

Frank, Stephen

From: Mark Bauer <MBauer@Geosyntec.com>
Sent: Thursday, September 1, 2022 10:07 AM
To: Wainer, Willie; Heflin, Lonnie
Cc: Spence, James; Frank, Stephen; Desperes, Michelle; Andrew grenzer -MDE-; rglazier@geosyntec.com; Ted Wilson
Subject: GenOn - Westland Ash Management Facility - Notification of Offsite Contamination Letter
Attachments: GenOn - Westland Ash Management Facility - Notification of Offsite Contamination Letter.pdf

Follow Up Flag: Follow up
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Good Morning Mr. Wainer,

The attached letter is intended to notify Montgomery County that contaminated groundwater has potentially migrated from the Westland Ash Management Facility, located at 21200 Martinsburg Road, Dickerson, Maryland, onto Montgomery County Site 2 Property located at 20130 Wasche Road, Dickerson, Maryland.

This letter was prepared in accordance with 40 CFR § 257.95(g)(2) of the Coal Combustion Residuals (CCR) Rule.

Please let us know if you have any questions regarding the information provided in the attached letter.

Best Regards,
Mark

Mark Bauer, P.G. (KY, NY, and PA)
Senior Geologist

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1 September 2022

Mr. Willie Wainer
Chief, Recycling and Resource Management Division Montgomery County
Department of Environmental Protection
Montgomery County, Maryland
101 Monroe Street
Rockville, Maryland 20850

**Subject: Notification of Potential Offsite Contamination
Westland Ash Management Facility
GenOn MD Ash Management LLC
Dickerson, Maryland 20842**

Dear Mr. Wainer:

Geosyntec Consultants (Geosyntec), on behalf of GenOn MD Ash Management LLC (MD Ash), has prepared this letter to notify Montgomery County (County), in accordance with 40 CFR § 257.95(g)(2) of the Coal Combustion Residuals (CCR) Rule, that contaminated groundwater has potentially migrated from the Westland Ash Management Facility, located at 21200 Martinsburg Road, Dickerson, Maryland (Site), onto Montgomery County Site 2 Property located at 20130 Wasche Road, Dickerson, Maryland (County Property).

In August and September 2021, two offsite monitoring wells (MW-24S and MW-24D) were installed on County Property located down-gradient from the Site. The two offsite wells located on County Property were sampled during the first semi-annual CCR monitoring event in February 2022. Samples were collected for analysis of constituents identified in Appendix III and IV of the CCR Rule.

Results of the first semi-annual groundwater sampling event from monitoring wells MW-24S and MW-24D were compared to background groundwater concentrations. Additionally, where applicable, the results for the Appendix IV constituents were compared to the groundwater protection standards (GWPS). The GWPS is defined as the higher of either statistically derived background concentrations and/or drinking water maximum contaminant levels (MCLs). The results of this evaluation indicated that the following 40 CFR § 257 Appendix III and Appendix IV constituents exceeded background and 40 CFR § 257 Appendix IV constituents exceeded GWPS concentrations at MW-24S and MW-24D:

- MW-24S - Background Exceedances: antimony, arsenic, barium, boron, calcium, chloride, lithium, molybdenum, pH, sulfate, and total dissolved solids;
- MW-24S - GWPS Exceedances: antimony, arsenic, and lithium;

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- MW-24D - Background Exceedances: arsenic, chloride, chromium, cobalt, lithium, molybdenum, sulfate, and total dissolved solids; and
- MW-24D - GWPS Exceedances: arsenic, cobalt, and lithium.

It should be noted, these two monitoring wells are new, and the current analytical data set available for these wells is insufficient to conduct a formal statistical analysis of the groundwater concentrations that is required for a regulatory compliance determination verse the GWPSs. Once a data set of sufficient size is available, statistical analyses will be conducted to assess trends detected in the groundwater concentration data and do a proper regulatory compliance determination verse GWPS. It should also be noted that monitoring wells sometimes require a 'break in period' wherein initial sample results are not representative of actual conditions in the surrounding groundwater, but concentrations stabilize at different concentrations with continued monitoring.

In addition, the corrective measures have been initiated and include, but are not limited to:

- Installation of a geosynthetic cover 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.
- MDE approval of a deconstruction plan for the removal of ash from Cell B. In 2019, 2020, 2021, and 2022 (through July), 44,841, 92,441, 167,205, and 111,938 tons of ash have been removed, respectively.

MD Ash and Geosyntec appreciate the County's patience and cooperation as we continue to evaluate the groundwater conditions at monitoring wells MW-24S and MW-24D, located on County Property. MD Ash and Geosyntec will continue to update the County with groundwater data, as it becomes available, and will continue to assess the extent of the potential offsite contamination on County Property. Should you have any questions or require any additional information, please contact the undersigned at 410.381.4333.

Sincerely,



Mark Bauer, P.G. (KY, PA and NY)
Senior Geologist



Robert Glazier, P.G. (DE, PA, NY, and TN)
Senior Principal