

Appendix 3 – ELG Considerations and Time Frame Considerations

Cardinal has successfully achieved zero liquid discharge of fly ash transport water as required by the 2015 ELG Rule. This was accomplished by converting the generating units to a dry fly ash system and disposing of the dry fly ash at the Residual Solid Waste Landfill. This project was completed in 2021.

Additionally, the Bottom Ash Pond was retrofitted, and the southern pond now operates in a closed loop system with blowdown to the Unit(s) FGD system. Notification of zero ash transport water discharge was submitted to Ohio EPA on April 6, 2023.

Cardinal is currently working towards installing new treatment technology for Flue Gas Desulfurization (FGD) wastewater as required by the October 13, 2020, ELG Reconsideration Rule. Cardinal submitted a Notice of Planned Participation to Ohio EPA stating the intent to close Unit 3 by the end of 2028 and install a new FGD wastewater treatment system for Units 1 & 2. Cardinal is currently working to install the treatment system as soon as possible, but no later than December 31, 2025, as required by the effective rule.

Cardinal respectfully requests any final deadline associated with ELG requirements be as soon as possible, but no later than the timelines established in 40 CFR 423.