

June 28, 2024

Ohio Environmental Protection Agency
Central Office
PO BOX 1049
Columbus, OH 43216

**Re: Cardinal Operating Company
ELG Annual Progress Report to Notice of Planned Participation**

To whom it may concern:

Revisions to the Effluent Limitation Guidelines and Standards (ELG) for the electric power generating point source category were finalized October 13, 2020. Under this rule US EPA established a subcategory for units ceasing coal combustion by December 31, 2028.

Cardinal submitted a Notice of Planned Participation (NOPP) to cease combusting coal at one Electric Generating Unit to Ohio EPA on October 13, 2021, in accordance with 40 CFR 423.19 (f)(1). The 2022 Annual Progress Report specified the Unit being retired was Unit 3. The 2023 Progress Report was provided as part of Cardinal's NPDES Permit Renewal Application.

Cardinal provides the following 2024 Annual Progress Report in accordance with 40 CFR 423.19 (f)(2)

On March 29th, 2023, US EPA released a proposed rule to expand the ELG rule for various waste streams applicable at Cardinal. This proposed rule was then issued final on May 9th, 2024 and will be effective July 8th, 2024. Due to the new rule making, Cardinal paused their efforts to comply with the 2020 rule so they could evaluate a holistic approach to complying with both the 2020 and future 2024 rule(s).

However, based on the timing of the rule release, there was insufficient time to comply with the 2024 rule (Zero Liquid Discharge) within the 2020 compliance dates (no later than Dec. 31, 2025). Technology selection, detailed engineering and permit applications were pushed back with the release of the 2024 rule, but the end compliance date is still on schedule:

July – October 2022

- Conceptual Engineering (Complete)

2023

- Cardinal selects treatment technology for Units 1 and 2 (Complete)
- Begin detailed engineering phase for new treatment system sized to handle flow from

two units (Ongoing)

October 2024

- Apply for permits to construct new treatment system

February 2025

- General contractor starts construction of system

December 31, 2025

- Commercial operation of new treatment system for two thirds of plant's water (Units 1 and 2)

December 31, 2028

- Cessation of coal combustion at Unit 3

Please contact Caitlin Schiebel at (614) 203-9081 or by email at cschiebel@ohioec.org with any questions regarding this Annual Progress Report.

Sincerely,



Tom Alban
Vice President – Power Generation
Cardinal Operating Company