Stantec Consulting Services Inc.
11687 Lebanon Road, Cincinnati OH 45241-2012

September 4, 2020 File: 175534017

Ohio Valley Electric Corporation
Indiana-Kentucky Electric Corporation
Attention: Mr. Tim Fulk
3932 U.S. Route 23
P.O. Box 468
Piketon, Ohio 45661

**Reference: Groundwater Sampling and Analysis Compliance**
**Boiler Slag Pond**
**EPA Final Coal Combustion Residuals (CCR) Rule**
**Kyger Creek Station**
**Cheshire, Gallia County, Ohio**

Dear Mr. Fulk,

This letter is to meet the intent of 40 CFR 257.105(h)(11), "Documentation prepared by the owner or operator recording the public meeting for the corrective measures assessment as required under §257.96(e)."

The Boiler Slag Pond at the Kyger Creek Station is in groundwater assessment monitoring under 40 CFR 257.95 of the *Disposal of Coal Combustion Residuals from Electric Utilities* rule (CCR Rule) signed by the U.S. Environmental Protection Agency (EPA) Administrator on December 19, 2014 and published in the Federal Register on April 17, 2015. Applied Geology and Environmental Science, Inc. (AGES) of Clinton, Pennsylvania prepared an assessment of corrective measures (ACM) report for the Boiler Slag Pond in September 2019. Ohio Valley Electric Corporation (OVEC) posted the ACM report to the publicly accessible internet and operating record on September 19, 2019. OVEC also sent a letter indicating the availability of the report to the director of the Ohio EPA.

Under the requirements of 40 CFR 257.96(e), "the owner or operator must discuss the results of the corrective measures assessment at least 30 days prior to the selection of remedy, in a public meeting with interested and affected parties."

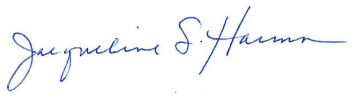
The Kyger Creek Station held an informational open house to discuss the results of the ACM activities at the Boiler Slag Pond on November 6, 2019. It was held at the Gallia County Senior Resource Center, 1167 State Route 160, Gallipolis, Ohio 45631. The Gallipolis Daily Tribune posted the advertisement for the open house beginning on October 22, 2019. A copy of the advertisement is included as Attachment A. Representatives from OVEC, the Kyger Creek Station, AGES, and Stantec were present. The sign-in sheet from the public meeting is provided as Attachment B. Attachment C contains the posters presented and discussed by the representatives at the meeting.

Stantec appreciates the opportunity to support OVEC and the Kyger Creek Station as they strive to meet the CCR Rule. Please feel free to contact me with questions or concerns at (513) 842-8200.

**Reference:** **Groundwater Sampling and Analysis Compliance**
**Boiler Slag Pond**
**EPA Final Coal Combustion Residuals (CCR) Rule**
**Kyger Creek Station**
**Cheshire, Gallia County, Ohio**

Regards,

**Stantec Consulting Services Inc.**



**Jacqueline Harmon** P.E.
Senior Associate
Phone: 513-842-8200 ext. 8220
Jacqueline.Harmon@stantec.com

Attachments: Attachment A – Advertisement, Gallipolis Daily Tribune (October 22, 2019)
Attachment B – Open House Sign-In Sheet (November 6, 2019)
Attachment C - Presentation Posters (November 6, 2019)

c. G. Coriell, OVEC
A. Hope, Kyger Creek Station
R. King, AGES

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# ATTACHMENT A

## Advertisement, Gallipolis Daily Tribune

## (October 22, 2019)

# Ohio Valley Electric Corporation - CCR Public Meeting - November 6

## 1167 State Route 160
## Gallipolis, OH 45631
### (Gallia County Senior Resource Center)

## Kyger Creek Station

## CCR Public Meeting

Ohio Valley Electric Corporation is holding an informational open house to discuss the results of Assessment of Corrective Measures activities completed at Kyger Creek Station's Boiler Slag Pond in accordance with 40 CFR 257.96(e).

Location: Gallia County Senior Resource Center 1167 State Route 160
Gallipolis, Ohio 45631

Date: November 6, 2019

Time: 6:00 pm - 7:30 pm

Format: The informational open house provides residents the opportunity to meet and talk with plant representatives in an open forum. There will be no formal presentation. Visitors may come and go at any time during the open house. Residents can offer observations, ask questions and learn more about the monitoring that has taken place and feasible mitigation options. Mail inquiries may be sent to the following address:

Ohio Valley Electric Corporation
ATTN: Gabe Coriell
PO Box 468
Piketon, Ohio 45661

OVEC/IKEC

OH-70154110

Oct 22, 2019. Ohio Valley Electric Corporation - CCR Public Meeting - November 6 Events Ads from Gallipolis Daily Tribune

# ATTACHMENT B

## Open House Sign-In Sheet

## (November 6, 2019)

*The Kyger Creek BSP CCR Public Meeting did not receive attendees from the Public

**Ohio Valley Electric Corporation**
**CCR Public Meeting- Kyger BSP**
**November 6, 2019**

| Name | Address | City | State | Zip | Group Affiliation |
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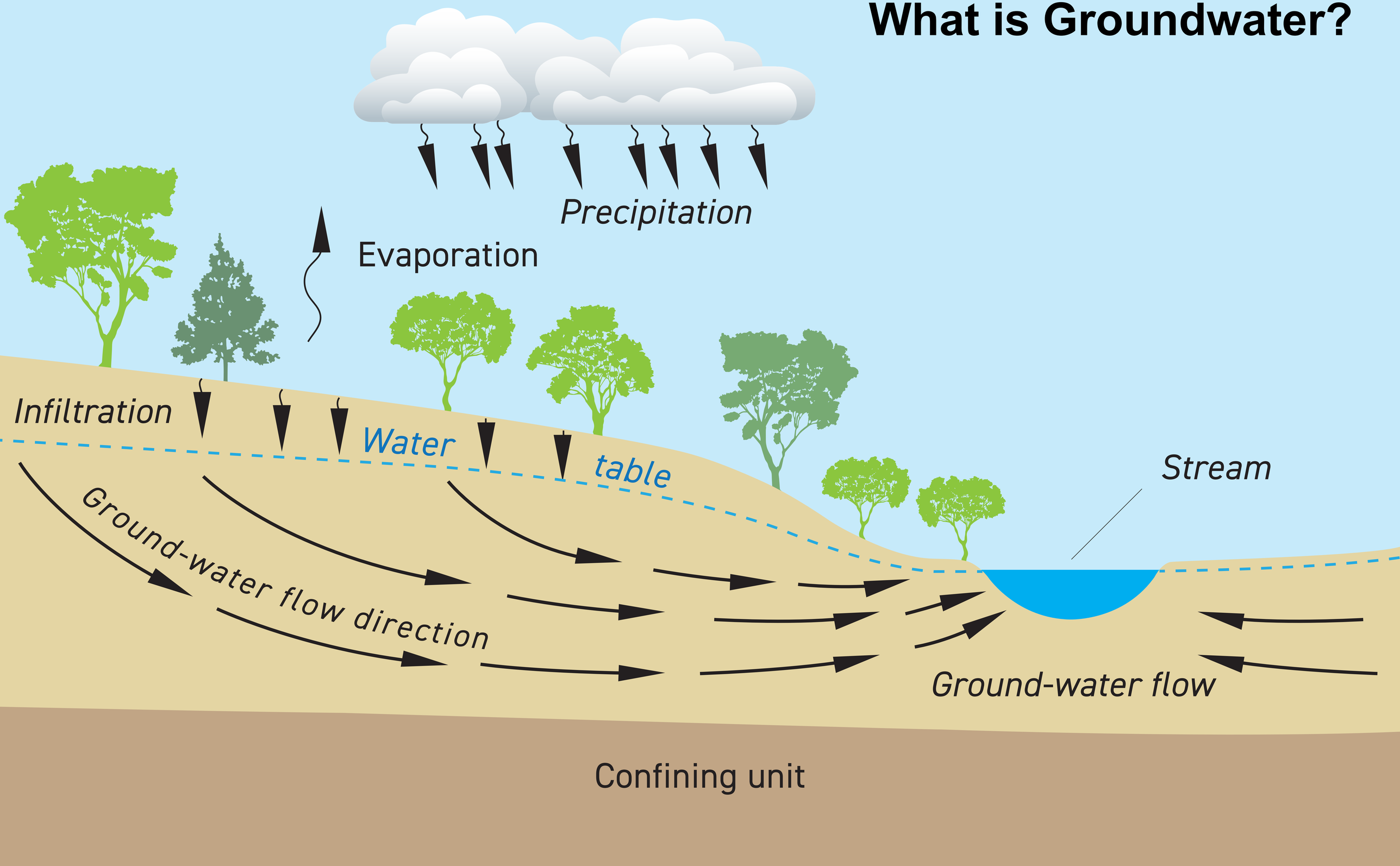
OVEC/IKEC
Ohio Valley Electric Corporation / Indiana-Kentucky Electric Corporation

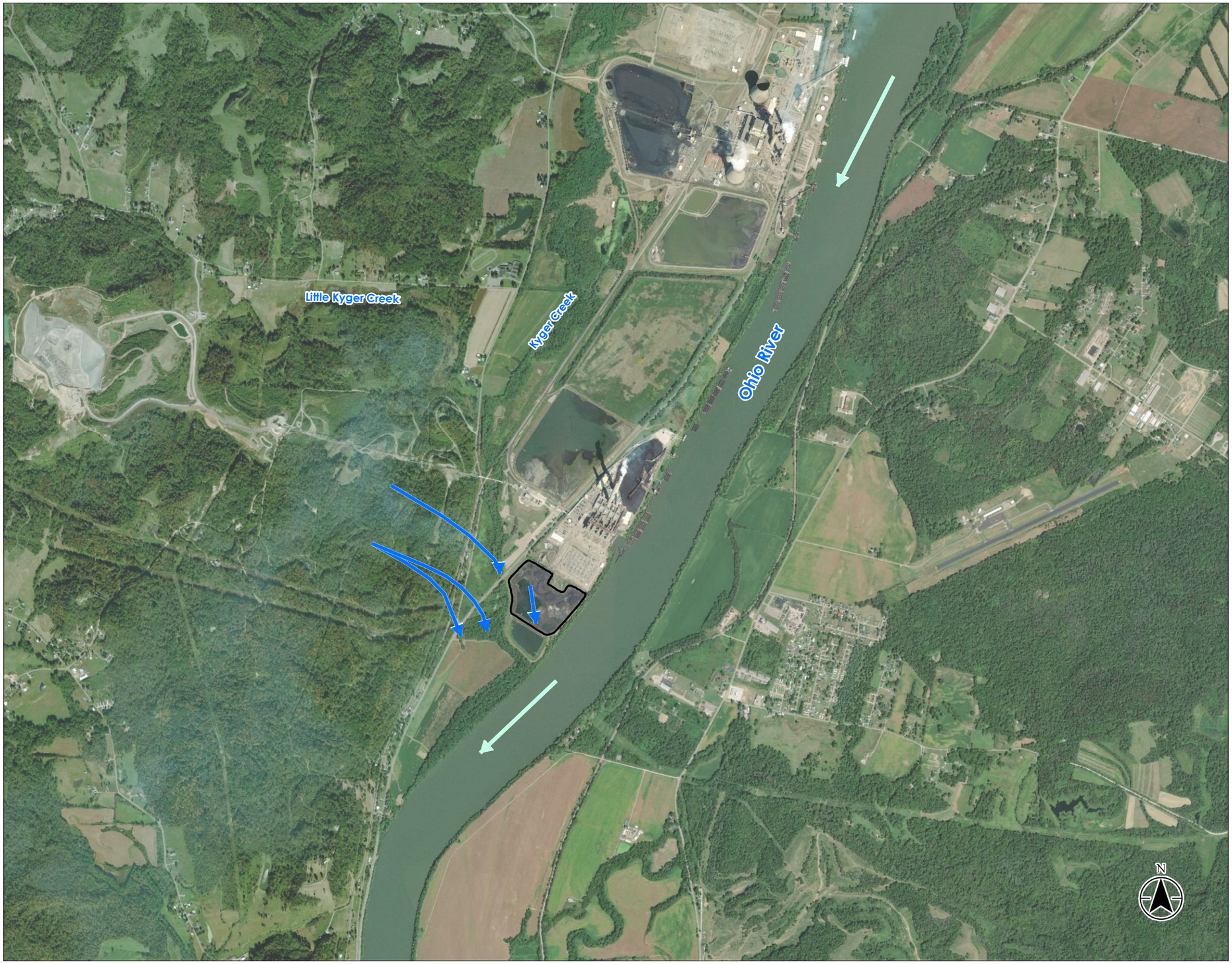
# ATTACHMENT C

## Presentation Posters

## (November 6, 2019)

# What is Groundwater?



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Legend

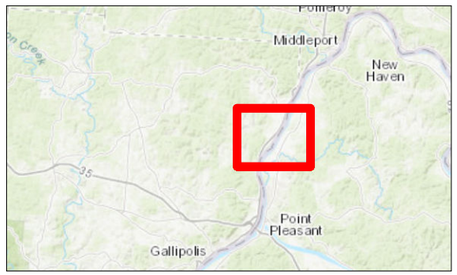
General Direction of Groundwater Flow

CCR Unit

0 1 Miles

**Notes** 1:24,000 (At original document size of 11x17)

1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Base features - ESRI
3. Ortho-Imagery does not represent current conditions.



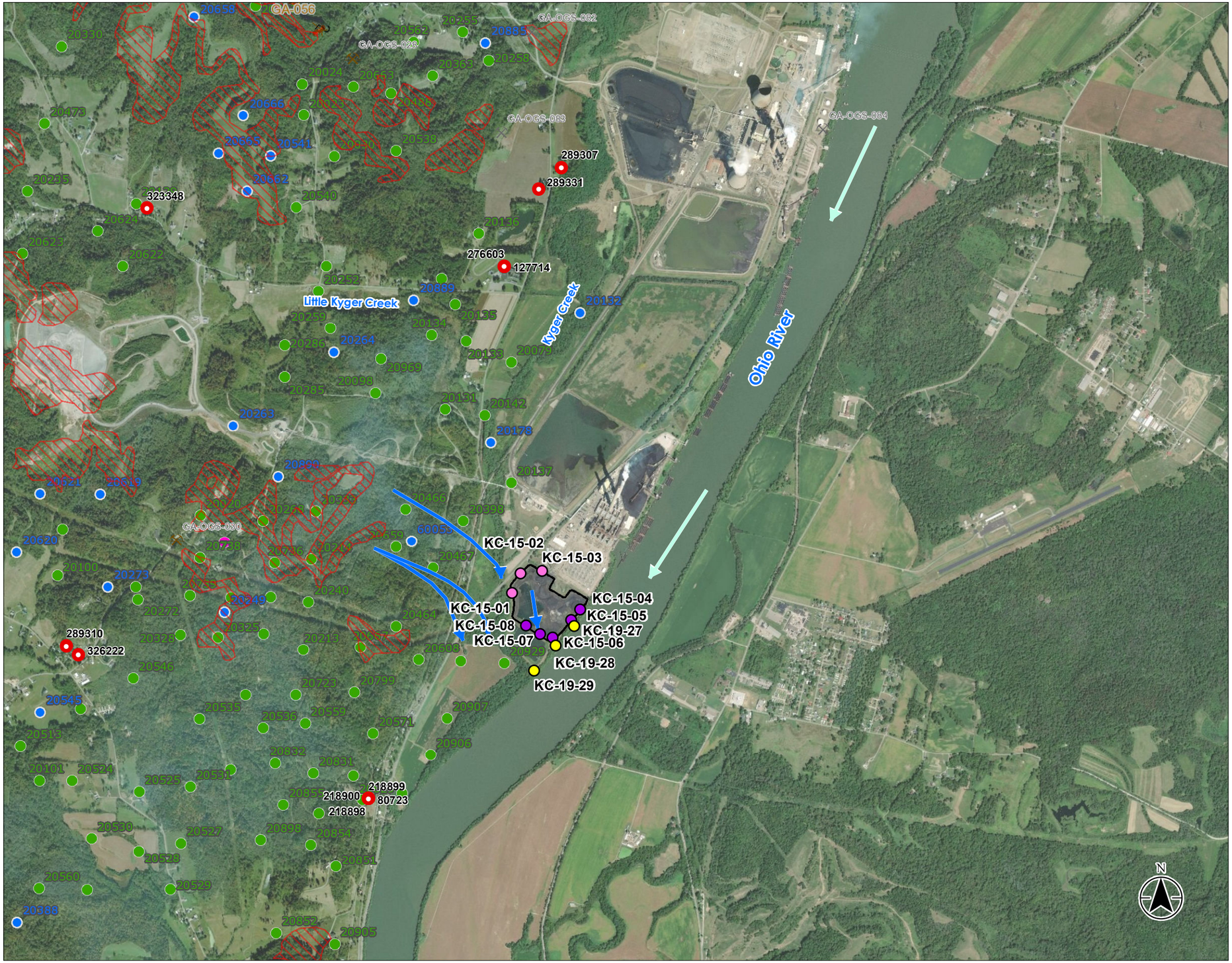

Project Location
Kyger Creek Station
Gallia County, OH

175534017
Prepared by AP on 10/28/2019
Technical Review by JH on 10/28/2019
Independent Review by SH on 10/28/2019

Client/Project
Ohio Valley Electric Corporation
Boiler Slag Pond

Figure No.
1

Title
**Areal Groundwater**

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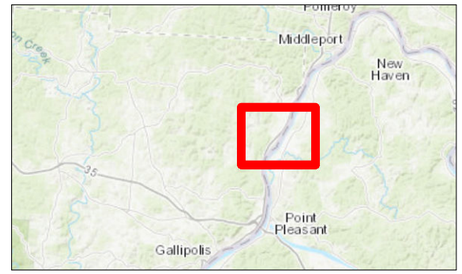
Legend

- Private Wells
- CCR Well - Downgradient
- CCR Well - Sentinel
- CCR Well - Upgradient / Background
- O/G Directional Bottom Hole Permitted
- O/G Directional Bottom Hole Producing
- O/G Directional Bottom Hole Plugged
- General Direction of Groundwater Flow
- Surface Mining
- CCR Unit

0 1 Miles

**Notes** 1:24,000 (At original document size of 11x17)

1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Base features - ESRI
3. Ortho-Imagery does not represent current conditions.
4. ODNR - Private Wells 2017
5. The nearest municipal water wells are located 3.74 miles downstream of the Boiler Slag Pond.
6. Monitoring and dewatering wells owned by Kyger Creek or Gavin Power Plants are not shown.
7. Legend (OIT_Services/MinesOfOhio) https://gis.ohiodnr.gov/ArcGIS/rest/services/OIT_Services/MinesOfOhio/MapServer/legend
8. Legend (DOG_Services/Oilgas_Wells_10_JS_TEST) https://gis.ohiodnr.gov/ArcGIS/rest/services/DOG_Services/Oilgas_Wells_10_JS_TEST/MapServer/legend
9. AGES (2016). Coal Combustion Residuals Regulation. Monitoring Well Installation Report. Ohio Valley Electric Corporation. Kyger Creek Station. Cheshire, Ohio. August.

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Ohio Valley Electric Corporation
Boiler Slag Pond

Figure No.
**2**

Title
**Regional Influences**


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Legend

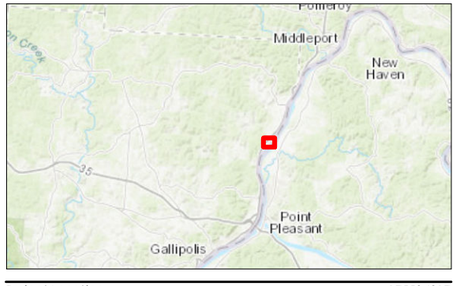
- CCR Well - Downgradient
- CCR Well - Sentinel
- CCR Well - Upgradient / Background
- CCR Unit

0 300 600 Feet

1:3,600 (At original document size of 11x17)

**Notes**

1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Base features - ESRI
3. Ortho-Imagery does not represent current conditions.
4. AGES (2016). Coal Combustion Residuals Regulation. Monitoring Well Installation Report. Ohio Valley Electric Corporation. Kyger Creek Station. Cheshire, Ohio. August.

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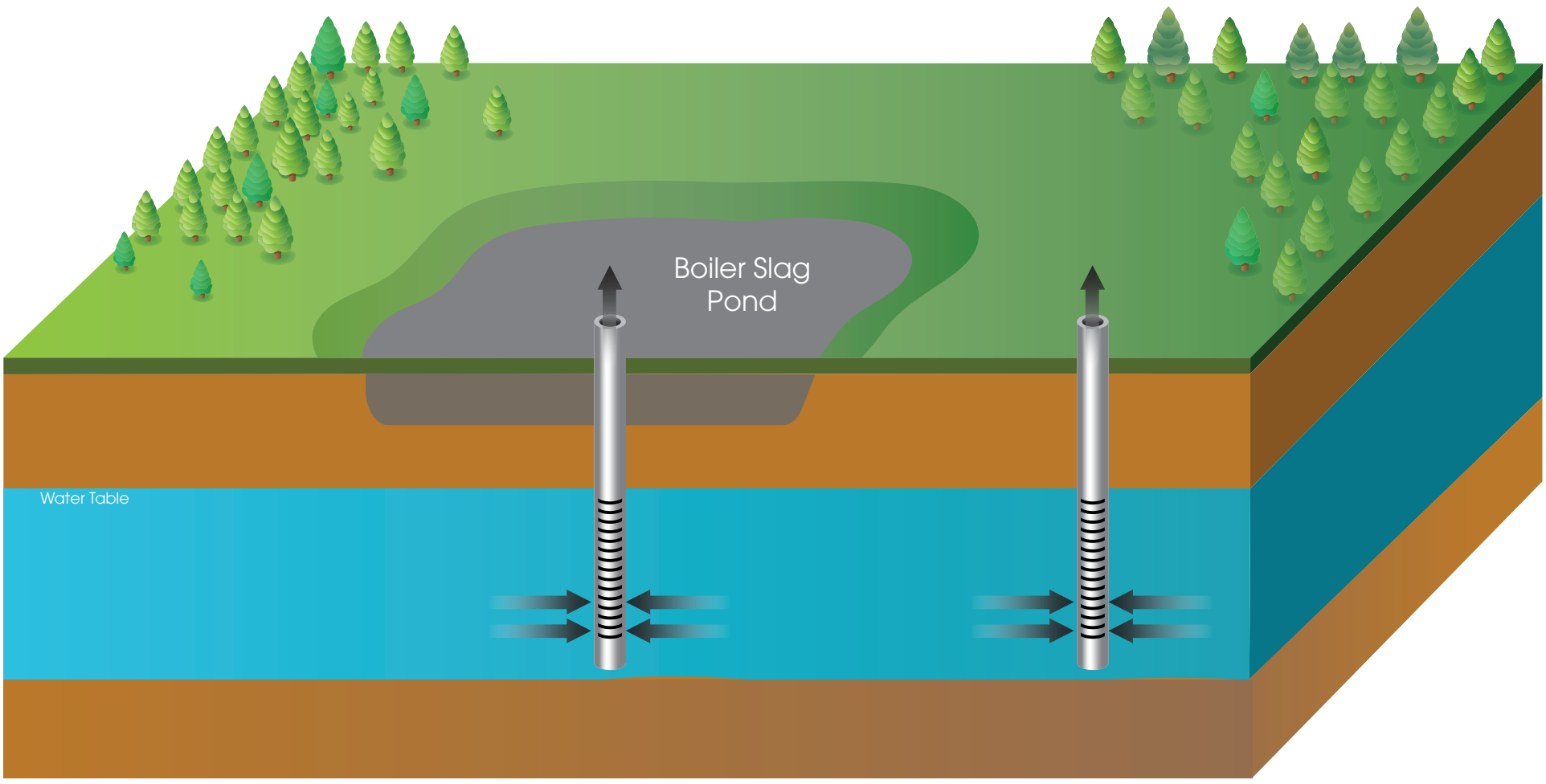
Client/Project
Ohio Valley Electric Corporation
Boiler Slag Pond

Figure No.
**3**

Title
**Monitoring Well Network**

# Groundwater Pump & Treat




Groundwater Pump & Treat involves withdrawing and cleaning the groundwater before returning it back to natural drainage systems.

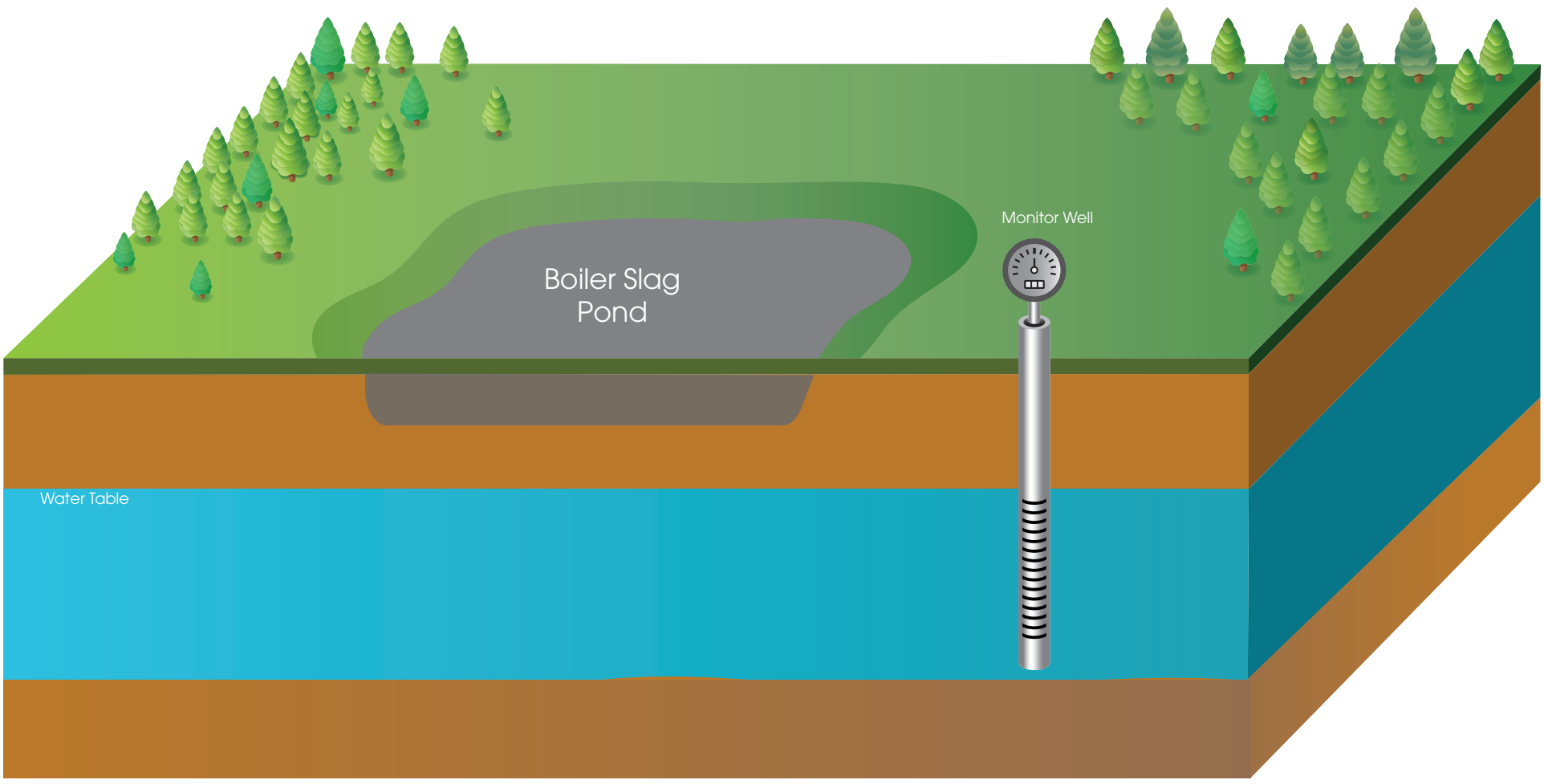
**Overview**

- Install wells into the groundwater at the Boiler Slag Pond and pump the groundwater with Arsenic in it to the surface.
- At the surface, the water will be treated to remove the Arsenic, the treated water will be sampled to make sure it's clean, and then discharged under a state permit.
- The monitoring program includes routine collection of water samples from the wells with analyses by an outside laboratory for Arsenic.
- The lab results will be studied to make sure that the pump and treat system is working. If not, then more wells may be needed the wells may be pumped at different rates.
- Remedial program will continue until Arsenic levels meet the standard.

OVEC/IKEC

Ohio Valley Electric Corporation / Indiana-Kentucky Electric Corporation

# Monitored Natural Attenuation (MNA)




Monitored Natural Attenuation allows for natural processes to attenuate (reduce) contaminants. The effectiveness of this remediation is demonstrated by periodic monitoring.

**Overview**

- Allows natural physical and chemical processes to attenuate (reduce) concentrations of Arsenic in the groundwater.
- Arsenic levels are reduced through mixing, adsorption of Arsenic into the deep soils and microbial breakdown of Arsenic.
- Attenuation happens on its own as a result of the natural chemistry of the groundwater, the affinity of the soil to bind up the Arsenic and the propensity of microbes to break down Arsenic.
- The monitoring program includes the routine collection of water samples from wells with analyses by an outside laboratory for Arsenic.
- The remedial program will continue until Arsenic levels meet the standard.

OVEC/IKEC

Ohio Valley Electric Corporation / Indiana-Kentucky Electric Corporation