



Golden Valley Electric Association

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Alternative Closure Annual Progress Report

Coal Combustion Residual Rule Compliance

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

July 30, 2019

This annual progress report is the initial report since notification made in July 2018 of GVEA's intent to comply with the alternative closure requirements under §257.103 of the CCR Rule for the four coal combustion residuals (CCR) units at the Healy Power Plant. This notification has been documented in GVEA's facility operations records to satisfy the requirements under §257.105(i)(11) of the CCR Rule, and posted to GVEA's CCR Website in accordance of §257.107(i)(11).

At the Healy Power Plant, groundwater concentrations of constituents listed in appendix IV of the CCR Rule have been detected at statistically significant levels exceeding the groundwater protection standard. As a result, GVEA is required to cease placement of CCR material in the unlined existing CCR surface impoundments (the Ash Pond, Recirculating Pond and Emergency Overflow Pond) within six months and either retrofit or close the ponds in accordance with §257.101 of the CCR Rule. Because the Ash Drying Area operates concurrently with the CCR surface impoundments, the Ash Drying Area (defined as a CCR landfill per CCR Rule) will need to close since placement of coal ash at the Ash Drying Area will also cease.

At this time, GVEA does not have an alternative disposal option capable of managing coal ash from Unit 1 and must continue to manage coal ash at the four CCR units, as needed, to generate and contribute power to GVEA's cooperative member owners. GVEA continues to evaluate alternative disposal options for managing Unit 1 coal ash. An assessment of Unit 1 and Unit 2 ash handling systems was recently conducted by a contract engineering company specializing in material handling solutions. Recommendations to modify the ash handling systems were made by and are currently being considered by GVEA for periodization, engineering and implementation.

To modify the ash handling systems, additional work is needed to design, construct/install, and operate the new system; including complete design of a new system for bottom ash handling and an upgrade to the fly ash handling system; the final solution will include additional conveyance components and control systems. Full commissioning of the new system will include conducting tests to confirm adequate flows rates and pressures. GVEA has made, and continues to make, progress to obtain alternative capacity at the Healy Power Plant for Unit 1 coal ash but will not have it completed in 2019. As such, it is GVEA's will continue to comply with the alternative closure requirements under §257.103 of the CCR Rule.

Once a new coal ash handling system is complete and operating effectively, GVEA will begin using the new system and initiate closure of the CCR units in accordance with the CCR Rule. GVEA expects to make progress this upcoming year and will to identify the alternative disposal option before July 2023 deadline. An annual progress report will be completed no later than 13 months from the date of this notification (August 2020) and will provide an update on the progress made and will identify the remaining steps necessary to fully provide alternative handling capacity for Unit 1 coal ash.

I hereby certify that the coal ash from Unit 1 must continue to be managed in the existing unlined surface impoundments (Ash Pond, Recirculating Pond, and Emergency Overflow Pond) and at the Ash Drying Area due to absence of an alternative disposal capacity at the Healy Power Plant at this time, and I am familiar with the provisions of Title 40 of the Code of Federal Regulations Parts 257 and 261 and the final rule to regulate the disposal of Coal Combustion Residuals (CCR) as a solid waste.



Naomi J. Morton Knight, P.E.
Environmental Officer



Date