



CCR Rule Groundwater Protection Standard Exceedance Notification

Mt. Storm Power Station – Low Volume Waste Settling Ponds Mount Storm, West Virginia

The second semi-annual 2018 assessment monitoring groundwater samples were collected from the Mt. Storm Power Station Low Volume Waste Settling Ponds' groundwater monitoring network in accordance with the federal Coal Combustion Residuals (CCR) Rule. The analytical results from this sampling event were compared to applicable groundwater protection standards (GWPS) and constituent concentrations above GWPS were identified. The wells in which these constituents were above GWPS are located inside the Mt. Storm Power Station property. Groundwater within the property and downgradient of the property is not used as drinking water and as such does not present a risk to drinking water quality.

40 CFR §257.95(g) requires the owner or operator of an existing CCR unit that is monitoring groundwater in accordance with the assessment monitoring program and has exceeded a GWPS to prepare a notification identifying the Appendix IV constituents that have exceeded the GWPS. The notification is complete when it is placed in the facility's operating record as required by 40 CFR §257.105(h)(8). The following constituents were detected at levels above GWPS.

CCR Rule Groundwater Protection Standard Exceedances

| Constituent | GWPS (parts per billion) | Downgradient Monitoring Well(s) | Concentration (parts per billion) |
|-------------|-----------------------------|------------------------------------|--------------------------------------|
| Cobalt | 29 | OW-8 | 31.9 |
| Arsenic | 10 | OW-12 | 13.5 |
| | | OW-13 | 13.7 |

Given the recent construction activity in the area and elevated turbidities in several wells, the facility intends to pursue an Alternate Source Demonstration to determine if the GWPS exceedances are a result of an alternate source, error in sampling, error in laboratory analysis, error in statistical evaluation, or natural variation in groundwater.