Station - Filter Ash Ponds and Desilting Basin." November 22, 2013.

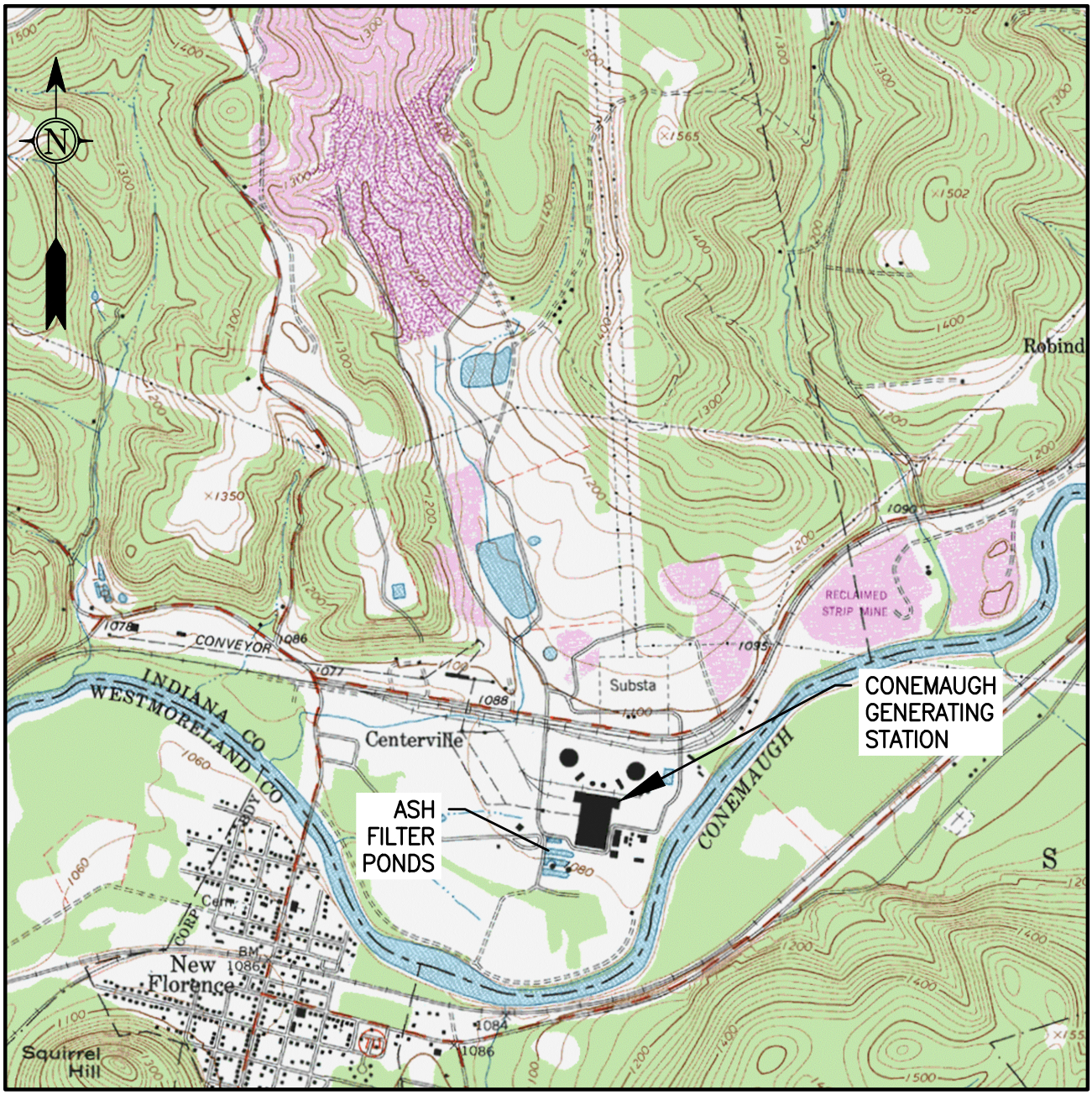
Gilbert Associates, Inc. "Conemaugh Power Station Addition of 4th Ash Filter Pond, As-Built Drawing No. D-782-008." Revised October 10, 1995.

Kimball, L. R., "Conemaugh Station Base Mapping." Drawing No. E-744-3093-0. August 4, 2010.

Raytheon Engineers & Constructors, Inc., "System Description, Ash Water Recycle, Conemaugh Station." May 5, 1995.

Reliant Energy. "Water Balance Diagram, for Conemaugh Station Units 1 & 2." Drawing No. 1942-SK-M-113 SH 2 Rev. 9. February 3, 2006.

FIGURES



REFERENCE:
U.S.G.S. 7.5 MINUTE SERIES
TOPOGRAPHIC QUADRANGLE

NEW FLORENCE, PENNSYLVANIA 1964
REVISED 1993

SCALE 1"=2000'

2000 0 2000

DRAWING TITLE

FIGURE 1 - SITE LOCATION MAP

PROJECT		DRAWN BY:	ISSUE DATE:
ASH FILTER PONDS CONEMAUGH GENERATING STATION INDIANA COUNTY, PENNSYLVANIA	gai consultants	**T.BORING**	**08/06/2026**
		CHECKED BY:	SCALE:
		L. ROUNCE	**AS SHOWN**
CLIENT		APPROVED BY:	SHEET NO.:
KEYSTONE-CONEMAUGH PROJECTS, LLC BLAIRSVILLE, PA		**A.SCHELLER**	**1** OF **1**

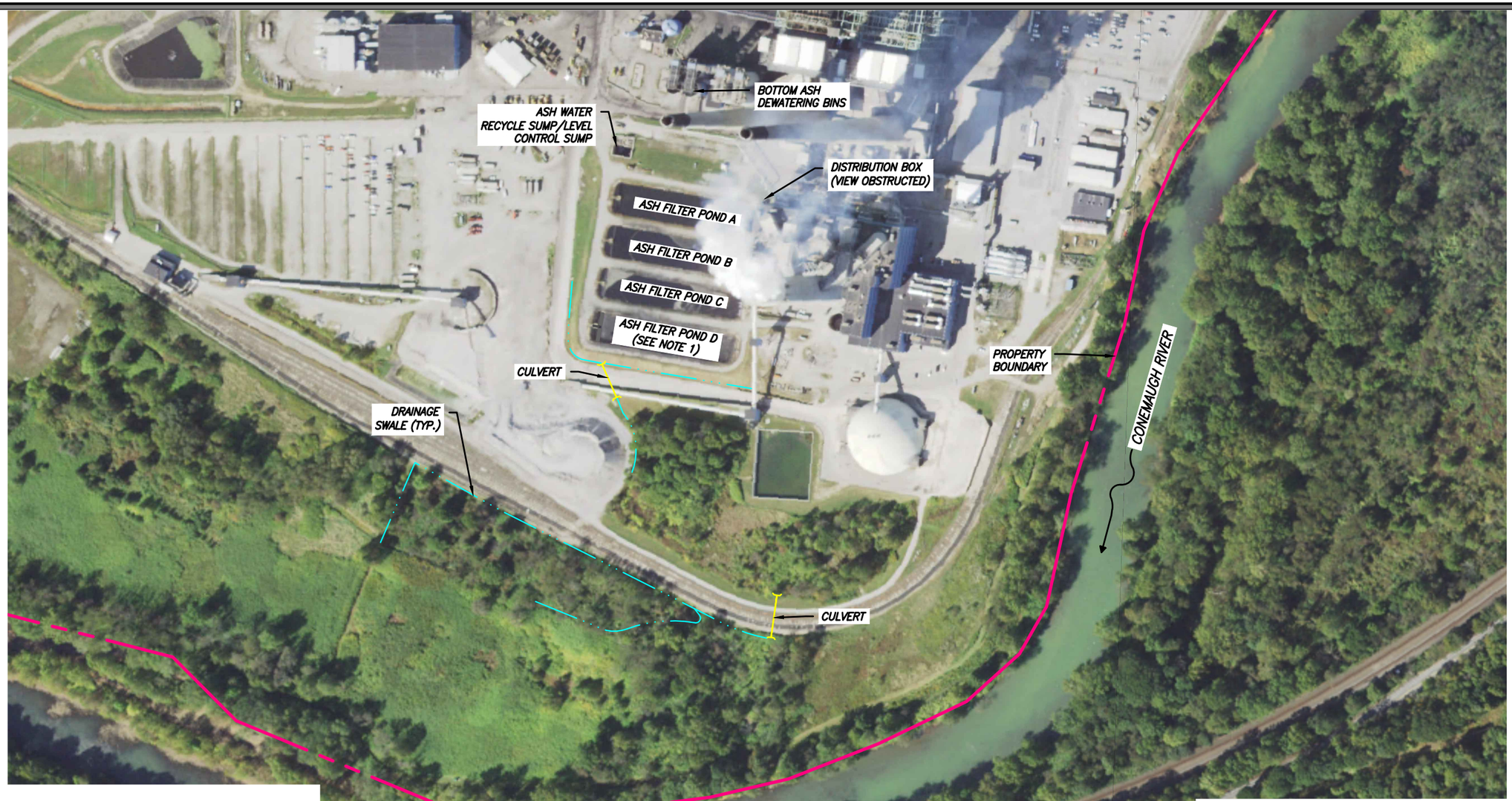
GAI FILE NUMBER:	GAI DRAWING NUMBER:	© 2026 GAI Consultants
C151611-14-C-A2-001-FIG 1	**FIGURE 1**	

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NORTH

NOTES:
1. IN 2024, POND D WAS REMOVED FROM SERVICE, DRAINED, AND CLEANED. POND D IS ISOLATED FROM THE BOTTOM ASH HANDLING SYSTEM AND ONLY RECEIVES STORMWATER THAT FALLS WITHIN ITS FOOTPRINT. STORMWATER WITHIN POND D MAY DRAIN FROM THE POND THROUGH THE EXISTING DEWATERING PIPE.

MAPPING REFERENCE:
AERIAL IMAGERY TAKEN FROM GOOGLE EARTH ON JUNE 11, 2019.

SCALE: 1" = 300'

300 0 300 600

NO.:	DATE:	DRAWN BY:	CHECKED BY:	APPROVED BY:	DESCRIPTION:

REVISION RECORD

DRAWING TITLE
FIGURE 2 - PHOTOGRAPHIC MAP

PROJECT
ASH FILTER PONDS
CONEMAUGH GENERATING STATION
INDIANA COUNTY, PENNSYLVANIA

gai consultants

CLIENT
KEYSTONE-CONEMAUGH PROJECTS, LLC
BLAIRSVILLE, PA

ISSUE DATE:	DRAWN BY:
09/23/2026	S.WOLFE
SCALE:	CHECKED BY:
AS SHOWN	T.BORING
REVISION	APPROVED BY: A.SCHELLER
	SHEET NO.: 1 OF 1

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GAI FILE NUMBER: C151611-14-C-B2-002-FIG 2

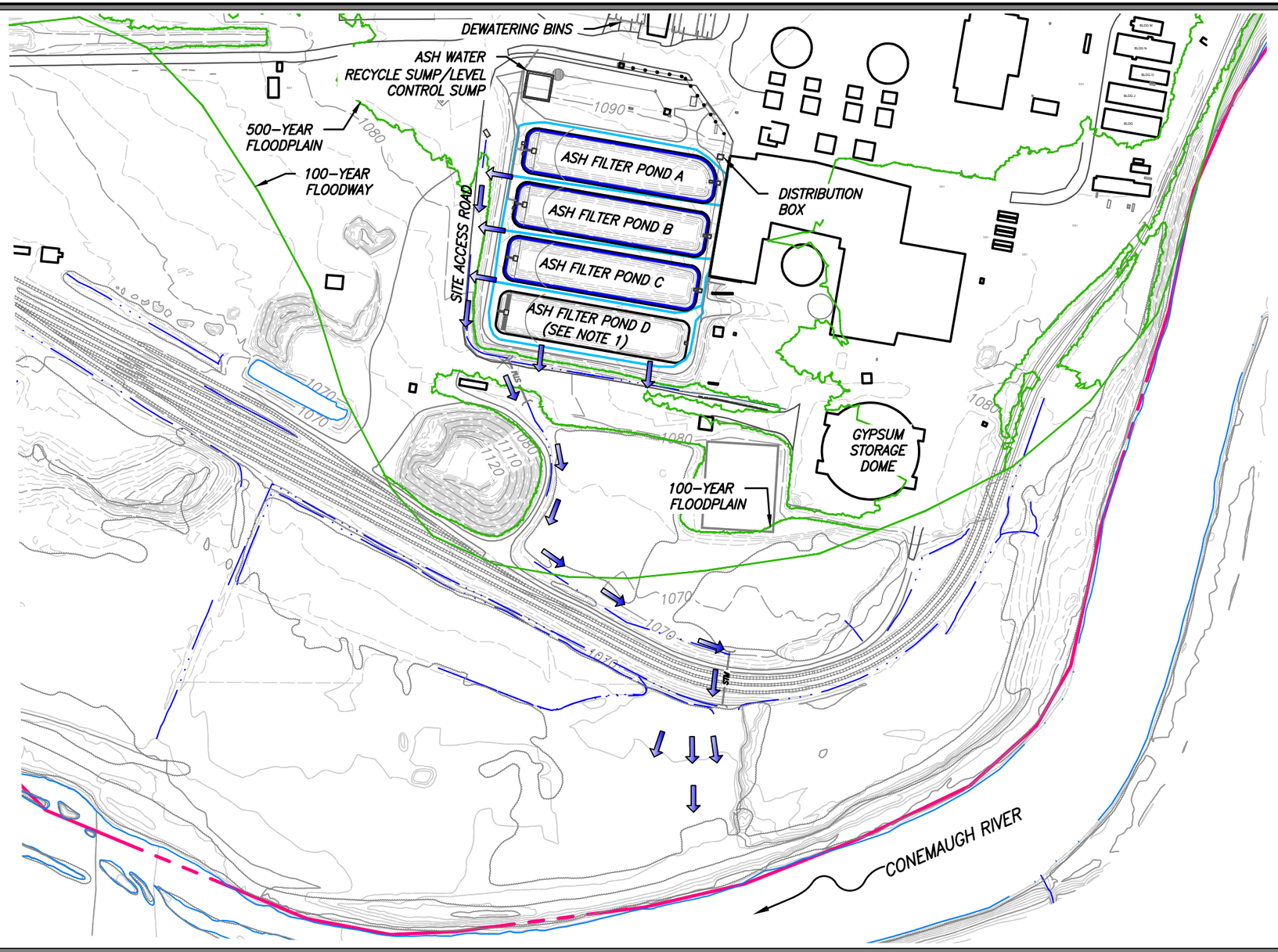
GAI DRAWING NUMBER: FIGURE 2

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NORTH

LEGEND:

- APPROXIMATE STATION PROPERTY BOUNDARY
- 1080 — 2-FOOT TOPOGRAPHIC CONTOUR (SEE REFERENCE 1)
- EXISTING DRAINAGE CHANNEL OR SWALE
- FLOW DIRECTION OF POND CONTENTS UNDER BREACH SCENARIO
- EXISTING STRUCTURE (SEE REFERENCE 1)
- FEMA SPECIAL FLOOD HAZARD AREA (SFHA) LIMITS (REFERENCE 2)
- STM — STORMWATER CULVERT
- APPROXIMATE POND DRAINAGE AREA LIMITS
- NORMAL POND OPERATING WATER LEVEL

NOTES:

1. IN 2024, POND D WAS REMOVED FROM SERVICE, DRAINED AND CLEANED. POND D IS ISOLATED FROM THE BOTTOM ASH HANDLING SYSTEM AND ONLY RECEIVES STORMWATER THAT FALLS WITHIN ITS FOOTPRINT. STORMWATER WITHIN POND D MAY DRAIN FROM THE POND THROUGH THE EXISTING DEWATERING PIPE.

REFERENCES:

1. GROUND SURFACE CONTOURS, EXISTING STRUCTURES AND SITE FEATURES EXTERNAL TO THE ASH FILTER PONDS WERE OBTAINED FROM SITE SURVEY DRAWING NO. E-744-3093-0, "CONEMAUGH STATION BASE MAPPING", BY LR. KIMBALL, DATED 8/4/2010. CONTOURS AND FEATURES AROUND THE ASH FILTER PONDS ARE BASED ON A FIELD SURVEY COMPLETED BY GAI CONSULTANTS, INC. IN 2020.
2. SFHA LIMITS WERE OBTAINED FROM FEMA, NATIONAL MAP HAZARD LAYER, INDIANA COUNTY, PA, 07/17/19.
3. APPROXIMATE CREST ELEVATIONS AND ASH FILTER POND CONFIGURATION IS BASED ON AS-BUILT DRAWINGS FROM THE ASH FILTER POND RETROFIT PROJECT BY GAI IN 2023 AND 2024.

SCALE: 1" = 250'

250 0 250 500

NO.:	DATE:	DRAWN BY:	CHECKED BY:	APPROVED BY:	DESCRIPTION:

REVISION RECORD

DRAWING TITLE: **FIGURE 3 - TOPOGRAPHIC AND FLOW DIRECTION MAP**

PROJECT: **ASH FILTER PONDS**
CONEMAUGH GENERATING STATION
INDIANA COUNTY, PENNSYLVANIA

gai consultants

CLIENT: **KEYSTONE-CONEMAUGH PROJECTS, LLC**
BLAIRSVILLE, PA

ISSUE DATE:	DRAWN BY:
10/07/2026	S.WOLFE
SCALE:	CHECKED BY:
AS SHOWN	T.BORING
REVISION	APPROVED BY: A.SCHELLER
	SHEET NO.: 1 OF 1

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GAI FILE NUMBER: **C151611-04-C-B2-003-FIG 3_New**

GAI DRAWING NUMBER: **FIGURE 3**

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GAI CAD FILE PATH: \\gaiconsultants.local\BUProj\Energy\2015\C151611.14 - Conemaugh CCR 5 Year Peri\CAD\Production DWGs\Hazard Classification Report\C151611-04-C-B2-003-FIG 3_New.dwg

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ATTACHMENT A
Hazard Potential Classification Forms

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CCR SURFACE IMPOUNDMENT
HAZARD POTENTIAL CLASSIFICATION FORM

Facility Name: Conemaugh Generating Station

Unit Name: Ash Filter Pond A

Type of Inspection (Circle One): Initial [Periodic] **Date of Visit:** 10/13/2026

Impoundment Configuration (Circle or Specify): Cross-Valley Side-Hill [Diked] Incised Other: _____

Notes:

1. If the impoundment is entirely incised, hazard potential classification is not necessary.
2. For the purposes of selecting a hazard potential category, this form assigns numeric values to the categories listed in 40 CFR §257.53, as follows:
   1 = Low 2 = Significant 3 = High

I. Risk to Human Life

Pursuant to 40 CFR 257.53, the probable loss of human life results in a High hazard potential rating.

Consideration	Yes	No	N/A	Scoring	Selected Score	Comments
Loss of Human Life *Would a failure or mis-operation of the unit probably cause loss of human life?*	☐	☑	☐	No = 1 Yes = 3	1	

II. Economic Losses

40 CFR 257.53 associates economic loss with a Significant hazard potential rating, except that low economic losses principally limited to the owner's property may be associated with a Low hazard potential rating.

Consideration	Yes	No	N/A	Scoring	Selected Score	Comments
Affected Parties *Would economic losses be principally limited to the surface impoundment owner's property?*	☑	☐	☐	Yes = 1 No = 2	1	Anticipated flow path follows Station property.
Magnitude *Are the anticipated economic losses due to a failure or mis-operation of the impoundment relatively low compared to the resources available to the owner/operator to correct foreseeable impacts?*	☑	☐	☐	Yes = 1 No = 2	1	

III. Environmental Losses

40 CFR 257.53 associates environmental damage with a Significant hazard potential rating, except that low environmental losses principally limited to the owner's property may be associated with Low hazard potential rating.

Feature	Yes	No	N/A	Scoring	Selected Score	Comments
Affected Areas *Would environmental losses be principally limited to the surface impoundment owner's property?*	☑	☐	☐	Yes = 1 No = 2	1	Anticipated flow path follows Station property.
Containment *In the event of a failure or mis-operation, is it likely that the CCR materials would be contained on Station property, eitherby natural features or through reasonably applied remedialmeasures, so as to prevent offsite migration of these materials?*	☑	☐	☐	Yes = 1 No = 2	1	Existing topography and site configuration encourage solids drop out and the spreading and dissipation of flow before exit of Station property.
Restoration *Is it expected that the area(s) impacted by a failure or mis-operation of the impoundment could be readily restored to pre-incident conditions?*	☑	☐	☐	Yes = 1 No = 2	1	
Sensitive Species *Are there any protected or endangered species in the area that would likely be impacted by a failure or mis-operation of the impoundment?*	☐	☑	☐	No = 1 Yes = 2	1	
Wetlands *Are there any jurisdictional or other identified wetlands in the area that would likely be impacted by a failure or mis-operation of the impoundment?*	☐	☑	☐	No = 1 Yes = 2	1	No adverse or lasting impacts to wetlands are anticipated.
Waterways *Are there any navigable streams or rivers that would likely be impacted by a failure or mis-operation of the impoundment?*	☐	☑	☐	No = 1 Yes = 2	1	Appreciable impacts to the Conemaugh River are not anticipated for reasons previously noted above.

CCR SURFACE IMPOUNDMENT
HAZARD POTENTIAL CLASSIFICATION FORM

Facility Name: Conemaugh Generating Station

Unit Name: Ash Filter Pond A

Type of Inspection (Circle One): Initial Periodic **Date of Visit:** 10/13/2026

IV. Lifeline Facilities

40 CFR 257.53 associates disruption of lifeline facilities with a Significant hazard potential rating. The National Weather Service defines lifeline facilities as distributive systems and related facilities necessary to provide electric power, oil and natural gas, water and wastewater, and communications.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Lifeline Facilities *Would a failure or mis-operation likely cause disruption to any distributive systems or facilities that provide electric power, oil and natural gas, water and wastewater, or communication services?*	☐	☑	☐	No = 1 Yes = 2	1	Critical Station infrastructure is located outside of the anticipated inundation area.

V. Other Concerns

40 CFR 257.53 notes the potential for other concerns not specifically identified in the regulation to justify a Significant hazard rating. GAI recognizes probable impacts to "Critical Facilities" as another concern that may trigger a Significant hazard rating. Critical Facilities as identified by the National Weather Service are listed below. Lifeline Facilities are also considered to be Critical Facilities, but are not listed below due to being addressed in Item IV. The inspector shall also consider any other site-specific concerns not previously addressed that may impact the hazard rating, and shall write in any such concerns below.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Critical Facilities *Would failure or mis-operation of the impoundment likely cause damage or sustained closure of any of the following critical facilities? If yes, please specify.*				No (to all) = 1 Yes (to any) = 2	1	
Emergency Response Facilities	☐	☑	☐			
Medical Facilities	☐	☑	☐			
Designated Emergency Shelters	☐	☑	☐			
Transportation	☐	☑	☐			
Telecommunications	☐	☑	☐			
Data centers	☐	☑	☐			
Financial	☐	☑	☐			
Major industrial/commercial	☐	☑	☐			
Other Concerns *Are there any other significant concerns relative to the potential impacts due to the failure or mis-operation of this impoundment? If yes, please specify.*	☐	☑	☐	No = 1 Yes = 2 (Depending on Severity)	1	

IV. Conclusions/Final Rating

The Final Rating is equal to the Maximum of all "Selected Scores" above.

Final Score = 1 (=Maximum "Selected Score" from above)

Hazard Potential Classification = LOW (1 = Low 2 = Significant 3 = High)

Adam B. Scheller
Printed Name

Adam Scheller
Signature*

Assistant Engineering Director, GAI Consultants Inc.
Title / Company

** Signature certifies that the inspection was performed as indicated, and that the information contained herein is true and accurate to the best of the inspector's knowledge.*

CCR SURFACE IMPOUNDMENT
HAZARD POTENTIAL CLASSIFICATION FORM

Facility Name: Conemaugh Generating Station

Unit Name: Ash Filter Pond B

Type of Inspection (Circle One): Initial [Periodic] **Date of Visit:** 10/13/2026

Impoundment Configuration (Circle or Specify): Cross-Valley Side-Hill [Diked] Incised Other: _____

Notes:

1. If the impoundment is entirely incised, hazard potential classification is not necessary.
2. For the purposes of selecting a hazard potential category, this form assigns numeric values to the categories listed in 40 CFR §257.53, as follows:
   1 = Low 2 = Significant 3 = High

I. Risk to Human Life

Pursuant to 40 CFR 257.53, the probable loss of human life results in a High hazard potential rating.

Consideration	Yes	No	N/A	Scoring	Selected Score	Comments
Loss of Human Life *Would a failure or mis-operation of the unit probably cause loss of human life?*	☐	☑	☐	No = 1 Yes = 3	1	

II. Economic Losses

40 CFR 257.53 associates economic loss with a Significant hazard potential rating, except that low economic losses principally limited to the owner's property may be associated with a Low hazard potential rating.

Consideration	Yes	No	N/A	Scoring	Selected Score	Comments
Affected Parties *Would economic losses be principally limited to the surface impoundment owner's property?*	☑	☐	☐	Yes = 1 No = 2	1	Anticipated flow path follows Station property.
Magnitude *Are the anticipated economic losses due to a failure or mis-operation of the impoundment relatively low compared to the resources available to the owner/operator to correct foreseeable impacts?*	☑	☐	☐	Yes = 1 No = 2	1	

III. Environmental Losses

40 CFR 257.53 associates environmental damage with a Significant hazard potential rating, except that low environmental losses principally limited to the owner's property may be associated with Low hazard potential rating.

Feature	Yes	No	N/A	Scoring	Selected Score	Comments
Affected Areas *Would environmental losses be principally limited to the surface impoundment owner's property?*	☑	☐	☐	Yes = 1 No = 2	1	Anticipated flow path follows Station property.
Containment *In the event of a failure or mis-operation, is it likely that the CCR materials would be contained on Station property, eitherby natural features or through reasonably applied remedialmeasures, so as to prevent offsite migration of these materials?*	☑	☐	☐	Yes = 1 No = 2	1	Existing topography and site configuration encourage solids drop out and the spreading and dissipation of flow before exit of Station property.
Restoration *Is it expected that the area(s) impacted by a failure or mis-operation of the impoundment could be readily restored to pre-incident conditions?*	☑	☐	☐	Yes = 1 No = 2	1	
Sensitive Species *Are there any protected or endangered species in the area that would likely be impacted by a failure or mis-operation of the impoundment?*	☐	☑	☐	No = 1 Yes = 2	1	
Wetlands *Are there any jurisdictional or other identified wetlands in the area that would likely be impacted by a failure or mis-operation of the impoundment?*	☐	☑	☐	No = 1 Yes = 2	1	No adverse or lasting impacts to wetlands are anticipated.
Waterways *Are there any navigable streams or rivers that would likely be impacted by a failure or mis-operation of the impoundment?*	☐	☑	☐	No = 1 Yes = 2	1	Appreciable impacts to the Conemaugh River are not anticipated for reasons previously noted above.

CCR SURFACE IMPOUNDMENT
HAZARD POTENTIAL CLASSIFICATION FORM

Facility Name: Conemaugh Generating Station

Unit Name: Ash Filter Pond B

Type of Inspection (Circle One): Initial | Periodic **Date of Visit:** 10/13/2026

IV. Lifeline Facilities

40 CFR 257.53 associates disruption of lifeline facilities with a Significant hazard potential rating. The National Weather Service defines lifeline facilities as distributive systems and related facilities necessary to provide electric power, oil and natural gas, water and wastewater, and communications.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Lifeline Facilities *Would a failure or mis-operation likely cause disruption to any distributive systems or facilities that provide electric power, oil and natural gas, water and wastewater, or communication services?*	☐	☑	☐	No = 1 Yes = 2	1	Critical Station infrastructure is located outside of the anticipated inundation area.

V. Other Concerns

40 CFR 257.53 notes the potential for other concerns not specifically identified in the regulation to justify a Significant hazard rating. GAI recognizes probable impacts to "Critical Facilities" as another concern that may trigger a Significant hazard rating. Critical Facilities as identified by the National Weather Service are listed below. Lifeline Facilities are also considered to be Critical Facilities, but are not listed below due to being addressed in Item IV. The inspector shall also consider any other site-specific concerns not previously addressed that may impact the hazard rating, and shall write in any such concerns below.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Critical Facilities *Would failure or mis-operation of the impoundment likely cause damage or sustained closure of any of the following critical facilities? If yes, please specify.*				No (to all) = 1 Yes (to any) = 2	1	
Emergency Response Facilities	☐	☑	☐			
Medical Facilities	☐	☑	☐			
Designated Emergency Shelters	☐	☑	☐			
Transportation	☐	☑	☐			
Telecommunications	☐	☑	☐			
Data centers	☐	☑	☐			
Financial	☐	☑	☐			
Major industrial/commercial	☐	☑	☐			
Other Concerns *Are there any other significant concerns relative to the potential impacts due to the failure or mis-operation of this impoundment? If yes, please specify.*	☐	☑	☐	No = 1 Yes = 2 (Depending on Severity)	1	

IV. Conclusions/Final Rating

The Final Rating is equal to the Maximum of all "Selected Scores" above.

Final Score = 1 (=Maximum "Selected Score" from above)

Hazard Potential Classification = LOW (1 = Low 2 = Significant 3 = High)

Adam B. Scheller
Printed Name

Adam Scheller
Signature*

Assistant Engineering Director, GAI Consultants, Inc.
Title / Company

** Signature certifies that the inspection was performed as indicated, and that the information contained herein is true and accurate to the best of the inspector's knowledge.*

CCR SURFACE IMPOUNDMENT
HAZARD POTENTIAL CLASSIFICATION FORM

Facility Name: Conemaugh Generating Station

Unit Name: Ash Filter Pond C

Type of Inspection (Circle One): Initial [Periodic] **Date of Visit:** 10/13/2026

Impoundment Configuration (Circle or Specify): Cross-Valley Side-Hill [Diked] Incised Other: _____

Notes:

1. If the impoundment is entirely incised, hazard potential classification is not necessary.
2. For the purposes of selecting a hazard potential category, this form assigns numeric values to the categories listed in 40 CFR §257.53, as follows:
   1 = Low 2 = Significant 3 = High

I. Risk to Human Life

Pursuant to 40 CFR 257.53, the probable loss of human life results in a High hazard potential rating.

Consideration	Yes	No	N/A	Scoring	Selected Score	Comments
Loss of Human Life *Would a failure or mis-operation of the unit probably cause loss of human life?*	☐	☑	☐	No = 1 Yes = 3	1	

II. Economic Losses

40 CFR 257.53 associates economic loss with a Significant hazard potential rating, except that low economic losses principally limited to the owner's property may be associated with a Low hazard potential rating.

Consideration	Yes	No	N/A	Scoring	Selected Score	Comments
Affected Parties *Would economic losses be principally limited to the surface impoundment owner's property?*	☑	☐	☐	Yes = 1 No = 2	1	Anticipated flow path follows Station property.
Magnitude *Are the anticipated economic losses due to a failure or mis-operation of the impoundment relatively low compared to the resources available to the owner/operator to correct foreseeable impacts?*	☑	☐	☐	Yes = 1 No = 2	1	

III. Environmental Losses

40 CFR 257.53 associates environmental damage with a Significant hazard potential rating, except that low environmental losses principally limited to the owner's property may be associated with Low hazard potential rating.

Feature	Yes	No	N/A	Scoring	Selected Score	Comments
Affected Areas *Would environmental losses be principally limited to the surface impoundment owner's property?*	☑	☐	☐	Yes = 1 No = 2	1	Anticipated flow path follows Station property.
Containment *In the event of a failure or mis-operation, is it likely that the CCR materials would be contained on Station property, eitherby natural features or through reasonably applied remedialmeasures, so as to prevent offsite migration of these materials?*	☑	☐	☐	Yes = 1 No = 2	1	Existing topography and site configuration encourage solids drop out and the spreading and dissipation of flow before exit of Station property.
Restoration *Is it expected that the area(s) impacted by a failure or mis-operation of the impoundment could be readily restored to pre-incident conditions?*	☑	☐	☐	Yes = 1 No = 2	1	
Sensitive Species *Are there any protected or endangered species in the area that would likely be impacted by a failure or mis-operation of the impoundment?*	☐	☑	☐	No = 1 Yes = 2	1	
Wetlands *Are there any jurisdictional or other identified wetlands in the area that would likely be impacted by a failure or mis-operation of the impoundment?*	☐	☑	☐	No = 1 Yes = 2	1	No adverse or lasting impacts to wetlands are anticipated.
Waterways *Are there any navigable streams or rivers that would likely be impacted by a failure or mis-operation of the impoundment?*	☐	☑	☐	No = 1 Yes = 2	1	Appreciable impacts to the Conemaugh River are not anticipated for reasons previously noted above.

CCR SURFACE IMPOUNDMENT
HAZARD POTENTIAL CLASSIFICATION FORM

Facility Name: Conemaugh Generating Station

Unit Name: Ash Filter Pond C

Type of Inspection (Circle One): Initial | Periodic **Date of Visit:** 10/13/2026

IV. Lifeline Facilities

40 CFR 257.53 associates disruption of lifeline facilities with a Significant hazard potential rating. The National Weather Service defines lifeline facilities as distributive systems and related facilities necessary to provide electric power, oil and natural gas, water and wastewater, and communications.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Lifeline Facilities *Would a failure or mis-operation likely cause disruption to any distributive systems or facilities that provide electric power, oil and natural gas, water and wastewater, or communication services?*	☐	☑	☐	No = 1 Yes = 2	1	Critical Station infrastructure is located outside of the anticipated inundation area.

V. Other Concerns

40 CFR 257.53 notes the potential for other concerns not specifically identified in the regulation to justify a Significant hazard rating. GAI recognizes probable impacts to "Critical Facilities" as another concern that may trigger a Significant hazard rating. Critical Facilities as identified by the National Weather Service are listed below. Lifeline Facilities are also considered to be Critical Facilities, but are not listed below due to being addressed in Item IV. The inspector shall also consider any other site-specific concerns not previously addressed that may impact the hazard rating, and shall write in any such concerns below.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Critical Facilities *Would failure or mis-operation of the impoundment likely cause damage or sustained closure of any of the following critical facilities? If yes, please specify.*				No (to all) = 1 Yes (to any) = 2	1	
Emergency Response Facilities	☐	☑	☐			
Medical Facilities	☐	☑	☐			
Designated Emergency Shelters	☐	☑	☐			
Transportation	☐	☑	☐			
Telecommunications	☐	☑	☐			
Data centers	☐	☑	☐			
Financial	☐	☑	☐			
Major industrial/commercial	☐	☑	☐			
Other Concerns *Are there any other significant concerns relative to the potential impacts due to the failure or mis-operation of this impoundment? If yes, please specify.*	☐	☑	☐	No = 1 Yes = 2 (Depending on Severity)	1	

IV. Conclusions/Final Rating

The Final Rating is equal to the Maximum of all "Selected Scores" above.

Final Score = 1 (=Maximum "Selected Score" from above)

Hazard Potential Classification = LOW (1 = Low 2 = Significant 3 = High)

Adam B. Scheller
Printed Name


Signature*

Assistant Engineering Director, GAI Consultants, Inc.
Title / Company

** Signature certifies that the inspection was performed as indicated, and that the information contained herein is true and accurate to the best of the inspector's knowledge.*

CCR SURFACE IMPOUNDMENT
HAZARD POTENTIAL CLASSIFICATION FORM

Facility Name: Conemaugh Generating Station

Unit Name: Ash Filter Pond D

Type of Inspection (Circle One): Initial [Periodic] **Date of Visit:** 10/13/2026

Impoundment Configuration (Circle or Specify): Cross-Valley Side-Hill [Diked] Incised Other: _____

Notes:

1. If the impoundment is entirely incised, hazard potential classification is not necessary.
2. For the purposes of selecting a hazard potential category, this form assigns numeric values to the categories listed in 40 CFR §257.53, as follows:
   1 = Low 2 = Significant 3 = High

I. Risk to Human Life

Pursuant to 40 CFR 257.53, the probable loss of human life results in a High hazard potential rating.

Consideration	Yes	No	N/A	Scoring	Selected Score	Comments
Loss of Human Life *Would a failure or mis-operation of the unit probably cause loss of human life?*	☐	☑	☐	No = 1 Yes = 3	1	

II. Economic Losses

40 CFR 257.53 associates economic loss with a Significant hazard potential rating, except that low economic losses principally limited to the owner's property may be associated with a Low hazard potential rating.

Consideration	Yes	No	N/A	Scoring	Selected Score	Comments
Affected Parties *Would economic losses be principally limited to the surface impoundment owner's property?*	☑	☐	☐	Yes = 1 No = 2	1	Anticipated flow path follows Station property.
Magnitude *Are the anticipated economic losses due to a failure or mis-operation of the impoundment relatively low compared to the resources available to the owner/operator to correct foreseeable impacts?*	☑	☐	☐	Yes = 1 No = 2	1	

III. Environmental Losses

40 CFR 257.53 associates environmental damage with a Significant hazard potential rating, except that low environmental losses principally limited to the owner's property may be associated with Low hazard potential rating.

Feature	Yes	No	N/A	Scoring	Selected Score	Comments
Affected Areas *Would environmental losses be principally limited to the surface impoundment owner's property?*	☑	☐	☐	Yes = 1 No = 2	1	Anticipated flow path follows Station property.
Containment *In the event of a failure or mis-operation, is it likely that the CCR materials would be contained on Station property, eitherby natural features or through reasonably applied remedialmeasures, so as to prevent offsite migration of these materials?*	☑	☐	☐	Yes = 1 No = 2	1	Existing topography and site configuration encourage solids drop out and the spreading and dissipation of flow before exit of Station property.
Restoration *Is it expected that the area(s) impacted by a failure or mis-operation of the impoundment could be readily restored to pre-incident conditions?*	☑	☐	☐	Yes = 1 No = 2	1	
Sensitive Species *Are there any protected or endangered species in the area that would likely be impacted by a failure or mis-operation of the impoundment?*	☐	☑	☐	No = 1 Yes = 2	1	
Wetlands *Are there any jurisdictional or other identified wetlands in the area that would likely be impacted by a failure or mis-operation of the impoundment?*	☐	☑	☐	No = 1 Yes = 2	1	No adverse or lasting impacts to wetlands are anticipated.
Waterways *Are there any navigable streams or rivers that would likely be impacted by a failure or mis-operation of the impoundment?*	☐	☑	☐	No = 1 Yes = 2	1	Appreciable impacts to the Conemaugh River are not anticipated for reasons previously noted above.

CCR SURFACE IMPOUNDMENT
HAZARD POTENTIAL CLASSIFICATION FORM

Facility Name: Conemaugh Generating Station

Unit Name: Ash Filter Pond D

Type of Inspection (Circle One): Initial | Periodic **Date of Visit:** 10/13/2026

IV. Lifeline Facilities

40 CFR 257.53 associates disruption of lifeline facilities with a Significant hazard potential rating. The National Weather Service defines lifeline facilities as distributive systems and related facilities necessary to provide electric power, oil and natural gas, water and wastewater, and communications.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Lifeline Facilities *Would a failure or mis-operation likely cause disruption to any distributive systems or facilities that provide electric power, oil and natural gas, water and wastewater, or communication services?*	☐	☑	☐	No = 1 Yes = 2	1	Critical Station infrastructure is located outside of the anticipated inundation area.

V. Other Concerns

40 CFR 257.53 notes the potential for other concerns not specifically identified in the regulation to justify a Significant hazard rating. GAI recognizes probable impacts to "Critical Facilities" as another concern that may trigger a Significant hazard rating. Critical Facilities as identified by the National Weather Service are listed below. Lifeline Facilities are also considered to be Critical Facilities, but are not listed below due to being addressed in Item IV. The inspector shall also consider any other site-specific concerns not previously addressed that may impact the hazard rating, and shall write in any such concerns below.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Critical Facilities *Would failure or mis-operation of the impoundment likely cause damage or sustained closure of any of the following critical facilities? If yes, please specify.*				No (to all) = 1 Yes (to any) = 2	1	
Emergency Response Facilities	☐	☑	☐			
Medical Facilities	☐	☑	☐			
Designated Emergency Shelters	☐	☑	☐			
Transportation	☐	☑	☐			
Telecommunications	☐	☑	☐			
Data centers	☐	☑	☐			
Financial	☐	☑	☐			
Major industrial/commercial	☐	☑	☐			
Other Concerns *Are there any other significant concerns relative to the potential impacts due to the failure or mis-operation of this impoundment? If yes, please specify.*	☐	☑	☐	No = 1 Yes = 2 (Depending on Severity)	1	

IV. Conclusions/Final Rating

The Final Rating is equal to the Maximum of all "Selected Scores" above.

Final Score = 1 (=Maximum "Selected Score" from above)

Hazard Potential Classification = LOW (1 = Low 2 = Significant 3 = High)

Adam B. Scheller
Printed Name

Adam Scheller
Signature*

Assistant Engineering Director, GAI Consultants, Inc.
Title / Company

** Signature certifies that the inspection was performed as indicated, and that the information contained herein is true and accurate to the best of the inspector's knowledge.*