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**Notification  
Establishment of Assessment Monitoring and  
Constituents in Appendix IV of the CCR Rule  
Exceeded the Groundwater Protection Standard**

**Coal Combustion Residual Rule Compliance**

Facility  
Healy Power Plant  
2.5 Mile Healy Spur Road  
Healy, Alaska

March 1, 2018

## Notification

This notification has been documented in GVEA's facility operations records to satisfy the requirements under §257.105(h)(5) and §257.105(h)(8) of the CCR Rule, and posted to GVEA's CCR Website in accordance of §257.107(h)(4) and §257.107(h)(6).

Between April 2016 and October 2017, groundwater monitoring was performed to comply with U.S. Environmental Protection Agency's (EPA's) Coal Combustion Residuals (CCR) Rule<sup>1</sup> for the four CCR units at the Golden Valley Electric Association, Inc. (GVEA) Healy Power Plant. Groundwater samples collected from the groundwater monitoring system were analyzed for both Detection and Assessment Monitoring constituents listed in Appendix III and IV of the CCR Rule. Statistical analyses were completed using the groundwater data collected in 2016 and 2017. These statistical analyses were consistent with the statistical methods previously specified in the *Groundwater Monitoring System and Statistical Method Certification*.

As a result of the groundwater statistical analyses performed, several Appendix III Detection Monitoring constituents were found at levels with a statistically significant increase over background levels at least one compliance well. As such, an assessment monitoring program is required per the CCR Rule. The assessment monitoring program is to include laboratory analysis of the groundwater for all constituents listed in Appendix IV of the CCR Rule, and the statistical comparison of detected Appendix IV constituents with the groundwater protection standards (GWPS) established consistent with 40 CFR §257.95(h).

Because the 2016 and 2017 groundwater samples were analyzed for Appendix IV constituents, the GWPS were established and a statistical comparison of the detected Appendix IV constituents with the GWPS was already performed, as discussed in the *Groundwater Monitoring and Corrective Action Report* dated January 2018.

Appendix IV constituents were detected at a statistically significant level above the GWPS at several monitoring wells and include antimony, arsenic, lithium, molybdenum, and selenium. However, as discussed in the *Groundwater Monitoring and Corrective Action Report*, several factors must be considered when interpreting the results of the statistical evaluations presented in the report. First, the background dataset should be evaluated to determine whether the established GWPS for lithium and molybdenum are representative of background concentrations at the Healy Power Plant. Regional background information, if available, will be evaluated to assist with this determination.

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<sup>1</sup> Title 40 of the Code of Federal Regulations Parts 257 and 261 (40 CFR 257 and 261) dated April 17, 2015

One or more additional background wells may be installed upgradient of the CCR units to expand the background dataset should regional background information be unavailable or determined unrepresentative for the groundwater monitoring system. It should be noted that EPA is currently seeking to remand several provisions of the CCR Rule including the practice of defaulting to the use of background concentrations as the groundwater protection standard for Appendix IV constituents that do not have defined Maximum Contaminant Levels (MCLs). Given that there is some potential for EPA to make changes to the CCR Rule or finalize a new rule, future corrective measures for addressing lithium and molybdenum in the groundwater will not be made until EPA finalizes a decision.