

**Date:** April 15, 2023  
**To:** Scott Wetzel  
**From:** Dave Erickson  
**Subject:** Semi-Annual Progress Report for Selecting and Designing Remedy  
Dave Johnston Power Plant – Ash Pond

In compliance with the requirements of the Coal Combustion Residuals (CCR) *Final Rule*, § 257.97(a), included herein is a semi-annual progress report for remedy selection and design. The Corrective Measures Assessment for the Ash Pond was completed and posted to the plant operating record on 4/15/2019. The preferred alternative in the assessment is closure by removal of the waste, pond liner, and underlying impacted soils. To date, the following activities have been completed in the selection and design of the remedy:

- **6/28/2019:** Initiated updates to the removal design, to incorporate elements of the new Unit 0 impoundment.
- **8/1/2019:** Conducted a public meeting to discuss the results of the corrective measures assessment.
- **8/26/2019:** Received comments from the Powder River Resource Council, Sierra Club, and Wyoming Outdoor Council. Comments were reviewed and will be addressed in the Remedy Selection Report.
- **9/4/2019:** Consultant contracted to perform design and oversight for pond closure by removal.
- **9/24/2019:** Initiated a contract to select the general contractor responsible for implementing the removal.
- **10/1/2019:** Installed monitoring well DJ-50, developed and sampled it for Appendix III and IV constituents to address comments received from the public meeting to supplement understanding of the nature and extent of past releases, and enhance the performance monitoring network. Additional existing wells used for the WDEQ monitoring program along Sand Creek have also been incorporated into the monitoring network to monitor remedy efficacy. The full network is now included in the corrective measures monitoring sampling and analysis plan.
- **10/14/2019:** Submitted remedial action work plan, engineering report, and confirmation sampling and analysis plan to WDEQ for review and approval.
- **3/12/2020:** General contractors were invited to bid on remediation project.
- **June 2020:** Ash Pond dewatering and solids removal began as part of standard plant operations and maintenance activities. Solids were transported and placed in the permitted Expansion Landfill.
- **May, August & October 2020:** The first, second and third quarterly groundwater monitoring events were completed in accordance with the corrective measures monitoring SAP.
- **October 2020:** Discontinued acceptance of waste at the Ash Pond (10-6-2020) and sent notification of intent to initiate closure to WDEQ. The remedy selection report, nature and extent report, and corrective measures sampling and analysis plan were placed in the plant operating record. The remedy selection report was also placed on the CCR website.

- **November 2020:** Removal of pond solids as part of closure.
- **December 2020:** Removal of pond solids was completed, and the liner was removed and placed in the Expansion Landfill.
- **January and February 2021:** Over-excavation of impacted soils beneath the liner was initiated and completed.
- **February 2021:** Soil confirmation sampling in the excavation was completed to determine if additional soil removal was needed.
- **April 2021:** Validated results were compared with site-specific background concentrations, and areas requiring additional excavation were identified.
- **May 2021:** A general contractor was selected to perform additional soil removal.
- **July 2021:** Sampling of the vertical soil profile was completed to the groundwater interface in impacted areas.
- **September 2021:** Validated analytical results from July sampling were used to define additional removal areas, construction drawings were prepared, and planning for final soil excavation was initiated.
- **February, April, August & September 2021:** The first, second, third and fourth quarterly groundwater monitoring events were completed in accordance with the corrective measures monitoring sampling and analysis plan (SAP).
- **October 2021:** Final excavation of impacted soils began in accordance with the Remedy Selection Report. Removed soil was placed in the Expansion Landfill for final disposal.
- **December 2021:** Final excavation of impacted soils was completed.
- **May 2022:** Post-removal confirmation sampling was completed.
- **June 2022:** Final soil cover and seeding was completed.
- **July 2022:** Final inspection of vegetative cover was completed.
- **March, May, July & September 2022:** The first, second, third and fourth quarterly groundwater monitoring events were completed in accordance with the corrective measures monitoring SAP.
- **October 2022:** A Draft Closure Report was prepared to comply with the CCR Rule and the Dave Johnston Plant operating permit, which is regulated by the Wyoming Department of Environmental Quality, Solid Waste Division. The Ash Pond has not reached attainment under the CCR Rule, as Appendix IV constituents continue to exceed their groundwater protection standards in downgradient monitoring wells.
- **December 2022.** Dave Johnston Plant representatives observed subsidence along the western edge of the reclaimed Ash Pond cap, where it adjoins the Clear Pond.
- **February 2023.** An inspection of the observed subsidence area was completed.
- **March 2023.** An engineering assessment was initiated to define the costs to design and install a liner beneath the Clear Pond and reclaim the subsidence area in the Ash Pond footprint. PacifiCorp is evaluating corrective measures to address the observed subsidence along the western edge of the Ash Pond, that has occurred since placement of the final cover. The pond will not be considered closed until the subsidence is addressed. The first round of quarterly groundwater monitoring was completed for the Ash Pond.

Upcoming tasks relative to the Ash Pond closure by removal will include the following:

- Develop engineering estimate to address Clear Pond seepage and reclaim subsidence along the western edge of the Ash Pond;
- Develop and submit engineering design and permit modifications to WDEQ for review and approval;
- Procure a general contractor to line the Clear Pond and reclaim subsidence area;
- Update the Closure Report to include corrective measures implemented to address Clear Pond Seepage and subsidence issues in the Ash Pond;
- Complete annual cover inspections;
- Complete quarterly groundwater monitoring in 2023; and
- Transition quarterly groundwater monitoring back to semi-annual beginning in 2024, in accordance with the Remedy Selection Report schedule and the corrective measures SAP.