

## **Division of Water Resources**

### **Duke Energy Coal Ash Impoundments Remediation Status Overview**

**November 17, 2015**

Duke Energy has submitted Comprehensive Site Assessments (CSAs) for all fourteen facilities and recently submitted six Phase 1 Corrective Action Plans (CAPs). Data gaps and deficiencies that have been identified for the CSAs and CAPs pose constraints on meeting CAMA requirements for site closure and hamper the Division's ability to review documents and make informed decisions regarding corrective action. Observations regarding CAPs are based on a cursory review of those generated for the H.F. Lee Energy Complex, L.V. Sutton Energy Complex, and the W.H. Weatherspoon Power Plant along with a very limited, preliminary review of the CAPs for the Dan River Combined Cycle Station, Riverbed Steam Station, and James E. Rogers Energy Facility (formerly Cliffside Steam Station). An overview of issues identified to date that are obstacles to restoration of groundwater quality at the coal ash facilities is provided below:

- Data that have been clearly identified as needed to complete site assessments have not been addressed at all facilities and have not been incorporated in groundwater models or preliminary remedial design. Remedial design will be incomplete until significant data gaps are addressed.
- For the most part, provisional background determinations for groundwater were not statistically derived; instead, ranges of concentrations were identified with typically the highest concentration detected chosen as representative of background. Since provisional background concentrations of groundwater constituents have not been adequately established, the 2L Standards and IMAC exceedances cannot be confirmed at this time.
- The fate and transport models generated to date to address 2L Standards and IMAC exceedances only incorporated a limited number of groundwater constituents. As a result, models that depict distribution of impacted groundwater are incomplete.
- The relationship of potential coal ash constituents detected in private and public water supply wells with respect to the coal ash impoundments has not been adequately evaluated at facilities where there are nearby receptors.