Date: **April 15, 2024**
To: **Nikou Hesari**
From: **Dave Erickson**
Subject: **Semi-Annual Progress Report for Selecting and Designing Remedy**
Huntington 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 CCR Landfill was completed and posted to the plant operating record on 5/15/2019. The preferred alternative in the assessment is optimization of the existing groundwater capture system. To date, the following activities have been completed in selecting and designing a remedy:

- **7/23/2019:** Conducted a public meeting to discuss the results of the corrective measures assessment.
- **8/26/2019:** Received comments from Heal Utah, Utah Clean Energy, and the Sierra Club. Comments were addressed in the Remedy Selection Report.
- **10/8/2019:** Completed internal work plan detailing the scope of work necessary to implement upgrades.
- **10/30/2019:** Performed aquifer testing using existing well HLF-8N to determine if it produced sufficient water to support groundwater capture.
- **12/14/2020:** Installed and developed four additional aquifer test wells HDP-4, HDP-5, HDP-6, and HDP-7.
- **01/14/2020:** Performed 14-hour pump test on HDP-5, while monitoring water levels in HDP-4, HDP-6, and HDP-7.
- **March 2020:** Completed evaluation of aquifer test data.
- **April 2020:** Began design for a pump and treat system, to include specifications for piping, electrical, and pumps needed to develop a closed system.
- **August 2020:** Pump and treat system 90% design completed.
- **September 2020:** Received order of approval from the Utah Department of Environmental Quality (UDEQ) State Engineer, for permanent change application 93-3782 granting the water right necessary to install the pump and treat system defined in the remedy selection report.
- **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.
- **February 2021:** Installed plumbing and electronic controls to the pumping wells completed in December 2019. Pumping wells underwent aquifer testing in January 2020. A full system test was performed to ensure the system is operational. Start-up will occur after permit updates have been approved by UDEQ.
- **April 2021:** System start-up was attempted, but a pump failure occurred. A new pump was ordered following the initial start-up attempt.
- **September 2021:** A replacement pump was installed, and system start-up was initiated. The system is fully operational and is capturing groundwater in accordance with the

Remedy Selection Report. Additional adjustments to the control system are ongoing as the system is optimized. Plant personnel are monitoring system performance.

- **October 2022.** The system remains fully operational and continues to capture groundwater. Plant personnel continue to monitor system performance.
- **December 2022.** Huntington Plant representatives noted that the flow meters / totalizers were not functioning properly. The system continues to capture groundwater but flows and quantities are not being recorded.
- **February 2023.** A site visit was conducted with a qualified electrician to determine the root cause of the meter failures, and so specifications for replacement meters could be identified. A power surge to the system was identified as the cause of the meter failures. A replacement power supply was installed, and new meters were ordered. Meter installation and calibration is planned for April 2023.
- **August 2023.** Supply-chain issues delayed the planned installation of the new meters/totalizers for the groundwater capture system. The replacements arrived in July 2023 and were installed and calibrated in August. The meters are now fully operational and are recording the quantity of groundwater captured by the system.
- **April 2024.** The groundwater capture system remains fully operational and is routing water that migrates through the Duck Pond drainage in accordance with the Remedy Selection Report. Groundwater capture is reducing impacts to groundwater in the valley alluvium. Plant representatives are monitoring system performance and recording the quantities of water captured during the year.

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

- Continue to monitor system operation;
- Complete system maintenance and optimization as needed; and
- Continue semi-annual groundwater monitoring.