



Notification of Completion of Retrofit Activities for

Bottom Ash Pond Complex - South Pond

Issue Purpose: For Use, Rev. 0
Issue Date: March 7, 2022

S&L Project No.: 13770-006

PREPARED BY:



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1 PURPOSE

In accordance with 40 CFR 257.102(k)(6), this document provides the notification of completion of retrofit activities for the South Pond of the existing Bottom Ash Pond Complex (BAPC) at the Cardinal Power Plant. Upon completion of the retrofit, the South Pond's name was changed from the former "Recirculation Pond" to the retrofitted "Bottom Ash Pond."

2 APPLICABLE CCR REGULATION

To provide notification of completion of retrofit activities for the South Pond of the BAPC, the following excerpts from 40 CFR Part 257 Subpart D (Federal CCR Rule) are applicable:

- **§257.102(k)(6):**
Within 30 days of completing the retrofit activities specified in paragraph (k)(1) of this section, the owner or operator must prepare a notification of completion of retrofit activities. The notification must include the certification by a qualified professional engineer as required by paragraph (k)(4) of this section. The owner or operator has completed the notification when it has been placed in the facility's operating record as required by § 257.105(j)(6).
- **§257.102(k)(4):**
Upon completion [of the retrofit], the owner or operator must obtain a certification from a qualified professional engineer verifying that the retrofit activities have been completed in accordance with the retrofit plan specified in paragraph (k)(2) of this section and the requirements of this section.
- **§257.102(k)(2):**
Written retrofit plan—(i) Content of the plan. The owner or operator must prepare a written retrofit plan that describes the steps necessary to retrofit the CCR unit consistent with recognized and generally accepted good engineering practices...

3 CERTIFICATION

I certify that

- The Cardinal Operating Company has completed the retrofit activities for the South Pond of the Bottom Ash Complex at the Cardinal Power Plant,
- The Construction Quality Assurance Contractor has certified that these retrofit activities were performed in accordance with the Project Specifications (Specification C-5413 and Specification C-5414),
- These retrofit activities have been completed in accordance with the written retrofit plan (*Bottom Ash Pond Complex South Pond Retrofit Plan*, dated October 19, 2020) and the requirements of 40 CFR 257.102(k), and
- I am a registered professional engineer under the laws of the State of Ohio.

Certified by: James T. Perry

Date: March 7, 2022

