



REGION 5

CHICAGO, IL 60604

**ELECTRONIC MAIL
DELIVERY RECEIPT REQUESTED**

Raoul Gabhart
Senior Environmental Professional
Duke Energy Gallagher Station
30 Jackson Street
New Albany, Indiana 47150
Raoul.Gabhart@duke-energy.com

Re: Notice of Violation and Opportunity to Confer
Duke Energy Gallagher Station
EPA I.D.: IND000807057
New Albany, Indiana

Dear Raoul Gabhart:

The U.S. Environmental Protection Agency has conducted a review of documents posted on Duke Energy Corporation's Coal Combustion Residual (CCR) Rule Compliance Data & Information website (CCR website) and contained in the Indiana Department of Environmental Management's (IDEM) public records pertaining or relevant to Duke Energy Corporation's compliance with the regulations at 40 C.F.R. Part 257, Subpart D – Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments (CCR Rule), at the Gallagher Generating Station (Duke-Gallagher) located in New Albany, Indiana.

Information currently available to the EPA suggests that Duke-Gallagher may be in violation of RCRA. By this letter, the EPA is extending to you an opportunity to advise the Agency, in person or in writing, of any further information the EPA should consider with respect to the potential violations.

During the records review, the EPA observed several potential violations, described in Enclosure A. The description of the potential violations is not a final determination regarding Duke-Gallagher's compliance with RCRA. EPA requests that you voluntarily submit a response in writing to us no later than 30 calendar days after receipt of this letter documenting the actions, if any, which you have taken to address the potential violations identified below or demonstrating why the potential violation(s) have not occurred.

Actions Requested

To the extent you have information related to the matters described herein and if you would like EPA to consider that information, then no later than 30 calendar days from receipt of this letter, please provide any information documenting the actions, if any, which you have taken to address the potential violations, as well as any additional information you deem relevant to these matters.

Please send all documents and information requested by this letter by electronic mail to:

r5lecab@epa.gov

and

brown.todd@epa.gov

The subject line of all email correspondence must include your EPA I.D. number: IND000807057. All electronically submitted materials must be in final and searchable format, such as Portable Document Format (PDF) with Optical Character Recognition (OCR) applied. If you are unable to send a response to these email addresses due to email size restrictions or other problems, contact Todd Brown to make additional arrangements for transmission of the response.

This letter is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks information from specific individuals or entities as part of an administrative investigation. You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to EPA in response to this letter. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

The EPA contact in this matter is Todd Brown. You may contact him at brown.todd@epa.gov or (312)-886-6091 if you have additional questions. If you have legal questions, contact Jamie Getz, Associate Regional Counsel, at getz.jamie@epa.gov or (312) 886-2287. Thank you for your prompt attention to these concerns and your efforts to protect human health and the environment.

Sincerely,

Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division

Enclosure

cc: Jenifer Reno, IDEM (jreno@idem.in.gov)
Lori Freeman, IDEM (lfreeman@idem.in.gov)

ENCLOSURE A
NOTICE OF VIOLATION
Duke Energy Corporation Gallagher Generating Station

Regulatory Note: Under 40 C.F.R. § 257.100(a), “Inactive CCR surface impoundments are subject to all of the requirements of this subpart applicable to existing CCR surface impoundments.”

Location of CCR Disposal Units: See Enclosure B for a map depicting the approximate locations of Ash Pond A, North Ash Pond, Primary Pond, Primary Pond Ash Fill, Secondary Settling Pond, and the Gallagher Landfill.

Ash Pond A, Primary Pond and the Secondary Settling Pond are/were existing CCR surface impoundments under the CCR Rule. As explained in the EPA’s letter to Duke-Gallagher dated January 11, 2022, North Ash Pond is also an existing CCR surface impoundment, and the Primary Pond Ash Fill is an inactive CCR surface impoundment, both of which are regulated by the CCR Rule. As further explained in the EPA’s letter, even had North Ash Pond not received CCR after October 19, 2015, it would still be regulated as an inactive CCR surface impoundment.

1. Publicly Accessible Internet Site Requirements: North Ash Pond and Primary Pond Ash Fill

Under 40 C.F.R. § 257.107, each owner or operator of a CCR unit subject to the requirements of Part 257, Subpart D must maintain a publicly accessible internet site (“CCR website”) containing the information specified at 40 C.F.R. §§ 257.107(e)-(j) regarding location restrictions, design criteria, operating criteria, groundwater monitoring and corrective action, closure and post-closure care, and retrofit criteria.

As the EPA explained in its January 11, 2022, letter to Duke Energy Corporation, the North Ash Pond and Primary Pond Ash Fill are regulated under 40 C.F.R. Part 257, Subpart D. None of the information described under 40 C.F.R. § 257.107 is posted on Duke Energy Corporation’s CCR website with respect to the North Ash Pond or Primary Pond Ash Fill.

2. Ash Pond A Closure

Under 40 C.F.R. § 257.61(c)(4), an owner or operator of an existing CCR surface impoundment who fails to demonstrate compliance with the requirements 40 C.F.R. § 257.61(a) (i.e., wetland location restriction) by October 17, 2018, is subject to the requirements of § 257.101(b)(1).

Under 40 C.F.R. § 257.101(b)(1)(ii), except as provided by paragraph (b)(4) of that section, within six months of determining that an existing CCR surface impoundment has not demonstrated compliance with the wetland location standard specified in § 257.61(a), the owner or operator of the CCR surface impoundment must cease placing CCR and non-CCR wastestreams into such unit and close the CCR unit in accordance with the requirements of § 257.102.

Duke-Gallagher determined that Ash Pond A did not meet the wetland location restriction requirements as of October 5, 2018, and therefore failed to demonstrate compliance by October 17, 2018. Six months after October 5, 2018, was April 5, 2019. Ash Pond A continued to receive waste until

November 15, 2020, which is 24 months and 28 days, or more than 18 months after the unit was required to be closed. Therefore, Duke-Gallagher failed to initiate closure by the required deadline.

3. Ash Pond A and Primary Pond Safety Factor Assessments

Under 40 C.F.R. § 257.73(e), the owner or operator must conduct an initial and periodic safety factor assessments for each CCR unit and document whether the calculated factors of safety for each CCR unit achieve the minimum safety factors specified in paragraphs (e)(1)(i) through (iv) of this section for the critical cross section of the embankment. The safety factor assessments must be supported by appropriate engineering calculations. The initial and periodic safety factor assessments must be posted on the facility CCR website. *See* 40 C.F.R. § 257.107(f)(11).

The safety factor assessments for Ash Pond A and Primary Pond posted on Duke-Energy Corporation's CCR website do not include any engineering calculations.

4. Fugitive Dust Control Plan

Under 40 C.F.R. § 257.80(b)(1), the CCR fugitive dust control plan must identify and describe the CCR fugitive dust control measures the owner or operator will use to minimize CCR from becoming airborne at the facility. The owner or operator must select, and include in the CCR fugitive dust control plan, the CCR fugitive dust control measures that are most appropriate for site conditions, along with an explanation of how the measures selected are applicable and appropriate for site conditions.

Duke-Gallagher's Fugitive Dust Control Plan dated June 25, 2019, with revisions dated October 26, 2022 ("Fugitive Dust Control Plan"), lists fugitive dust control measures. The plan states "[t]hese techniques will be used as needed and are not listed in order of importance or effectiveness." The plan does not include an explanation of whether or how the measures selected are applicable and appropriate for site conditions.

Under 40 C.F.R. § 257.80(b)(2), if the owner or operator operates a CCR landfill or any lateral expansion of a CCR landfill, the CCR fugitive dust control plan must include procedures to emplace CCR as conditioned CCR.

Duke-Gallagher's Fugitive Dust Control Plan does not include procedures to emplace CCR as conditioned CCR. Instead, the plan refers to the landfill operations plan or permit for this information. The landfill operations plan is not posted on Duke-Gallagher's CCR website.

5. Fugitive Dust Control Annual Reports

Under 40 C.F.R. § 257.80(c), the owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken. The reports must be posted on the facility CCR website. *See* 40 C.F.R. § 257.107(g)(2).

The annual CCR fugitive dust control reports posted on Duke-Gallagher's CCR website for the years 2016 through 2023 do not include a description of the actions taken by Duke-Gallagher to control CCR

fugitive dust. Instead, reports simply note “Adherence to the Gallagher Station CCR Fugitive Dust Control Plan” in a table.

6. Selection of Statistical Method for Secondary Settling Pond

Under 40 C.F.R. § 257.90(b)(1)(ii), no later than October 17, 2017, the owner or operator of the CCR unit must develop the groundwater sampling and analysis program to include selection of the statistical procedures to be used for evaluating groundwater monitoring data as required by § 257.93. The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the selected statistical method is appropriate for evaluating the groundwater monitoring data for the CCR management area. The certification must include a narrative description of the statistical method selected to evaluate the groundwater monitoring data. *See* 40 C.F.R. § 257.93(f)(6). The professional engineer certification must be posted on the facility CCR website. *See* 40 C.F.R. §§ 257.93(j) and 257.107(h)(3).

Duke-Gallagher did not post a professional engineer certification for the facility’s groundwater sampling and analysis program on its CCR website stating that the selected statistical method is appropriate for evaluating the groundwater monitoring data for the Secondary Settling Pond. Instead, the link for the statistical method certification on the CCR website leads to the professional engineer certification for the design of the groundwater monitoring system.

7. Notice of Exceedance of Groundwater Protection Standard – Ash Pond A, Primary Pond, and Secondary Settling Pond

Under 40 C.F.R. § 257.95(g), if one or more constituents in appendix IV to 40 C.F.R. Part 257 are detected at statistically significant levels (SSLs) above the groundwater protection standard established under paragraph (h) of this section in any sampling event, the owner or operator must prepare a notification identifying the constituents in appendix IV to this part that have exceeded the groundwater protection standard. The notification must be posted on the facility CCR website. *See* 40 C.F.R. §§ 257.95(i) and 257.107(h)(6).

According to annual groundwater monitoring reports posted on Duke-Gallagher’s CCR website, and semiannual groundwater monitoring reports submitted to IDEM, 66 samples from Ash Pond A, Primary Pond, and Secondary Settling Pond monitoring wells collected between March 2018 and September 2023 yielded SSLs above the groundwater protection standard of appendix IV constituents. A list is included in Enclosure C.

Duke-Gallagher has posted only 5 notices on its CCR website identifying the constituents in Appendix IV that exceeded the groundwater protection standard. Duke-Gallagher has not posted the required notice for each sampling event in which an appendix IV constituent exceeded the groundwater protection standard.

8. Selection of Remedy: Ash Pond A and Primary Pond

Under 40 C.F.R. § 257.97(a), based on the results of the corrective measures assessment conducted under § 257.96, the owner or operator must, as soon as feasible, select a remedy that, at a minimum, meets the standards listed in paragraph (b) of this section. Under 40 C.F.R. § 257.97(b), remedies must be protective of human health and the environment, attain the groundwater protection standard as specified pursuant to § 257.95(h), control the source(s) of releases so as to reduce or eliminate, to the maximum extent feasible, further releases of constituents in appendix IV to 40 C.F.R. Part 257 into the environment, remove from the environment as much of the contaminated material that was released from the CCR unit as feasible, taking into account factors such as avoiding inappropriate disturbance of sensitive ecosystems, and comply with standards for management of wastes as specified in § 257.98(d).

Duke-Gallagher completed its assessment of corrective measures report for Ash Pond A in June 2019. Duke-Gallagher has yet to select a remedy.

Duke-Gallagher completed its assessment of corrective measures report for Primary Pond in June 2019. Duke-Gallagher has yet to select a remedy.

9. Closure Notification for Unlined Surface Impoundment: Ash Pond A, Primary Pond, Secondary Settling Pond

Under 40 C.F.R. § 257.101(a)(1), as soon as technically feasible, but not later than April 11, 2021, an owner or operator of an existing unlined CCR surface impoundment must cease placing CCR and non-CCR wastestreams into such CCR surface impoundment and either retrofit or close the CCR unit in accordance with the requirements of § 257.102. An owner or operator of an existing unlined CCR surface impoundment that closes in accordance § 257.101(a)(1), must include a statement in the notification required under § 257.102(g) or (k)(5) that the CCR surface impoundment is closing or retrofitting under the requirements of § 257.101(a)(1). See 40 C.F.R. § 257.101(a)(2).

Ash Pond A, Primary Pond, and Secondary Settling Pond are unlined.

The closure notifications posted on Duke Energy Corporation's CCR website for Ash Pond A, Primary Pond, and Secondary Settling Pond do not include a statement that the CCR surface impoundment is closing under the requirements of 40 C.F.R. § 257.101(a)(1).

10. Closure Notification for Location Restrictions: Ash Pond A, Primary Pond, Secondary Settling Pond

Under 40 C.F.R. § 257.101(b)(1)(i), the owner or operator of an existing CCR surface impoundment that has not demonstrated compliance with the location standard specified in § 257.60(a) must cease placing CCR and non-CCR wastestreams into such CCR unit as soon as technically feasible, but no later than April 11, 2021, and close the CCR unit in accordance with the requirements of § 257.102.

Under 40 C.F.R. § 257.101(b)(1)(ii), within six months of determining that an existing CCR surface impoundment has not demonstrated compliance with any location standard specified in §§ 257.61(a), 257.62(a), 257.63(a), and 257.64(a), the owner or operator of the CCR surface impoundment must

cease placing CCR and non-CCR wastestreams into such CCR unit and close the CCR unit in accordance with the requirements of § 257.102.

An owner or operator of an existing CCR surface impoundment that closes in accordance with paragraph 40 C.F.R. § 257.101(b)(1) must include a statement in the notification required under § 257.102(g) that the CCR surface impoundment is closing under the requirements of 40 C.F.R. § 257.101(b)(1). *See* 40 C.F.R. § 257.101(b)(3).

Duke-Gallagher certified that Ash Pond A and Primary Pond did not meet the requirements of the location standard specified at § 257.60(a) (i.e., placement above uppermost aquifer).

Duke-Gallagher certified that Ash Pond A and Primary Pond did not meet the requirements of the location standard specified at § 257.61(a) (i.e., wetlands).

Duke-Gallagher certified that Primary Pond did not meet the requirements of the location standard specified at § 257.63(a) (i.e., seismic impact zones).

Duke-Gallagher certified that Primary Pond did not meet the requirements of the location standard specified at § 257.64(a) (i.e., unstable areas).

According to statements available on Duke-Gallagher's CCR website, Duke-Gallagher did not certify the Secondary Settlement Pond met the requirements of the location standards specified at §§ 257.60(a), 257.61(a), 257.62(a), 257.63(a), and 257.64(a) because the CCR unit has been removed from service, with the CCR excavated from the basin and closure activities completed.

By failing to certify that the CCR impoundments meet applicable location standards, Duke-Gallagher failed to demonstrate compliance with the location standards and was therefore required to close Ash Pond A, Primary Pond, and Secondary Settling Pond and include a statement in the closure notification that they are being closed under the requirements of 40 C.F.R. § 257.101(b)(1). The closure notifications posted on Duke-Gallagher's CCR website for Ash Pond A, Primary Pond, and Secondary Settling Pond do not include a statement that the CCR surface impoundment is closing under the requirements of 40 C.F.R. § 257.101(b)(1).

11. Closure Notification – Safety Factor Assessment

Under 40 C.F.R. § 257.101(b)(2), within six months of either failing to complete the initial or any subsequent periodic safety factor assessment required by § 257.73(e) by the deadlines specified in § 257.73(f)(1) through (3) or failing to document that the calculated factors of safety for the existing CCR surface impoundment achieve the minimum safety factors specified in § 257.73(e)(1)(i) through (iv), the owner or operator of the CCR surface impoundment must cease placing CCR and non-CCR wastestreams into such CCR unit and close the CCR unit in accordance with the requirements of § 257.102.

An owner or operator of an existing CCR surface impoundment that closes in accordance with 40 C.F.R. § 257.101(b)(2) must include a statement in the notification required under § 257.102(g) that the CCR surface impoundment is closing under the requirements of § 257.101(b)(2).

Duke-Gallagher did not complete the initial or any subsequent periodic safety factor assessment required by § 257.73(e) for the Secondary Settling Pond.

The closure notification for Secondary Settling Pond posted on Duke-Gallagher's CCR website does not include a statement that the CCR surface impoundment is closing under the requirements of § 257.101(b)(2).

The initial and periodic safety factor assessments for Primary Pond posted on Duke Energy Corporation's CCR website conclude it does not meet the minimum safety factors specified in § 257.73(e)(1)(iii) and (iv).

The closure notification for Primary Pond posted on Duke Energy Corporation's CCR website does not include a statement that the CCR surface impoundment is closing under the requirements of § 257.101(b)(2).

12. Closure Plan Revision: Primary Pond

Under 40 C.F.R. § 257.102(b)(3)(iii), the owner or operator must amend the closure plan at least 60 days prior to a planned change in the operation of the facility or CCR unit, or no later than 60 days after an unanticipated event requires the need to revise an existing written closure plan. If a written closure plan is revised after closure activities have commenced for a CCR unit, the owner or operator must amend the current closure plan no later than 30 days following the triggering event. The amended closure plan must be posted on the facility CCR website. *See* 40 C.F.R. §§ 257.102(j) and 257.107(i)(4).

Duke-Gallagher posted a closure plan on its CCR website for Ash Pond A and Primary Pond on November 11, 2016, which is dated October 10, 2016. No subsequent revisions are posted on Duke-Gallagher's CCR website. The closure plan posted does not discuss a "cut-off" wall surrounding the Primary Pond.

However, IDEM's December 8, 2021 approval of Duke-Gallagher's closure plan for the Primary Pond includes the requirement to install a cut-off wall around the perimeter of the Primary Pond as a condition of closing with waste-in-place.

Duke-Gallagher has not revised its closure plan posted on the CCR website for the Primary Pond to include the addition of the cut-off wall.

13. Closure Time Frames: Ash Pond A, North Ash Pond, Primary Pond, Primary Pond Ash Fill

Under 40 C.F.R. § 257.102(f)(1)(ii), except as provided for in § 257.102(f)(2), the owner or operator must complete closure of an existing CCR surface impoundment within five years of commencing closure activities. The timeframes for completing closure of a CCR unit may be extended if the owner or operator can demonstrate that it was not feasible to complete closure of the CCR unit within the required timeframes due to factors beyond the facility's control. *See* 40 C.F.R. § 257.102(f)(2)(i). The extension demonstration must be posted on the facility CCR website. *See* 40 C.F.R. § 257.107(i)(6). CCR surface impoundments of 40 acres or smaller may extend the time to complete closure by no longer than two years. *See* 40 C.F.R. § 257.102(f)(2)(ii)(A).

Under 40 C.F.R. § 257.102(e)(3), for purposes of 40 C.F.R. Part 257, Subpart D, closure of the CCR unit has commenced if the owner or operator has ceased placing waste and completes any of the following actions or activities:

- a. Taken any steps necessary to implement the written closure plan required by § 257.102 (b);
- b. Submitted a completed application for any required state or agency permit or permit modification; or
- c. Taken any steps necessary to comply with any state or other agency standards that are a prerequisite, or are otherwise applicable, to initiating or completing the closure of a CCR unit.

Duke-Gallagher submitted a closure plan application for its Ash Pond System, which includes Ash Pond A, North Ash Pond, Primary Pond, and Primary Pond Ash Fill, on December 21, 2016.

Therefore under 40 C.F.R. § 257.102(e)(3)(ii), closure of these units had commenced and closure was required to be completed by December 21, 2021.

On August 26, 2021, Duke-Gallagher posted a Certification Statement and Demonstration Closure Time Frame Extension for the Primary Pond on its CCR website. The Primary Pond is less than 40 acres and therefore closure completion could be extended to December 2023 (i.e., two additional years).

Duke-Gallagher did not post extension demonstration for any of the other impoundments.

As of this date, Duke-Gallagher had yet to complete closure of Ash Pond A, North Ash Pond, Primary Pond, and Primary Pond Ash Fill.

ENCLOSURE B
LOCATION OF CCR DISPOSAL UNITS
Duke Energy Corporation Gallagher Generating Station



Note: Boundaries of CCR disposal units as depicted are approximate and based on locations given in Duke-Gallagher's January 2020 Groundwater Sampling and Analysis Plan.

ENCLOSURE C
Sampling Events with Exceedances of the Groundwater Protection Standard
Duke Energy Corporation Gallagher Generating Station

Sample Date	Monitoring Well	Appendix IV SSLs	Surface Impoundment
3/19/2018	MW-A305	As, Mo	Ash Pond A
3/20/2018	MW-A318	As	Primary Pond
9/19/2018	MW-A305	As, Mo	Ash Pond A
9/19/2018	MW-A309	Co	Primary Pond
9/19/2018	MW-A318	As	Primary Pond
3/6/2019	MW-A305	As, Mo	Ash Pond A
3/7/2019	MW-A309	Co	Primary Pond
4/25/2019	MW-A301	Mo	Secondary Settling Pond
4/26/2019	MW-A302	Mo	Secondary Settling Pond
4/26/2019	MW-A319	Mo	Secondary Settling Pond
9/10/2019	MW-A302	Mo	Secondary Settling Pond
9/10/2019	MW-A319	Mo	Ash Pond A/Secondary Settling Pond
9/11/2019	MW-A301	Mo	Secondary Settling Pond
9/11/2019	MW-A305	As, Mo	Ash Pond A
9/11/2019	MW-A306	Li, Mo	Ash Pond A
9/11/2019	MW-A316	Mo	Primary Pond
9/11/2019	MW-A318	As	Primary Pond
10/29/2019	MW-A301	Mo	Secondary Settling Pond
10/29/2019	MW-A302	Mo	Secondary Settling Pond
10/29/2019	MW-A319	Mo	Ash Pond A/Secondary Settling Pond
3/3/2020	MW-A302	Mo	Secondary Settling Pond
3/3/2020	MW-A316	Mo	Primary Pond
3/4/2020	MW-A301	Mo	Secondary Settling Pond
3/4/2020	MW-A305	As, Mo	Ash Pond A
3/4/2020	MW-A306	Li, Mo	Ash Pond A
3/4/2020	MW-A318	As	Primary Pond
3/4/2020	MW-A319	Mo	Ash Pond A/Secondary Settling Pond
9/1/2020	MW-A301	Mo	Secondary Settling Pond
9/1/2020	MW-A302	Mo	Secondary Settling Pond
9/1/2020	MW-A305	Mo	Ash Pond A
9/1/2020	MW-A306	Mo	Ash Pond A
9/2/2020	MW-A319	Mo	Ash Pond A/Secondary Settling Pond
3/2/2021	MW-A301	Mo	Secondary Settling Pond
3/2/2021	MW-A302	Mo	Secondary Settling Pond
3/2/2021	MW-A319	Mo	Ash Pond A/Secondary Settling Pond
3/3/2021	MW-A305	As, Mo	Ash Pond A
3/3/2021	MW-A306	Mo	Ash Pond A
3/3/2021	MW-A316	Li, Mo	Primary Pond
9/15/2021	MW-A301	Mo	Secondary Settling Pond
9/15/2021	MW-A302	Mo	Secondary Settling Pond
9/15/2021	MW-A305	Mo	Ash Pond A

Sample Date	Monitoring Well	Appendix IV SSLs	Surface Impoundment
9/15/2021	MW-A306	Li, Mo	Ash Pond A
9/15/2021	MW-A316	Li, Mo	Primary Pond
9/15/2021	MW-A318	As	Primary Pond
9/15/2021	MW-A319	Mo	Ash Pond A/Secondary Settling Pond
3/8/2022	MW-A306	As, Li, Mo	Ash Pond A
3/8/2022	MW-A316	Li, Mo	Primary Pond
3/8/2022	MW-A318	As	Primary Pond
3/9/2022	MW-A301	Mo	Secondary Settling Pond
3/9/2022	MW-A302	Mo	Secondary Settling Pond
3/9/2022	MW-A305	As, Mo	Ash Pond A
3/9/2022	MW-A319	Mo	Ash Pond A/Secondary Settling Pond
9/7/2022	MW-A302	Mo	Secondary Settling Pond
9/7/2022	MW-A319	Mo	Ash Pond A/Secondary Settling Pond
9/8/2022	MW-A301	Mo	Secondary Settling Pond
9/8/2022	MW-A318	As, Co	Primary Pond
9/9/2022	MW-A305	As, Mo	Ash Pond A
3/7/2023	MW-A319	Mo	Ash Pond A/Secondary Settling Pond
3/8/2023	MW-A301	Mo	Secondary Settling Pond
3/8/2023	MW-A302	Mo	Secondary Settling Pond
3/8/2023	MW-A305	As, Mo	Ash Pond A
3/8/2023	MW-A318	As	Primary Pond
9/6/2023	MW-A301	Mo	Secondary Settling Pond
9/6/2023	MW-A319	Li, Mo	Ash Pond A/Secondary Settling Pond
9/7/2023	MW-A302	Mo	Secondary Settling Pond
9/7/2023	MW-A305	As, Mo	Ash Pond A