

Submitted to Zimmer Power Station 1781 US Route 52 Moscow, OH 45153 Submitted by AECOM 1001 Highlands Plaza Drive West Suite 300 St. Louis, MO 63110

October 2016

CCR Rule Report: Initial Inflow Design Flood Control System Plan

For

Gypsum Recycle Pond

At Zimmer Power Station

1 Introduction

This Coal Combustion Residual (CCR) Rule Report documents that the initial inflow design flood control system plan for the Gypsum Recycle Pond at the Zimmer Power Station meets the requirements specified in 40 Code of Federal Regulations (CFR) §257.82. The Gypsum Recycle Pond is located near Moscow, Ohio in Clermont County, approximately 0.1 miles northeast of the Zimmer Power Station. The Gypsum Recycle Pond serves as a storage pond for miscellaneous CCRs from wash-down collection systems and stormwater runoff at the Zimmer Power Station.

The Gypsum Recycle Pond is an existing CCR surface impoundment as defined by 40 CFR §257.53. The CCR Rule requires that the initial inflow design flood control system plan for an existing CCR surface impoundment be prepared by October 17, 2016. The plan must document how the inflow design flood control system has been designed and constructed to meet the requirements of 40 CFR §257.82 and be supported by appropriate engineering calculations.

The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer stating that the inflow design flood control system meets the requirements of 40 CFR §257.82. The owner or operator must prepare an inflow design flood control system plan every five years.

2 Initial Inflow Design Flood Control System Plan

40 CFR §257.82

- (a) The owner or operator of an existing ... CCR surface impoundment ... must design, construct, operate, and maintain an inflow design flood control system as specified in paragraphs (a)(1) and (2) of this section.
 - (1) The inflow design flood control system must adequately manage flow into the CCR unit during and following the peak discharge of the inflow design flood specified in paragraph (a)(3) of this section.
 - (2) The inflow design flood control system must adequately manage flow from the CCR unit to collect and control the peak discharge resulting from the inflow design flood specified in paragraph (a)(3) of this section.
 - (3) The inflow design flood is:
 - (i) For a high hazard potential CCR surface impoundment, ..., the probable maximum flood;
 - (ii) For a significant hazard potential CCR surface impoundment, ..., the 1,000-year flood;
 - (iii) For a low hazard potential CCR surface impoundment, ..., the 100-year flood; or
 - (iv) For an incised CCR surface impoundment, the 25-year flood.
- (b) Discharge from the CCR unit must be handled in accordance with the surface water requirements under §257.3-3.

Analyses completed for the initial inflow design flood control system plan of the Gypsum Recycle Pond are described in the following subsections. Data and analysis results in the following subsections are based on spillway design information shown on design drawings, construction information, topographic surveys, information about operations and maintenance provided by the Zimmer Power Station, and field measurements collected by AECOM. The analysis approach and results of the hydrologic and hydraulic analyses are presented in the following subsections.

The Gypsum Recycle Pond is an incised CCR surface impoundment as defined by 40 CFR §257.53. Therefore, in accordance with 40 CFR §257.82(a)(3)(iv), the Inflow Design Flood (IDF) is the 25-year flood.

2.1 Initial Inflow Design Flood Control Systems (§257.82(a))

An initial inflow design flood control system plan, supported by a hydraulic and hydrologic analysis, was developed for the Gypsum Recycle Pond by evaluating the effects of a 24-hour duration design storm for the 25-year IDF using a hydraulic HydroCAD (Version 10) computer model and a starting water surface elevation of 503.0 feet. The computer model evaluated the Gypsum Recycle Pond's ability to collect and control the 25-year IDF under existing operational and maintenance practices. Rainfall data for the 25-year IDF was obtained from the National Oceanic and Atmospheric Administration (NOAA) Atlas 14. The NOAA Atlas 14 rainfall depth is 5.33 inches.

The HydroCAD model results for the Gypsum Recycle Pond indicate that the CCR unit has sufficient storage capacity and spillway structures to adequately manage (1) flow into the CCR unit during and following the peak discharge of the 25-year IDF and (2) flow from the CCR unit to collect and control the peak discharge resulting from the 25-year IDF. The peak water surface elevation is 506.8 feet during the IDF, and the minimum crest elevation of the Gypsum Recycle Pond is 509.0 feet. Therefore, overtopping is not expected.

Based on this evaluation, the Gypsum Recycle Pond meets the requirements in §257.82(a).

2.2 Discharge from the CCR Unit (§257.82(b))

40 CFR §257.82(b) provides that the discharge from the CCR unit must be handled in accordance with the surface water requirements under 40 CFR §257.3-3, which states the following:

- (a) For purposes of section 4004(a) of the Act, a facility shall not cause a discharge of pollutants into waters of the United States that is in violation of the requirements of the National Pollutant Discharge Elimination System (NPDES) under section 402 of the Clean Water Act, as amended.
- (b) For purposes of section 4004(a) of the Act, a facility shall not cause a discharge of dredged material or fill material to waters of the United States that is in violation of the requirements under section 404 of the Clean Water Act, as amended. (c) A facility or practice shall not cause non-point source pollution of waters of the United States that violates applicable legal requirements implementing an areawide or Statewide water quality management plan that has been approved by the Administrator under section 208 of the Clean Water Act, as amended.
- (d) Definitions of the terms Discharge of dredged material, Point source, Pollutant, Waters of the United States, and Wetlands can be found in the Clean Water Act, as amended, 33 U.S.C. 1251 et seq., and implementing regulations, specifically 33 CFR part 323 (42 FR 37122, July 19, 1977).

The handling of discharge was evaluated by reviewing design drawings, information about operations and maintenance, conditions observed in the field by AECOM, and the inflow design flood control system plan developed per §257.82(a).

Based on this evaluation, outflow from the Gypsum Recycle Pond is ultimately routed through a NPDES-permitted outfall to the Ohio River. Hydraulic and hydrologic analyses performed as part of the initial inflow design flood control system plan found that the Gypsum Recycle Pond adequately manages outflow during the 25-year IDF, as overtopping of the Gypsum Recycle Pond is not expected.

Therefore, discharge of pollutants in violation of the NPDES permit is not expected as all discharge during the IDF is routed and controlled through the existing spillway system and NPDES-permitted outfall. Based on this evaluation, the Gypsum Recycle Pond meets the requirements in §257.82(b).

3 Certification Statement

CCR Unit: Zimmer Power Station; Gypsum Recycle Pond

I, Victor A. Modeer, being a Registered Professional Engineer in good standing in the State of Ohio, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this CCR Rule Report, and the underlying data in the operating record, has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the initial inflow design flood control system plan dated October 23, 2016 meets the requirements of 40 CFR §257.82.

VICTOR A MODERSR.
Printed Name

John 13/14

Date



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