

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 Structural Stability Assessment

For

Gypsum Recycle Pond

At Zimmer Power Station

This Coal Combustion Residual (CCR) Rule Report documents that the Gypsum Recycle Pond at the Zimmer Power Station is exempt from the structural stability assessment requirements specified in 40 Code of Federal Regulations (CFR) §257.73(d). 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 incised CCR surface impoundment, as defined in 40 CFR 257.53. Under 40 CFR §257.73(b) structural stability assessments (§257.73(d)) must be performed for an existing CCR surface impoundment that:

- 1. Has a height of five feet or more and a storage volume of 20 acre-feet or more; or
- 2. Has a height of 20 feet or more.

The Gypsum Recycle Pond does not satisfy the criteria of §257.73(b) because the incised impoundment does not have dikes. Therefore, the Gypsum Recycle Pond is not subject to the structural stability assessment requirements under §257.73(d).

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