

September 5, 2025

SEMIANNUAL REMEDY SELECTION PROGRESS REPORT POND SYSTEM MIAMI FORT POWER PLANT

In accordance with Title 40 of the Code of Federal Regulations (40 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. § 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 6, 2025 and September 5, 2025 at the Pond System located at the Miami Fort Power Plant.

As stated in the March 5, 2020 Semiannual Remedy Selection Progress Report, a Corrective Measures Assessment (CMA) was completed for Basin A of the Pond System on September 5, 2019, to address SSLs for total cobalt and total molybdenum (see related notification dated February 6, 2019), as required by 40 C.F.R. § 257.96. This CMA has been revised three times as detailed below:

- November 12, 2020, to reflect the characterization of the Pond System as a single multi-unit comprised of Basins A and B, including an Alternative Source Demonstration (ASD) for SSLs of arsenic (identified for Basin B) and molybdenum.
- November 30, 2020, to include additional information related to site geology and hydrogeology and apply evaluation criteria to potential corrective measures.
- June 30, 2025, to include an ASD completed on April 14, 2024 for an arsenic exceedance; and attach site investigation data collection and analysis completed between 2020 and 2025 supporting the evaluation of potential corrective measures.

Selection and design of the source control measure is in progress and will be incorporated into groundwater flow and transport modeling. Once completed, the potential groundwater corrective measures in combination with the source control measures considered in the CMA will be evaluated and a remedy selected.

As stated in the notification letter dated August 15, 2025, SSLs for total arsenic and total cobalt were identified at the Pond System following Assessment Monitoring completed during the reporting period in accordance with 40 C.F.R. § 257.95, consistent with related observations during previous reporting periods.