Message

From: gcoriell@ovec.com [gcoriell@ovec.com]
Sent: 11/17/2020 7:09:50 PM
To: Hillyer, Kirsten [hillyer.kirsten@epa.gov]; Behan, Frank [Behan.Frank@epa.gov]
Subject: Fw: Submission of Demonstration for a Site-specific Alternative to Initiation of Closure Deadline for the Indiana-Kentucky Electric Corporation's Clifty Creek Station - Revision 1
Attachments: Clifty CCR Closure Extension_Rev1 November 17 2020.pdf

Ms. Hillyer/Mr. Behan:

Please see the email below pertaining to the submission of the revised demonstration for a site-specific alternative to initiation of closure deadline being submitted on behalf of the Indiana-Kentucky Electric Corporation's Clifty Creek Station.

Thanks!

Gabriel S. Coriell
Environmental Services Manager
Environmental Affairs
Ohio Valley Electric Corp.
Indiana-Kentucky Electric Corp.
Phone: (740) 289-7267
Cell: Ex. 6 Personal Privacy (PP)
Fax: (740) 897-7731
E-mail: gcoriell@ovec.com

"Work SAFE today, someone will need you tomorrow!"
----- Forwarded by Gabriel S. Coriell/OVEC/US on 11/17/2020 02:05 PM -----

From: Gabriel S. Coriell/OVEC/US
To: "Huggins, Richard" <Huggins.Richard@epa.gov>
Date: 11/17/2020 02:01 PM
Subject: Submission of Demonstration for a Site-specific Alternative to Initiation of Closure Deadline for the Indiana-Kentucky Electric Corporation's Clifty Creek Station - Revision 1

Mr. Huggins:

Attached below is the revised demonstration for a site-specific alternative to initiation of closure deadline being submitted on behalf of the Indiana-Kentucky Electric Corporation's Clifty Creek Station, which incorporates the feedback from your team provided on October 29, 2020. The list below provides an overview of the revisions made to the demonstration and the applicable section where the revised language/information can be found.

Updates to Clifty demonstration:

- Updated List of Abbreviations to capture updates made to the text (including adding BSHS)
- Section 2.1
  - Relocated Table 2-1

    - Added text describing IDEM's intent to use the Restricted Waste Site (RWS) regulations to review the WBSP closure design and permit the activities as a Type I RWS , which will require close coordination with IDEM
- Section 2.1.2
    - Added estimated average stormwater flows for 10-year, 24-event to Table 2-3
- Section 2.1.5
    - Added text describing effort required to haul CCR and non-CCR wastestreams to offsite POTW for disposal. This includes number of trucks (assuming a 7,500 gallon capacity) required for each wastestream each day.
    - Added text describing why the East Area Runoff Collection Pond cannot treat these flows without continued use of the WBSP.
    - Table 2-4
        - Added text describing business factors which led IKEC not to select Conversion to Dry Handling (made similar update in Table 2-5)
        - Updated text for Temporary Treatment System to describe daily flows which would need to be treated rather than comparing to new LVWTS design
- Section 2.1.6
    - Added language to describe considerations for building BSHS and LVWTS on top of existing CCR as well as references to new figures included in Appendices A and D
    - Re-organized text to include all preliminary design considerations above the bulleted list of primary scope items
    - Added diversion of stormwater around LRCP to list of primary scope items
- Section 2.1.8
    - Updated compliance dates to match schedule and other sections of the report
    - Updated frac tank quantities to tie back to average daily flows of CCR and non-CCR wastestreams
    - Added text describing potential schedule impacts which could result from permitting process due to Type I RWS approach
- Section 2.3
    - Removed references to construction production rates
- Section 4 – added text noting that IKEC will update the pond closure plans once the demonstration is approved
- Appendix A – Added plan and sections of BSHS location within pond and BSHS preliminary tank design
- Appendix B
    - Updated water balance to show that the East Area Runoff Collection Pond flow goes to the WBSP as is current operation and
    - Revised FGD waste sump flow based to reflect more current flow values (reduced)
- Appendix C – re-printed schedule to show task bars for items occurring between 2020-2023
- Appendix D - Added plan and sections of LVWTS

This submittal is being submitted pursuant to 40 C.F.R. § 257.103(f)(1) for the two CCR surface impoundments (West Boiler Slag Pond and Landfill Runoff Collection Pond) located at the Clifty Creek Station, and is being provided for your review, consideration, and subsequent approval.

This email transmittal is being submitted to Kirsten Hillyer, Frank Behan, and Richard Huggins separately due to internal email server constraints. In addition, the demonstration will be posted to the facility's CCR Rule Compliance Data and Information website for reference. Notification of the placement of the demonstration on the CCR Rule Compliance Data and Information website will be provided to the Commissioner of the Indiana Department of Environmental Management as a courtesy.

If you have any questions regarding this submittal, please contact either Mike Brown, Environmental, Safety & Health Director, at 740-289-7299, or myself at 740-289-7267.

Gabriel S. Coriell
Environmental Services Manager
Environmental Affairs
Ohio Valley Electric Corp.
Indiana-Kentucky Electric Corp.
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Cell: Ex. 6 Personal Privacy (PP)
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E-mail: gcoriell@ovec.com

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