

**Semi-Annual Progress Report-02
Selection and Design of Corrective Remedy
Conesville Ash Pond System**

**Conesville Plant
Conesville Industrial Park LLC
Conesville, OH**

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1.0 BACKGROUND

The Ash Pond System (APS) at the Conesville Plant is regulated by the Federal CCR Rule, 40 CFR Part 257. Sampling and analyses of groundwater from the monitoring network installed pursuant to 40 CFR §257.95 identified the following Appendix IV constituents at statistically significant levels above the respective groundwater protection standards (GWPS): arsenic, lithium, molybdenum.

Conesville Industrial Park LLC (CIP) has purchased the facility from American Electric Power (AEP) in June 2020 and has determined that there are two technically feasible alternatives for remediating the groundwater at the APS. Each could be implemented with two options for source control: closure by removal or closure by capping.

Alternative #1: Source Control (Capping) with Monitored Natural Attenuation

Alternative #2: Removal of APS and disposal in a acceptable landfill

An Assessment of Corrective Measures (ACM) Report describing these alternatives was prepared in accordance with 40 CFR §257.96 and posted to the Operating Record on January 29, 2021.

2.0 PURPOSE

This semiannual report is required by 40 CCR §257.97 and describes CIP progress in selecting and designing the corrective measure(s) discussed in the ACM Report.

This Report-02 covers the period from: March 6, 2020 – December 31, 2020.

3.0 PROGRESS

As noted in the ACM Report, CIP determined that source control could be achieved by either closing the APS and leaving CCR materials in place with a CCR compliant cap system or by removing all CCR materials from the APS and disposing of them at an acceptable landfill.

During the period covered by Report-02, CIP evaluated the construction duration and constraints associated with the removal of CCR from the APS and prepared a construction cost estimate for this source control option. At this time, CIP Management is reviewing the cost estimate, as well as the risks and benefits of each source control option.

CIP conducted the semi-annual groundwater sampling and testing during this report period. In addition to sampling the monitoring wells in the CCR groundwater network, the monitoring wells installed in 2018 and 2019 were also sampled. A total of 47 wells (19 Network and 28 Other) were sampled and the results summarized in the report, "Annual Groundwater Monitoring and Corrective Action Report."

4.0 PLANNED WORK

CIP will sample and test all of the monitoring wells as part of the semi-annual requirement.

CIP also plans to retain the services of a consultant to further evaluate the technologies identified in the ACM as per the criteria set forth in 40 CCR §257.97

CIP will submit another progress report by June 30, 2021.