



28835 N Herky Dr. Unit 120
Lake Bluff, Illinois 60044
Phone 847.578.5000
Fax 847.549.3242

November 14, 2023

Ms. Elizabeth Zoldak
Environmental Specialist II, Division of Surface Water
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

Form A Item 7 - Outfall 002 Summary

Dear Ms. Zoldak:

The Avon Lake Generating Station retired on April 1, 2022. The plant was subsequently sold to Avon Lake Environmental Redevelopment Group, LLC (ALERG) on April 4, 2022. ALERG is not in the steam electric business and has begun the decommissioning/demolishing process at the plant. As a result, many of the outfalls at the plant have had a significant reduction in discharge due to the plant being inoperable.

The current 002 outfall is permitted to receive water from yard sump 6, yard sump 1, treated coal pile runoff water and ash sluice water during times when there is a recycle outage. All these discharges come together in the primary settling basin. The primary basin gravity flows into the secondary basin via concrete pipes between the ponds. The water is then pumped through anthracite filtration prior to discharge to Lake Erie. As a result of the decommissioning activities the only source of water to the settling basins and ultimately outfall 002 is yard sump 1 and yard sump 6.

In May 2023 the site had a slight exceedance of the low-level mercury monthly average at outfall 002. The results never exceeded the daily max and historically the plant has managed anomalies by resampling to meet the monthly average. An attempt was made to be in compliance with the monthly average via resampling, but once it was determined this was not possible all discharge ceased from 002.

As a result of the significant reduction in discharge water to the primary/secondary settling basins and the recent low level mercury exceedance, ALERG evaluated the use of a smaller more controlled filtration system at 002. The selected system is described in the PTI application and includes a diesel pump, bag filters, and two (2) carbon vessels with inline sampling ports prior to discharge at outfall 002. This new system is more practical for the current site conditions and will allow for more effective lower flow treatment of low level mercury than the anthracite vessels, as demolition activities continue to progress at the site.

This alternate carbon treatment will allow demolition of the larger, obsolete treatment works while ensuring water quality compliance at Outfall 002.

If you have questions, please contact Gary Deigan via email at gdeigan@deiganassociates.com

Sincerely,
Deigan & Associates, LLC



Gary J. Deigan
Ohio Certified Professional No. 400



Bryan Peter
Project Manager

cc: Norman Divers Vice President – EH&S ALERG