

March 6, 2020

Cardinal Operating Company
306 County Road 7 E
Brilliant, Ohio 43913

Semi-Annual Progress Report on Groundwater Corrective Measures at FAR II

This Progress Report is prepared to provide an update on the status of selecting and designing the remedy/ corrective measure in accordance with CCR Rule § 257.97(a).

A public meeting was held on September 4th, 2019 to discuss the Assessment of Corrective Measures (ACM) Report for groundwater protection exceedances at Monitoring Wells M-11 and FA-8. The ACM outlined four corrective measure options which Cardinal has been reviewing since the report was prepared.

As described in § 257.97(b), Cardinal must select a remedy that:

- Protects human health and environment;
- Attains the groundwater protection standards;
- Controls the source of the release to reduce or eliminate, to the maximum extent feasible, further releases of constituents in Appendix IV to the environment;
- Removes from the environment as much of the contaminant material that was released from the CCR Unit as is feasible; and
- Comply with standards for waste management.

Additionally, Cardinal shall consider the following evaluation factors when selecting a remedy, as prescribed in § 257.97(c):

- The long term and short-term effectiveness and protectiveness of the remedy, along with the degree of certainty that the remedy will prove successful;
- The effectiveness of the remedy in controlling the source to reduce further releases;
- The ease or difficulty of implementing a potential remedy; and
- The degree to which community concerns are addressed.

At this time Cardinal is still evaluating groundwater flow conditions at the Facility to determine which remedy would be most effective at meeting the requirements stated above. Cardinal believes a decision on the corrective measure should be made prior to the end of the year.

Once the corrective measure is selected, a report detailing the implementation, schedule and effectiveness of meeting § 257.97(b), will be published on Cardinal's CCR Compliance Website.