

# CARDINAL



## OPERATING COMPANY

October 4, 2022

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

**Re: Cardinal Operating Company  
Update 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.

Pursuant to 40 CFR Part 423, Cardinal Operating Company (Cardinal) provides the following update to the Notice of Planned Participation (NOPP) submitted on October 13, 2021.

Cardinal consists of three coal-fired generation units (referenced as Unit 1, Unit 2 and Unit 3). This NOPP committed Cardinal to the closure of one (1) of the three (3) units, no later than December 31, 2028. Cardinal is now identifying that Unit 3 will cease operation by this date.

As originally included in the NOPP, below is a preliminary timeline for major milestones to comply with the ELG rule with Units 1 and 2 continuing to operate and Unit 3 retiring. This timeline will be updated in the Annual Progress Report as the project progresses.

*July-October 2022*

- Conceptual engineering

*January 6, 2023*

- Cardinal will select a technology for treatment of FGD wastewater for Units 1 and 2
- Begin detailed engineering phase for new treatment system sized to handle flow from two units

*April 1, 2023*

- Apply for permits to construct new treatment system

*December 31, 2023*

*April 1, 2024*

- Commence construction of new treatment system

*December 31, 2025*

- Commence operation of new treatment system for two thirds of the plant's water

*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](mailto:cschiebel@ohioec.org) with any questions regarding this NOPP.

Sincerely,



Thomas Alban  
Vice President, Cardinal Operating Company