

## **MEMORANDUM**

SUBJECT: Executive Order 12866 Meeting, “Hazardous and Solid Waste Management System: Disposal of CCR; A Holistic Approach to Closure Part B: Alternate Demonstration for Unlined Surface Impoundments; Implementation of Closure; Legacy Units”

FROM: Earthjustice

TO: Office of Information and Regulatory Affairs, Office of Management and Budget; Environmental Protection Agency

DATE: February 12, 2020

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In August 2018, the U.S. Court of Appeals for the D.C. Circuit issued a decision ordering that the 2015 Coal Combustion Residuals (“CCR”) Rule<sup>1</sup> be vacated and remanded with respect to the provisions “that permit unlined impoundments to continue receiving coal ash unless they leak, *see* [40 C.F.R.] § 257.101(a), classify ‘clay-lined’ impoundments as lined, *see* 40 C.F.R. § 257.71(a)(1)(i), and exempt from regulation inactive impoundments at inactive facilities, *see* 40 C.F.R. § 257.50(e).” *Util. Solid Waste Activities Grp. v. EPA*, 901 F.3d 414, 449 (D.C. Cir. 2018).

### **“CLAY-LINED” SURFACE IMPOUNDMENTS**

Before issuing any new proposed rule addressing “Alternate Demonstration[s] for Unlined Surface Impoundments,” EPA must ensure “no reasonable probability of adverse effects on health or the environment,” as the Resource Conservation and Recovery Act requires. 42 U.S.C. § 6944(a). Information provided by owners/operators in compliance with the 2015 CCR Rule, as assessed by EPA and by Earthjustice, highlights significant risks associated with unlined surface impoundments, including clay-lined surface impoundments.

For example, in a recent memorandum, EPA provided information on 30 surface impoundments certified as “clay lined.” *See* EPA, Memo. re: Request for Underlying Data for Exhibits 2-1-A, B, and C of the Regulatory Impact Analysis of the A Holistic Approach to Closure Part A: Deadline to Initiate Closure, Docket ID No. EPA-HQ-OLEM-2019-0172-0044 (Jan. 2020). This information is outlined in the table below. A unit was assumed to be “leaking” if groundwater monitoring efforts had identified either an Appendix III Statistically Significant Increase relative to baseline monitoring (“App. III SSI”) or Appendix IV Statistically Significant Levels (“App. IV SSL”) without demonstrating an alternative source for the contaminants (“alleged ASD”). EPA, Regulatory Impact Analysis, Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities; a Holistic Approach to Closure Part A:

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<sup>1</sup> EPA, Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, 80 Fed. Reg. 21,302 (Apr. 17, 2015).

Deadline to Initiate Closure, Docket ID No. EPA-HQ-OLEM-2019-0172-0016, at 2-7 note b (Oct. 2019).

Of the 25 clay-lined surface impoundments with status designations, 16 of them (or nearly two thirds) are listed as leaking. A majority of these leaking clay-lined surface impoundments were listed as meeting all location restriction requirements.

**Table 1.** EPA Summary of Clay-Lined Surface Impoundment Compliance Information (Collection Effort Completed on July 12, 2019)

| State | Unit Status | Unit Closed | NOI to Close Posted | Liner Type | Location Restrictions | Leaking Status |
|-------|-------------|-------------|---------------------|------------|-----------------------|----------------|
| IA    | Inactive    |             | Yes                 | Clay Lined | n - NOI               | Not Reported   |
| LA    | Active      |             | No                  | Clay Lined | Pass All              | Not Leaking    |
| LA    | Active      |             | No                  | Clay Lined | Pass All              | Not Leaking    |
| LA    | Active      |             | No                  | Clay Lined | Pass All              | Not Leaking    |
| MI    | Active      |             | No                  | Clay Lined | Fail                  | <b>Leaking</b> |
| MN    | Inactive    | Yes         | Yes                 | Clay Lined | n - NOI               | Not Reported   |
| MN    | Active      |             | No                  | Clay Lined | Pass All              | <b>Leaking</b> |
| MN    | Active      |             | No                  | Clay Lined | Pass All              | <b>Leaking</b> |
| MN    | Active      |             | No                  | Clay Lined | Fail Aquifer Only     | <b>Leaking</b> |
| ND    | Active      |             | Yes                 | Clay Lined | Pass All              | Not Leaking    |
| OH    | Active      |             | No                  | Clay Lined | Pass All              | <b>Leaking</b> |
| OH    | Active      |             | No                  | Clay Lined | Pass All              | <b>Leaking</b> |
| PA    | Active      |             | No                  | Clay Lined | Pass All              | <b>Leaking</b> |
| PA    | Active      |             | No                  | Clay Lined | Pass All              | <b>Leaking</b> |
| PA    | Active      |             | No                  | Clay Lined | Pass All              | <b>Leaking</b> |
| PA    | Active      |             | No                  | Clay Lined | Pass All              | <b>Leaking</b> |
| TX    | Active      |             | No                  | Clay Lined | Pass All              | <b>Leaking</b> |
| TX    | Active      |             | No                  | Clay Lined | Pass All              | <b>Leaking</b> |
| TX    | Active      |             | No                  | Clay Lined | Pass All              | Not Reported   |
| TX    | Active      |             | No                  | Clay Lined | Missing All           | Not Reported   |
| TX    | Active      |             | No                  | Clay Lined | Missing All           | Not Reported   |
| TX    | Active      |             | No                  | Clay Lined | Fail Aquifer Only     | Not Leaking    |
| TX    | Active      |             | No                  | Clay Lined | Fail Aquifer Only     | Not Leaking    |
| TX    | Active      |             | No                  | Clay Lined | Fail Aquifer Only     | Not Leaking    |
| TX    | Active      |             | No                  | Clay Lined | Pass All              | <b>Leaking</b> |
| TX    | Active      |             | No                  | Clay Lined | Pass All              | <b>Leaking</b> |
| TX    | Active      |             | No                  | Clay Lined | Pass All              | <b>Leaking</b> |
| TX    | Active      |             | No                  | Clay Lined | Pass All              | Not Leaking    |
| TX    | Active      |             | No                  | Clay Lined | Pass All              | Not Leaking    |
| WV    | Active      |             | Yes                 | Clay Lined | Pass All              | <b>Leaking</b> |

Although EPA does not appear to have provided the public with any additional details or analysis related to these clay-lined surface impoundments, Earthjustice is aware of 26 open surface impoundments at 14 plants that are certified as “clay-lined,”<sup>2</sup> and they may all be causing adverse effects on health or the environment. Of these, many are leaking, and only about five<sup>3</sup> are known to be in non-compliance of at least one location restriction. Overall, information posted in compliance with the 2015 CCR Rule related to these units and other units must be reviewed to assess risks associated with unlined surface impoundments.

**Table 2.** Earthjustice Summary of Clay-Lined Surface Impoundment Compliance Certifications

| Name of Plant or Site (link to website)                   | Operator                        | State | “Clay-Lined” CCR Unit                                     | Location Status of “Clay-Lined” Unit per Certifications | Leaking Status of “Clay-Lined” Unit per Certifications |
|-----------------------------------------------------------|---------------------------------|-------|-----------------------------------------------------------|---------------------------------------------------------|--------------------------------------------------------|
| <a href="#">Ames Electric Services Power Plant</a>        | City of Ames                    | IA    | Surface Impoundments (Notice of Intent to close 12/15/15) | Certifications due April 2020                           | App. III SSI                                           |
| <a href="#">Brame Energy Center (formerly Rodemacher)</a> | CLECO                           | LA    | Bottom Ash Pond                                           |                                                         | None reported                                          |
|                                                           |                                 |       | Fly Ash Pond                                              |                                                         | None reported                                          |
| <a href="#">Dolet Hills Power Station</a>                 | CLECO                           | LA    | Ash Basin No. 1                                           |                                                         | None reported                                          |
| <a href="#">Boswell Energy Center</a>                     | Minnesota Power                 | MN    | Bottom Ash Surface Impoundment                            |                                                         | App. IV SSL (alleged ASD)                              |
|                                                           |                                 |       | Unit 3 Impoundment                                        | Failed aquifer restriction                              | App. IV SSL (alleged ASD)                              |
|                                                           |                                 |       | Unit 4 Impoundment                                        |                                                         | App. IV SSL (alleged ASD)                              |
| <a href="#">Lewis &amp; Clark Station</a>                 | Montana-Dakota Utilities Co.    | MT    | Scrubber Pond (East)                                      |                                                         | App. IV SSL                                            |
|                                                           |                                 |       | Scrubber Pond (West)                                      |                                                         | App. IV SSL                                            |
| <a href="#">Zimmer Power Station</a>                      | Luminant (formerly Dynegy Inc.) | OH    | Coal Pile Runoff Pond                                     |                                                         | App. III SSI                                           |
|                                                           |                                 |       | Gypsum Recycle Pond                                       |                                                         | App. III SSI                                           |
| <a href="#">Hugo Power Station</a>                        |                                 | OK    | CCR Unit 2 & 3 Surface Impoundment                        | Failed aquifer restriction                              | App. III SSI (alleged ASD)                             |
|                                                           | GenOn                           | PA    | Bottom Ash Filter Pond - B (#3283201)                     |                                                         | App. III SSI (alleged ASD)                             |

<sup>2</sup> The liner evaluation and certification reports for these known units are submitted along with this memorandum. The certifications for regulated surface impoundments are available on the publicly accessible owner/operator websites and were also previously submitted to EPA for consideration. See Comments of Earthjustice *et al.*, Docket ID No. EPA-HQ-OLEM-2017-0286-1820 (Apr. 27, 2018).

<sup>3</sup> According to EPA, “[b]ased on the data on the CCR publicly accessible websites there are 28 active surface impoundments that certified as ‘clay-lined’. Of these 28, seven failed at least one location restriction . . . .” 84 Fed. Reg. 65,941, 65,944 (Dec. 2, 2019) (emphasis added).

| Name of Plant or Site (link to website)                 | Operator                     | State | “Clay-Lined” CCR Unit                         | Location Status of “Clay-Lined” Unit per Certifications | Leaking Status of “Clay-Lined” Unit per Certifications |
|---------------------------------------------------------|------------------------------|-------|-----------------------------------------------|---------------------------------------------------------|--------------------------------------------------------|
| <a href="#">Conemaugh Generating Station</a>            |                              |       | Bottom Ash Filter Pond - C (#3283201)         |                                                         | App. III SSI (alleged ASD)                             |
|                                                         |                              |       | Bottom Ash Filter Pond - D (#3283201)         |                                                         | App. III SSI (alleged ASD)                             |
|                                                         |                              |       | Bottom Ash Filter Recycle Pond - A (#3283201) |                                                         | App. III SSI (alleged ASD)                             |
| <a href="#">Big Brown Steam Electric Station</a>        | Luminant Generation Co., LLC | TX    | N. Bottom Ash Pond                            |                                                         | App. III SSI                                           |
|                                                         |                              |       | S. Bottom Ash Pond                            |                                                         | App. III SSI                                           |
| <a href="#">Limestone Electric Generating Station</a>   | NRG                          | TX    | Secondary E Pond Unit (Unit 003)              |                                                         | App. III SSI (alleged ASD)                             |
| <a href="#">Martin Lake Steam Electric Station</a>      | Luminant Generation Co., LLC | TX    | Permanent Disposal Pond 5                     |                                                         | App. III SSI (alleged ASD)                             |
| <a href="#">Monticello Steam Electric Station</a>       | Luminant Generation Co., LLC | TX    | Northeast Ash Water Retention Pond            | Failed aquifer restriction                              | None reported                                          |
|                                                         |                              |       | Southwest Ash Settling Pond                   | Failed aquifer restriction                              | None reported                                          |
|                                                         |                              |       | West Ash Settling Pond                        | Failed aquifer restriction                              | None reported                                          |
| <a href="#">Oak Grove Steam Electric Station</a>        | Luminant Generation Co., LLC | TX    | FGD-A Pond                                    |                                                         | App. IV SSL                                            |
| <a href="#">W.A. Parish Electric Generating Station</a> | NRG                          | TX    | Air Preheater Pond                            |                                                         | App. III SSI (alleged ASD)                             |
|                                                         |                              |       | FGD Emergency Pond                            |                                                         | App. III SSI (alleged ASD)                             |

It is important to note that EPA is aware of significant noncompliance with the 2015 CCR Rule’s requirements, as explained in recent comments submitted to the agency. *See* Comments of Earthjustice *et al.*, Docket No. EPA-HQ-OLEM-2019-0172, at 95-107 & related appendix (Jan. 31, 2020) (“Part A Comments”). In other words, the two tables above, which are based on information provided by owners/operators in compliance with the 2015 CCR Rule on compliance websites, offer only a preliminary look at the extent of the leaking and risks associated with clay-lined surface impoundments.

The 2015 CCR Rule requires groundwater monitoring near certain units and prescribes methods for collecting and analyzing groundwater quality data. 40 C.F.R. §§ 257.90-257.98. Among other things, the Rule requires each owner or operator to sample groundwater from “background”

wells, which “represent the quality of background groundwater that has not been affected by leakage from a CCR unit,” *id.* § 257.91(a)(1), and to compare groundwater from downgradient wells to these background wells. *Id.* §§ 257.94, 257.95.

These analytical requirements are designed to detect spatial differences in contamination. Yet, many owners and operators are violating these requirements by conducting “intra-well” analyses of groundwater data. An intra-well analysis compares each well to itself over time. This kind of analysis can detect temporal trends – increasing or decreasing contamination – but says nothing about spatial patterns between and among wells. Intra-well analyses are plainly inconsistent with the CCR Rule for the simple reason that they do not compare downgradient groundwater to “background.” The only circumstance in which a downgradient well might possibly provide evidence of background groundwater quality is in the case of a new CCR unit, with downgradient wells installed prior to construction. At existing CCR units, however, downgradient wells are not and cannot be background wells.

For example, per owner/operator certifications, the “leaking statuses” for the clay-lined Bottom Ash and Fly Ash Ponds at Cleco’s Brame Energy Center are listed as “Not Leaking” in this memorandum’s first table (*see* “LA” or Louisiana rows) and as “None Reported” in this memorandum’s second table. However, as the comments detailed, the units should be in assessment monitoring. Part A Comments at Appendix to Section XV at 6. While chloride levels in the five wells upgradient of the ash ponds (wells D-1, D-2, D-3, L-1, and L-2) never exceed 20 mg/L, chloride levels in the following wells are consistently higher:<sup>4</sup>

- W-3: 45 to 195 mg/L
- W-19: 44 to 61 mg/L
- W-24: 66 to 175 mg/L

If Cleco were to conduct a proper inter-well analysis, it would find SSIs for chloride, and the site would be in assessment monitoring. *Id.* Instead, Cleco is using intra-well statistics for everything but pH, has not confirmed any SSIs, and has not initiated assessment monitoring.<sup>5</sup> Cleco is violating the CCR Rule by failing to compare downgradient data to background wells and by failing to initiate assessment monitoring. EPA must properly assess and consider the risks associated with all unlined surface impoundments, like the clay-lined surface impoundments at the Brame Energy Center.

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<sup>4</sup> Cleco Power LLC, 2017 Annual Groundwater Monitoring Report for the Coal Combustion Residuals Rule, Cleco Power LLC Brame Energy Center Bottom Ash Pond and Fly Ash Pond (Jan. 2018).

<sup>5</sup> Cleco Power LLC, 2018 Annual Groundwater Monitoring Report for the Coal Combustion Residuals Rule, Cleco Power LLC Brame Energy Center Bottom Ash Pond and Fly Ash Pond (Jan. 2019).

## INACTIVE IMPOUNDMENTS AT INACTIVE FACILITIES (OR “LEGACY PONDS”)

As summarized in the Risk Assessment for the 2015 CCR Rule:<sup>6</sup>

[t]he 2010 Risk Assessment relied on a 1997 Electric Power Research Institute (EPRI) survey to characterize the type, size, design and location of CCR surface impoundments and landfills. However, two more-recent EPA surveys of on-site [Waste Management Units] have since been completed: 2009 Information Request Responses [obtained under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act] together with Impoundment Assessment Reports, . . . ; and 2010 Questionnaire for the Steam Electric Power Generating Effluent Guidelines . . . .

The data from these EPA surveys are collectively referred to as the “2014 CCR database” in this memorandum.<sup>7</sup>

The 2014 Risk Assessment summarized that there were 218 known surface impoundments discovered to be outside the scope of the 2015 CCR Rule for one of the following reasons: (1) The facility was no longer a coal-fired electric utility according to the 2012 EIA database; (2) The landfill or surface impoundment was found to be inactive or retired; or (3) The surface impoundment was not designed to accumulate CCRs (e.g., cooling water ponds).<sup>8</sup> The 2014 Risk Assessment does include data collected on the number of coal ash surface impoundments and landfills present at each relevant facility, among other things.<sup>9</sup> Although the Assessment does not appear to include why each individual unit was originally excluded, EPA has this information and should use it, or other readily available information, to regulate coal ash legacy ponds without any further delay, as required by the D.C. Circuit decision.

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<sup>6</sup> EPA, Human and Ecological Risk Assessment of Coal Combustion Residuals, Docket ID No. EPA-HQ-RCRA-2009-0640-11993, at 2-6 to 2-8 (Dec. 2014) (“2014 Risk Assessment”) (footnotes omitted).

<sup>7</sup> EPA, Information Request Responses from Electric Utilities, <https://archive.epa.gov/epawaste/nonhaz/industrial/special/fossil/web/html/index-3.html> (“Database Results (Excel) 04-12-12” links to a 2012 spreadsheet of units, referred to as “2012 xlsx” in Table 3); <https://archive.epa.gov/epawaste/nonhaz/industrial/special/fossil/web/html/index-4.html> (“Summary Table for Impoundment Reports (.xls) - July 31, 2014” links to a 2014 spreadsheet of units, referred to as “2014 xlsx” in Table 3); *see generally* EPA, Steam

Electric Power Generating Effluent Guidelines Questionnaire, <https://www.epa.gov/eg/steam-electricpower-generating-effluent-guidelines-questionnaire>

(includes response database). The fields and entries in the database were extracted and made available online in PDF and Microsoft Excel spreadsheets. The Web archive includes additional information, including extensive expert reports based on visual assessments of sites, interviews with site personnel, and, when available, reviews of geotechnical reports, studies related to the design, construction and operation of those impoundments, and past state and federal inspections of the impoundments.

<sup>8</sup> 2014 Risk Assessment at 4-16.

<sup>9</sup> *Id.* at Attachment A-1.

As explained in the D.C. Circuit, EPA’s “asserted difficulty in locating the owners or operators responsible for legacy ponds does not hold water.” In other words, “EPA knows where existing legacy ponds are and, with that and other information, the EPA already is aware of or can feasibly identify the responsible parties.”<sup>10</sup> Although this memorandum does not aim to memorialize the full or confirmed universe of legacy ponds, it presents preliminary research to demonstrate that information regarding potential legacy ponds is readily available and has been known for over a decade.

To identify facilities that may have legacy units that must be regulated, Earthjustice compared facility level information in the 2014 Risk Assessment with the facilities now regulated by the 2015 CCR Rule.<sup>11</sup> Based on publicly available information, there are potentially legacy ponds and landfills at around 100 sites. Looking at legacy ponds specifically, Table 3 below includes a list of 75 sites with 193 potential legacy ponds.

In addition, Earthjustice compared this information with the publicly available spreadsheets related to the 2014 CCR database. These spreadsheets confirm that EPA had detailed information about units, including the *names and mailing addresses* of the last known owners or operators, for over half of the potential sites identified, or 45 of the 75. In addition, EPA had the names of the last known owners and operators and additional details for an additional 8 sites in the 2014 CCR database. For the last remaining 24 potential sites, many common resources, like the U.S. Energy Information Administration Monthly Electric Generator Inventory (“EIA 860M”), can be used to help identify related owners and operators.

Legacy ponds at a number of the plants and sites listed in this document have already been documented to have caused harm to health and the environment. In addition, many of the legacy ponds are known to present serious risks. For example, the Vermilion legacy ash ponds sit on the banks of the Middle Fork of the Vermilion river, Illinois’ only National Scenic River, in an area frequented by kayakers and tubers. The river is quickly and significantly eroding its banks, posing the risk that the ash ponds will collapse, and the ponds are known to be leaking.

It is past due for EPA to protect communities near dozens of known legacy coal ash ponds by requiring them to meet the CCR Rule’s standards as quickly as possible.

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<sup>10</sup> *Util. Solid Waste Activities Grp.*, 901 F.3d at 433 (citing 2014 CCR database, in part).

<sup>11</sup> EPA, List of Publicly Accessible Internet Sites Hosting Compliance Data and Information Required by the Disposal of Coal Combustion Residuals Rule, <https://www.epa.gov/coalash/list-publiclyaccessible-internet-sites-hosting-compliance-data-and-information-required>.

**Table 3.** Preliminary information on plants appearing in the 2014 Risk Assessment which (1) do not appear to have regulated coal ash units and (2) have or potentially have legacy surface impoundments.

| Potential Plant or Site                                       | # of SIs (A-1) | # of LFs (A-1) | City (A-1) <sup>12</sup> |    | Example of Readily available Operator Information | Example Information Source |
|---------------------------------------------------------------|----------------|----------------|--------------------------|----|---------------------------------------------------|----------------------------|
| Greene County                                                 | 1              | 0              | Forkland                 | AL | Alabama Power Co                                  | 2012 xlsx                  |
| Widows Creek                                                  | 12             | 0              | Stevenson                | AL | Tennessee Valley Authority                        | 2012 xlsx                  |
| Arapahoe                                                      | 6              | 0              | Denver                   | CO | Xcel Energy                                       | 2012 xlsx                  |
| Cameo                                                         | 2              | 0              | Palisade                 | CO | Xcel Energy                                       | 2012 xlsx                  |
| Craig                                                         | 2              | 1              | Craig                    | CO | Tri-State G & T Assn Inc                          | 2012 xlsx                  |
| NRG Energy Center Dover                                       | 1              | 0              | Dover                    | DE | NRG Energy Center Dover, LLC                      | 2012 xlsx                  |
| Scholz                                                        | 3              | 0              | Sneads                   | FL | Gulf Power Co                                     | 2014 xlsx                  |
| Mitchell (GA)                                                 | 3              | 0              | Albany                   | GA | Georgia Power Co                                  | 2012 xlsx                  |
| Harlee Branch                                                 | 5              | 0              | Milledgeville            | GA | Georgia Power Co                                  | 2012 xlsx                  |
| Sixth Street                                                  | 4              | 0              | Cedar Rapids             | IA | Alliant Energy                                    | 2012 xlsx                  |
| Dubuque                                                       | 1              | 0              | Dubuque                  | IA | Alliant Energy                                    | 2012 xlsx                  |
| Fair Station                                                  | 2              | 1              | Muscatine                | IA | Central Iowa Power Cooperative                    | EIA 860M                   |
| Meredosia (*may be undergoing closure in place)               | 2              | 0              | Meredosia                | IL | Ameren Energy Generating Co                       | 2012 xlsx                  |
| Pearl Station (*may be closed in place)                       | 1              | 0              | Pearl                    | IL | Prairie Power, Inc                                | 2014 xlsx                  |
| Vermilion                                                     | 2              | 1              | Oakwood                  | IL | Dynegy Midwest Generation Inc                     | 2012 xlsx                  |
| Crawford (*may have been excavated)                           | 1              | 0              | Chicago                  | IL | Midwest Generations EME LLC                       | EIA 860M                   |
| Fisk                                                          | 3              | 0              | Chicago                  | IL | Midwest Generations EME LLC                       | EIA 860M                   |
| Hutsonville (*may have been closed in place)                  | 4              | 0              | Hutsonville              | IL | Ameren Energy Generating Co                       | 2012 xlsx                  |
| Edwardsport                                                   | 2              | 1              | Edwardsport              | IN | Duke Energy Corp                                  | 2012 xlsx                  |
| Frank E. Ratts                                                | 8              | 0              | Petersburg               | IN | Hoosier Energy R E C Inc                          | 2012 xlsx                  |
| Dean H Mitchell                                               | 8              | 0              | Gary                     | IN | Northern Indiana Pub Serv Co                      | 2012 xlsx                  |
| Tanners Creek                                                 | 5              | 1              | Lawrenceburg             | IN | American Electric Power                           | 2012 xlsx                  |
| Warrick Power Plant                                           | 1              | 0              | Newburgh                 | IN | AGC Division of APG Inc., Alcoa                   | EIA 860M                   |
| Riverton                                                      | 1              | 0              | Riverton                 | KS | Empire District Electric Co                       | 2012 xlsx                  |
| Dale Station (*ponds may be undergoing closure by excavation) | 3              | 0              | Winchester               | KY | East Kentucky Power Coop Inc                      | 2012 xlsx                  |

<sup>12</sup> Longitudes and Latitudes for each plant or site are readily available in the 2014 Risk Assessment.

| Potential Plant or Site                                      | # of SIs (A-1) | # of LFs (A-1) | City (A-1) <sup>12</sup> |    | Example of Readily available Operator Information | Example Information Source |
|--------------------------------------------------------------|----------------|----------------|--------------------------|----|---------------------------------------------------|----------------------------|
| Green River                                                  | 5              | 0              | Central City             | KY | Kentucky Utilities Co                             | 2012 xlsx                  |
| Kenneth C Coleman                                            | 3              | 0              | Hawesville               | KY | Big Rivers/Western Kentucky Energy Corp           | 2012 xlsx                  |
| Tyrone                                                       | 2              | 0              | Versailles               | KY | Kentucky Utilities Co                             | 2012 xlsx                  |
| Mount Tom                                                    | 3              | 1              | Holyoke                  | MA | First Light Power Resources                       | 2012 xlsx                  |
| Somerset Station                                             | 4              | 0              | Somerset                 | MA | NRG Somerset Power LLC                            | 2012 xlsx                  |
| R. Paul Smith Power Station                                  | 2              | 1              | Williamsport             | MD | Allegheny Energy Supply Co LLC                    | 2012 xlsx                  |
| Erickson Station                                             | 1              | 0              | Lansing                  | MI | Lansing Board of Water & Light                    | 2012 xlsx                  |
| Harbor Beach Power Plant                                     | 1              | 0              | Harbor Beach             | MI | DTE Electric Company                              | EIA 860M                   |
| Otto E. Eckert Station                                       | 1              | 0              | Lansing                  | MI | Lansing Board of Water and Light                  | EIA 860M                   |
| Riverside                                                    | 1              | 0              | Minneapolis              | MN | Northern States Power Co                          | 2012 xlsx                  |
| Lake Road                                                    | 2              | 1              | St. Joseph               | MO | Kansas City Power & Light Co                      | 2012 xlsx                  |
| Chamois Power Plant                                          | 1              | 0              | Chamois                  | MO | Central Electric Power Coop - (MO)                | EIA 860M                   |
| Hawthorn                                                     | 1              | 1              | Kansas City              | MO | Kansas City Power & Light Co                      | 2012 xlsx                  |
| JE Corette Plant                                             | 2              | 1              | Billings                 | MT | Talen Montana LLC                                 | EIA 860M                   |
| Cape Fear Steam Electric Plant (*to be closed by excavation) | 5              | 0              | Moncure                  | NC | Progress Energy Carolinas Inc                     | 2012 xlsx                  |
| Greenidge                                                    | 2              | 1              | Dresden                  | NY | Greenidge Generation Holdings LLC                 | EIA 860M                   |
| Muskingum River                                              | 4              | 0              | Waterford                | OH | American Electric Power                           | 2012 xlsx                  |
| O H Hutchings                                                | 3              | 0              | Miamisburg               | OH | Dayton Power & Light Co                           | 2012 xlsx                  |
| Picway                                                       | 1              | 0              | Lockbourne               | OH | American Electric Power                           | 2012 xlsx                  |
| Walter C Beckjord                                            | 4              | 2              | New Richmond             | OH | Duke Energy Corp                                  | 2012 xlsx                  |
| Ashtabula                                                    | 1              | 0              | Ashtabula Township       | OH | FirstEnergy Generation Corp                       | EIA 860M                   |
| Avon Lake                                                    | 2              | 1              | Avon Lake                | OH | GenOn Power Midwest, LP                           | EIA 860M                   |
| Bay Shore                                                    | 1              | 1              | Oregon                   | OH | Walleye Power, LLC                                | EIA 860M                   |
| Eastlake                                                     | 1              | 1              | Eastlake                 | OH | FirstEnergy Generation Corp                       | EIA 860M                   |
| Lake Shore                                                   | 1              | 0              | Cleveland                | OH | FirstEnergy Generation Corp                       | EIA 860M                   |
| R. E. Burger                                                 | 2              | 1              | Shadyside                | OH | FirstEnergy Generation Corp                       | EIA 860M                   |

| Potential Plant or Site                                | # of SIs (A-1) | # of LFs (A-1) | City (A-1) <sup>12</sup> |    | Example of Readily available Operator Information | Example Information Source |
|--------------------------------------------------------|----------------|----------------|--------------------------|----|---------------------------------------------------|----------------------------|
| Sooner                                                 | 2              | 0              | Red Rock                 | OK | Oklahoma Gas & Electric Co                        | EIA 860M                   |
| Elrama Power Plant                                     | 4              | 1              | Elrama                   | PA | NRG Power Midwest LP                              | 2014 xlsx                  |
| Hunlock Power Station                                  | 2              | 0              | Hunlock Creek            | PA | UGI Development Company                           | 2012 xlsx                  |
| Shawville                                              | 4              | 2              | Shawville                | PA | NRG REMA, LLC                                     | 2014 xlsx                  |
| Sunbury Generation LP                                  | 1              | 0              | Shamokin Dam             | PA | Sunbury Generation LP                             | 2012 xlsx                  |
| Portland                                               | 3              | 4              | Mt. Bethel               | PA | GenOn REMA, LLC                                   | EIA 860M                   |
| Canadys Steam (*undergoing closure by excavation)      | 3              | 0              | Canadys                  | SC | South Carolina Electric&Gas Co                    | 2012 xlsx                  |
| Dolphus M Grainger (*undergoing closure by excavation) | 2              | 0              | Conway                   | SC | Santee Cooper (South Carolina Pub Serv Auth)      | 2012 xlsx                  |
| Jefferies (*undergoing closure by excavation)          | 2              | 0              | Moncks Corner            | SC | Santee Cooper (South Carolina Pub Serv Auth)      | 2012 xlsx                  |
| Ben French                                             | 1              | 0              | Rapid City               | SD | Black Hills Power, Inc. d/b/a                     | EIA 860M                   |
| Carbon Power Plant                                     | 2              | 2              | Helper                   | UT | PacifiCorp.                                       | Online search              |
| Glen Lyn                                               | 2              | 1              | Glen Lyn                 | VA | American Electric Power                           | 2014 xlsx                  |
| Hopewell                                               | 1              | 0              | Hopewell                 | VA | Dominion Energy                                   | Online search              |
| Bay Front                                              | 2              | 2              | Ashland                  | WI | Xcel Energy                                       | 2014 xlsx                  |
| WI Power & Light Co - Rock River Generating            | 4              | 0              | Beloit                   | WI | Alliant Energy                                    | 2014 xlsx                  |
| Pulliam                                                | 1              | 1              | Green Bay                | WI | Wisconsin Public Service Corp                     | EIA 860M                   |
| Albright Power Station                                 | 2              | 2              | Albright                 | WV | First Energy Corp.                                | 2014 xlsx                  |
| Philip Sporn                                           | 2              | 1              | New Haven                | WV | American Electric Power                           | 2012 xlsx                  |
| Grant Town Power Plant                                 | 5              | 3              | GrantTown                | WV | American Bituminous Power LP                      | EIA 860M                   |
| Kammer                                                 | 1              | 0              | Moundsville              | WV | American Electric Power                           | 2012 xlsx                  |
| Kanawha River                                          | 1              | 0              | Glasgow                  | WV | American Electric Power                           | 2012 xlsx                  |
| Rivesville Power Station                               | 4              | 2              | Rivesville               | WV | Monongahela Power Co                              | EIA 860M                   |
| Wyodak Plant                                           | 1              | 1              | Gillette                 | WY | PacifiCorp                                        | 2012 xlsx                  |
| Osage                                                  | 2              | 2              | Osage                    | WY | Black Hills Power, Inc. d/b/a                     | EIA 860M                   |
| <b>75</b>                                              | <b>193</b>     | <b>41</b>      |                          |    |                                                   |                            |

**Table 4.** Notes regarding facilities listed in the 2014 Risk Assessment but omitted from Table 3.

|                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| J K Spruce and J T Deely     | "The Calaveras Power Station includes two coal plants stations near San Antonio, operated by CPS Energy, the municipal utility serving San Antonio. The two plants, known as J.T. Deely and J.K. Spruce, share a common set of coal ash storage and disposal units. For purposes of the Coal Ash Rule, CPS Energy is monitoring four coal ash units."                                                                                                                                                                                                  |
| Northside Generating Station | "JEA's Northside Generating Station ("NGS"), located in Duval County, Jacksonville, Florida, consists of three electric generation units that use a combination of natural gas, petroleum coke and coal to produce more than 1,300 megawatts of peak electric capacity. Combustion residuals at the NGS are generated primarily from the combustion of fuels (including other fossil fuels) other than coal. The CCR Rule, therefore, does not apply to the management of byproducts and other combustion residuals at the NGS. (40 C.F.R. 257.50(f))" |
| Martin Drake                 | Appears to be covered by the regulated Clear Spring Ranch Landfill                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Ray D Nixon                  | Appears to be covered by the regulated Clear Spring Ranch Landfill                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Brandon Shores               | "If not otherwise beneficially reused, the Brandon Shores Generating Station sends CCR materials to the Fort Armistead Road - Lot 15 Industrial Landfill, also owned and managed by Raven Power, a wholly owned subsidiary of Talen Energy."                                                                                                                                                                                                                                                                                                           |
| San Juan                     | Appears that coal ash generated at the San Juan Generating Station may be returned to the adjacent mines for use in reclamation, and that the station may not have or utilize ash impoundments or landfills.                                                                                                                                                                                                                                                                                                                                           |
| Southwest Power Station      | Appears to have been the John Twitty Energy Center                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Urquhart                     | Appears to be excavated                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| McMeekin                     | Appears to be excavated                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Kraft                        | "The plant is retired, and the ash pond was removed prior to the effective date of the CCR rule."                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Riverbend                    | Appears to be excavated                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

Although there are additional plants and sites that may have legacy surface impoundments that do not appear to be listed in the 2014 Risk Assessment and may still need to be regulated, such as Watts Bar Fossil Plant, Arkwright Power Plant, or Venice Station, EPA should not delay regulating known sites to identify potential additions.

**Table 5.** Other Facilities with Potential Legacy Waste (Landfills)

| Potential Plant or Site           | # of SIs (A-1) | # of LFs (A-1) | City (A-1)     | State (A-1) |
|-----------------------------------|----------------|----------------|----------------|-------------|
| Polk                              | 0              | 1              | Mulberry       | FL          |
| Earl F Wisdom                     | 0              | 1              | Spencer        | IA          |
| Streeter Station                  | 0              | 1              | Cedar Falls    | IA          |
| Quindaro                          | 0              | 1              | Kansas City    | KS          |
| Chalk Point LLC                   | 0              | 2              | Aquasco        | MD          |
| Morgantown<br>Generating Plant    | 0              | 2              | Newburg        | MD          |
| Allen S King                      | 0              | 1              | Bayport        | MN          |
| Taconite Harbor<br>Energy Center  | 0              | 3              | Schroeder      | MN          |
| Schiller                          | 0              | 1              | Portsmouth     | NH          |
| Danskammer<br>Generating Station  | 0              | 1              | Newburgh       | NY          |
| Armstrong Power<br>Station        | 0              | 2              | Adrian         | PA          |
| Foster Wheeler Mt<br>Carmel Cogen | 0              | 1              | Marion Heights | PA          |
| Titus                             | 0              | 4              | Birdsboro      | PA          |
| WPS Westwood<br>Generation, LLC   | 0              | 1              | Tremont        | PA          |
| Harrington                        | 0              | 2              | Amarillo       | TX          |
| Tolk                              | 0              | 1              | Sudan          | TX          |
| Genoa                             | 0              | 2              | Genoa          | WI          |
| John P. Madgett                   | 0              | 2              | Alma           | WI          |
| South Oak Creek                   | 0              | 3              | Oak Creek      | WI          |
| Valley                            | 0              | 4              | Milwaukee      | WI          |
| Willow Island                     | 0              | 1              | Willow Island  | WV          |
| <b>21</b>                         | <b>0</b>       | <b>37</b>      |                |             |

The numerous damage case reports prepared by EPA and by public interest organizations include evidence of the risks legacy ponds represent.<sup>13</sup> EPA noted in promulgating the 2015 CCR Rule that “[d]amage cases generally provide extremely potent evidence in hazardous waste listings,” and that the number of damage cases collected for coal ash up to 2014 was “by far the largest number of documented cases in the history of the RCRA program.”<sup>14</sup> Table 6 provides a summary of damage cases at sites that are not currently regulated by the 2015 CCR Rule and that included at least one surface impoundment.

**Table 6.** *Excerpt from Damage Case Database* – EPA’s confirmed damage cases demonstrate the risks posed by coal ash waste, and many damages cases likely involved legacy ponds that could still be present and unregulated today.

| #     | Facility                                                             |    | Waste Unit Type                                                                                                                                                                                                | Year Damage Noted | Failure Mode                                                                             | Status identified in 2014             |
|-------|----------------------------------------------------------------------|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------------------------------------------------------------------------------|---------------------------------------|
| PTa02 | Widows Creek Fossil Fuel Plant, TVA                                  | AL | 3 major SIs (ash pond, gypsum pond, and gypsum settling pond) and several minor (de-minimis) ponds.                                                                                                            | Early 1990s       | GW (SW: 1/2009 gypsum pond spill killed fish; \$9.2 million in cleanup; declared FONSI). | Active                                |
| PTb03 | Montville Generating Station - NRG Energy/Montville Power            | CT | Several primary coal ash settling ponds and disposal lagoon (active until 1971, when plant switched to oil) - implicated; and 3 unregulated, off site dumping areas.                                           | SW: Late 1960s    | GW & SW; Soil                                                                            | Inactive (Plant switched fuel to oil) |
| PTa04 | Lansing Smith Plant - Florida Power & Light                          | FL | A Primary SI (with 3 cells)                                                                                                                                                                                    | Pre-1985          | GW                                                                                       | Active                                |
| None  | Meredosia Power Station Ash Ponds - Ameren Energy Generating Company | IL | 2 active SIs (Fly Ash pond and Bottom Ash pond); three inactive SIs (Fly Ash, Bottom Ash, ?).                                                                                                                  | 2010              | GW                                                                                       | Some active, some inactive            |
| PTa10 | Vermillion Power Station - Illinois Power (Dynergy Midwest)          | IL | 3 multi-cell Primary SIs - one active, two closed (one in the mid-1970s and the other converted, in 1988, into a stormwater pond); and a cooling pond. Impact associated w/at least one of the two closed SIs. | Pre-2000          | GW                                                                                       | Inactive                              |

<sup>13</sup> See Alexander Livnat, U.S. Environmental Protection Agency, CCR Damage Case Database, Technical Support Document on Damage Cases, Docket ID No. EPA-HQ-RCRA-2009-0640-12123 (Dec. 18, 2014) (“Damage Case Database”); Environmental Integrity Project and Earthjustice, Coming Clean: What the EPA Knows About the Dangers of Coal Ash (May 2009), <https://earthjustice.org/sites/default/files/library/reports/final-coming-clean-ejeip-report-20090507.pdf>; Environmental Integrity Project and Earthjustice, Out of Control: Mounting Damages from Coal Ash Waste Sites (Feb. 24, 2010), <https://earthjustice.org/sites/default/files/library/reports/ej-eipreportout-of-control-final.pdf>; Environmental Integrity Project, Earthjustice, and Sierra Club, In Harm’s Way: Lack of Federal Coal Ash Regulations Endangers Americans And Their Environment (Aug. 26, 2010), <https://earthjustice.org/sites/default/files/files/report-in-harms-way.pdf>.

<sup>14</sup> 80 Fed. Reg. at 21,452.

| #     | Facility                                                                                |    | Waste Unit Type                                                                                                                                                                  | Year Damage Noted                | Failure Mode       | Status identified in 2014                                                                                       |
|-------|-----------------------------------------------------------------------------------------|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|--------------------|-----------------------------------------------------------------------------------------------------------------|
| PTa08 | Hutsonville Power Station - Central Illinois Public Service Co. (Ameren)                | IL | Five Primary SIs, one of which (Pond D) is assoc. w/impact (closed in 2000, partially replaced by a LF).                                                                         | Pre-2000 (as early as mid-1980s) | GW                 | Plant retired end of 2011. Closure of Pond D completed 1/2013.                                                  |
| PTb11 | Venice Power Station – Union Electric/Ameren/AmerenUE                                   | IL | 3 Primary SIs (implicated; stopped receiving CCR in 1977, but kept receiving process wastewater till 2005), closed 2010.                                                         | 1996                             | GW                 | Inactive. Plant retired.                                                                                        |
| PTb23 | Mirant Dickerson’s Generation Station’s Westland Disposal Site                          | MD | 1 LF (comprising one closed and one active phase); 2 settling/leachate treatment ponds.                                                                                          | 2005 (unauthorized discharges)   | GW & SW            | Active. NRG, new owner, plans to switch the Dickerson Plant from coal to oil or have it retired in mid-2017.    |
| PTb34 | Cape Fear Steam Plant – Progress Energy                                                 | NC | 5 unlined SIs: one Primary (active until plant’s retirement); two ponds for stormwater management; and 2 inactive ponds. Inadequate info to pin point down specific source term. | 2007                             | GW                 | Some Active, some not (prior to Plant’s retirement in 10/2012).                                                 |
| PTa29 | W.J. Neal Plant - Basin Electric                                                        | ND | Unlined Primary SI, closed since late 1980s.                                                                                                                                     | 1982                             | GW & SW; Sediments | Inactive (closed) 1989/90.                                                                                      |
| PTa30 | Beckjord Station - Cinergy W.C.                                                         | OH | 3 Primary (unlined) SIs, one of which is active.                                                                                                                                 | 1985                             | GW                 | Active/modified                                                                                                 |
| PTb41 | Muskingum River Plant – AEP/Ohio Power                                                  | OH | 4 Primary, unlined SIs - one is implicated.                                                                                                                                      | 2005                             | GW                 | Active. Generation Units 1-4 to retire by Dec. 31, 2014, while Unit 5 might be then switched to natural gas.    |
| PTb43 | Phillips Power Plant – Duquesne Light Co.                                               | PA | LF (FGD); 2 (unlined) wastewater treatment lagoons (implicated). All WUs closed (the ponds were clean-closed).                                                                   | SIs: Late 1980s; LF: mid-1990s   | GW & SW            | Inactive; early and late-1990s. Plant decommissioned 2002, demolished 2011/2012.                                |
| PTb44 | Hunlock Power Station – UGI Development Co.                                             | PA | 2 unlined SIs, operated until Plant’s decommissioning (2010), implicated.                                                                                                        | 1999                             | GW                 | Inactive. As of 5/22/2010, the Hunlock PP is no longer operative, including all associated disposal activities. |
| PTb46 | Portland Generating Station’s Bangor Quarry Ash Disposal Site – RRI Energy, Inc         | PA | LF in a quarry, lined above existing ash only in 1999 (implicated); 2 Secondary Ponds: Stormwater sedimentation pond & leachate collection pond (NPDES-regulated outfalls)       | GW: 2001; SW: 2006               | GW & SW            | Active. Plant slated to close in January 2015.                                                                  |
| None  | McMeekin Station Ash Landfill and Ponds - South Carolina Electric & Gas Company (SCANA) | SC | LF and 3 SIs.                                                                                                                                                                    | 2005                             | GW                 | Active                                                                                                          |

| #     | Facility                                                                         |    | Waste Unit Type                                                                                                                                                                                                                                                                                        | Year Damage Noted | Failure Mode                  | Status identified in 2014                                                                                                              |
|-------|----------------------------------------------------------------------------------|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| PTb48 | Dolphus M. Grainger Generating Station - South Carolina Public Service Authority | SC | 2 Primary, unlined SIs, one of which had been converted (1977) into dry ash storage area prior to the recent retirement of the Plant. At least one of the SIs is implicated.                                                                                                                           | 1996              | GW & SW                       | Inactive: the Plant shut down operation in May 2012.                                                                                   |
| PTb54 | Fayette Power Project (Sam Seymour) – Lower Colorado River Authority             | TX | 2 Primary SIs (at least one implicated), coal pile runoff pond, 2,400-acre cooling lake, 1 CCR (FGD) LF and 1 Class II Sanitary LF.                                                                                                                                                                    | 2005              | GW                            | Pond closed; LF Active                                                                                                                 |
| PTa41 | Rock River Ash Disposal Facility - Alliant (WP&L)                                | WI | 4 Primary ponds (discontinued in 2000, but not yet closed).                                                                                                                                                                                                                                            | 1976-1977         | GW                            | Inactive (decommissioned: 2000)                                                                                                        |
| PTa34 | Alma Off-site Fly Ash Landfill - Dairyland Power                                 | WI | One Primary SI, converted to LF in 1995. The current, lined LF not implicated.                                                                                                                                                                                                                         | Pre-1993          | GW                            | Some Active, some not                                                                                                                  |
| PR06  | Morgantwon Faulkner Offsite Landfill, PEPCO (Mirant, GenOn, NRG)                 | MD | 3 LFs & 3 associated sets of stormwater/ leachate management ponds (implicated); artificial wetland.                                                                                                                                                                                                   | 1991              | GW & SW; Ecol (veget. Damage) | Closed (2010)                                                                                                                          |
| PR20  | Fern Valley Landfill, Orion Power Holdings                                       | PA | LF (implicated) with a leachate collection/storm water pond.                                                                                                                                                                                                                                           | 1995              | GW, SW, ecologic              | Inactive/2007                                                                                                                          |
| PR22  | Martins Creek Power Plant, PPL                                                   | PA | 4 SI: two closed (# 2 & 3); one retired during the spill and partially closed since 1999, and completely closed afterwards (# 1, implicated in GW impact), and one active during spill (# 4, implicated in dike breach) subsequently decommissioned.                                                   | 2005              | GW, SW                        | All four basins are inactive. Plant's 2 coal-fired units closed 2007 (demolished 2009) due to air pollution impacts on New Jersey.     |
| PR23  | Canadys Plant, SCE&G                                                             | SC | 2 Primary SIs. Old pond deactivated 1989 and a new one kicked in (both implicated). Also, waste water treatment ponds (i.e., Coal pile runoff basins #1 and #2, coal pile runoff detention basin, low-volume waste ponds A, B, and C, and spray pond.                                                  | 1982 2008         | GW                            | Inactive since Plant's closure (Nov. 2013)                                                                                             |
| PR25  | Urquhart Station, SCE&G                                                          | SC | LF & SIs (2 Settling basins, receiving only small amount of fly ash and stormwater, and dredged every 12-18 months - implicated). Also, wastewater treatment ponds (i.e., metals pond, low-volume waste pond, ash-landfill runoff basin, low-volume waste polishing pond, and stormwater runoff pond.) | 1989; 2007        | GW, Soil                      | Active                                                                                                                                 |
| PR27  | Oak Ridge Y-12 OU# 2, DOE                                                        | TN | Ash retention SI and an abandoned (Lst.?) quarry. Presently LF (not implicated).                                                                                                                                                                                                                       | 1989              | SW/Ecol, GW                   | Inactive                                                                                                                               |
| PR34  | Chisman Creek, VEPCO                                                             | VA | 4 (now abandoned) sand and gravel pits and three man-made ponds.                                                                                                                                                                                                                                       | 1980              | GW & SW                       | Inactive/1974. One (out of two) coal-fired unit would likely close by 2015 and a second unit would likely be converted to natural gas. |

| #    | Facility                          |    | Waste Unit Type | Year Damage Noted | Failure Mode | Status identified in 2014                                          |
|------|-----------------------------------|----|-----------------|-------------------|--------------|--------------------------------------------------------------------|
| PR40 | E.J. Stoneman,<br>Dairyland Power | WI | Primary SI      | 1976              | GW           | Inactive. Plant recently converted into a biomass-fueled facility. |