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MEMORANDUM

13 May 2019
File No. 130116

TO: AES Ohio Generation, LLC
745 US Route 52
Manchester, Ohio 45144
Attn: Troy Williams

FROM: Haley & Aldrich, Inc.

SUBJECT: Initiation of Assessment of Corrective Measures Pursuant to 40 CFR § 257.95(g)(3)(i) and
40 CFR § 257.96
JM Stuart Station – Pond 5, Pond 7/7A, Pond 10 and Landfill 11

AES Ohio Generation, LLC (AES) is implementing the U.S. Environmental Protection Agency (U.S. EPA) Federal Coal Combustion Residuals (CCR) Rule (40 CFR § 257 and 261) effective 19 October 2015 (along with subsequent revisions) for the active CCR surface impoundments referred to as Pond 5, Pond 7/7A and Pond 10 and the CCR landfill referred to as Landfill 11 at the JM Stuart Station, located in Adams County near Manchester, Ohio. AES has constructed a CCR Rule compliant groundwater monitoring system consistent with 40 CFR § 257.91 and completed detection (40 CFR § 257.94) and assessment monitoring (40 CFR § 257.95) for each of these four CCR units. The statistical analysis of the assessment monitoring results for these units identified Appendix IV constituents at statistically significant levels above Groundwater Protection Standards.

This memorandum serves as notification required by 40 CFR § 257.95(g)(5) that an assessment of corrective measures for Pond 5, Pond 7/7A, Pond 10 and Landfill 11 has been initiated within 90 days of identifying a statistically significant level above the GWPS for Appendix IV constituents and that the assessment will be completed in accordance with 40 CFR § 257.96.