

OHIO VALLEY ELECTRIC CORPORATION

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WRITER'S DIRECT DIAL NO: 740-897-7768

March 1, 2019

Mr. Bruno Pigott, Commissioner Indiana Department of Environmental Management 100 N. Senate Avenue Mail Code 50-01 Indianapolis, IN 46204-2251

Dear Mr. Pigott:

Re: Indiana-Kentucky Electric Corporation 2018 Annual Groundwater Monitoring and Corrective Actions Report

As required by 40 CFR 257.106(h)(1), the Indiana-Kentucky Electric Corporation (IKEC) is providing notification to the Commissioner (State Director) of the Indiana Department of Environmental Management that the second Annual CCR Groundwater Monitoring and Corrective Actions report has been completed in compliance with 40 CFR 257.90(e) for IKEC's Clifty Creek Station. The report has been placed in the facility's operating record in accordance with 40 CFR 257.105(h)(1), as well as on the company's publically accessible internet site in accordance with 40 CFR 257.107(h)(1), which can be viewed at https://www.ovec.com/CCRCompliance.php.

If you have any questions, or require any additional information, please call me at (740) 897-7768.

Sincerely,

Tim Full

Tim Fulk Engineer II

TLF:klr



Stantec Consulting Services Inc. 11687 Lebanon Road, Cincinnati OH 45241-2012

February 27, 2019

File: 175534018, 200.201

Ohio Valley Electric Corporation Indiana-Kentucky Electric Corporation Attention: Mr. Gabriel Coriell 3932 U.S. Route 23 P.O. Box 468 Piketon, Ohio 45661

Reference: 2018 Annual Groundwater Monitoring and Corrective Action Report (Rev. 1.0) EPA Final Coal Combustion Residuals (CCR) Rule Clifty Creek Generating Station Madison, Indiana

Dear Mr. Coriell,

The EPA Final CCR Rule requires owners or operators of existing CCR landfills and surface impoundments to prepare an annual groundwater monitoring and corrective action report no later than January 31 of the year following the calendar year a groundwater monitoring system has been established for such CCR unit as required by 40 CFR 257.90(e). For the Indiana-Kentucky Electric Corporation (IKEC), this applies to the Clifty Creek Station's West Boiler Slag Pond, Landfill Runoff Collection Pond, and CCR Landfill.

The annual report must document the status of the groundwater monitoring and corrective action program for the CCR unit, summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and project key activities for the upcoming year. At a minimum, the annual groundwater monitoring and corrective action report must contain the following information, to the extent available:

- 1. A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit;
- 2. Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;
- 3. In addition to all the monitoring data obtained under §§257.90 through 257.98, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs;
- 4. A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in



February 27, 2019 Mr. Gabriel Coriell Page 2 of 2

Reference: 2018 Annual Groundwater Monitoring and Corrective Action Report (Rev. 1.0) EPA Final Coal Combustion Residuals (CCR) Rule Clifty Creek Generating Station Madison, Indiana

addition to identifying the constituent(s) detected at a statistically significant increase over background level); and

5. Other information required to be included in the annual report as specified in §§257.90 through 257.98.

IKEC has retained Applied Geology and Environmental Science, Inc. of Clinton, Pennsylvania (AGES) to perform the Clifty Creek Station's groundwater monitoring and corrective action support under the EPA Final CCR Rule. The 2018 CCR Regulation Groundwater Monitoring and Corrective Action Report (GWCAR) was prepared by AGES to present the annual groundwater monitoring at the West Boiler Slag Pond, Landfill Runoff Collection Pond, and CCR Landfill of the Clifty Creek Station. AGES (2019a) was posted to the Clifty Creek Station's operating record by January 31, 2019. AGES (2019b) revised the annual report's discussion of the groundwater protection standards and the projected activities to summarize the results of the statistical evaluations. Stantec Consulting Services Inc. (Stantec) has reviewed AGES (2019a and 2019b); and they meet the requirements specified in 40 CFR 257.90(e).

Please contact us with any questions or concerns. We appreciate the opportunity to continue to work with the Clifty Creek Generating Station and the Indiana-Kentucky Electric Corporation.

Regards,

Stantec Consulting Services Inc.

Senior Associate Phone: (513) 842-8200 ext 8220 Fax: (513) 842-8250 Jacqueline.Harmon@stantec.com

Attachment: AGES (2019b). Coal Combustion Residuals Regulation, 2018 Groundwater Monitoring and Corrective Action Report, Indiana-Kentucky Electric Corporation. Clifty Creek Station, Madison, Indiana, January. February 2019. Revision 1.0.

c. Stan Harris, John Griggs, John McInnes jsh v:\1755\active\175534018\geotechnical\analysis\groundwater\2018 annual report - ages\175534018 let 20190227.docx

Design with community in mind



2402 Hookstown Grade Road, Suite 200 Clinton, PA 15026 www.appliedgeology.net

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COAL COMBUSTION RESIDUALS REGULATION 2018 GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

INDIANA-KENTUCKY ELECTRIC CORPORATION CLIFTY CREEK STATION MADISON, INDIANA

JANUARY 2019 FEBRUARY 2019 REVISION 1.0

Prepared for:

INDIANA-KENTUCKY ELECTRIC CORPORATION (IKEC)

By:

APPLIED GEOLOGY AND ENVIRONMENTAL SCIENCE, INC.

JANUARY 2019 FEBRUARY 2019 REVISION 1.0

Prepared for:

INDIANA-KENTUCKY ELECTRIC CORPORATION (IKEC)

Prepared By:

APPLIED GEOLOGY AND ENVIRONMENTAL SCIENCE, INC.

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TABLE OF CONTENTS

1.0	INTRODUCTION	.1
2.0	BACKGROUND	.1
3.0	TYPE I RESIDUAL WASTE LANDFILL AND LANDFILL RUNOFF	
	COLLECTION POND	2
	3.1 Groundwater Monitoring Network	2
	3.2 Groundwater Sampling	3
	3.3 Analytical Results	3
	3.4 Groundwater Protection Standards	7
4.0	WEST BOILER SLAG POND	5
	4.1 Groundwater Monitoring Network	5
	4.2 Groundwater Sampling	5
	4.3 Analytical Results	6
5.0	PROBLEMS ENCOUNTERED	6
6.0	PROJECTED ACTIVITIES FOR 2019	.7
7 0		_

TABLE OF CONTENTS (Continued)

LIST OF TABLES

- 3-1 Groundwater Monitoring Network Type I Residual Waste Landfill and Landfill Runoff Collection Pond
- 3-2 Summary of Samples Collected During 2018 Type I Residual Waste Landfill and Landfill Runoff Collection Pond
- 3-3 Summary of Measured Field Parameters 2018 Type I Residual Waste Landfill and Landfill Runoff Collection Pond
- 3-4 Summary of Potential and Confirmed Statistically Significant Increases Type I Residual Waste Landfill and Landfill Runoff Collection Pond
- 3-5 Groundwater Protection Standards Type I Residual Waste Landfill and Landfill Runoff Collection Pond
- 4-1 Groundwater Monitoring Network West Boiler Slag Pond
- 4-2 Summary of Samples Collected During 2018 West Boiler Slag Pond
- 4-3 Summary of Measured Field Parameters 2018 West Boiler Slag Pond

LIST OF FIGURES

- 1 Site Location Map
- 2 Monitoring Well Locations Type I Residual Waste Landfill and Landfill Runoff Collection Pond
- 3 Monitoring Well Locations West Boiler Slag Pond

LIST OF APPENDICES

- A Groundwater Elevations
- B Groundwater Flow Maps
- C Appendix III and Appendix IV Constituents
- D Analytical Results

LIST OF ACRONYMS

AGES	Applied Geology and Environmental Science, Inc.
CCR	Coal Combustion Residuals
GMPP	Groundwater Monitoring Program Plan
GWPS	Groundwater Protection Standard
IDEM	Indiana Department of Environmental Management
IKEC	Indiana-Kentucky Electric Corporation
LRCP	Landfill Runoff Collection Pond
MCL	Maximum Contaminant Level
MW	Megawatt
OVEC	Ohio Valley Electric Corporation
RCRA	Resource Conservation and Recovery Act
SAP	Statistical Analysis Plan
SSI	Statistically Significant Increase
Stantec	Stantec Consulting Services, Inc.
Type I Landfill	Type I Residual Waste Landfill
S.U.	Standard Unit
U.S. EPA	United States Environmental Protection Agency
WBSP	West Boiler Slag Pond

1.0 INTRODUCTION

On December 19, 2014, the United States Environmental Protection Agency (U.S. EPA) issued their final Coal Combustion Residuals (CCR) regulation which regulates CCR as a non-hazardous waste under Subtitle D of Resource Conservation and Recovery Act (RCRA) and became effective six (6) months from the date of its publication (April 17, 2015) in the Federal Register, referred to as the "CCR Rule." The rule applies to new and existing landfills, and surface impoundments used to dispose of or otherwise manage CCR generated by electric utilities and independent power producers. Because the rule was promulgated under Subtitle D of RCRA, it does not require regulated facilities to obtain permits, does not require state adoption, and cannot be enforced by U.S. EPA. The only compliance mechanism is for a state or citizen group to bring a RCRA suit in federal district court against any facility that is alleged to be in non-compliance with the new requirements.

This Groundwater Monitoring and Corrective Action Report has been prepared in accordance with §257.90 (e) of the CCR Rule and documents the status of the groundwater monitoring and corrective action program for each CCR unit, summarizes the key actions completed during 2018, describes any problems encountered, discusses actions to resolve the problems, and projects key activities for the upcoming year.

2.0 BACKGROUND

The Clifty Creek Station, located in Madison, Indiana, is a 1,304-megawatt (MW) coal-fired generating plant operated by the Indiana-Kentucky Electric Corporation (IKEC), a subsidiary of the Ohio Valley Electric Corporation (OVEC). The Clifty Creek Station has six (6) 217.26-MW generating units and has been in operation since 1955. Beginning in 1955, ash products were sluiced to disposal ponds located in the plant site. During the course of plant operations, CCRs have been managed and disposed of in various units at the station. There are three (3) CCR units at the Clifty Creek Station (Figure 1):

- Type I Residual Waste Landfill (Type I Landfill);
- Landfill Runoff Collection Pond (LRCP); and
- West Boiler Slag Pond (WBSP).

A discussion of the status of the groundwater monitoring program for each CCR unit is presented in the following sections of this report.

3.0 TYPE I RESIDUAL WASTE LANDFILL AND LANDFILL RUNOFF COLLECTION POND

The Type I Landfill and LRCP occupy an approximately 200-acre area situated within an eroded bedrock channel (Figures 1 and 2). Beginning in 1955, ash products were sluiced to disposal ponds located in the plant site. To allow for more disposal capacity, an on-site fly ash pond was developed into a Type III Landfill in 1988. All required permits for the Type III Landfill were obtained from the Indiana Department of Environmental Management (IDEM) and the Type III Landfill were disposal of low-sulfur coal ash in the fly ash Type III Landfill. Emplacement of low-sulfur coal ash in the Type III Landfill began in January 1995. In April 2007, IKEC submitted a permit application to IDEM to upgrade the former Type III landfill to a Type I landfill. In 2013, IDEM issued a renewed permit and approved IKEC's request to upgrade the landfill to a Type I landfill.

The Type I Landfill consists of approximately 109 acres, and has been approved by IDEM as a Type I Residual Waste Landfill. The remaining 91 acres consist of the LRCP located at the southwest end of the Type I Landfill.

3.1 Groundwater Monitoring Network

As detailed in the *Monitoring Well Installation Report* (Applied Geology and Environmental Science, Inc. [AGES] 2018a), the CCR groundwater monitoring network for the Type I Landfill and LRCP consists of the following eight (8) monitoring wells:

- CF-15-04 (Background);
- CF-15-05 (Background);
- CF-15-06 (Background);
- CF-15-07 (Downgradient);
- CF-15-08 (Downgradient);
- CF-15-09 (Downgradient);
- WBSP-15-01 (Background); and
- WBSP-15-02 (Background).

The locations of all the wells in the groundwater monitoring network are shown on Figure 2. As listed above and shown on Table 3-1, the CCR groundwater monitoring network includes five (5) background and three (3) downgradient monitoring wells, which satisfies the requirements of the CCR Rule. Groundwater levels measured in 2018 are included in Appendix A. Groundwater flow maps for the two (2) monitoring events completed in 2018 are included in Appendix B.

3.2 Groundwater Sampling

In accordance with §257.94 of the CCR Rule, the first round of Detection Monitoring was conducted in March 2018. Based on the results of the statistical evaluation of the Detection Monitoring data (see Section 3.3), the Type I Landfill and LRCP entered into Assessment Monitoring on September 11, 2018. The first round of Assessment Monitoring samples were collected in October 2018.

All groundwater samples were collected in accordance with the Groundwater Monitoring Program Plan (GMPP) (AGES 2018b). The Detection Monitoring samples were analyzed for all Appendix III constituents, and the Assessment Monitoring samples were analyzed for all Appendix III and Appendix IV constituents. In accordance with §257.90(e)(3), Table 3-2 presents a sampling summary, including the number of groundwater samples collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the Detection or the Assessment Monitoring program. Table 3-3 summarizes the measurements of field parameters collected at the completion of purging, immediately prior to collection of each sample. All samples were shipped to an analytical laboratory to be analyzed for all of the parameters listed in Appendix III and/or Appendix IV of the CCR Rule (Appendix C) as appropriate.

3.3 Analytical Results

Upon receipt, the March 2018 groundwater monitoring data were statistically evaluated in accordance with §257.93(f) of the CCR Rule and the SAP (Stantec 2018) for the Clifty Creek Station CCR program. Appendix D summarizes the analytical results for groundwater samples collected in 2018. The initial statistical evaluation of the Detection Monitoring data identified potential SSIs of Appendix III constituents pH and Boron in three (3) wells. (As discussed in Section 5.0, a faulty pH meter was suspected of causing the SSIs for pH.) In accordance with the SAP, the wells were re-sampled for those constituents in May 2018. Based on the results of the re-sampling the SSIs were confirmed for Boron in wells CF-15-08 and CF-15-09 at the Type I Landfill and LRCP (Table 3-4).

Upon receipt of the October 2018 analytical results, the groundwater monitoring data were statistically evaluated in accordance with §257.93(f) of the CCR Rule and the SAP (Stantec 2018) for the Clifty Creek Station CCR program. The initial statistical evaluation of the Assessment Monitoring data collected in October 2018 identified potential SSIs of one (1) or more Appendix III and Appendix IV constituents in three (3) wells. In accordance with the SAP, the wells were re-sampled for those constituents in December 2018. Based on the results of the re-sampling, the following Appendix III and Appendix IV SSIs were confirmed (Table 3-4):

Appendix III SSIs CF-15-08: Boron; and CF-15-09: Boron.

<u>Appendix IV SSIs</u> CF-15-08: Molybdenum; and CF-15-09: Molybdenum.

3.4 Groundwater Protection Standards

Based on the first round of Assessment Monitoring at the Type I Landfill & LRCP, SSIs were confirmed for one (1) Appendix IV constituent: Molybdenum. Therefore, IKEC has established a Groundwater Protection Standard (GWPS) for each Appendix IV constituent in accordance with the $\S257.95(h)(1)$ through $\S257.95(h)(3)$ as follows:

(1) For constituents for which the U.S. Environmental Protection Agency (U.S. EPA) has established a Maximum Contaminant Level (MCL), the GWPS shall be the MCL for that constituent.

(2) On July 30, 2018, the U.S. EPA published alternate limits to be used for several constituents that did not have previously established MCLs to be used as the GWPS for those constituents.

(3) For constituents for which the background level is higher than the MCL or the alternate limit, the background concentration shall be the GWPS for that constituent.

Table 3-5 presents the list of GWPS for the Assessment Monitoring program at the Type I Landfill & LRCP that were developed in accordance with the above requirements. Molybdenum concentrations in CF-15-08 in September 2018 (524 μ g/L) and December 2018 (429 μ g/L) were greater than the GWPS of 100 μ g/L. Molybdenum concentrations in CF-15-09 in September 2018 (85.9 μ g/L) and December (87.1 μ g/L) were not greater than the GWPS.

Based on the results above, the Molybdenum concentrations in CF-15-08 were further evaluated to determine if Molybdenum was present at a Statistically Significant Level (SSL) above the GWPS. In accordance with the SAP (Stantec 2018), a 95% Lower Confidence Limit (LCL) of the mean Molybdenum concentration was calculated using the samples collected from CF-15-08 throughout the CCR groundwater monitoring program. The 95% LCL for Molybdenum in CF-15-08 (262.3 ug/L) was greater than the Molybdenum GWPS (100 ug/L). The statistical evaluation therefore concluded that Molybdenum in CF-15-08 was present at a SSL above the GWPS.

4.0 WEST BOILER SLAG POND

The WBSP currently serves as a settling facility for sluiced boiler slag produced at the plant. The pond is formed by natural grade to the north, east and west and a southern dike that runs along the bank of the Ohio River. The Devil's Backbone borders the northern side of the WBSP (Figures 1 and 3).

4.1 <u>Groundwater Monitoring Network</u>

As detailed in the *Monitoring Well Installation Report* (AGES 2018a), the CCR groundwater monitoring network for the WBSP includes the following 13 wells:

- CF-15-04 (Background);
- CF-15-05 (Background);
- CF-15-06 (Background);
- WBSP-15-01 (Upgradient);
- WBSP-15-02 (Upgradient);
- WBSP-15-03 (Upgradient);
- WBSP-15-04 (Downgradient);
- WBSP-15-05 (Downgradient);
- WBSP-15-06 (Downgradient);
- WBSP-15-07 (Downgradient);
- WBSP-15-08 (Downgradient);
- WBSP-15-09 (Downgradient); and
- WBSP-15-10 (Downgradient).

The locations of the wells in the groundwater monitoring network are shown on Figure 3. As listed above and shown on Table 4-1, the CCR groundwater monitoring network for the WBSP includes six (6) background and upgradient wells, and seven (7) downgradient wells, which satisfies the requirements of the CCR Rule.

Groundwater levels measured in 2018 are included in Appendix A. Groundwater flow maps for the two (2) monitoring events completed in 2018 are included in Appendix B.

4.2 <u>Groundwater Sampling</u>

In accordance with §257.94 of the CCR Rule, IKEC completed two (2) rounds of groundwater monitoring in accordance with the Detection Monitoring Program at the WBSP. Table 4-2 presents a sampling summary, which includes the number of groundwater samples collected for analysis for each upgradient, background and downgradient well, the dates the samples were collected, and whether the sample was required by the Detection Monitoring program. Table 4-3 summarizes the measurements of field parameters collected at the completion of purging,

immediately prior to collection of each sample. All samples were collected in accordance with the GMPP (AGES 2018b) and shipped to an analytical laboratory to be analyzed for all of the parameters listed in Appendix III of the CCR Rule (Appendix C).

4.3 Analytical Results

Upon receipt of the March 2018 and October 2018 analytical results, the groundwater monitoring data were statistically evaluated in accordance with §257.93(f) of the CCR Rule and the SAP (Stantec 2018). Appendix D summarizes the analytical results for groundwater samples collected in 2018. No potential SSIs were identified during either of the Detection Monitoring events. Therefore, the WBSP will remain in Detection Monitoring.

5.0 PROBLEMS ENCOUNTERED

During the March 2018 Detection Monitoring event, potential SSIs for pH were reported in all downgradient wells at the Type I Landfill and LRCP (ranging from 10.12 standard units (S.U.) to 11.57 S.U.). A thorough review of historic pH data for all of the wells, and well purging and sampling forms from the March 2018 event indicated that the elevated pH readings were the result of a faulty pH meter used during the March 2018 sampling event.

The range of historic pH values measured at all the Type I Landfill and LRCP wells (CF-15-07, CF-15-08, and CF-15-09) ranged from 6.69 S.U. to 7.91 S.U. with the average being 7.29 S.U. The highest March 2018 pH value (10.85 S.U.) was three (3) orders of magnitude higher than the historic average for pH. In addition, all the Type I Landfill and LRCP wells were sampled by the same field crew using the same pH meter. The WBSP wells were sampled by a different crew and pH meter. Only wells monitored by the field crew working at the Type I Landfill and LRCP exhibited elevated pH readings.

Prior to the resampling event in May 2018, a new pH meter and new calibration solutions were acquired, and all the field staff were re-trained on proper calibration methods. During the May 2018 sampling event, all the affected wells were purged until stabilization of field parameters was achieved in accordance with the methods detailed in the GMPP (AGES 2018b). After stabilization of the field parameters, the pH of water collected from each well was measured and recorded on the purge forms. None of the previously identified SSIs for pH were confirmed by the resampling.

6.0 PROJECTED ACTIVITIES FOR 2019

The WBSP will remain in Detection Monitoring and continue to be sampled on a semi-annual basis.

The Type I Landfill and LRCP entered into Assessment Monitoring on September 11, 2018, and two (2) Appendix IV SSIs were reported for Molybdenum during the October 2018 monitoring event. Molybdenum was the detected at a SSL above the GWPS. Therefore, IKEC will characterize the nature and extent of the release, complete required notifications, and complete an alternate source demonstration or initiate an assessment of corrective measures in accordance with §257.95(g).

7.0 **REFERENCES**

Applied Geology and Environmental Science, Inc. (AGES) 2018a. Coal Combustion Residuals Regulation Monitoring Well Installation Report. Indiana-Kentucky Electric Corporation, Clifty Creek Station, Madison, Jefferson County, Indiana. Revision 1.0. November 2018.

Applied Geology and Environmental Science, Inc. (AGES) 2018b. Coal Combustion Residuals Regulation Groundwater Monitoring Program Plan, Indiana-Kentucky Electric Corporation, Clifty Creek Station, Madison, Jefferson County, Indiana. Revision 1.0. November 2018.

Stantec Consulting Services, Inc. (Stantec), 2018. Coal Combustion Residuals Regulation Statistical Analysis Plan, Indiana-Kentucky Electric Corporation, Clifty Creek Station, Madison, Jefferson County, Indiana. January 2018.

TABLES

TABLE 3-1 GROUNDWATER MONITORING NETWORK TYPE I RESIDUAL WASTE LANDFILL AND LANDFILL RUNOFF COLLECTION POND CLIFTY CREEK STATION MADISON, INDIANA

Monitoring Well	Designation	Date of	Coord	linates	Ground	Top of Casing	Top of Screen	Base of Screen	Total Depth
ID	Designation	Installation	Northing	Easting	Elevation (ft) ²	Elevation (ft) ²	Elevation (ft)	Elevation (ft)	Casing (ft)
CF-15-04	Background	12/3/2015	451482.81	569307.19	465.55	468.03	439.55	429.55	38.48
CF-15-05	Background	12/1/2015	447491.91	565533.64	439.85	442.58	422.85	412.85	29.73
CF-15-06	Background	11/30/2015	447026.92	565190.31	437.49	440.40	431.49	421.49	18.91
CF-15-07	Downgradient	11/23/2015	443135.08	562259.25	438.61	441.11	432.61	422.61	18.50
CF-15-08	Downgradient	11/19/2015	443219.57	562537.29	460.33	462.79	430.33	420.33	42.46
CF-15-09	Downgradient	11/25/2015	443445.96	562871.69	456.73	459.45	447.73	442.73	16.72
WBSP-15-01	Background	11/30/2015	449072.27	566322.12	466.93	469.36	458.93	448.93	20.43
WBSP-15-02	Background	11/11/2015	449803.91	566987.30	473.83	476.76	457.83	452.83	23.93

Notes:

1. The Well locations are referenced to the North American Datum (NAD83), east zone coordinate system.

2. Elevations are referenced to the North American Vertical Datum (NAVD) 1988

TABLE 3-2 SUMMARY OF SAMPLES COLLECTED DURING 2018 TYPE I RESIDUAL WASTE LANDFILL AND LANDFILL RUNOFF COLLECTION POND CLIFTY CREEK STATION MADISON, INDIANA

Well ID	Designation	Mar-18	May-18	Oct-18	Dec-18
CF-15-04	Background	DM	NS	AM	NS
CF-15-05	Background	DM	NS	AM	NS
CF-15-06	Background	DM	NS	AM	NS
CF-15-07	Downgradient	DM	DM	AM	AM
CF-15-08	Downgradient	DM	DM	AM	АМ
CF-15-09	Downgradient	DM	DM	AM	AM
WBSP-15-01	Background	DM	NS	AM	NS
WBSP-15-02	Background	DM	NS	AM	NS

DM: Detection Monitoring

AM: Assessment Monitoring

NS: Not Sampled

TABLE 3-3 SUMMARY OF MEASURED FIELD PARAMETERS - 2018 TYPE I RESIDUAL WASTE LANDFILL AND LANDFILL RUNOFF COLLECTION POND CLIFTY CREEK STATION MADISON, INDIANA

						Dissolved	
	.	T	Conductivity	pH	Oxidation Reduction	Oxygen	Turbidity
Sample ID	Date	Temperature (°C)	(µonms/cm)	(5.0.)	Potential (mv)	(mg/L)	(NTUS)
CF-15-04	Mar-18	9.84	1491	10.06	-49.9	14.42	3.46
CF-15-05	Mar-18	10.85	1071	9.56	-37.6	13.28	4.03
CF-15-06	Mar-18	5.70	1201	10.36	-57.2	0.41	4.81
CF-15-07	Mar-18	9.08	1086	10.18	-50.0	0.14	4.76
CF-15-08	Mar-18	13.29	1018	10.21	-47.7	10.9	4.86
CF-15-09	Mar-18	9.04	1160	10.85	-50.4	15.39	3.71
WBSP-15-01	Mar-18	11.27	1508	6.65	97.2	3.55	18
WBSP-15-02	Mar-18	19.20	749	7.34	151.8	5.98	4.10
CF-15-07	May-18	18.32	985	7.12	-22	8.43	4.76
CF-15-08	May-18	21.34	755	7.45	304	8.36	4.91
CF-15-09	May-18	19.68	942	7.13	192	4.15	9.34
CF-15-04	Oct-18	16.34	661	7.76	390	6.03	4.38
CF-15-05	Oct-18	21.87	869	7.18	146	5.2	3.82
CF-15-06	Oct-18	21.32	12980	7.89	332	1.12	n/a
CF-15-07	Oct-18	19.25	1040	7.24	-30	4.43	4.38
CF-15-08	Oct-18	21.38	860	7.57	335	4.69	3.75
CF-15-09	Oct-18	20.42	1380	7.05	310	1.23	23.8
WBSP-15-01	Oct-18	21.64	1260	6.37	261	5.51	53.8
WBSP-15-02	Oct-18	24.17	1640	6.64	309	1.23	4.14
CF-15-07	Dec-18	16.49	1027	7.31	34.7	2.27	3.74
CF-15-08	Dec-18	16.27	847	7.61	273.4	1.44	3.55
CF-15-09	Dec-18	18.33	1123	7.03	325.1	1.27	9.34

°C: Degrees Celcius

µohms/cm: Micro-ohms per centimeter

S.U.: Standard Units

mV: Millivolts

mg/L: Milligrams per liter

NTUs: Nephelometric Turbidity Units

TABLE 3-4 SUMMARY OF POTENTIAL AND CONFIRMED SSIS TYPE I RESIDUAL WASTE LANDFILL AND LANDFILL RUNOFF COLLECTION POND CLIFTY CREEK STATION MADISON, INDIANA

			1st Detection Monitoring Event	1st Detection Monitoring Resampling	1st Assessment Monitoring Event	1st Assessment Monitoring Resampling
	Appendix			May 2018		December 2018
Well Id	III or IV	Parameter	Potential SSI	Confirmed SSI (Yes/No)	Potential SSI	Confirmed SSI (Yes/No)
Type I Residual Wast	te Landfill &	Landfill Runoff Colle	ection Pond			
CF-15-07	III	pН	Yes	No	No	
	IV	Arsenic			Yes	No
CF-15-08	III	Boron	Yes	Yes	Yes	Yes
	III	pН	Yes	No	No	
	IV	Molybdenum			Yes	Yes
CF-15-09	III	Boron	Yes	Yes	Yes	Yes
	Ш	рН	Yes	No	No	
	IV	Arsenic			Yes	No
	IV	Beryllium			Yes	No
	IV	Chromium			Yes	No
	IV	Cobalt			Yes	No
	IV	Lead			Yes	No
	IV	Molybdenum			Yes	Yes
	IV	Selenium			Yes	No

SSI: Statistically Significant Increase

UPL: Upper Prediction Limit

mg/L: Milligrams per liter

s.u.: Standard Units

--: Not evaluated

TABLE 3-5 GROUNDWATER PROTECTION STANDARDS TYPE I RESIDUAL WASTE LANDFILL AND LANDFILL RUNOFF COLLECTION POND CLIFTY CREEK STATION MADISON, INDIANA

Appendix IV Constituents							
Constituent	Background	MCL/SMCL	Groundwater Protection Standard				
Antimony, Sb	0.2185 (µg/L)	6 (µg/L)	6 (µg/L)				
Arsenic, As	4.47 (µg/L)	10 (µg/L)	10 (µg/L)				
Barium, Ba	116.7 (µg/L)	2000 (µg/L)	2000 (µg/L)				
Beryllium, Be	0.176 (μg/L)	4 (µg/L)	4 (µg/L)				
Cadmium, Cd	0.08 (µg/L)	5 (µg/L)	5 (µg/L)				
Chromium, Cr	8.4 (μg/L)	100 (µg/L)	100 (µg/L)				
Cobalt, Co	2.578 (µg/L)	6 (µg/L)*	6 (µg/L)				
Fluoride, F	0.5532 (mg/L)	4 (mg/L)	4 (mg/L)				
Lithium, Li	0.103 (µg/L)	40 (µg/L)*	40 (µg/L)				
Lead, Pb	2.023 (µg/L)	15 (µg/L)*	15 (µg/L)				
Mercury, Hg	1.33 (µg/L)	2 (µg/L)	2 (µg/L)				
Molybdenum, Mo	62.4 (µg/L)	100 (µg/L)*	100 (µg/L)				
Radium 226 & 228 (combined)	8.02 (pCi/L)	5 (pCi/L)	8.02 (pCi/L)				
Selenium, Se	0.44 (μg/L)	50 (µg/L)	50 (µg/L)				
Thallium, Tl	0.1788 (µg/L)	2 (µg/L)	2 (µg/L)				

* Established by EPA as part of 2018 decision.

TABLE 4-1 GROUNDWATER MONITORING NETWORK WEST BOILER SLAG POND CLIFTY CREEK STATION MADISON, INDIANA

Monitoring Well	Designation	Date of	Coord	linates	Ground	Top of Casing	Top of Screen	Base of Screen	Total Depth From Top of
ID	0	Installation	Northing	Easting	Elevation (ft) ²	Elevation (ft) ²	Elevation (ft)	Elevation (ft)	Casing (ft)
CF-15-04	Background	12/3/2015	451482.81	569307.19	465.55	468.03	439.55	429.55	38.48
CF-15-05	Background	12/1/2015	447491.91	565533.64	439.85	442.58	422.85	412.85	29.73
CF-15-06	Background	11/30/2015	447026.92	565190.31	437.49	440.40	431.49	421.49	18.91
WBSP-15-01	Upgradient	11/30/2015	449072.27	566322.12	466.93	469.36	458.93	448.93	20.43
WBSP-15-02	Upgradient	11/11/2015	449803.91	566987.30	473.83	476.76	457.83	452.83	23.93
WBSP-15-03	Upgradient	12/4/2015	451181.98	568093.60	484.91	488.03	476.91	471.91	16.12
WBSP-15-04	Downgradient	11/12/2015	450610.07	568637.65	471.17	473.71	416.17	406.17	67.54
WBSP-15-05	Downgradient	11/17/2015	450051.40	568495.72	471.90	474.42	410.90	400.90	73.52
WBSP-15-06	Downgradient	11/19/2015	449470.57	568402.50	471.28	473.51	395.78	385.78	87.73
WBSP-15-07	Downgradient	11/23/2015	448947.93	567946.39	468.82	471.31	426.82	416.82	54.49
WBSP-15-08	Downgradient	11/25/2015	448625.46	567343.24	468.56	471.06	415.76	405.76	65.30
WBSP-15-09	Downgradient	1/6/2016	448359.31	566711.13	471.21	470.69	421.21	410.21	59.48
WBSP-15-10	Downgradient	1/5/2016	448125.51	566225.21	471.21	470.69	425.21	435.21	55.48

Notes:

1. The Well locations are referenced to the North American Datum (NAD83), east zone coordinate system.

2. Elevations are referenced to the North American Vertical Datum (NAVD) 1988

TABLE 4-2 SUMMARY OF SAMPLES COLLECTED DURING 2018 WEST BOILER SLAG POND CLIFTY CREEK STATION MADISON, INDIANA

Well ID	Designation	Mar-18	Oct-18
CF-15-04	Background	DM	DM
CF-15-05	Background	DM	DM
CF-15-06	Background	DM	DM
WBSP-15-01	Upgradient	DM	DM
WBSP-15-02	Upgradient	DM	DM
WBSP-15-03	Upgradient	DM	DM
WBSP-15-04	Downgradient	DM	DM
WBSP-15-05	Downgradient	DM	DM
WBSP-15-06	Downgradient	DM	DM
WBSP-15-07	Downgradient	DM	DM
WBSP-15-08	Downgradient	DM	DM
WBSP-15-09	Downgradient	DM	DM
WBSP-15-10	Downgradient	DM	DM

DM: Detection Monitoring

NS: Not Sampled

TABLE 4-3 SUMMARY OF MEASURED FIELD PARAMETERS - 2018 WEST BOILER SLAG POND CLIFTY CREEK STATION MADISON, INDIANA

						Dissolved	
			Conductivity	pН	Oxidation Reduction	Oxygen	Turbidity
Sample ID	Date	Temperature (°C)	(µohms/cm)	(S.U.)	Potential (mV)	(mg/L)	(NTUs)
CF-15-04	Mar-18	9.84	1491	10.06	-49.9	14.42	3.46
CF-15-05	Mar-18	10.86	1071	9.56	-37.6	13.28	4.63
CF-15-06	Mar-18	5.7	1201	10.36	-57.2	0.41	4.81
WBSP-15-01	Mar-18	11.27	1508	6.65	97.2	3.55	18
WBSP-15-02	Mar-18	19.2	749	7.34	151.8	5.98	4.1
WBSP-15-03	Mar-18	11.39	1130	7.05	70.5	5.72	2.73
WBSP-15-04	Mar-18	11.55	1020	7.89	-87.1	0.68	4.16
WBSP-15-05	Mar-18	11.4	867	7.02	-102.5	0.34	1.66
WBSP-15-06	Mar-18	9.75	1045	7.32	-135.6	1.06	4.02
WBSP-15-07	Mar-18	11.16	1495	6.95	-77.8	3.85	4.29
WBSP-15-08	Mar-18	9.91	740	7.08	-128.1	4.25	62.6
WBSP-15-09	Mar-18	10.15	852	7.22	-120.4	1.01	4.37
WBSP-15-10	Mar-18	10.75	822	6.95	-68.7	1.08	42.7
CF-15-04	Oct-18	16.34	66.1	7.76	390	6.03	4.38
CF-15-05	Oct-18	21.87	869	7.18	146	5.2	3.82
CF-15-06	Oct-18	21.32	12980	7.89	332	1.12	n/a
WBSP-15-01	Oct-18	21.64	1260	6.37	261	5.51	53.8
WBSP-15-02	Oct-18	24.17	1640	6.64	309	1.23	4.14
WBSP-15-03	Oct-18	20.62	918	7.7	367	4.65	4.48
WBSP-15-04	Oct-18	21.23	831	8.55	200	6.87	4.01
WBSP-15-05	Oct-18	20.15	952	7.48	-151	0	3.56
WBSP-15-06	Oct-18	17.43	1010	7.3	-89	0	4.77
WBSP-15-07	Oct-18	21.23	1490	6.75	-153	0	4.31
WBSP-15-08	Oct-18	21.3	939	6.35	-140	0	9.81
WBSP-15-09	Oct-18	24.09	503	6.48	-130	0.01	4.72
WBSP-15-10	Oct-18	23.11	611	6.39	-89	0.39	33.1

°C: Degrees Celcius

µohms/cm: Micro-ohms per centimeter

S.U.: Standard Units

mV: Millivolts

mg/L: Milligrams per liter

NTUs: Nephelometric Turbidity Units

FIGURES





Plot: 01/17/2019 15:38 _PROGRAMS-IKEC\Clifty Creek-CCR Program\CAD\2018 GW Monitoring-Corrective Action Rpt\2018_IKEC_Clifty_Corrective Action_MW Locs.dwg\FIG 2



Plot: 01/18/2019 11:22 _PROGRAMS-IKEC\Clifty Creek-CCR Program\CAD\2018 GW Monitoring-Corrective Action Rpt\2018_IKEC_Clifty_Corrective Action_MW Locs.dwg\FIG 3

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	INDIANA-KENTUCKY ELECTRIC CORPOR	RATION
	CLIFTY CREEK STATION	
nc.	MADISON, INDIANA	
200	MONITORING WELL LOCATIONS	
		REV.
	FIGURE J	

APPENDIX A

GROUNDWATER ELEVATIONS

TABLE A-1 CLIFTY CREEK CREEK PLANT SUMMARY OF GROUNDWATER ELEVATION DATA - MARCH 2018 AND OCTOBER 2018 TYPE I LANDFILL, LANDFILL RUNOFF COLLECTION POND AND WEST BOILER SLAG POND CLIFTY CREEK STATION MADISON, INDIANA

	Mar-18	Oct-18
Monitoring Well Designation	Groundwater Elevation (ft)	Groundwater Elevation (ft)
TYPE I LANDFILL AND	LANDFILL RUNOFF COLLE	CCTION POND
CF-15-04	437.62	436.47
CF-15-05	436.33	433.98
CF-15-06	426.21	425.35
CF-15-07	436.46	435.66
CF-15-08	441.81	440.56
CF-15-09	447.06	444.98
WEST BOILER SLAG	POND	
WBSP-15-01	451.53	450.21
WBSP-15-02	467.19	459.58
WBSP-15-03	476.58	476.91
WBSP-15-04	423.67	424.69
WBSP-15-05	423.51	424.52
WBSP-15-06	423.42	424.52
WBSP-15-07	431.73	431.85
WBSP-15-08	436.06	435.37
WBSP-15-09	435.73	432.67
WBSP-15-10	436.06	432.46

APPENDIX B

GROUNDWATER FLOW MAPS

Plot: 01/15/2019 11:24 _PROGRAMS-IKEC\Clifty Creek-CCR Program\CAD\2018 GW Monitoring-Corrective Action Rpt\Appx B\2018_IKEC_Clifty_Corrective Action_Appx B_MAR18 b10.dwg\B-1

Plot: 01/18/2019 13:08 _PROGRAMS-IKEC\Clifty Creek-CCR Program\CAD\2018 GW Monitoring-Corrective Action Rpt\Appx B\2018_IKEC_Clifty_Corrective Action_Appx B_MAR18 b10.dwg\B-3

Plot: 01/15/2019 16:08 _PROGRAMS-IKEC\Clifty Creek-CCR Program\CAD\2018 GW Monitoring-Corrective Action Rpt\Appx B\2018_IKEC_Clifty_Corrective Action_Appx B_OCT18 b11.dwg\B-3

Plot: 01/16/2019 10:57 _PROGRAMS-IKEC\Clifty Creek-CCR Program\CAD\2018 GW Monitoring-Corrective Action Rpt\Appx B\2018_IKEC_Clifty_Corrective Action_Appx B_0CT18 b11.dwg\B-4

APPENDIX C

APPENDIX III AND APPENDIX IV CONSTITUENTS

APPENDIX III AND APPENDIX IV CONSTITUENTS TYPE I RESIDUAL WASTE LANDFILL AND LANDFILL RUNOFF COLLECTION POND AND WEST BOILER SLAG POND CLIFTY CREEK STATION MADISON, INDIANA

Appendix III Constituents
(Detection Monitoring)
Constituent
Boron, B
Calcium, Ca
Chloride, Cl
Fluoride, F
pH (units=SU)
Sulfate, SO4
Total Dissolved Solids (TDS)
Appendix IV Constituents
(Assessment Monitoring)
Constituent
Antimony, Sb
Arsenic, As
Barium, Ba
Beryllium, Be
Cadmium, Cd
Chromium, Cr
Cobalt, Co
Fluoride, F
Lithium, Li
Lead, Pb
Mercury, Hg
Molybdenum, Mo
Radium 226 & 228 (combined)(units=pCi/L)
Selenium, Se
Thallium, Tl

APPENDIX D

ANALYTICAL RESULTS

CF-15-04 SUMMARY OF 2018 ANALYTICAL RESULTS

Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison, Indiana

Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	0.043	0.09 J
Calcium, Ca	mg/L	106	74.2
Chloride, Cl	mg/L	282	50.2
Fluoride, F	mg/L	0.09	0.12
pH	s.u.	10.06	7.76
Sulfate, SO4	mg/L	35.2	34.4
Total Dissolved Solids (TDS)	mg/L	788	377
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.1 J
Arsenic, As	ug/L	NA	0.38
Barium, Ba	ug/L	NA	57.5
Beryllium, Be	ug/L	NA	0.1 U
Cadmium, Cd	ug/L	NA	0.05 U
Chromium, Cr	ug/L	NA	0.2 J
Cobalt, Co	ug/L	NA	0.114
Fluoride, F	mg/L	0.09	0.12
Lithium, Li	mg/L	NA	0.009 J
Lead, Pb	ug/L	NA	0.141
Mercury, Hg	ug/L	NA	0.003 J
Molybdenum, Mo	ug/L	NA	2.54
Radium 226 & 228 (combined)	pCi/L	NA	0.62
Selenium, Se	ug/L	NA	0.2 J
Thallium, Tl	ug/L	NA	0.5 U

Notes:

CF-15-05 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison, Indiana

Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	0.209	0.174
Calcium, Ca	mg/L	103	113
Chloride, Cl	mg/L	31.5	30.2
Fluoride, F	mg/L	0.47	0.48
pH	s.u.	9.56	7.18
Sulfate, SO4	mg/L	44.3	40.9
Total Dissolved Solids (TDS)	mg/L	528	502
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.02 J
Arsenic, As	ug/L	NA	0.91
Barium, Ba	ug/L	NA	58.8
Beryllium, Be	ug/L	NA	0.1 U
Cadmium, Cd	ug/L	NA	0.04 J
Chromium, Cr	ug/L	NA	0.228
Cobalt, Co	ug/L	NA	0.463
Fluoride, F	mg/L	0.47	0.48
Lithium, Li	mg/L	NA	0.01 J
Lead, Pb	ug/L	NA	0.21
Mercury, Hg	ug/L	NA	0.003 J
Molybdenum, Mo	ug/L	NA	2.94
Radium 226 & 228 (combined)	pCi/L	NA	0.484
Selenium, Se	ug/L	NA	0.06 J
Thallium, Tl	ug/L	NA	0.5 U

Notes:

CF-15-06 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison, Indiana

Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	0.16	0.05 J
Calcium, Ca	mg/L	125	184
Chloride, Cl	mg/L	7.76	8.21
Fluoride, F	mg/L	0.2	0.21
pH	s.u.	10.36	7.89
Sulfate, SO4	mg/L	112	102
Total Dissolved Solids (TDS)	mg/L	630	696
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.07 J
Arsenic, As	ug/L	NA	1.21
Barium, Ba	ug/L	NA	149
Beryllium, Be	ug/L	NA	0.934
Cadmium, Cd	ug/L	NA	0.3
Chromium, Cr	ug/L	NA	6.81
Cobalt, Co	ug/L	NA	8.27
Fluoride, F	mg/L	0.2	0.21
Lithium, Li	mg/L	NA	0.02 J
Lead, Pb	ug/L	NA	15.7
Mercury, Hg	ug/L	NA	0.006
Molybdenum, Mo	ug/L	NA	3.02
Radium 226 & 228 (combined)	pCi/L	NA	NA
Selenium, Se	ug/L	NA	1.9
Thallium, Tl	ug/L	NA	0.5 U

Notes:

CF-15-07

SUMMARY OF 2018 ANALYTICAL RESULTS

Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison, Indiana

Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	0.204	0.112
Calcium, Ca	mg/L	123	168
Chloride, Cl	mg/L	10.6	5.34
Fluoride, F	mg/L	0.2	0.24
pH	s.u.	10.12	7.29
Sulfate, SO4	mg/L	32.7	2.7
Total Dissolved Solids (TDS)	mg/L	548	1240
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.06 J
Arsenic, As	ug/L	NA	6.81
Barium, Ba	ug/L	NA	92.4
Beryllium, Be	ug/L	NA	0.1 U
Cadmium, Cd	ug/L	NA	0.07
Chromium, Cr	ug/L	NA	0.36
Cobalt, Co	ug/L	NA	2.41
Fluoride, F	mg/L	0.2	0.24
Lithium, Li	mg/L	NA	0.03 U
Lead, Pb	ug/L	NA	0.336
Mercury, Hg	ug/L	NA	0.004 J
Molybdenum, Mo	ug/L	NA	12.8
Radium 226 & 228 (combined)	pCi/L	NA	0.387
Selenium, Se	ug/L	NA	0.2 J
Thallium, Tl	ug/L	NA	0.5 U

Notes:

CF-15-08 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station Madison, Indiana

Parameter	Units	Mar-18	May-18	Oct-18
Appendix III Constituents			•	
Boron, B	mg/L	8.5	8.6	11.9
Calcium, Ca	mg/L	123	NA	145
Chloride, Cl	mg/L	14.7	NA	17.4
Fluoride, F	mg/L	0.41	NA	0.41
рН	s.u.	10.21	7.45	7.53
Sulfate, SO4	mg/L	203	NA	257
Total Dissolved Solids (TDS)	mg/L	588	NA	636
Appendix IV Constituents				
Antimony, Sb	ug/L	NA	NA	0.07 J
Arsenic, As	ug/L	NA	NA	0.94
Barium, Ba	ug/L	NA	NA	51.4
Beryllium, Be	ug/L	NA	NA	0.1 U
Cadmium, Cd	ug/L	NA	NA	0.02 J
Chromium, Cr	ug/L	NA	NA	0.385
Cobalt, Co	ug/L	NA	NA	0.547
Fluoride, F	mg/L	0.41	NA	0.41
Lithium, Li	mg/L	NA	NA	0.02 J
Lead, Pb	ug/L	NA	NA	0.457
Mercury, Hg	ug/L	NA	NA	0.004 J
Molybdenum, Mo	ug/L	NA	NA	524
Radium 226 & 228 (combined)	pCi/L	NA	NA	0.437
Selenium, Se	ug/L	NA	NA	0.07 J
Thallium, Tl	ug/L	NA	NA	0.5 U

Notes:

CF-15-09 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station Madison, Indiana

Danamatan	Unita	Mar 18	Moy 18	Oct 18
	Units	Iviai-10	Wiay-10	001-18
Appendix III Constituents				
Boron, B	mg/L	5.86	6.1	7.59
Calcium, Ca	mg/L	184	NA	250
Chloride, Cl	mg/L	3.52	NA	3.47
Fluoride, F	mg/L	0.3	NA	0.32
pH	s.u.	10.85	7.09	7.05
Sulfate, SO4	mg/L	287	NA	274
Total Dissolved Solids (TDS)	mg/L	710	NA	790
Appendix IV Constituents				
Antimony, Sb	ug/L	NA	NA	0.16
Arsenic, As	ug/L	NA	NA	4.67
Barium, Ba	ug/L	NA	NA	38.2
Beryllium, Be	ug/L	NA	NA	0.261
Cadmium, Cd	ug/L	NA	NA	0.05 J
Chromium, Cr	ug/L	NA	NA	14.9
Cobalt, Co	ug/L	NA	NA	7.45
Fluoride, F	mg/L	0.3	NA	0.32
Lithium, Li	mg/L	NA	NA	0.02 J
Lead, Pb	ug/L	NA	NA	6.25
Mercury, Hg	ug/L	NA	NA	0.007
Molybdenum, Mo	ug/L	NA	NA	85.9
Radium 226 & 228 (combined)	pCi/L	NA	NA	NA
Selenium, Se	ug/L	NA	NA	1.3
Thallium, Tl	ug/L	NA	NA	0.5 U

Notes:

WBSP-15-01 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison, Indiana

Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	0.1	0.134
Calcium, Ca	mg/L	157	164
Chloride, Cl	mg/L	9.45	25.3
Fluoride, F	mg/L	0.27	0.31
pH	s.u.	6.65	6.37
Sulfate, SO4	mg/L	139	146
Total Dissolved Solids (TDS)	mg/L	685	711
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.09 J
Arsenic, As	ug/L	NA	1.52
Barium, Ba	ug/L	NA	25.3
Beryllium, Be	ug/L	NA	0.144
Cadmium, Cd	ug/L	NA	0.03 J
Chromium, Cr	ug/L	NA	4.76
Cobalt, Co	ug/L	NA	2.91
Fluoride, F	mg/L	0.27	0.31
Lithium, Li	mg/L	NA	0.034
Lead, Pb	ug/L	NA	2.63
Mercury, Hg	ug/L	NA	NA
Molybdenum, Mo	ug/L	NA	0.7 J
Radium 226 & 228 (combined)	pCi/L	NA	NA
Selenium, Se	ug/L	NA	0.6
Thallium, Tl	ug/L	NA	0.5 U

Notes:

WBSP-15-02 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison, Indiana

Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	3.98	4.36
Calcium, Ca	mg/L	231	277
Chloride, Cl	mg/L	12.1	11.3
Fluoride, F	mg/L	0.37	0.36
pH	s.u.	7.34	6.64
Sulfate, SO4	mg/L	607	515
Total Dissolved Solids (TDS)	mg/L	1200	1190
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.14
Arsenic, As	ug/L	NA	0.44
Barium, Ba	ug/L	NA	22.6
Beryllium, Be	ug/L	NA	0.1 U
Cadmium, Cd	ug/L	NA	0.03 J
Chromium, Cr	ug/L	NA	0.788
Cobalt, Co	ug/L	NA	0.081
Fluoride, F	mg/L	0.37	0.36
Lithium, Li	mg/L	NA	0.088
Lead, Pb	ug/L	NA	0.09 J
Mercury, Hg	ug/L	NA	0.002 J
Molybdenum, Mo	ug/L	NA	2.45
Radium 226 & 228 (combined)	pCi/L	NA	0.3588
Selenium, Se	ug/L	NA	0.06 J
Thallium, Tl	ug/L	NA	0.5 U

Notes:

WBSP-15-03 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison, I	ndiana
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Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	0.08	0.167
Calcium, Ca	mg/L	66.2	112
Chloride, Cl	mg/L	108	63.8
Fluoride, F	mg/L	0.22	0.26
pH	s.u.	7.05	7.7
Sulfate, SO4	mg/L	59.1	98
Total Dissolved Solids (TDS)	mg/L	402	564
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.08 J
Arsenic, As	ug/L	NA	0.17
Barium, Ba	ug/L	NA	13.1
Beryllium, Be	ug/L	NA	0.1 U
Cadmium, Cd	ug/L	NA	0.05 U
Chromium, Cr	ug/L	NA	0.1 J
Cobalt, Co	ug/L	NA	0.06
Fluoride, F	mg/L	0.22	0.26
Lithium, Li	mg/L	NA	0.03 U
Lead, Pb	ug/L	NA	0.09 J
Mercury, Hg	ug/L	NA	0.004 J
Molybdenum, Mo	ug/L	NA	4.56
Radium 226 & 228 (combined)	pCi/L	NA	0.917
Selenium, Se	ug/L	NA	0.4
Thallium, Tl	ug/L	NA	0.5 U

Notes:

WBSP-15-04 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison, Indiana

Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	4.61	4.59
Calcium, Ca	mg/L	94.1	121
Chloride, Cl	mg/L	63.2	113
Fluoride, F	mg/L	0.19	0.18
pH	s.u.	7.89	8.55
Sulfate, SO4	mg/L	193	205
Total Dissolved Solids (TDS)	mg/L	426	570
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.16
Arsenic, As	ug/L	NA	3.62
Barium, Ba	ug/L	NA	104
Beryllium, Be	ug/L	NA	0.1 U
Cadmium, Cd	ug/L	NA	0.05 U
Chromium, Cr	ug/L	NA	0.605
Cobalt, Co	ug/L	NA	0.255
Fluoride, F	mg/L	0.19	0.18
Lithium, Li	mg/L	NA	0.03 U
Lead, Pb	ug/L	NA	0.107
Mercury, Hg	ug/L	NA	0.004 J
Molybdenum, Mo	ug/L	NA	52.6
Radium 226 & 228 (combined)	pCi/L	NA	0.994
Selenium, Se	ug/L	NA	0.1 J
Thallium, Tl	ug/L	NA	0.5 U

Notes:

WBSP-15-05 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison, Indiana

Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	3.14	3.19
Calcium, Ca	mg/L	123	119
Chloride, Cl	mg/L	62.7	60.2
Fluoride, F	mg/L	0.17	0.16
pH	s.u.	7.02	7.48
Sulfate, SO4	mg/L	240	235
Total Dissolved Solids (TDS)	mg/L	560	562
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.04 J
Arsenic, As	ug/L	NA	3.75
Barium, Ba	ug/L	NA	104
Beryllium, Be	ug/L	NA	0.1 U
Cadmium, Cd	ug/L	NA	0.01 J
Chromium, Cr	ug/L	NA	0.22
Cobalt, Co	ug/L	NA	1.22
Fluoride, F	mg/L	0.17	0.16
Lithium, Li	mg/L	NA	0.03 U
Lead, Pb	ug/L	NA	0.131
Mercury, Hg	ug/L	NA	0.003 J
Molybdenum, Mo	ug/L	NA	74.9
Radium 226 & 228 (combined)	pCi/L	NA	1.139
Selenium, Se	ug/L	NA	0.05 J
Thallium, Tl	ug/L	NA	0.5 U

Notes:

WBSP-15-06 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison,	Indiana
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Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	2.37	2.81
Calcium, Ca	mg/L	102	111
Chloride, Cl	mg/L	56	80.1
Fluoride, F	mg/L	0.18	0.18
pH	s.u.	7.32	7.3
Sulfate, SO4	mg/L	141	216
Total Dissolved Solids (TDS)	mg/L	454	564
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.03 J
Arsenic, As	ug/L	NA	1.51
Barium, Ba	ug/L	NA	55.8
Beryllium, Be	ug/L	NA	0.1 U
Cadmium, Cd	ug/L	NA	0.1
Chromium, Cr	ug/L	NA	0.305
Cobalt, Co	ug/L	NA	2.48
Fluoride, F	mg/L	0.18	0.18
Lithium, Li	mg/L	NA	0.03 U
Lead, Pb	ug/L	NA	0.305
Mercury, Hg	ug/L	NA	0.002 J
Molybdenum, Mo	ug/L	NA	70.1
Radium 226 & 228 (combined)	pCi/L	NA	0.652
Selenium, Se	ug/L	NA	0.05 J
Thallium, Tl	ug/L	NA	0.5 U

Notes:

WBSP-15-07 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison, I	ndiana
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Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	0.003 J	0.05 J
Calcium, Ca	mg/L	167	176
Chloride, Cl	mg/L	12.9	12.5
Fluoride, F	mg/L	0.37	0.32
pH	s.u.	6.95	6.75
Sulfate, SO4	mg/L	2.5	3.9
Total Dissolved Solids (TDS)	mg/L	777	770
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.11
Arsenic, As	ug/L	NA	51.3
Barium, Ba	ug/L	NA	500
Beryllium, Be	ug/L	NA	0.1 U
Cadmium, Cd	ug/L	NA	0.11
Chromium, Cr	ug/L	NA	0.282
Cobalt, Co	ug/L	NA	2.36
Fluoride, F	mg/L	0.37	0.32
Lithium, Li	mg/L	NA	0.01 J
Lead, Pb	ug/L	NA	0.204
Mercury, Hg	ug/L	NA	0.003 J
Molybdenum, Mo	ug/L	NA	11
Radium 226 & 228 (combined)	pCi/L	NA	1.499
Selenium, Se	ug/L	NA	0.4
Thallium, Tl	ug/L	NA	0.5 U

Notes:

WBSP-15-08 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison,	Indiana
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Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	0.005 U	0.132
Calcium, Ca	mg/L	74.6	72.2
Chloride, Cl	mg/L	16.5	16.6
Fluoride, F	mg/L	0.26	0.19
pH	s.u.	7.08	6.35
Sulfate, SO4	mg/L	0.2	0.4 U
Total Dissolved Solids (TDS)	mg/L	380	336
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.08 J
Arsenic, As	ug/L	NA	81.3
Barium, Ba	ug/L	NA	356
Beryllium, Be	ug/L	NA	0.03 J
Cadmium, Cd	ug/L	NA	0.01 J
Chromium, Cr	ug/L	NA	0.539
Cobalt, Co	ug/L	NA	1.39
Fluoride, F	mg/L	0.26	0.19
Lithium, Li	mg/L	NA	0.03 U
Lead, Pb	ug/L	NA	0.346
Mercury, Hg	ug/L	NA	0.003 J
Molybdenum, Mo	ug/L	NA	1 J
Radium 226 & 228 (combined)	pCi/L	NA	1.03
Selenium, Se	ug/L	NA	0.2
Thallium, Tl	ug/L	NA	0.5 U

Notes:

WBSP-15-09 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison, Indiana

Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	0.054	0.291
Calcium, Ca	mg/L	48.6	56
Chloride, Cl	mg/L	3.35	2.05
Fluoride, F	mg/L	0.22	0.43
pH	s.u.	7.22	6.48
Sulfate, SO4	mg/L	55.3	4.7
Total Dissolved Solids (TDS)	mg/L	221	239
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.03 J
Arsenic, As	ug/L	NA	21.4
Barium, Ba	ug/L	NA	139
Beryllium, Be	ug/L	NA	0.1 U
Cadmium, Cd	ug/L	NA	0.05 U
Chromium, Cr	ug/L	NA	0.2 J
Cobalt, Co	ug/L	NA	0.263
Fluoride, F	mg/L	0.22	0.43
Lithium, Li	mg/L	NA	0.03 U
Lead, Pb	ug/L	NA	0.09 J
Mercury, Hg	ug/L	NA	0.003 J
Molybdenum, Mo	ug/L	NA	28.4
Radium 226 & 228 (combined)	pCi/L	NA	0.1714
Selenium, Se	ug/L	NA	0.1 J
Thallium, Tl	ug/L	NA	0.5 U

Notes:

WBSP-15-10 SUMMARY OF 2018 ANALYTICAL RESULTS Indiana-Kentucky Electric Corporation

Clifty Creek Station

Madison, Indiana

Parameter	Units	Mar-18	Oct-18
Appendix III Constituents			
Boron, B	mg/L	0.005 U	0.16
Calcium, Ca	mg/L	70.4	78.6
Chloride, Cl	mg/L	24	20.9
Fluoride, F	mg/L	0.28	0.29
pH	s.u.	6.95	6.39
Sulfate, SO4	mg/L	44.7	38.8
Total Dissolved Solids (TDS)	mg/L	329	316
Appendix IV Constituents			
Antimony, Sb	ug/L	NA	0.04 J
Arsenic, As	ug/L	NA	9.37
Barium, Ba	ug/L	NA	286
Beryllium, Be	ug/L	NA	0.03 J
Cadmium, Cd	ug/L	NA	0.02 J
Chromium, Cr	ug/L	NA	0.289
Cobalt, Co	ug/L	NA	1.85
Fluoride, F	mg/L	0.28	0.29
Lithium, Li	mg/L	NA	0.03 U
Lead, Pb	ug/L	NA	0.473
Mercury, Hg	ug/L	NA	0.004 J
Molybdenum, Mo	ug/L	NA	12.2
Radium 226 & 228 (combined)	pCi/L	NA	0.625
Selenium, Se	ug/L	NA	0.2 J
Thallium, Tl	ug/L	NA	0.5 U

Notes: