



Golden Valley Electric Association

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Your Touchstone Energy® Cooperative 

Alternative Closure Notification

Coal Combustion Residual Rule Compliance

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

July 30, 2018

Notification

It is GVEA's intent to comply with the alternative closure requirements under §257.103 of the CCR Rule. This notification has been documented in GVEA's facility operations records to satisfy the requirements under §257.105(i)(10) of the CCR Rule, and posted to GVEA's CCR Website in accordance of §257.107(i)(10).

Between April 2016 and October 2017, groundwater monitoring was performed to comply with the U.S. Environmental Protection Agency's (EPA's) Coal Combustion Residuals (CCR) Rule¹ for the four CCR units (the Ash Pond, Recirculating Pond, Emergency Overflow Pond, and Ash Drying Area) 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. When the groundwater statistical analyses were performed, Appendix IV constituents were detected at a statistically significant level above their respective groundwater protection standard at several monitoring wells and include antimony, arsenic, lithium, molybdenum, and selenium, as discussed in the *Groundwater Monitoring and Corrective Action Report* dated January 2018. 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.

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 has been evaluating and testing alternative disposal options for managing Unit 1 coal ash and has determined that the preferred alternative is to convey coal ash from Unit 1 plant and combine it with the Unit 2 coal ash system. From the Unit 2 coal ash system, bottom/slag ash and fly ash are transferred to separate intermediate storage silos that are used to load the coal ash directly into trucks in an enclosed bay for transport and final disposal at the Usibelli Coal Mine.

Some conveyance piping and equipment is currently in place to convey Unit 1 coal ash to the Unit 2 coal ash system and it has been tested in concept for a small scale pilot test. Additional work remains to design, complete, and operate the new system; including complete design of the new system followed by installation of additional conveyance components and control systems. Full commissioning of the new system will include conducting additional tests to confirm adequate flows rates and pressures.

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

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 by July 31, 2018. As such, it is GVEA's intent to comply with the alternative closure requirements under §257.103 of the CCR Rule.

Once the 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. With the full commissioning of the Healy Unit 2 plant, GVEA expects to have upgrades to the Unit 1 ash handling system completed in 2019. If delays occur due to unforeseen challenges that prevent completion by the end of 2019, GVEA will prepare an annual progress report. The annual progress report will be completed no later than 13 months from the date of this notification (August 2019) 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