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Your Touchstone Energy® Cooperative 

Groundwater Remedy Selection and Design Semiannual Progress Report

Coal Combustion Residual Rule Compliance

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

February 28, 2019

This semiannual progress report is the initial report since completing the corrective measures assessment in August 2018 to document GVEA's progress towards selecting and designing the remedy for the groundwater impacts associated with the four coal combustion residuals (CCR¹) units at the Healy Power Plant. This report has been documented in GVEA's facility operations records to satisfy the requirements under §257.105(h)(12) of the CCR Rule, and posted to GVEA's CCR Website in accordance of §257.107(h)(9).

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. Accordingly, corrective measures are to be assessed and taken to prevent further releases, to remediate any releases, and to restore affected areas to their original conditions in accordance with the CCR Rule. Additionally, because the ponds are unlined, GVEA must cease placement of CCR in ponds and retrofit or close the ponds in accordance with the CCR Rule. GVEA intends to close the ponds since location requirements in the CCR Rule restricts continued use of these ponds even if the ponds were retrofitted with a liner. Closure of the ponds will consist of removing coal ash from within the waste boundary of each of the four CCR units and backfilling excavations as outlined in the *Closure and Post-Closure Plan*.

In August 2018, GVEA completed an assessment of corrective measures in accordance with the CCR Rule. As part of the assessment process, alternatives were developed and screened against threshold criteria to determine whether corrective measures would meet the remedial objectives and should be retained or eliminated from further consideration. Upon completing a detailed evaluation, source removal and disposal of CCR material within the four CCR units was identified as the preferred corrective measure to effectively address groundwater impacts associated with the CCR units. As stated in the *Corrective Measures Assessment Report*, source removal and disposal would be the primary corrective measure taken since the unlined ponds must close and be removed in accordance with the CCR Rule. The remedy to address groundwater impacts cannot commence until an alternative disposal option is identified and operating to manage CCR material from Unit 1.

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 determined that the preferred alternative is to convey the CCR material from Unit 1 plant and combine it with the Unit 2 coal ash system. From the Unit 2 coal ash

¹ CCR is defined under the CCR Rule as fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers.

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 CCR material to the Unit 2 coal ash system and has been manually tested. Additional work remains to design, complete, and operate a new automated system. Once the new coal ash handling system is complete and operating effectively, GVEA will begin with selecting and designing the remedy to address groundwater impacts associated with the CCR units at the Healy Power Plant.
