

Date: October 15, 2022
To: Scott Wetzels
From: Dave Erickson
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 4/15/2019. The preferred alternative in the assessment was re-design and/or optimization of the existing horizontal well capture system, to address localized groundwater impacts. To date, the following activities have been completed in the selecting and designing a remedy:

- **6/28/2019:** Contract was initiated to complete an inspection of existing horizontal well system and to scope the work needed to evaluate the remedy.
- **7/23/2019:** Conducted a public meeting to discuss the results of the corrective measures assessment.
- **8/20/2019:** A site visit was completed by the project engineer to inspect and document the current condition of the existing horizontal well system. Research began on inspection, cleaning, and upgrade methods for the existing system.
- **8/26/2019:** Received comments from Heal Utah, Utah Clean Energy, and the Sierra Club. Comments were reviewed and addressed in Remedy Selection Report.
- **9/23/2019:** Contract finalized to inspect each horizontal well using a mobile camera. Equipment will be on site during the inspection to clean the wells if warranted.
- **11/12/2019:** Inspection caps were removed from the horizontal capture wells in an attempt to inspect well integrity. Well construction prevented the camera from entering the wells to perform the inspections, due to the size of the openings.
- **June 2020:** The initial vendor tasked with performing inspections was unable to successfully retrofit their camera equipment to fit the well openings. Additional vendor sources to perform the well inspections were sought for procurement.
- **October 2020:** 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.
- **January 2021:** Performed full inspection of existing horizontal wells. The wells are not in good working order.
- **March 2021:** An investigation to assess liquids in the landfill waste was attempted using Geoprobe direct push drilling methods. The drilling method could not reach the desired depths.
- **March 2022.** Sonic drilling was completed in the landfill to support an assessment of potential liquid in the landfill waste. Three new monitoring wells were installed downgradient of ELF-14, they include: ELF-15, ELF-16, and ELF-17.

- **May-October 2022.** Sampling and evaluation of data acquired from the new monitoring wells installed in the landfill is ongoing, to determine if additional corrective measures are needed.

Upcoming tasks relative to the CCR Landfill will include the following:

- Determine if additional downgradient monitoring wells are needed;
- Assess the need for design, permitting, and installation of additional horizontal wells or other corrective measures; and
- Continue semi-annual groundwater monitoring.