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June 1, 2020

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Laurie Stevenson, Director
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

Dear Ms. Stevenson:

Re: Ohio Valley Electric Corporation
2020 Semi-Annual Selection of Remedy Report

As required by 40 CFR 257.106(h)(9), the Ohio Valley Electric Corporation is providing notification to the Director of the Ohio Environmental Protection Agency that the first Semi-Annual Selection of Remedy report has been completed in compliance with 40 CFR 257.97(a) for Kyger Creek Station's Boiler Slag Pond (BSP). The intent of the report is to provide a six-month update on the progress of selecting a remedy for confirmed Appendix IV SSIs above the groundwater protection standard in the groundwater at the BSP. The report has been placed in the facility's operating record in accordance with 40 CFR 257.105(h)(12), as well as, on the company's publicly accessible internet site in accordance with 40 CFR 257.107(h)(9), which can be viewed at <https://www.ovec.com/CCRCompliance.php>.

If you have any questions, or require any additional information, please call me at (740) 897-7768.

Sincerely,

A handwritten signature in black ink that reads "Tim Fulk". The signature is written in a cursive, slightly slanted style.

Tim Fulk
Engineer II

TLF:klr

Semiannual Report on the Progress of Remedy Selection

40 CFR 257.97(a)

Boiler Slag Pond

Kyger Creek Station
Cheshire, Ohio

May 2020

Prepared by: Ohio Valley Electric Corporation
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1 INTRODUCTION

In accordance with 40 CFR § 257.97(a), the Ohio Valley Electric Corporation (OVEC) has prepared this Semi-Annual report to document progress toward remedy selection, design and implementation of corrective actions associated with groundwater monitoring exceedances at the Kyger Creek Station's Boiler Slag Pond (BSP). This report summarizes activities during the period of December 6, 2019, through June 6, 2020. Updates to the report will be published semi-annually, until such time a remedy has been selected. Upon selection, a final report will be prepared describing the selected remedy and how it meets the standards specified in the rule.

1.1 REGULATORY BACKGROUND

On December 19, 2014, the United States Environmental Protection Agency (U.S. EPA) issued their final Coal Combustion Residuals (CCR) regulation which regulates CCR as a non-hazardous waste under Subtitle D of Resource Conservation and Recovery Act (RCRA) and became effective six (6) months from the date of its publication (April 17, 2015) in the Federal Register, referred to as the "CCR Rule." The rule applies to new and existing landfills, and surface impoundments used to dispose of or otherwise manage CCR generated by electric utilities and independent power producers. The rule includes requirements for monitoring groundwater and assessing corrective measures if constituents listed in Appendix IV of the rule are detected in groundwater samples collected from downgradient monitoring wells at Statistically Significant Levels (SSL) greater than the established GWPS.

In May 2019, OVEC initiated an Assessment of Corrective Measures (ACM) at the Kyger Creek BSP as a result of a confirmed SSL of Appendix IV constituent Arsenic in monitoring well KC-15-07 during September 2018 Assessment Monitoring Activities, as required by 40 CFR § 257.97(a). In accordance with 40 CFR § 257.96(a), OVEC prepared an ACM report for the Kyger Creek BSP. It was placed in the facility's operating record and uploaded to OVEC's Publicly Accessible Internet Site on September 19, 2019. The ACM Report provided an assessment of the effectiveness of potential corrective measures in achieving the criteria provided in 40 CFR § 257.96(c). Multiple strategies were evaluated to address groundwater exhibiting concentrations of Arsenic above the GWPS, with two technically feasible options identified. Both feasible options require dewatering of the pond, followed by the execution of an engineered cap and closure of the BSP facility, and are as follows:

- Monitored Natural Attenuation (MNA); and
- Conventional Vertical Well System (Groundwater Extraction and Treatment) (Ex-Situ)

Following the completion of the ACM Report, OVEC hosted a public meeting to present the options for remediation on November 6, 2019, in Gallipolis, Ohio. OVEC then

observed a 30-day public comment period, per 40 CFR § 257.97(a), prior to beginning the process of selecting a remedy. No comments were received during this time period.

Semi-annual reports are required pursuant to 40 CFR § 257.97(a) to document progress toward remedy selection and design. The CCR Rule provides flexibility for more field investigation, data analysis and consideration prior to the selection of a remedy. OVEC will continue to review new data as it becomes available and implement changes to the groundwater monitoring and corrective action program as necessary to maintain compliance with the rule.

1.2 REPORT CONTENTS

The first semi-annual progress report provides regulatory background, an overview of site characteristics and ACM findings, and summarizes activities supporting the selection and implementation of a remedy during the period of December 6, 2019, through June 6, 2020.

2 SITE BACKGROUND

The Kyger Creek Station, located in Cheshire, Ohio, is a 1.1-gigawatt coal-fired generating station operated by OVEC. The Kyger Creek Station has five (5), 217-megawatt generating units and has been in operation since 1955. CCRs were sluiced to surface impoundments located in the plant site since it began operation. The Kyger Creek BSP is located at the south end of the Kyger Creek Station and is approximately 32 acres in size. The BSP was built to serve as a process and disposal area for coal combustion waste products generated at the station. Overflow from the BSP is carried into a reinforced concrete intake structure at the south end of the Boiler Slag Complex. Water entering the intake structure is discharged into the Clearwater Pond. Built in 1980, the Clearwater Pond is approximately nine (9) acres in size and is located to the southwest end of BSP. The Clearwater Pond is not a CCR unit and monitoring is not required.

2.1 UNIT SPECIFIC GEOLOGY AND HYDROGEOLOGY

Available data show, deposits of silts and clays beneath the base of the BSP range from 15 to over 50 feet thick. The silts and clays transition to a layer of sand and gravel where groundwater is present. Based on previously reported physical properties and yield, the sand and gravel unit was determined to be the uppermost aquifer beneath the BSP and is located more than five (5) feet beneath the bottom of the BSP as required by the CCR Rule. Water level data from the existing wells illustrate groundwater flowing primarily toward the south and southwest.

Regional groundwater flows to the south and southeast towards the Ohio River. Local groundwater flow beneath the BSP generally flows from the northwest to the south and southeast towards the Ohio River. During periods when the water level in the Ohio River rises significantly and flooding occurs, groundwater flow in the uppermost aquifer will temporarily reverse with groundwater flowing toward the north and east beneath the BSP. This flow reversal is evident in groundwater levels measured in February 2018.

2.2 POTENTIAL RECEPTOR REVIEW

OVEC completed an assessment of the proximity of public and private drinking water supplies to the BSP in response to SSLs above the GWPS. It was determined that the closest withdrawal wells designated by the Ohio Department of Natural Resources (ODNR) as drinking water wells were located greater than one mile from the facility, and were not hydraulically connected to the groundwater at the BSP facility.

3 GROUNDWATER ASSESSMENT MONITORING PROGRAM

Groundwater assessment monitoring for the Kyger Creek BSP is conducted in accordance with 40 CFR § 257.95.

3.1 GROUNDWATER MONITORING WELL NETWORK

In compliance with 40 CFR § 257.91, the CCR groundwater monitoring network for the BSP consists of the following eight (8) wells:

- KC-15-01 (Upgradient);
- KC-15-02 (Upgradient);
- KC-15-03 (Upgradient);
- KC-15-04 (Downgradient);
- KC-15-05 (Downgradient);
- KC-15-06 (Downgradient);
- KC-15-07 (Downgradient); and
- KC-15-08 (Downgradient).

Additionally, three (3) monitoring wells that were installed as part of the additional assessment activities for the BSP were added to the CCR groundwater monitoring network for the BSP as follows:

- KC-19-27 (Downgradient);
- KC-19-28 (Downgradient); and
- KC-19-29 (Downgradient).

3.2 GROUNDWATER CHARACTERIZATION

Groundwater assessment monitoring was first conducted at the Kyger BSP during September 2018 sampling. Arsenic, an Appendix IV constituent, was detected and confirmed to exceed the GWPS of 10 µg/L at well KC-15-07. In response, OVEC was required to characterize the extent of the release, pursuant to 40 CFR § 257.95(g)(1), and installed additional monitoring wells at the property boundary (wells KC-19-27, KC-19-28, KC-19-28). It was determined that Arsenic was not leaving the property at levels higher than the GWPS, and therefore the potential remediation zone was confined to the BSP complex (AGES, 2019).

4 ASSESSMENT OF CORRECTIVE MEASURES

In accordance with 40 CFR § 257.96(a), OVEC prepared an ACM report for the Kyger Creek BSP and placed it in the facility's operating record. It was uploaded to OVEC's Publicly Accessible Internet Site on September 19, 2019. The ACM Report provided an assessment of the effectiveness of potential corrective measures in achieving the criteria provided in 40 CFR § 257.96(c).

4.1 PLANNED SOURCE CONTROL MEASURES

Per 40 CFR § 257.96(a), the objectives of the corrective measures evaluated in this ACM Report are "to prevent further releases, to remediate any releases, and to restore affected area to original conditions." As required in 40 CFR § 257.97(b), corrective measures, at minimum, must:

- (1) Be protective of human health and the environment;*
- (2) Attain the groundwater protection standard as specified pursuant to § 257.95(h);*
- (3) Control the source(s) of releases so as to reduce or eliminate, to the maximum extent feasible, further releases of constituents in Appendix IV to this part into the environment;*
- (4) Remove from the environment as much of the contaminated material that was Released from the CCR unit as is feasible, taking into account factors such as avoiding in appropriate disturbance of sensitive ecosystems;*
- (5) Comply with standards for management of wastes as specified in § 257.98(d).*

During the ACM development process, several in-situ and ex-situ remedial technologies were evaluated to address Arsenic in groundwater at the BSP, and screened against evaluation criteria requirements in 40 CFR § 257.96(c). The two (2) technologies that

appear to be most technically feasible, and therefore most likely for selection as a remedy were:

- Monitored Natural Attenuation; and
- Conventional Vertical Well System (Groundwater Extraction) (Ex-Situ).

Both feasible options require dewatering of the pond, followed by the execution of an engineered cap and closure of the BSP facility. OVEC is committed to continued compliance with the requirements and timeframes of the CCR Rule, and will close the Kyger BSP in accordance with 40 CFR § 257.102 prior to implementation of further groundwater remediation measures. OVEC, with the assistance of its Qualified professional Engineer, has evaluated its site and available resources, and determined that no alternative capacity is available to receive the boiler slag. As a result, closure of the BSP will not commence until OVEC has constructed alternative capacity. This will likely involve the construction of concrete dewatering tanks and a new lined low volume waste pond in the immediate area of the existing BSP in order to manage Kyger Creek Station's boiler slag waste stream and other non-CCR low volume waste waters. Once the proposed equipment and management ponds are operational, the BSP can be removed from operation and closure operations will be completed. A projected date for final closure and ceasing operation is unknown at this time, and subject to USEPA approval.

The initial closure methods described above will reduce the potential for releases and migration of CCR constituents. Groundwater assessment monitoring as required by 40 CFR § 257.96(b) will continue until a remedy is selected and implemented. The monitoring will be conducted to track changes in groundwater conditions as a result of these closures and operational changes. These data will also be considered in the selection and design of a remedy in accordance with 40 CFR § 257.97.

4.2 POTENTIAL REMEDIAL TECHNOLOGIES

As a source control measure, the Kyger Creek BSP will be closed in accordance with CFR § 257.102 prior to implementation of further groundwater remediation efforts. In addition to source control measures, two primary strategies were identified to address groundwater exhibiting concentrations of Arsenic above the GWPS, including:

- Monitored Natural Attenuation; and
- Conventional Vertical Well System (Groundwater Extraction) (Ex-Situ).

The ACM report titled "Kyger Creek BSP- Assessment of Corrective Measures Report" (AGES, 2019), which is available on OVEC's publicly accessible internet site, provides a more detailed description of these corrective measures. The effectiveness of each potential corrective measure was assessed in accordance with 40 CFR § 257.96 (c), and both options listed above are considered technically feasible, and appropriate for groundwater remediation efforts at the BSP.

5 SELECTION OF REMEDY: CURRENT PROGRESS

As noted in the ACM Report, OVEC determined that source control would be best achieved by leaving the CCR material in place and installing a CCR compliant cap system.

During the period covered by this semi-annual report, OVEC evaluated the construction duration and constraints associated with closure in place. A preliminary cost estimate and project schedule has been developed for this portion of corrective measure activities.

OVEC's hydrogeologist conducted the semi-annual groundwater sampling and testing during this report period. In addition to sampling the monitoring wells in the CCR groundwater monitoring network, the sentinel wells installed to aid in ACM activities were also sampled. A total of 11 wells (8 Network and 3 Sentinel) were sampled near the BSP and the results summarized in the report, "2019 – Kyger Creek CCR Annual Groundwater Monitoring and Corrective Action Report, (AGES, 2020)"

5.1 PLANNED WORK

OVEC's consultant or hydrogeologist will sample and test all of the monitoring wells as part of the semi-annual requirement.

OVEC will file a site-specific extension request with US EPA to identifying a technically feasible timeline for closure of the BSP since there is no alternative capacity to receive the CCR and non-CCR waste streams.

OVEC and their CCR hydrogeologist will continue evaluate the technology options identified in the ACM, and engage the site's Qualified Professional Engineer to ensure the alternatives meet the criteria set forth in 40 CFR 257.97.

OVEC will submit the next progress report by December 6, 2020.

A final report will be prepared after the remedy is selected. This report will describe the proposed solution and how it meets the standards specified in 40 CFR § 257.97(b) and 257.97(c). Recordkeeping requirements specified in 40 CFR § 257.105(h), notification requirements specified in 40 CFR § 257.106(h), and internet requirements specified in 40 CFR § 257.107(h) will be complied with as required by 40 CFR § 257.96(f).