

September 5, 2020

SEMIANNUAL REMEDY SELECTION PROGRESS REPORT MIAMI FORT POND SYSTEM

In accordance with Title 40 Code of Federal Regulations (C.F.R.) § 257.97(a), the owner or operator of a coal combustion residuals (CCR) unit must prepare a semiannual report describing the progress in selecting and designing a remedy for statistically significant levels (SSLs) of constituents listed in Appendix IV of 40 C.F.R. Part 257 over the groundwater protection standards established in accordance with 40 C.F.R. § 257.95(h).

This report is for activities occurring between March 5, 2020 and September 5, 2020 at the Miami Fort Pond System located at the Miami Fort Power Station.

As stated in the March 5, 2020 Semiannual Remedy Selection Progress Report, A Corrective Measures Assessment (CMA) was completed for Basin A of the Miami Fort Pond System on September 5, 2019 as required by 40 C.F.R. § 257.96. The CMA identified three potential source control measures and five potential groundwater corrective measures for further evaluation.

In May of 2020, the Pond System Groundwater Monitoring System Certification, Rev 0 was prepared, and the Miami Fort Statistical Method Certification, Rev 1 was updated to reflect the characterization of the Miami Fort Pond System as a single multi-unit system for purposes of groundwater monitoring and closure activities.

As stated in the notification letter dated August 13, 2020, SSLs for total arsenic, total cobalt, and total molybdenum were identified at the Pond System during assessment monitoring completed in accordance with 40 C.F.R. § 257.95.

Selection of the source control measure continues to be in the feasibility study phase and will incorporate groundwater flow and transport modeling that is in development. Selection of the groundwater remedy continues to be in the monitored natural attenuation (MNA) feasibility study phase. Activities completed since March 5, 2020 include review of existing groundwater and source water data, identification and collection of additional groundwater and source water samples, identification of additional data collection needs to support development of a geochemical conceptual site model, and completion of additional monitoring wells and aquifer testing. These activities are necessary to supplement hydrogeologic site characterization, understand the natural attenuation mechanisms occurring at the site, and to evaluate the natural attenuation of constituents to meet applicable groundwater protection standards. Ongoing corrective measures assessment activities address the entire multi-unit Miami Fort Pond System.