

March 1, 2022

Ms. Hillyer,

On February 21, 2022, you requested that Cardinal Plant provide an update on the progress made toward compliance with US EPA's April 11, 2021 "cease receipt" deadline, as extended, for Cardinal's Bottom Ash Pond (BAP) CCR Impoundment. Cardinal's site-specific alternative deadline was based on segregating CCR wastewater from non-CCR wastewater and closing the existing BAP. Cardinal is constructing a new CCR Impoundment and a new non-CCR Impoundment – collectively referred to as the BAP Complex – pursuant to Ohio EPA issued PTIs. What follows below are the responses to your inquiries:

1. *A narrative explaining the progress made and current activities and phase/step at the facility to achieve alternative capacity.*

Cardinal Plant's demonstration indicated alternative disposal capacity for the non-CCR waste streams, allowing only CCR to go into the new CCR impoundment, would be available by June 9, 2022. Based on current schedules provided by suppliers, this date is still accurate.

Cardinal Plant has made steady progress with its conversion and construction activities and remains on schedule with the alternative date requested for completion of the BAP Complex project. The new CCR unit, the South Pond, is completed and will be ready to accept CCR materials once the new pumps necessary to divide the CCR wastewater from the non-CCR wastewater are installed.

Cardinal Plant has suffered multiple delays from the pump manufacturer but remains on schedule to separate the waste streams and cease all CCR placement in a non-CCR permitted unit by the June 9, 2022, deadline.

2. *A discussion of the issues that led to the delay (if a delay has occurred) to the requested date to cease receipt of waste.*

Because Cardinal's existing configuration could not handle segregated waste streams, Cardinal worked with Flowserve to develop capacity to transport CCR and non-CCR waste streams to the BAP Complex.

When Cardinal's initial order was placed with Flowserve on May 24, 2021, it was to replace impellers in the existing pumps. When the existing pumps were removed and inspected by the manufacturer, the condition of the pumps warranted full replacement.

Cardinal ordered the replacement pumps on August 11, 2021, with a delivery date of 23 weeks – the in-service date was expected to be January 2022. In early December, Cardinal was notified of the first of several manufacturing delays. Four separate delays have pushed the delivery date significantly. As of the writing of this letter, pumps are scheduled to be delivered

in April and May, with the fourth pump scheduled to arrive May 23, 2022. Cardinal is not requesting an extension to the cease receipt date of June 9, 2022, pending delivery of pumps.

3. *An updated requested date to cease receipt of waste (if the original date requested has changed).*

N/A

4. *An updated narrative justifying the new date to cease receipt of waste (if the original date requested has changed).*

N/A

Cardinal Plant will post all required compliance information to the CCR compliance website as required by rule.

Please contact me with any questions.



Sincerely,
Caitlin Schiebel