



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

NOVEMBER 17, 2017

Ohio EPA NOV 17 '17
Entered Directors Journal

Mr. Gabriel Coriell
Ohio Valley Electric Corporation
Kyger Creek Station
5758 SR 7 N
Cheshire, Ohio 45620

Re: OVEC Kyger Creek Landfill
Director's Authorization
Approval
Residual Solid Waste Landfills
Gallia County
RSWL018814

Subject: Ohio Valley Electric Corporation, Kyger Creek Station Residual Waste Landfill, Alternate Parameter List

Dear Mr. Coriell:

On July 18, 2017, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Southeast District Office (SEDO), received the document titled, "Revised Request to Use an Alternate Parameter List", for the Ohio Valley Electric Corporation's (OVEC) Kyger Creek Station Residual Waste Landfill (Facility) located in Gallia County. This document, dated July 17, 2017, was prepared by Applied Geology and Environmental Science, Inc. (AGES) and submitted by OVEC, pursuant to Ohio Administrative Code (OAC) Rule 3745-30-08(D)(2), and requested replacement of specific groundwater monitoring constituents required for the groundwater monitoring program at the Facility. On September 11, 2017, SEDO received an additional revision to the document.

Pursuant to OAC Rule 3745-30-08(D)(2), the owner or operator of a residual solid waste landfill may propose an alternate list of parameters to meet the requirements of paragraphs (D)(3) to (D)(6) of this rule. The list of alternate parameters should be submitted by the owner or operator and approved by the director prior to use. The alternate parameter list should be indicative of the waste streams deposited at the landfill facility and should be protective of human health and safety and the environment.

OVEC reported that calcium, chloride, manganese, sodium, and sulfate are not suitable for use as indicator parameters due to influential onsite activities such as previous coal mining, oil and gas production, and road salting activities. OVEC proposed that the following constituents be used as the indicator parameters (statistically evaluated parameters): boron, cadmium, copper, magnesium, potassium, and selenium. No parameters are being deleted fully as part of the alternate parameter list request.

Ohio EPA has reviewed the submitted information and concurs with the request for alternate parameters. Pursuant to OAC Rule 3745-30-08(D)(2), the owner or operator is hereby authorized to utilize the alternate parameters list summarized in Table 3 of the July 17, 2017 submittal and includes the following:

- 1) The indicator parameters to be statistically analyzed during each semiannual event include boron, cadmium, copper, magnesium, potassium, and selenium for all geologic units.
- 2) The monitoring wells screened in the Bellaire Sandstone will also include chloride as an indicator parameter.
- 3) The monitoring wells screened in the Buffalo Sandstone will also include sulfate as an indicator parameter.
- 4) The following groundwater monitoring parameters will be analyzed semiannually: calcium, chloride, mercury, silver, sodium, sulfate, total dissolved solids, total organic carbon, chemical oxygen demand, and total alkalinity.
- 5) The annual groundwater monitoring parameters will include arsenic, barium, chromium, iron, lead, manganese, gross alpha, and gross beta.
- 6) The following field parameters will be measured during each sampling event: temperature, pH, specific conductance, and turbidity.
- 7) This alternate parameter list does not result in any groundwater monitoring parameters being removed from the annual monitoring requirements.
- 8) As required by OAC Rule 3745-30-08 Appendix III-A, any newly installed ground water monitoring wells will be required to sample for phenols, cyanide, and volatile organic compounds during the initial quarter of groundwater monitoring.

This approval shall not be construed to release the owner or operator from the obligation to comply with the requirements of any other ground water monitoring program being conducted at the Facility.

The action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Ohio Revised Code (ORC) Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office,

Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
30 East Broad Street, 4th Floor
Columbus, Ohio 43215

If you have any questions concerning this letter, please contact Dan Bergert of Ohio EPA, SEDO at (740) 380-5438.

Sincerely,



Holly Tucker, Chief Southeast District Office
for Craig W. Butler, Director

HT/CB/DB/mr

cc: Henry C. Cleland, OVEC
cc: John McKean, Gallia County Health Department
ec: Steve Lowry, SEDO-DDAGW