

**SEMI-ANNUAL CORRECTIVE MEASURES PROGRESS REPORT  
ASH BASIN 6 – Brunner Island, LLC  
(November 2020)**

Advanced GeoServices Corp. (AGC) has been retained by Brunner Island, LLC (Brunner) to provide an update regarding the corrective measure activities associated with groundwater at Ash Basin 6 (Basin 6), as described below.

1.0 BASIN 6 CONDITIONS

This semi-annual progress report is provided pursuant to 40 C.F.R. 257.97 (a) of the federal Coal Combustion Residuals Rule (CCR Rule 40 CFR Part 257, Subpart D) as an update on the progress of selecting and implementing an appropriate corrective measure(s) for groundwater at Brunner's Basin 6, located in East Manchester Township, York County, Pennsylvania. A Groundwater Assessment Monitoring Program continues at Basin 6 to characterize groundwater conditions. Based on statistical analyses of the Assessment Monitoring data collected, exceedances of relevant Groundwater Protection Standards (GWPS) have been identified. An Assessment of Corrective Measures (ACM) was completed in June 2019 for Basin 6 to identify corrective measure alternatives which could potentially be used to address GWPS exceedances.

Placement of waste in Basin 6 from CCR and non-CCR waste streams was ceased on May 31, 2019.

The following corrective measures-related activities have taken place at Basin 6.

- Shortly after cessation of the CCR and non-CCR-waste streams, the discharge structure for the basin was modified to allow water to passively drain through it and into the polishing pond section of Basin 6. This modification allowed the ponded water level of the basin to be lowered approximately 12 feet. These activities were completed prior to the submission of the November 2019 (initial) Semi-Annual Report.
- In December 2019 and January 2020, an active dewatering system was installed within the basin to remove ponded water below the discharge structure. This system includes a pump which collects water from the main former pond area and discharges water into the discharge structure which gravity drains to the polishing pond area of the basin. This active dewatering system was used to remove the remaining residual plant discharge water, which could not passively drain, from the former pond area within the basin by February 2020. The active dewatering system continues to be used intermittently to pump down any stormwater which accumulates in the former pond area of the basin.
- Additional investigation of potential enhanced in-basin dewatering actions is underway. The pilot testing and analysis of the data will be completed later in 2020. Enhancement of the dewatering effort may be recommended if it may further significantly improve potential impacts to groundwater or if deemed substantially beneficial as a supplemental corrective measures.

- Additional characterization of the groundwater beneath Basin 6 also continued in accordance with the Federal CCR rule. Groundwater was sampled in February and August 2020.
- Excavation and removal of CCR material as a corrective measure, as authorized under a pre-CCR Rule state permit issued by the Pennsylvania Department of Environmental Protection (PADEP), has continued. Removal of the CCR reduces the volume of source material (ash) responsible for the exceedances of GWPS at the Facility.

The planning activities associated with a public meeting to discuss the results of the ACM and the status of Basin 6 continued. It is expected that the public meeting will be conducted after restrictions from the COVID-19 pandemic are lifted. Meanwhile, Brunner is continuing to remove accumulated stormwater from the pond as necessary and continuing the monitoring of groundwater conditions in the Basin 6 area in accordance with the CCR Rule and the PADEP residual waste permit.

## 2.0 LIMITATIONS

It is the Consultant's professional opinion that the aforementioned information is accurate as of the date of such signature. Any opinion or decisions by Consultant are made on the basis of Consultant's experience, qualifications and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions and other estimates are based on available data, and actual conditions may vary from these encountered at the times and locations where data are obtained.

## 3.0 CERTIFICATION

I, Christopher T. Reitman, being a Registered Professional Engineer, in accordance with the Pennsylvania Professional Engineer's Registration, do hereby certify to the best of my knowledge, information, and belief, that this report is true and correct and has been prepared in accordance with generally accepted good engineering practices.

Signature: 

Date: November 13, 2020