

CARDINAL



OPERATING COMPANY

October 13, 2021

Ohio Environmental Protection Agency
Central Office
2195 Front Street
Logan, OH 43138-9031

**Re: Cardinal Operating Company
40 CFR 423.19(f)(1) 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 Notice of Planned Participation (NOPP), per 40 CFR 423.19(f)(1).

Cardinal consists of three coal-fired generation units (referenced as Unit 1, Unit 2 and Unit 3). This NOPP commits Cardinal to the closure of one (1) of the three (3) units, no later than December 31, 2028. Because all three units have similar outputs, Cardinal is currently conducting engineering studies to determine the most efficient configuration for a two-unit operation. Based on these results, either Unit 1 or Unit 3 will be retired by December 31, 2028. Cardinal will identify the selected unit by October 13, 2022. This selection will be included in the Annual Progress Report required by 40 CFR 423.19.

The selected unit will permanently cease coal combustion by December 31, 2028. This date represents a retirement. PUCO has been informed of the plan to retire a unit at Cardinal by the end of 2028 and has declined to exercise jurisdiction over the selection of the particular unit to be retired. At the time the unit is selected, Cardinal will seek required approvals for the selected unit to retire. Below is a preliminary timeline for major milestones to comply with the ELG rule for the two units that will continue to operate and the one retiring unit. This timeline will be updated in the Annual Progress Report as the project progresses.

October 13, 2022

- Specify unit to retire
- Determine deadlines for regulatory notifications and approvals if any
- Select ELG compliance treatment for remaining two units, begin engineering phase for new treatment system sized to handle flow from two units

April 1, 2023

- Apply for permits to construct new treatment system

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 one of the three units at Cardinal

Please contact Caitlin Schiebel at 614-203-9081 or by email at cschiebel@ohioec.org with any questions regarding this NOPP.

Sincerely,



Thomas Alban
Vice President, Cardinal Operating Company