

October 13, 2023

Mr. Glen Vonderembse
Ohio Environmental Protection Agency
Southwest District Office
Division of Surface Water
401 East Fifth Street
Dayton, OH 45402

**Re: Zimmer Power Plant;
Notification of Completion of Closure of the Coal Pile Runoff Pond, D-Basin, and the Gypsum
Recycle Pond**

Dear Mr. Glen Vonderembse:

In accordance with 40 C.F.R. § 257.102(h), Zimmer Power Company LLC (“Zimmer”) is providing notification that the closure of the Coal Pile Runoff Pond, D-Basin, and the Gypsum Recycle Pond was completed on October 13, 2023.

Pursuant to 40 C.F.R. § 257.102(f)(3), Zimmer has attached the certifications from a qualified professional engineer verifying that that closure of the Coal Pile Runoff Pond, D-Basin, and the Gypsum Recycle Pond has been completed in accordance with (1) the facility’s closure plan developed under 40 C.F.R. § 257.102(b) and (2) the requirements of 40 C.F.R. § 257.102.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Osterbrink". The signature is fluid and cursive, with a long horizontal stroke at the end.

John C. Osterbrink
Zimmer Power Company LLC
Plant Manager

I. CCR Removal Certification

S&ME, Inc. (“Consultant”) has been retained by Zimmer Power Company LLC to prepare the following certification verifying that coal combustion residuals (“CCR”) have been removed from the Coal Pile Runoff Pond, D-Basin, and the Gypsum Recycle Pond in accordance with the closure-by-removal performance standard contained in 40 C.F.R. §257.102(c).

Pursuant to 40 C.F.R. § 257.102(f)(3) the owner or operator of a CCR unit must obtain a certification from a qualified professional engineer verifying that closure has been completed in accordance with the closure plan specified in 40 C.F.R. § 257.102(b) and the requirements of 40 C.F.R. § 257.102. All solids, including soils with visual indication of effect by ash storage, were removed from the Coal Pile Runoff Pond, D-Basin, and the Gypsum Recycle Pond in accordance with the criteria in 40 C.F.R. § 257.102(c), and closure was completed in accordance with the revised closure plan dated January 5, 2023. Accordingly, it is the opinion of Consultant that closure of the ponds by removal has been achieved.

A. Limitations

Consultant’s certification is limited to certifying that CCR solids were removed and decontamination completed, in accordance with the CCR Rule. In addition, Consultant has been involved in various aspects of the closure process and, thus, is familiar with activities associated with the solids removal activities. Consultant’s certification is based on information provided to Consultant as of the date of this certification. Any opinion or decisions by Consultant are made on the basis of Consultant’s experience, qualifications, and professional judgment and are not to be construed as warranties or guaranties.

B. Certification

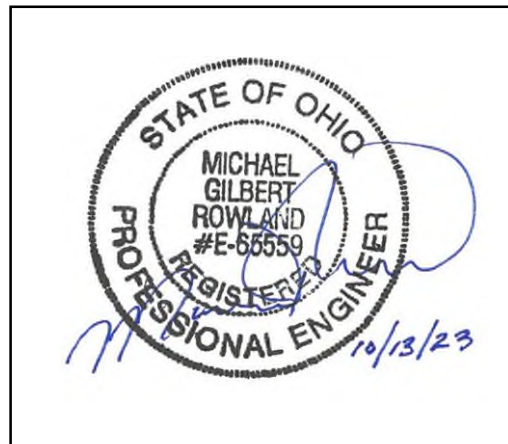
I, Michael G. Rowland, being a Registered Professional Engineer, in accordance with the Ohio Professional Engineer’s Registration do hereby certify to the best of my knowledge, information, and belief, that the information contained herein is true and correct and has been prepared in accordance with generally accepted good engineering practices.

Michael G. Rowland, P.E., Senior Engineer

Printed Name

October 13, 2023

Date



II. Groundwater Certification

Ramboll has been retained by Zimmer Power Company LLC to prepare the following certification verifying that the groundwater monitoring concentrations for the Coal Pile Runoff Pond, D-Basin, and the Gypsum Recycle Pond do not exceed the groundwater protection standards established pursuant to 40 C.F.R. § 257.95(h) for constituents listed in Appendix IV in accordance with 40 C.F.R. § 257.102(c).

Pursuant to 40 C.F.R. § 257.102(f)(3) the owner or operator of a CCR unit must obtain a certification from a qualified professional engineer verifying that closure has been completed in accordance with the closure plan specified in 40 C.F.R. § 257.102(b) and the requirements of 40 C.F.R. § 257.102. Based on a review of third quarter 2023 groundwater data collected after the completion of closure construction activities, groundwater monitoring concentrations at the facility do not exceed the groundwater protection standard established pursuant to § 257.95(h) for constituents listed in Appendix IV. Accordingly, it is the opinion of Ramboll that the groundwater component of the closure performance standard specified in 40 C.F.R. § 257.102(c) has been met.

A. Certification

I, Nikki Pagano, being a Registered Professional Engineer, in accordance with the Ohio Professional Engineer’s Registration do hereby certify to the best of my knowledge, information, and belief, that the information contained herein is true and correct and has been prepared in accordance with generally accepted good engineering practices.

Nikki Pagano, P.E., P.G., Senior Managing Engineer

Printed Name

October 13, 2023

Date

