

2018 Annual Groundwater Monitoring and Corrective Action Report

Zimmer Gypsum Recycle Pond – CCR Unit ID 124
Zimmer Power Station
1781 Route 52
Moscow, Ohio 45153

Dynegy Zimmer, LLC

January 31, 2019



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2018 Annual Groundwater Monitoring and Corrective Action Report

Zimmer Gypsum Recycle Pond – CCR Unit ID 124
Zimmer Power Station
Moscow, Ohio

Prepared for:
Dynegy Zimmer, LLC



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ACRONYMS AND ABBREVIATIONS

CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
GWPS	Groundwater Protection Standard
mg/L	milligrams per liter
NRT/OBG	Natural Resource Technology, an OBG Company
OBG	O'Brien & Gere Engineers, part of Ramboll
pCi/L	picoCuries per liter
SSI	Statistically Significant Increase
SSL	Statistically Significant Level
S.U.	Standard Units
TDS	Total Dissolved Solids

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SECTION 1: INTRODUCTION

This report has been prepared on behalf of Dynege Zimmer, LLC by O'Brien & Gere Engineers, part of Ramboll (OBG), to provide the information required by the Code of Federal Regulations (CFR) found in 40 CFR 257.90(e) for the Zimmer Gypsum Recycle Pond located at Zimmer Power Station near Moscow, Ohio.

In accordance with 40 CFR § 257.90(e), the owner or operator of an existing Coal Combustion Residuals (CCR) unit must prepare an annual groundwater monitoring and corrective action report, for the preceding calendar year, that documents the status of the groundwater monitoring and corrective action program for the CCR unit, summarizes key actions completed, describes any problems encountered, discusses actions to resolve the problems, and projects key activities for the upcoming year. At a minimum, the annual report must contain the following information, to the extent available:

1. A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit.
2. Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken.
3. In addition to all the monitoring data obtained under §§ 257.90 through 257.98, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs.
4. A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels).
5. Other information required to be included in the annual report as specified in §§ 257.90 through 257.98¹.

This report provides the required information for the Zimmer Gypsum Recycle Pond for calendar year 2018.

¹ For calendar year 2018, corrective action and other information required to be included in the annual report as specified in §§ 257.96 through 257.98 is not applicable.

SECTION 2: MONITORING AND CORRECTIVE ACTION PROGRAM STATUS

Detection Monitoring Program sampling event dates and parameters collected are provided in the detection monitoring program summary table below. One sample was collected from each background and downgradient well in the monitoring system during each sampling event. Analytical data was evaluated after each event in accordance with the Statistical Analysis Plan, Zimmer Power Station, Dynegy Zimmer, LLC (NRT/OBG, 2017) to identify any statistically significant increases (SSIs) of Appendix III parameters over background concentrations. The sampling event and whether SSIs were identified are provided in the detection monitoring program summary table below.

Detection Monitoring Program Summary

Sampling Dates	Parameters Collected	SSIs	Assessment Monitoring Program Established
November 13 and 14, 2017	Appendix III	Yes	April 9, 2018

Alternate source evaluations were inconclusive for one or more of the SSIs. Consequently, and in accordance with 40 CFR § 257.94(e)(2), an Assessment Monitoring Program was established for the Zimmer Gypsum Recycle Pond on April 9, 2018 and the required notifications completed.

The first Assessment Monitoring sampling event was completed on May 8, 2018. One sample was collected from each background and downgradient well in the monitoring system and analyzed for Appendix III and Appendix IV parameters.

In accordance with 40 CFR § 257.95(d)(1), all wells were originally sampled on September 18, 2018 for all Appendix III parameters and Appendix IV parameters detected during the first Assessment Monitoring sampling event. One sample was collected from each background and downgradient well in the monitoring system. The contract laboratory’s delivery service delayed delivery causing samples in 3 coolers to be over the recommended temperature of 6 degrees Celsius at the time of delivery to the lab. The sampling team returned to Zimmer Gypsum Recycle Pond on September 27, 2018 to collect additional samples from all background and downgradient wells in the monitoring system. Analytical data from the resampling event was evaluated in accordance with the statistical analysis plan (NRT/OBG, 2017) to determine any SSIs of Appendix III parameters over background concentrations or statistically significant levels (SSLs) of Appendix IV parameters over Groundwater Protection Standards (GWPSs). The assessment monitoring program summary table below provides a summary of the Assessment Monitoring Program and results of SSL determinations.

Assessment Monitoring Program Summary

Sampling Dates	Parameters Collected	SSLs
May 8, 2018	Appendix III Appendix IV	Not Applicable
September 27, 2018	Appendix III Appendix IV Detected	To Be Determined

Statistical background values are provided in Table 1 and GWPSs in Table 2. Analytical results from the events summarized in the detection and assessment monitoring summary tables above are included in Tables 3 and 4.

The Zimmer Gypsum Recycle Pond remains in the Assessment Monitoring Program in accordance with 40 CFR § 257.95.

SECTION 3: KEY ACTIONS COMPLETED IN 2018

Two groundwater monitoring events were completed in 2018 under the Assessment Monitoring Program. These events occurred in May and September, and are detailed in Section 2.

In general, one groundwater sample was collected from each background and downgradient well in the monitoring system during each event. The sampling team returned to Zimmer Gypsum Recycle Pond to collect samples from wells each background and downgradient well in the monitoring system. because the original samples collected earlier in the September sampling event arrived at the laboratory above the recommended temperature of 6 degrees Celsius.

All samples were collected and analyzed in accordance with the Sampling and Analysis Plan (AECOM, 2017). All monitoring data obtained under 40 CFR §§ 257.90 through 257.98 (as applicable) in 2018 are presented in Tables 3 and 4.

The groundwater monitoring system, including the CCR unit and all background and downgradient monitoring wells, is presented in Figure 1.

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SECTION 4: PROBLEMS ENCOUNTERED AND ACTIONS TO RESOLVE THE PROBLEMS

No problems were encountered with the groundwater monitoring program during 2018. Groundwater samples were collected and analyzed in accordance with the Sampling and Analysis Plan (AECOM, 2017), and all data was accepted.

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SECTION 5: KEY ACTIVITIES PLANNED FOR 2019

The following key activities are planned for 2019:

- Continuation of the Assessment Monitoring Program with semi-annual sampling scheduled for the first and third quarters of 2019.
- Complete evaluation of analytical data from the downgradient wells, using GWPSs to determine whether an SSL of Appendix IV parameters has occurred.
- If an SSL is identified, potential alternate sources (i.e., a source other than the CCR unit caused the SSL or that SSL resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality) will be evaluated. If an alternate source is demonstrated to be the cause of the SSL, a written demonstration will be completed within 90 days of SSL determination and included in the annual groundwater monitoring and corrective action report for 2019.
 - » If an alternate source(s) is not identified to be the cause of the SSL, the applicable requirements of 40 CFR §§ 257.94 through 257.98 (e.g., assessment of corrective measures) as may apply in 2019 will be met, including associated recordkeeping/notifications required by 40 CFR §§ 257.105 through 257.108.

REFERENCES

AECOM, 2017, Sampling and Analysis Plan, CCR Rule Groundwater Monitoring, Gypsum Recycle Pond, Unit 124, Zimmer Power Station, Moscow, Ohio, Job Number: 60442412, Revision 0, October 17, 2017.

Natural Resource Technology, an OBG Company, 2017, Statistical Analysis Plan, Zimmer Power Station, Dynegy Zimmer, LLC, October 17, 2017.

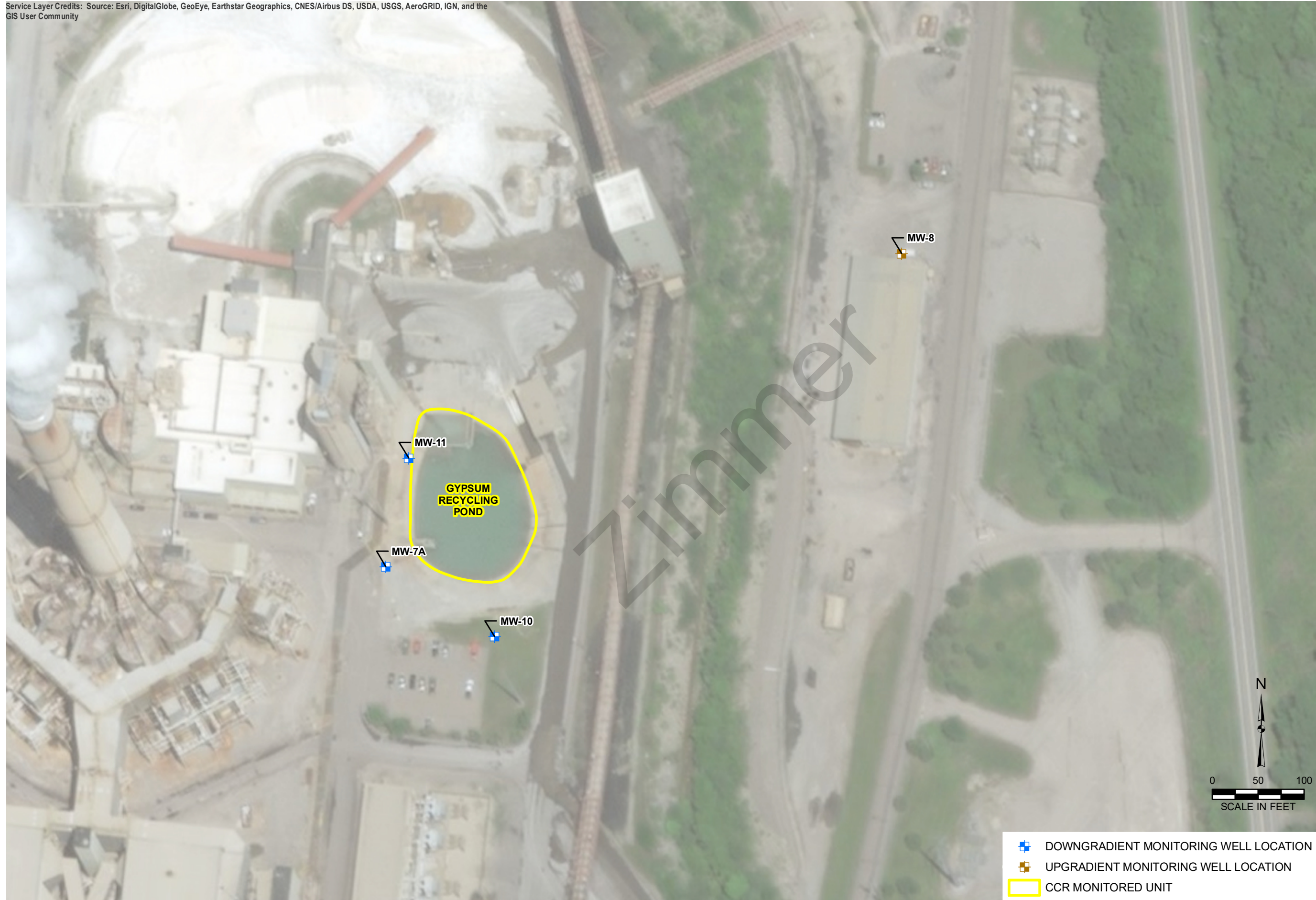
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Figures

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- DOWNGRADIENT MONITORING WELL LOCATION
- UPGRADIENT MONITORING WELL LOCATION
- CCR MONITORED UNIT

DRAWN BY/DATE:
SDS 11/28/18
REVIEWED BY/DATE:
AJB 1/24/19
APPROVED BY/DATE:
NMP 1/28/19

GROUNDWATER SAMPLING WELL LOCATION MAP
ZIMMER GYPSUM RECYCLING POND
UNIT ID: 124

2018 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT
VISTRA CCR RULE GROUNDWATER MONITORING
ZIMMER POWER STATION
MOSCOW, OHIO

PROJECT NO: 70096
FIGURE NO: 1



Tables

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Table 1. Statistical Background Values

2018 Annual Groundwater Monitoring and Corrective Action Report

Zimmer Power Station

Unit ID 124 - Zimmer Gypsum Recycle Pond

Parameter	Statistical Background Value
Appendix III	
Boron (mg/L)	0.0904
Calcium (mg/L)	168.9
Chloride (mg/L)	42.17
Fluoride (mg/L)	0.106
pH (S.U.)	6.5 / 7.8
Sulfate (mg/L)	72.7
TDS (mg/L)	578

[O: RAB 8/22/18, C: KLS: 8/27/18]

Notes:

mg/L = milligrams per liter

S.U. = Standard Units

TDS = Total Dissolved Solids

Table 2. Groundwater Protection Standards

2018 Annual Groundwater Monitoring and Corrective Action Report

Zimmer Power Station

Unit ID 124 - Zimmer Gypsum Recycle Pond

Parameter	Groundwater Protection Standard
Appendix IV	
Antimony (mg/L)	0.006
Arsenic (mg/L)	0.01
Barium (mg/L)	2
Beryllium (mg/L)	0.004
Cadmium (mg/L)	0.005
Chromium (mg/L)	0.10
Cobalt (mg/L)	0.006
Fluoride (mg/L)	4
Lead (mg/L)	0.015
Lithium (mg/L)	0.04
Mercury (mg/L)	0.002
Molybdenum (mg/L)	0.10
Selenium (mg/L)	0.05
Thallium (mg/L)	0.002
Radium 226+228 (pCi/L)	5

[O: RAB 8/22/18, C: KLS: 8/27/18]

Notes:

mg/L = milligrams per liter

pCi/L = picoCuries per liter

Table 3. Appendix III Analytical Results

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Zimmer Power Station

Unit ID 124 - Zimmer Gypsum Recycle Pond

Sample Location	Date Sampled	B, total (mg/L)	Ca, total (mg/L)	Cl, total (mg/L)	F, total (mg/L)	pH (field) (SU)	SO4, total (mg/L)	TDS (mg/L)
Background / Upgradient Monitoring Wells								
MW-8	11/13/2017	<0.08	113	15.0	<1	6.8	<50	434
	5/8/2018	<1	127	33.8	<1	7.0	62.8	491
	9/27/2018	<0.08	121	14.5	<1	7.0	66.5	439
Downgradient Monitoring Wells								
MW-7A	11/14/2017	1.40	118	64.7	<1	6.7	277	718
	5/8/2018	1.54	135	63.7	<1	6.8	318	923
	9/27/2018	1.57	119	55.7	<1	6.7	205	667
MW-10	11/14/2017	4.07	126	<150	1.44	6.9	582	1210
	5/8/2018	5.72	249	146	2.49	6.9	1070	2180
	9/27/2018	4.89	150	113	1.77	6.9	534	1230
MW-11	11/14/2017	0.498	133	68.1	<1	6.8	188	634
	5/8/2018	<1	139	75.1	<1	7.0	197	793
	9/27/2018	0.921	164	78.1	<1	6.8	<250	771

[O: RAB 12/27/18, C: JQW 12/27/18][U: RAB 1/17/19]

Notes:

mg/L = milligrams per liter

S.U. = Standard Units

TDS = Total Dissolved Solids

< = concentration is less than the reporting limit

Table 4. Appendix IV Analytical Results

2018 Annual Groundwater Monitoring and Corrective Action Report

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Unit ID 124 - Zimmer Gypsum Recycle Pond

Sample Location	Date Sampled	Sb, total (mg/L)	As, total (mg/L)	Ba, total (mg/L)	Be, total (mg/L)	Cd, total (mg/L)	Cr, total (mg/L)	Co, total (mg/L)	F, total (mg/L)	Pb, total (mg/L)	Li, total (mg/L)	Hg, total (mg/L)	Mo, total (mg/L)	Ra226/228 Combined (pCi/L)	Se, total (mg/L)	Tl, total (mg/L)
Background / Upgradient Monitoring Wells																
MW-8	5/8/2018	<0.003	<0.005	<0.2	<0.004	<0.005	<0.005	<0.005	<1	<0.005	<0.04	<0.0002	<0.01	0.182	<0.01	<0.002
	9/27/2018 ^a	NA	<0.001	NA	NA	NA	<0.002	NA	<1	NA	NA	NA	NA	0.215	NA	NA
Downgradient Monitoring Wells																
MW-7A	5/8/2018	<0.003	<0.005	<0.2	<0.004	<0.005	0.00755	<0.005	<1	<0.005	<0.04	<0.0002	<0.01	0.522	<0.01	<0.002
	9/27/2018 ^a	NA	<0.001	NA	NA	NA	0.00207	NA	<1	NA	NA	NA	NA	0.411	NA	NA
MW-10	5/8/2018	<0.003	0.00535	<0.2	<0.004	<0.005	<0.005	<0.005	2.49	<0.005	<0.04	<0.0002	<0.01	0.246	<0.01	<0.002
	9/27/2018 ^a	NA	0.00153	NA	NA	NA	<0.002	NA	1.77	NA	NA	NA	NA	0.294	NA	NA
MW-11	5/8/2018	<0.003	<0.005	<0.2	<0.004	<0.005	<0.005	<0.005	<1	<0.005	<0.04	<0.0002	<0.01	0.457	<0.01	<0.002
	9/27/2018 ^a	NA	<0.001	NA	NA	NA	<0.002	NA	<1	NA	NA	NA	NA	0.294	NA	NA

[O: RAB 12/27/18, C: JQW 12/27/18][U: RAB 1/17/19, U: AJB 1/28/19]

Notes:

mg/L = milligrams per liter

pCi/L = picoCuries per liter

NA = Not Analyzed

< = concentration is less than the reporting limit

^aOnly the parameters detected during the previous sampling event were analyzed during this sampling event, in accordance with 40CFR § 257.95(d)(1).

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