



March 4, 2020

**SEMIANNUAL REMEDY SELECTION PROGRESS REPORT
OAK GROVE STEAM ELECTRIC STATION – FGD Ponds**

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 the FGD Ponds at the Oak Grove Steam Electric Station.

As stated in the notification dated February 6, 2019, SSLs for cobalt and lithium were identified at the FGD Ponds during 2018 assessment monitoring completed in accordance with 40 C.F.R. § 257.95. However, no SSLs were identified for cobalt, lithium or any other Appendix IV constituent in subsequent semi-annual assessment monitoring completed during 2019.

In response to the 2018 SSLs, an Assessment of Corrective Measures (ACM) report was completed for the FGD Ponds in September 2019 as required by 40 C.F.R. § 257.96. The ACM report identified a potential source control remedy of retrofitting the liner system in FGD-A Pond and potential groundwater remedies consisting of monitored natural attenuation, groundwater extraction and treatment or a vertical hydraulic barrier.

A public meeting was held on October 29, 2019 at the Pidgeon Center in Franklin, Texas to discuss the results of the of the ACM in accordance with 40 C.F.R. § 257.96(e).

Design of the FGD-A Pond liner system retrofit is underway. However, based on the absence of Appendix IV constituent SSLs observed during the 2019 assessment monitoring program, further evaluation of groundwater remedy alternatives for the FGD Ponds has been postponed until such time as on-going assessment monitoring identifies SSLs for one or more Appendix IV constituents.