



HALEY & ALDRICH, INC.
259 W. Front Street
Suite 6
Missoula, MT 59802
406.794.3395

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TO: Nikou Hesari

FROM: Haley & Aldrich, Inc.

SUBJECT: Semi-Annual Progress Report for Selecting and Designing Remedy
Hunter Power Plant – CCR Landfill

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 Hunter CCR Landfill was completed and posted to the plant operating record on 11 June 2019. As cited in the Remedy Selection Report prepared by Water & Environmental Technologies (WET) the selected remedy is re-design and/or optimization of the existing horizontal well capture system, to address localized groundwater impacts¹. This report documents activities completed during the period from 16 April 2024, through 14 October 2024².

SUMMARY OF ACTIONS COMPLETED

The following activities have been completed during this reporting period:

- **April 2024:** Continued Assessment Monitoring: Collected groundwater samples from the CCR monitoring wells and evaluated the results from the April 2024 sampling event in support of ongoing groundwater monitoring compliance activities.
- **October 2024:** Continued Assessment Monitoring: Collected groundwater samples from the CCR monitoring wells. Final laboratory reports are pending.
- **October 2024:** Due to the remedial efforts implemented at the landfill between 2007 and 2016, continued declines in groundwater elevations and/or dry wells have been observed as part of regular groundwater monitoring. Monitoring of groundwater elevations and water quality have continued to ensure water is being removed from the system and the footprint of downgradient impacts in groundwater continues to be reduced.

¹ Remedy Selection Report: CCR Landfill – Hunter Power Plant, Castle Dale, Utah (WET, August 2020).

² Haley & Aldrich is currently providing support to PacifiCorp relative to the reporting of ongoing progress of remedial actions at this unit and has relied upon information and progress/activities performed by WET in the preparation of this report.

PLANNED ACTIVITIES

Anticipated activities for the upcoming six months include the following:

- Continue to monitor effluent production in existing horizontal wells. It should be noted that some of the wells are no longer operable, and the remaining wells do not appear to be consistently recovering liquid (which could be a function of either successful dewatering of the landfill or design/operational issues with the system);
- Evaluate groundwater elevation data to determine if monitoring wells that have been previously dry, remain dry. If so, recommendations will be developed as to the location and depths for replacement monitoring wells to supplement the existing monitoring well network;
- Continue semi-annual groundwater monitoring. The groundwater analytical results will be analyzed for trends and if the "remedy" does not appear to be working to address the groundwater exceedances then additional remedial measures will be evaluated;
- Prepare the Annual Groundwater Monitoring and Corrective Action Report; and
- Provide a semi-annual progress report that summarizes activities completed.