



REPLY TO  
ATTENTION OF:

**DEPARTMENT OF THE ARMY**  
BUFFALO DISTRICT, CORPS OF ENGINEERS  
1776 NIAGARA STREET  
BUFFALO, NEW YORK 14207-3199

April 9, 2014

Regulatory Branch

SUBJECT: Coordination Prior to Letter of Permission Authorization, Processing No. 2000-00838, Location: Lake Erie, Avon Lake Township, Lorain County, Ohio.

Email to: Rachel.taulbee@epa.state.oh.us

REGULAR MAIL:  
Section 401 Coordinator  
Ohio Environmental  
Protection Agency  
P.O. Box 1049  
Columbus, Ohio 43216-1049

UPS/FED-EX:  
Ohio Environmental  
Protection Agency  
Lazarus Government Center  
Columbus, Ohio 43215

The U.S. Army Engineer District, Buffalo, is considering the issuance of a **LETTER OF PERMISSION** to:

NRG Power Midwest LLP  
Avon Lake Generating Station  
121 Champion Way  
Suite 300  
Canonsburg, PA 15317

Authorizing work as follows: Maintenance dredging of 63,000 cubic yards of accumulated sediment from the Avon Lake Generating Station's intake and discharge channel (20,000 cy from the intake channel and 43,000 cy from the discharge channel), to allow for unobstructed flow of cooling water to and from the plants generating units. The intake channel is proposed to be dredged to a depth of 556.46' - 560.50' IGLD 1985 and the discharge channel is proposed to be dredged to a depth of 552.19' - 560.50' IGLD 1985.

Dredging will be performed using a barge mounted clamshell bucket and the material will be placed into bottom dump scows, for release at two separate nearshore areas (see attached sheets 11 and 12 for details on the location of nearshore disposal sites 1 and 2).

Intake Channel Samples: Within the intake channel, the applicant collected sediment samples from 8 different locations and tested for grain size and total organic carbon (TOC). The TOC

samples were further divided into the following depth classes: 0-2', 2-4', and 4-6', for a total of 17 individual TOC readings (see Corps Attachment 2)

Intake channel samples B3 (all depths), B4 (2-4'), B6 (0-2' and 2-4'), and B8 (all depths) comply with the blanket 401 Water Quality Certification (WQC) for nearshore placement (i.e., all are greater than 60 percent sand and gravel and contain less than 5 g/kg TOC) (see Corps Attachment 2).

Intake channel samples B1 (0-2'); B2 (0-2' and 2-4'); B4 (0-2'); B5 (0-2'); B6 (2-4'), and B7 (0-2' and 2-4') all have suitable grain size for nearshore placement. However TOC values of these samples all exceed 5 g/kg (see Corps Attachment 2). When the 17 individual TOC readings are considered cumulatively, the combine TOC value for all materials equals 6.8 g/kg of TOC.

Since the aggregate total of all samples is only marginally elevated above the blanket 401 WQC limit of 5 g/kg, the **U.S. Army Corps of Engineers is requesting a 401 WQC – Director's Authorization** (pursuant to Section A. 1. a. of the *Grant of Section 401 Water Quality Certification to Establish Letters of Permission for Seven Categories of Activities in Surface Waters*, document dated 16 September 2013), for the placement of dredged intake channel material into the nearshore area.

Discharge Channel Samples: Within the discharge channel, the applicant collected sediment samples from 8 different locations and tested for grain size and TOC. The TOC samples were further divided into the following depth classes: 0-2', 2-4', 4-6', 6-8', 8-10', 10-12', and 12-13', for a total of 23 individual TOC readings (see Corps Attachment 3)

All discharge channel samples comply with the blanket 401 Water Quality Certification (WQC) for nearshore placement (all are greater than 60 percent sand and gravel and contain less than 5 g/kg TOC) (see Corps Attachment 3).

Please review and comment on the enclosed copy of the applicant's submittal.

Questions pertaining to this matter should be directed to me at (716)-879-4186, by writing to the following address: U.S. Army Corps of Engineers, 1776 Niagara Street, Buffalo New York 14207, or by e-mail at: [joseph.w.krawczyk@usace.army.mil](mailto:joseph.w.krawczyk@usace.army.mil)

**\*\*IMPORTANT NOTE\*\* -- PLEASE RESPOND WITHIN 15 DAYS OF THE ABOVE DATE OR WE WILL ASSUME YOU HAVE NO OBJECTION TO THE ISSUANCE.**