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SEMIANNUAL CORRECTIVE MEASURES PROGRESS REPORT SEPTEMBER 2020

for

WESTLAND ASH MANAGEMENT MONTGOMERY COUNTY, MARYLAND

Prepared By:

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1. PURPOSE

Geosyntec Consultants (Geosyntec) has prepared this *Semiannual Corrective Measures Progress Report* for the Westland Ash Management Facility (the Site) located in Montgomery County, Maryland. This report provides a description of the progress of selecting and designing the remedy for the statistically significant levels (SSLs) above the groundwater protection standards (GWPSs) associated with the Site to fulfill the requirements of the Federal Coal Combustion Residual Rule (CCR Rule) codified in Title 40 of the Code of Federal Regulations (CFR) Subpart D Section 257.97 (40 CFR§257.97). This report is required by 40 CFR§257.97(a).

2. BACKGROUND

GenOn entered into a Consent Decree with the Maryland Department of Environment (MDE) and a group of intervenors in 2013 to complete a Nature and Extent of Contamination Study (NES) and a Corrective Measures Plan (CMP) for the two CCR landfills (Cell B and Cell C). Only Cell B is regulated by the CCR Rule because Cell C was closed prior to the Rule's effective date. Statistically significant increases (SSIs) above background groundwater concentrations were detected at compliance monitoring wells downgradient of both landfills under the NES, and downgradient of Cell B under the CCR Rule Detection Monitoring Program in January 2018. As a result of the SSIs, an Assessment Monitoring Program was triggered. In December 2018, statistically significant levels (SSLs) above GWPSs were identified. GenOn monitored private wells downgradient from the site, when the landowner was willing to allow such monitoring, as required by the Consent Decree and no indication of site-related constituents were detected in those samples. GenOn has continued to monitor these private wells and there is still no indication of site-related constituents.

A Corrective Measures Plan (CMP) under the Consent Decree was submitted to MDE in June 2017 and revised in July 2018. The CMP included closure-in-place for the ash landfills, storm water management improvements, enhanced leachate treatment, and groundwater monitoring. GenOn met with MDE in November 2018 to present a closure-by-removal (deconstruction concept) for removal of ash from the site and submitted a deconstruction plan to MDE in January 2019. MDE approved the initial phase of the plan in February 2019.

An Assessment of Corrective Measures (ACM) for Cell B under the CCR Rule was completed in March 2019. The ACM identified a preferred remedy consisting of: (i) maintaining the geomembrane cap on the inactive side slopes of Cell B, (ii) removal of ash for beneficial reuse, and (iii) continued groundwater monitoring. Plans for various phases of deconstruction were submitted to MDE in April, May, and June 2019 and initial phases were approved by MDE in September 2019. A public meeting on the 10-15 year deconstruction plan was held on February 8, 2020. The Consent Decree was amended in August 2020 to allow for deconstruction (i.e. closure by removal) rather than closure in place.

3. CORRECTIVE MEASURES IMPLEMENTATION ACTIVITIES

GenOn has continued to refine the NES and the CMP under the Consent Decree. The following interim Corrective Measure under 257.98(a)(3) have taken place since the ACM was completed in March 2019.

- A geosynthetic cover was installed on Cell C in 2016 and on the inactive side slopes of Cell B in 2017 to reduce leachate generation while the ash is removed for beneficial reuse;
- A deconstruction plan has been prepared for the ash removal;
- A zero-valent iron (ZVI) leachate treatment component was added to the leachate treatment system in 2017;
- Groundwater Monitoring – monitoring of groundwater has continued under the Assessment Monitoring Program in accordance with the CCR Rule. Groundwater was sampled in August 2020.

GenOn is coordinating these actions with Maryland Department of Environment. Performance of the interim and final corrective measures will limit potential exposure to site-related constituents and thereby protect human health and the environment.

Ongoing monitoring data will continue to be assessed for changes that might require additional interim measures. Additional interim measures might include containment system improvements, such as installation of a less permeable intermediate cover on the top of Cell B, or source removal, to further reduce potential releases. Other existing and emerging technologies that may become available would also be considered as appropriate. It should be noted that the groundwater flow velocity at the site is very low such that changes in groundwater quality in response to interim and final corrective measures are not expected to be detectable for many years.

GenOn is coordinating with MDE on the locations of additional downgradient monitoring wells, including one downgradient from Cell B at the property boundary as required by 257.95 (g)(1)(iii).

4. REMEDY SELECTION AND DESIGN PROGRESS

A final remedy has yet to be selected/approved. GenOn planned to hold a public meeting to discuss the results of the ACM pursuant to 40 CFR 257.96(e) in the Fall of 2019 but MDE requested that it be delayed until the remedy under the Consent Decree was approved. Work toward the Consent Decree remedy selection/approval by MDE and the intervenors is ongoing. A public meeting under the Consent Decree was held on February 8, 2020. Planning activities are underway to facilitate a future public meeting to discuss the results of the ACM under the CCR Rule and the status of the remedy. It is expected that the public meeting will be conducted after restrictions from the COVID-19 pandemic are lifted and MDE has approved the remedy under the Consent Decree.