Message

From: Thill, Stephen D [SThill@idem.IN.gov]
Sent: 4/23/2021 12:29:24 PM
To: Mooney, Susan [mooney.susan@epa.gov]
CC: Huggins, Richard [Huggins.Richard@epa.gov]; Vescovi, Susan [vescovi.susan@epa.gov]; Schumacher, Jessica [Schumacher.Jessica@epa.gov]; Mullins, Angela [Mullins.Angela@epa.gov]; Moore, Tammy [moore.tammy@epa.gov]
Subject: RE: seeking a meeting to discuss 2 CCR sites
Attachments: Duke Gallagher APS 2019 03 07 Geology Memo 82725430.pdf; Gallagher APS 2021 04 15 Update of GW Elevations Table.pdf; Duke Gallagher APS Waste Bottom Elevations.xlsx

Good morning all,

Attached is some follow-up information regarding your questions about the groundwater and waste elevations at Gallagher Station's Primary Pond Ash Fill and North Pond.

Best,
Steve

From: Mooney, Susan <mooney.susan@epa.gov>
Sent: Wednesday, April 14, 2021 5:39 PM
To: Thill, Stephen D <SThill@idem.IN.gov>
Cc: Mcclure, Amy <AMcclure@idem.IN.gov>; Huggins, Richard <Huggins.Richard@epa.gov>; Vescovi, Susan <vescovi.susan@epa.gov>; Schumacher, Jessica <Schumacher.Jessica@epa.gov>; Mullins, Angela <Mullins.Angela@epa.gov>; Moore, Tammy <moore.tammy@epa.gov>
Subject: RE: seeking a meeting to discuss 2 CCR sites

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Here are some questions regarding the three sites.

Clifty Creek

- Has the Phase 1 Closure Plan for the West Boiler Slag Pond been approved?
- Has IKEC submitted a Phase 2 closure plan for the West Boiler Slag Pond?
- What is IDEM's position on IKEC's plan to close with waste in place?
- Does IDEM have information that would indicate the surface impoundments are in contact with groundwater?
- IKEC is planning on constructing a concrete settling tank below final grade. Has IDEM permitted something similar to this before? If so how?
- IKEC stated in their Part A demonstration that they will use one liner/cap system for the new basins to be constructed within the footprint of the West Boiler Slag Pond. Is this consistent with what you have heard or reviewed? Do you have any concerns with this approach?
- What is IDEM's position on IKEC using CCR as structural fill for the new concrete tanks and below the basins in both the West Boiler Slag Pond and Landfill Runoff Collection Pond?
- What is IDEM's position on IKEC building new wastewater basins into the existing CCR of the West Boiler Slag Pond and Landfill Runoff Collection Pond?
- Has IDEM reviewed the groundwater monitoring of the West Boiler Slag Pond and Landfill Runoff Collection Pond? Particularly, the placement of background wells WBSP-15-02 and WBSP-15-03.

Gallagher

- What was IDEM's reasoning as to why the Primary pond Ash Fill and the North Pond are not subject to the Federal CCR rule?

Michigan City

- In addition to the approved closure plan, are there separate efforts related to remediation at the site?
- Has IDEM evaluated potential releases to Lake Michigan from the ash used as fill on the site?

Susan Mooney
Chief, RCRA C&D Section
Land and Chemicals Branch
Land, Chemicals and Redevelopment Division
US EPA Region 5
312-886-3585

From: Thill, Stephen D <SThill@idem.IN.gov>
Sent: Friday, April 9, 2021 12:30 PM
To: Mooney, Susan <mooney.susan@epa.gov>
Cc: Mcclure, Amy <AMcclure@idem.IN.gov>
Subject: RE: seeking a meeting to discuss 2 CCR sites

Hi Susan,

We would be happy to discuss. We will check schedules and get back to you on timing. If there are any specific questions EPA would like us to address, it would be very helpful for preparation purposes to have some indication of those questions in advance.

Thanks very much,
Steve

From: Mooney, Susan <mooney.susan@epa.gov>
Sent: Friday, April 9, 2021 1:09 PM
To: Thill, Stephen D <SThill@idem.IN.gov>; Mcclure, Amy <AMcclure@idem.IN.gov>
Subject: seeking a meeting to discuss 2 CCR sites

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Hi Steve and Amy,

I hope you both are doing well. Our national program colleagues reached out to the region and asked if we could assist in setting up a call with you to discuss 2 Indiana CCR sites. One site, Clifty Creek, relates to EPA's Part A review and the timeline submitted by the facility regarding state permitting. The second site, the Gallagher facility, was brought to the attention of the program by Earthjustice regarding the approved closure plan. We know you've been working on these sites for many years.

On the US EPA side we'd have Richard Huggins, who manages the Branch that covers CCR work in the Office of Resource Conservation and Recovery and some of his staff; Laurel Celeste in the Office of General Counsel; and from Region 5, me, Tammy Moore (my Branch Chief) and a couple of my staff.

Would any of the following days/times (all Eastern) work for you and your staff next week:

- April 13 at 1:00 pm
- April 14 at 3:30
- April 15 at 1:00
- April 16: anytime between 12:30 and 3:30

I hope we can find a time that works. Thanks for considering this and have a good weekend!

Susan Mooney
Chief, RCRA C&D Section
Land and Chemicals Branch
Land, Chemicals and Redevelopment Division
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