

March 5, 2020

SEMIANNUAL REMEDY SELECTION PROGRESS REPORT HENNEPIN ASH POND NO. 2

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 Ash Pond No. 2 (AP2) at Hennepin Power Station.

As stated in the notification dated February 6, 2019, SSLs for total lithium and total molybdenum were identified at AP2 during assessment monitoring completed in accordance with 40 C.F.R. § 257.95.

A Corrective Measures Assessment (CMA) was completed for AP2 on September 5, 2019 as required by 40 C.F.R. § 257.96. The CMA evaluated closure in place with a soil cover system in accordance with the Closure and Post Closure Care Plan submitted to the Illinois Environmental Protection Agency (IEPA) in February 2018 and amended in October 2018. IEPA provided comments in May 2019, and a response to comments was submitted July 2019. Monitored natural attenuation (MNA) was also a component of all alternatives evaluated.

Following completion of the CMA, a meeting with IEPA was held on October 10, 2019 to discuss their comments on the Closure and Post Closure Care Plan and subsequent response to those comments. Additional groundwater modeling and documentation was provided in a closure plan addendum submitted in January 2020.

A public meeting was held on December 17, 2019 at St. Margaret's Hospital Presentation Room in Spring Valley, Illinois to discuss the results of the of the CMA in accordance with 40 C.F.R. § 257.96(e).

Selection of the groundwater remedy is currently in the MNA feasibility study phase.