



Remedy Selection Report
Richmond Power and Light
Whitewater Valley Station Surface Impoundment
Whitewater Valley Station
Richmond, Wayne County, Indiana

GAI Project Number: C151119.25

January 2026



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Certification/Statement of Professional Opinion

The Remedy Selection Report (Report) for the Surface Impoundment (Impoundment) at Richmond Power and Light's Whitewater Valley Station (Station) was prepared by GAI Consultants, Inc. (GAI). It is my professional opinion as a Professional Engineer licensed in the State of Indiana that the Report has been prepared in accordance with good and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances and at the time and in the same locale. It is my professional opinion that the Report was prepared consistent with the requirements of §257.97 of the United States Environmental Protection Agency's "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments," published in the Federal Register on April 17, 2015, with an effective date of October 19, 2015 (40 CFR 257 Subpart D), and subsequent revisions.

The use of the words "certification" and/or "certify" in this document shall be interpreted and construed as a Statement of Professional Opinion and is not and shall not to be interpreted or construed as a guarantee, warranty, or legal opinion.

GAI Consultants, Inc.

John R. Klamut, P.E.
Engineering Director



Date: 1/27/2026

1.0 Introduction

This report is the Remedy Selection Report for groundwater impacts identified at the inactive Surface Impoundment (Impoundment) located at Richmond Power and Light's (RPL's) Whitewater Valley Station (Station), located in Richmond, Wayne County, Indiana (see Figure 1). The Station is a coal-fired electric generating station, and Coal Combustion Residuals (CCR) generated at the Station were historically sluiced to the Station's Surface Impoundment (Impoundment), which was built in the 1950s.

The Impoundment is regulated as an existing CCR surface impoundment under the United States Environmental Protection Agency's *Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments* (40 CFR 257 Subpart D) published in the Federal Register on April 17, 2015, with an effective date of October 19, 2015 (CCR Rule) and subsequent revisions. The Impoundment meets the provisions of the CCR Rule's *Extension of Compliance Deadlines for Certain Inactive Surface Impoundments: Response to Partial Vacatur*, effective October 4, 2016.

2.0 Purpose

In February 2020, a notice documenting that a statistically significant level of molybdenum had been observed in a groundwater monitoring well was issued (placed within the Station's operating record and publicly accessible internet page). As per CCR Rule requirements, GAI Consultants, Inc. (GAI) prepared an Assessment of Corrective Measures (ACM) for the Impoundment (GAI, 2020). This Remedy Selection Report will present the selected corrective measure for use at the Impoundment.

Pursuant to CCR Rule Section 257.97(a), upon selection of a remedy, the owner of a CCR impoundment must prepare a final report describing the selected remedy and how it meets the standards specified in CCR Rule Section 257.97(b). This Remedy Selection Report will therefore include:

- ▶ Remedy Selected.
- ▶ Verification that the selected remedy will:
 - Be protective of human health and the environment;
 - Attain the groundwater protection standard as specified pursuant to CCR Rule Section 257.95(h);
 - Control the source(s) of releases so as to reduce or eliminate, to the maximum extent feasible, further releases into the environment of constituents listed in appendix IV of the CCR Rule;
 - Remove from the environment as much of the contaminated material that was released from the CCR unit as is feasible, taking into account factors such as avoiding inappropriate disturbance of sensitive ecosystems; and
 - Comply with standards for management of wastes as specified in CCR Rule Section 257.98(d).

3.0 Site Information

3.1 Site History

From discussion with Station personnel, sluicing of fly ash and bottom ash to the Impoundment was reduced significantly during the mid-1970s, with rare instances when the Impoundment received sluiced fly ash as a backup option until October 18, 2015. From the mid-1970s to 2015, the Surface Impoundment received Bottom Ash Hydrobin overflow and drain water on days the Station operated.

Starting in 2012, the Station began operating as a peaking station and typically operates 20 to 30 days per year. The size of the Impoundment is approximately 14 acres. The state identification number for the Impoundment is 89-UP-04.

The Impoundment is now inactive and only receives localized site stormwater runoff. A coal pile runoff pond has been constructed to minimize stormwater runoff to the Impoundment. A polishing pond area known as Pond P1-P3 is part of the Impoundment on its northern boundary. The Impoundment drains to the Pond P1-P3 area via a series of gravel drains. Water drains from Pond P1-P3 area through Pond P-4 to the Richmond Sanitary District sewer line on the north side of the property.

3.2 Site Geology/Hydrogeology

The general Site geology, based on publications by the Indiana Department of Natural Resources, indicates that the Impoundment sits above an unconsolidated surficial aquifer (Maier, 2011a), referred to as a Till Veneer Aquifer System, which is generally less than 50 feet thick. The aquifer is described as a till with intermittent and discontinuous surface and subsurface gravels and sands in places. The aquifer is underlain by the Ordovician-age Maquoketa Aquifer System, a bedrock aquifer (Maier, 2011b) composed primarily of shale with some interbedded limestone (note that in most of Wayne County the Maquoketa is overlain by thick clay deposits). A review of water wells (from the Department of Natural Resources website) indicated that considerable drawdown and dry holes are common in both the till and the rock aquifers. Looking at available water well logs on the website (<https://www.in.gov/dnr/water/ground-water-wells/water-well-record-database/>), there were a few wells drilled near the localized high point along Route 27 to the east of the Site that were drilled into rock and were considered to be dry in till and in rock. A few nearby wells appear to have encountered water at top-of-rock or in granular layers within the till. Potentiometric surface maps of Wayne County for the unconsolidated aquifers (Schmidt, 2014a) and the bedrock aquifers (Schmidt, 2014b) both show the Site to be on the edge of the available mapping.

From the results of the GAI 2016 groundwater characterization of the Site, the soil aquifer has been determined to consist of an apparently continuous saturated sand or sand and gravel layer on the site located within or at the base of the till. The potentiometric surface slopes generally to the west through the site.

The rock aquifer has been determined to consist primarily of fractured, weathered limestone located within five to ten feet below the top of rock surface. It is saturated and confined by the till except on the southwest corner of the site where it is unconfined in a bedrock high point on the site. The slope of the potentiometric surface is complicated, with a large relatively flat high in the northern half of the site and low areas to the south and northwest.

Surface water provides recharge to the soil aquifer.

4.0 Groundwater Monitoring

A Groundwater monitoring system was established at the Impoundment site beginning in 2016 during initial interactions with the Indiana Department of Environmental Management (IDEM). The wells on site were originally analyzed for the CCR Rule Appendix III and Appendix IV parameters in addition to parameters requested by IDEM. In January 2018, the parameter list was reduced to just the Appendix III and Appendix IV parameters. The initial detection monitoring samples for CCR Rule Appendix III parameters were collected in March 2019. Background standards were calculated for the Appendix III parameters; during the June 2019 review it was determined that there were statistically significant increases (SSIs) for one Appendix III parameter (fluoride) in two of the downgradient monitoring wells. Subsequent assessment monitoring, beginning in September 2019, revealed a statistically significant level of molybdenum in a downgradient well.

The Site system, which is shown on Figure 2, is composed of:

- ▶ Eight monitoring well (MW) pairs (shallow and deep wells designated as S and D) at locations MW-A through MW-H.
 - Monitoring well MW-GS was found to have insufficient water for monitoring purposes; a third well, designated as MW-GSR, was installed in its place.
 - It was determined during the characterization that the shallow wells represent groundwater in the uppermost aquifer on Site, the soil aquifer. The deep wells are drilled into the underlying rock aquifer and are therefore only being used as piezometers.
- ▶ Two shallow monitoring wells at locations MW-IS and MW-JS installed as part of an arsenic investigation of MW-H-S.
- ▶ Five shallow monitoring wells designated as MW-KS, MW-LS, MW-MS, MW-NS, and MW-OS installed offsite on property to the west of the impoundment as part of the ACM characterization.
- ▶ Two older, shallow wells designated as MW-1 and MW-2, made of stainless steel that were believed to have been installed as part of a petroleum tank leak investigation.
 - These are only used as piezometers.
- ▶ Five staff gauges used to monitor water levels in ponds A-1, A-2, A-3, A-4, and P-4.
- ▶ Four piezometers (PZ-1703, 1704, 1705, and 1706) used to monitor water levels near pond A-1 and in ponds P-1, P-2, and P-3.
- ▶ PZ-1701 and PZ-1702 were abandoned during the coal pile runoff control construction operations. PZ-1706 was abandoned in 2025 after being damaged.

The monitoring wells at locations A through H were installed in 2016. The monitoring wells at locations IS and JS were installed in 2018. The ACM characterization monitoring wells at locations MW-KS, MW-LS, MW-MS, MW-NS, and MW-OS were installed in July 2020.

Figure 3 shows a potentiometric map of the uppermost (soil) aquifer based upon water level readings taken during the last round of background samples in March 2024. A Groundwater Monitoring and Corrective Action Report from December 2024 notes that statistically significant levels of total lithium were found in downgradient wells MW-BS, MW-CS, and MW-DS, and statistically significant levels of total molybdenum were found in downgradient well MW-BS.

5.0 Assessment of Corrective Measures

Since a statistically significant level of molybdenum was found in a downgradient well in 2019, preparation of an ACM report was required by the CCR Rule. The ACM report was completed in September 2020. The ACM report discussed the history of groundwater monitoring and the site and consider the following potential corrective measures:

- ▶ Monitored Natural Attenuation
- ▶ Source Removal with Post-Removal Monitoring
- ▶ Hydraulic Containment
- ▶ Physical Containment/Hydraulic Barrier
- ▶ Permeable Reactive Barrier
- ▶ In-Situ Stabilization

A public meeting was held on June 28, 2021, to discuss the ACM report as required by 40 CFR Section 257.96. As required by the CCR Rule, this meeting occurred at least 30 days prior to the selection of a corrective measures remedy.

6.0 Remedy Selection

RPL, GAI, and specialty contractors discussed each of the potential remedies suggested in the ACM report. The potential remedies were reviewed for applicability, effectiveness, constructability, and impacts to the local environment. Based on the discussions and vetting of the potential remedies, a physical containment/hydraulic barrier has been selected as the remedy to address groundwater impacts resulting from the Impoundment.

Physical barriers such as vertical barrier walls and caps are used to isolate source materials and prevent migration of water through the source material to areas outside of the area of control. For the Impoundment, this will be achieved via a fully encapsulating vertical barrier wall around the perimeter of the Impoundment and an associated cap over the areal extent of the Impoundment.

The cap and cutoff wall system has been submitted to IDEM for approval as part of a closure plan for the Impoundment.

6.1 Initial Investigations

As part of the Assessment of Corrective Measures, an investigation to evaluate the suitability of a cutoff wall was completed, during which a portion of the impoundment with an inadequate underlying clay layer was identified. The remedy design will therefore include relocating CCR in a portion of the impoundment with an inadequate underlying clay layer to a location within the impoundment which has underlying soils with adequate low permeability suitable for keying in the cutoff wall. This consolidation of material will reduce downward migration of the water out of the impoundment and reduce the areal extent of the in-place CCR.

6.2 Site Preparation

Prior to completing closure via installation of a cap and cutoff wall, the site will be prepared to optimize the use of the cap and wall. Site work will consist of:

- ▶ Removal of CCR material from select portions of the site;
- ▶ Regrading of CCR to achieve closure grades; and
- ▶ Compaction of CCR material to provide a stable subgrade for the closure cap.

Perched water encountered during these activities will be discharged via current discharge mechanisms.

6.3 Impoundment Cap

A cap system will be used to prevent rainwater from infiltrating into the Impoundment. The cap will consist of:

- ▶ Six inches of topsoil;
- ▶ 24 inches of cover soil;
- ▶ Filter geotextile;
- ▶ Integrated Drainage System geomembrane, consisting of a 50-mil linear low-density polyethylene (LLDPE) liner, with drainage studs and stability spikes; and
- ▶ Liner subgrade, typically to consist of proof-rolled CCR material.

In select locations, modifications to the cap system will be used to accommodate:

- ▶ Existing on-site utility poles;
- ▶ Utility pole guy wire anchors;
- ▶ Access road surfacing; and
- ▶ Drainage channel lining.

The proposed cap meets the CCR Rule requirements for permeability of final cover (the permeability

for LLDPE liner has been reported as 3.6×10^{-10} cm/sec).

6.4 Impoundment Cutoff Wall

A cutoff wall will be installed to enclose the portion of the Impoundment where CCR material will remain in place. The cutoff wall will be specified to meet the requirements of the IDEM guidance document *Engineering Control: Slurry Walls* (May 2021). The cutoff wall will be installed below the level of CCR contained within the Impoundment and will penetrate through a sand layer underlying the CCR to key into a lower fine-grained material layer. This will act to seal off the CCR material from any surrounding groundwater. The cutoff wall backfill permeability requirement is 1×10^{-7} cm/sec. See Figure 4 for a schematic cross section of the Impoundment and proposed cutoff wall.

Piezometers will be installed within the capped Impoundment to monitor water levels within the Impoundment. Should water levels within the Impoundment exceed those outside the Impoundment, water will be pumped from the Impoundment via extraction wells to provide a negative gradient for Impoundment internal water. Water pumped from the Impoundment will be pretreated if required and then discharged to the Richmond Sanitary District system.

It is expected that the cutoff wall will influence the local groundwater in the area outside and around the Impoundment. Following Impoundment closure, the groundwater could be expected to have local increases in the areas to the east of the Impoundment as the natural groundwater flow direction encounters the impermeable wall. The increases will build up to generate sufficient head to direct the flow to the north and/or the south around the wall. The cutoff wall alignment has taken this flow redirection into account and has been configured to avoid containing the groundwater flow. To the west of the Impoundment, the redirected flow is expected to converge to achieve existing conditions.

6.5 Remedy Requirements

Selection of the cap and cutoff wall containment system will satisfy the remedy requirements of Section 257.97(b) of the CCR Rule.

6.5.1 Human Health and the Environment

The cap and cutoff wall system will protect human health and the environment. The cap system will prevent rainfall from infiltrating into the CCR located within the Impoundment and prevent removal of CCR from the Impoundment surface, while the cutoff wall will isolate the CCR material from the surrounding groundwater. This will serve to prevent the migration of CCR and its components from entering either the surface or the subsurface environment.

6.5.2 Attain Groundwater Protection Standard

The isolation of CCR with the cutoff wall will prevent CCR material and its components from mobilizing into the surrounding groundwater.

6.5.3 Source Control

The cap and cutoff wall will isolate and contain the in-place CCR material and will reduce and/or eliminate further releases of constituents in Appendix IV of the CCR Rule.

6.5.4 Removal of contaminated material

Molybdenum and lithium have been identified in downgradient monitoring wells at statistically significant levels. It is anticipated that, after installation of the cap and cutoff wall, molybdenum and lithium levels will naturally attenuate and dissipate over time. Post-construction monitoring after installation of the cap and cutoff wall will be used to verify this conclusion.

6.5.5 Waste Management

Section 257.98(d) of the CCR Rule states that CCR “shall be managed in a manner that complies with all applicable Resource Conservation and Recovery Act (RCRA) requirements.” Since Part 257 of the

Federal Rules is part of the RCRA, and the CCR Rule also falls under Part 257, compliance with CCR Rule requirements for the Impoundment site will also meet RCRA requirements.

6.6 Remedy Evaluation

Pursuant to Section 257.97(c), the following evaluation factors were considered in the selection of the remedy.

6.6.1 Long- and Short-term Effectiveness and Protectiveness

The cap and cutoff wall will provide immediate effectiveness once installed. The cap will consist of a geomembrane with soil cover to prevent rainfall infiltration into the CCR as well as release of CCR material into the surface environment. The cutoff wall, combined with monitoring of water levels within and outside the Impoundment, will prevent migration of any water internal to the Impoundment into the surrounding groundwater. After installation of the cap and cutoff wall, the existing risk of CCR being introduced either into the surface environment or into the groundwater will be minimized.

Potential short-term risks during implementation of the selected remedy could include fugitive CCR dust being generated during grading activities and installation of the cap system. A dust control plan has been incorporated into the implementation documents to minimize this risk. Excavation for installation of the cutoff wall could expose CCR material or perched water and/or groundwater that may contain CCR constituents. Water control during construction will be used to direct such water back into the Impoundment to follow existing discharge protocols.

A long-term monitoring and maintenance plan has been prepared for the Impoundment to address the period after installation of the cap and cutoff wall. This plan includes provisions for monitoring and maintenance of the cap system. The cap and cutoff wall remedy will be effective as long or longer than the 30-year monitoring period mandated by the CCR Rule.

6.6.2 Source Control Effectiveness

The cap and cutoff wall will minimize further releases from the Impoundment by covering the surface of the Impoundment to prevent release of CCR into the surface environment and by containing the CCR within the cutoff wall to prevent release of CCR constituents into the surrounding groundwater.

6.6.3 Implementation Ease/Difficulty

Implementation of the cap and cutoff wall should encounter few difficulties. Construction of the systems will follow a standard procedure for utilizing the selected technologies. The surface area of the Impoundment will be graded to provide a suitable subgrade for the cap system, which is a common procedure used in closures of landfills and impoundments. The cutoff wall will be constructed by trenching around the Impoundment perimeter and installing a low permeability slurry to provide containment.

IDEM will need to provide approval of the cap and cutoff wall system prior to installation. RPL and IDEM have engaged in discussions throughout the remedy selection and design process and IDEM considerations have been incorporated into the proposed plans.

Any water removed from within the Impoundment after installation of the cap and cutoff wall will be discharged to the Richmond Sanitary District system. Should pre-treatment of the water be required, the location of treatment facilities have been discussed with IDEM.

6.6.4 Community Concerns

A public meeting was held to discuss the Assessment of Corrective Measures report. Members of the community attended the meeting and none of the potential remedies discussed were questioned by those in attendance.

6.7 Remedy Implementation

Section 257.98 of the CCR Rule contains provisions for implementation of the selected remedy within 90 days of remedy selection.

6.7.1 Establish and Implement a Corrective Groundwater Monitoring Program

A corrective action groundwater monitoring program must be established and implemented that meets the requirements of an assessment monitoring program, documents the effectiveness of the corrective action remedy, and demonstrates compliance with the groundwater protection standard.

The Impoundment has been under an assessment monitoring program since 2019 after fluoride was observed, and a groundwater sampling and analysis plan was provided to IDEM as part of the submission for approval of the cap and cutoff wall system. After the cap and cutoff wall are installed, this plan will serve to demonstrate effectiveness and compliance.

6.7.2 Implement the Corrective Action Remedy

The initial step in implementing the selected remedy was submission of the proposed plans to IDEM for approval. Once IDEM has approved the proposed cap and cutoff wall system, the construction process will commence and the corrective action remedy will be implemented.

6.7.3 Take Interim Measures to Reduce Contaminants Leaching from the CCR Unit

The potential for contaminants to leach from the Impoundment has been reduced as no new CCR material has been placed in the Impoundment since 2015.

Additionally, construction of an upgradient coal runoff pond in 2019-2020 reduced stormwater runoff into the Impoundment, and construction of an internal swale has reduced ponded water potential (and subsequent ground water recharge) within the Impoundment. Reducing these sources of water will reduce the infiltration of surface water into the Impoundment's CCR material.

7.0 References

GAI Consultants, Inc. June 2016. Groundwater Characterization Report.

GAI Consultants, Inc. September 2020. Assessment of Corrective Measures.

GAI Consultants, Inc. December 2024. Sixth Annual Groundwater Monitoring and Corrective Action Report.

Indiana Department of Environmental Management. May 2021. Technical Guidance Document – Engineering Control: Slurry Walls.

Maier, Randall D. (a), 2011. Bedrock Aquifer Systems of Wayne County, Indiana. Aquifer System Map 83-B, Indiana Department of Natural Resources, July 2011.

Maier, Randall D. (b), 2011. Unconsolidated Aquifer Systems of Wayne County, Indiana. Aquifer System Map 83-A, Indiana Department of Natural Resources, July 2011.

Schmidt, Robert K. (a), 2014. Potentiometric Surface Map of Bedrock Aquifer Systems of Wayne County, Indiana. Aquifer System Map 41-A, Indiana Department of Natural Resources, June 2014.

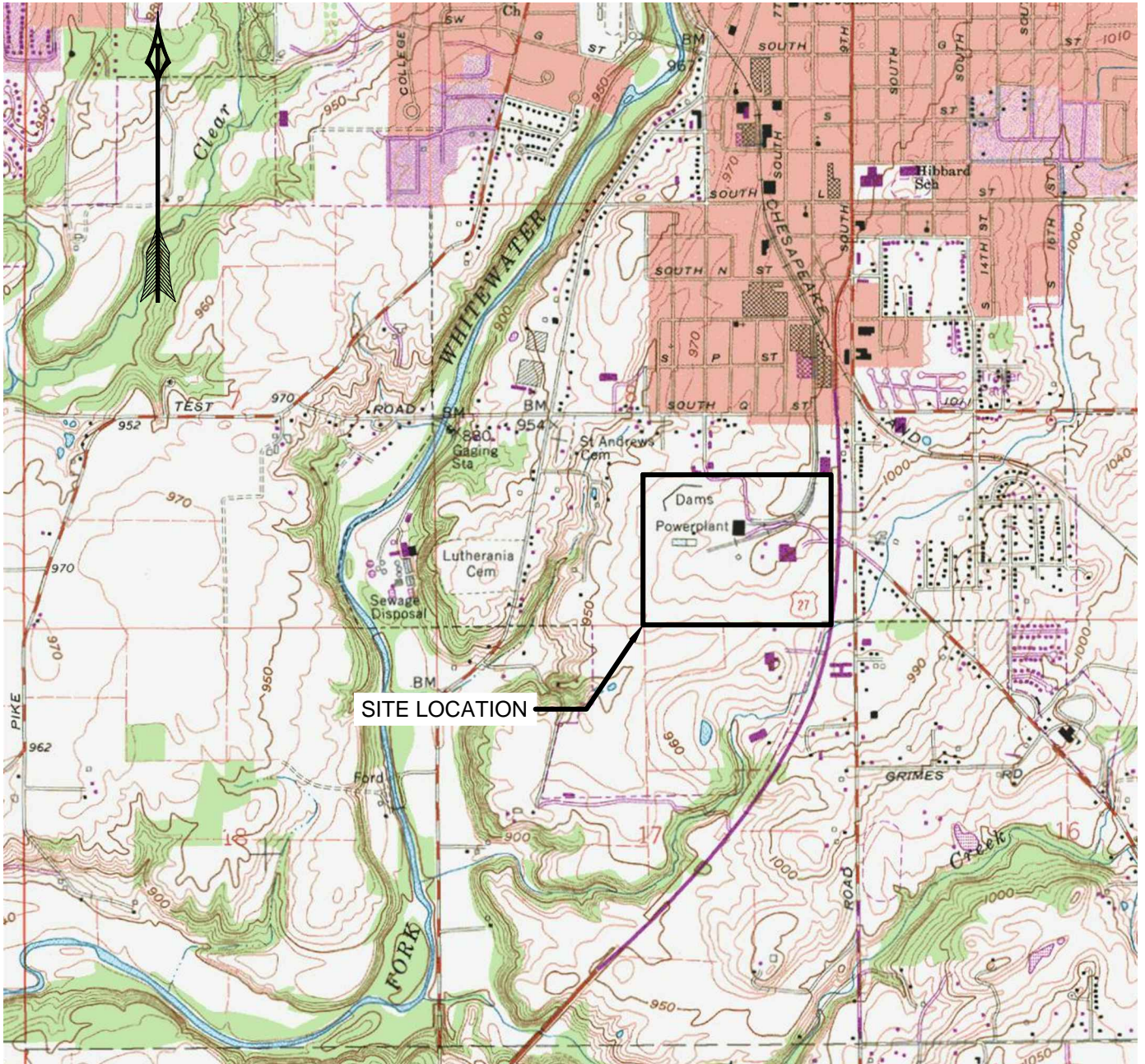
Schmidt, Robert K. (b), 2014. Potentiometric Surface Map of the Unconsolidated Aquifer Systems of Wayne County, Indiana. Aquifer System Map 41-B, Indiana Department of Natural Resources, June 2014.

United States Environmental Protection Agency. April 17, 2015. *40 CFR Parts 257 and 261 – Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities*. Final Rule.

United States Environmental Protection Agency. April 5, 2016. *40 CFR Part 257 – Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities; Extension of Compliance Deadlines for Certain Inactive Surface Impoundments; Response to Partial Vacatur.*

FIGURES

GAI CAD FILE PATH: Z:\Energy\2015\C151119.04 - RPL_GW IDEM Closure Nar\CAD\Production Drawings\C151119-04-002-001-A2-001.dwg



MAP REFERENCE:
 RICHMOND, IN 7.5 MINUTE
 QUADRANGLE DATED 1960
 PHOTO REVISED 1981

SCALE: 1" = 2000'



DRAWING TITLE		GAI DRAWING NUMBER:		
FIGURE 1 - SITE LOCATION MAP		A2-001		
PROJECT		GAI FILE NUMBER:		
WHITewater IDEM CLOSURE PLAN		C151119-04-002-001-A2-001		
CLIENT		DRAWN BY:	CHECKED BY:	APPROVED BY:
RICHMOND POWER AND LIGHT COMPANY		MAYHOEJ		
RICHMOND, INDIANA		SHEET NO.:	SCALE:	ISSUE DATE:
		1 OF 1	AS SHOWN	08/16/2016
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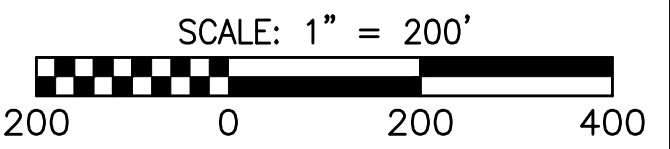
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REFERENCE:
 IMAGERY IS FROM 2023 AND WAS OBTAINED FROM MICROSOFT CORPORATION VIA MAXAR, CNES, AND AIRBUS.
 SURVEY FOR BORING, PIEZOMETER AND STAFF GAUGE LOCATIONS AND ELEVATIONS PROVIDED BY BEALS-MOORE & ASSOCIATES, INC. DATED APRIL 15TH, 2016, SEPTEMBER 27, 2016, JULY 10, 2017 AND AUGUST 26, 2020.

LEGEND

- ▲ A-2 STAFF GAUGE LOCATION
- ◆ A-S MONITORING WELL OR PIEZOMETER LOCATION
- ⊕ PZ-1701 ABANDONED MONITORING WELL OR PIEZOMETER LOCATION
- - - - - APPROXIMATE LIMIT OF IMPOUNDMENT

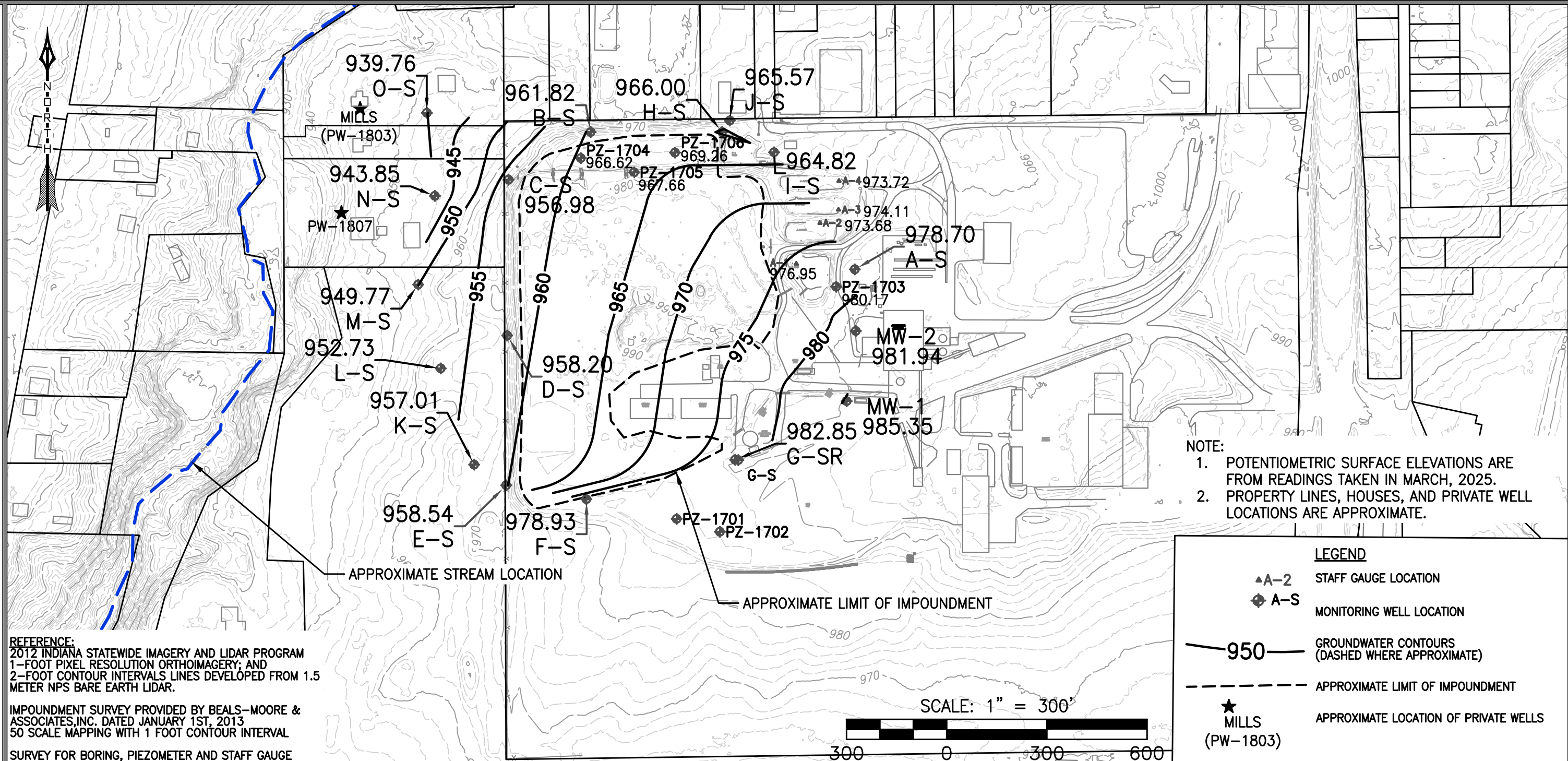


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2	11/30/2023	MAYHOEJ	BORTZKM	BORTZKM	UPDATED IMAGERY

REVISION RECORD

DRAWING TITLE		
FIGURE 2 - GROUND WATER MONITORING SYSTEM LOCATION MAP		
PROJECT		CLIENT
IMPOUNDMENT CLOSURE WHITEWATER VALLEY STATION WAYNE COUNTY RICHMOND, INDIANA 47374	gai consultants	RICHMOND POWER & LIGHT 2000 US 27 SOUTH RICHMOND, INDIANA 47374

DRAWN BY: MAYHOEJ	CHECKED BY: TURKARJ	APPROVED BY: TURKARJ
REVISION	SCALE: AS SHOWN	ISSUE DATE: 08/31/2020
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GAI FILE NUMBER: C151119-22-000-000-B2-003 rev 3		
GAI DRAWING NUMBER: B2-003		



NOTE:
 1. POTENTIOMETRIC SURFACE ELEVATIONS ARE FROM READINGS TAKEN IN MARCH, 2025.
 2. PROPERTY LINES, HOUSES, AND PRIVATE WELL LOCATIONS ARE APPROXIMATE.

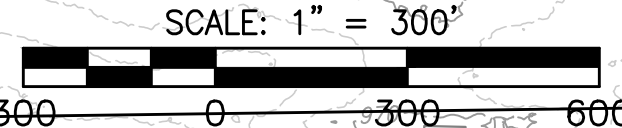
LEGEND

- ▲A-2 STAFF GAUGE LOCATION
- ◆A-S MONITORING WELL LOCATION
- 950— GROUNDWATER CONTOURS (DASHED WHERE APPROXIMATE)
- - - - - APPROXIMATE LIMIT OF IMPOUNDMENT
- ★ MILLS (PW-1803) APPROXIMATE LOCATION OF PRIVATE WELLS

REFERENCE:
 2012 INDIANA STATEWIDE IMAGERY AND LIDAR PROGRAM 1-FOOT PIXEL RESOLUTION ORTHOIMAGERY; AND 2-FOOT CONTOUR INTERVALS LINES DEVELOPED FROM 1.5 METER NPS BARE EARTH LIDAR.


IMPOUNDMENT SURVEY PROVIDED BY BEALS-MOORE & ASSOCIATES, INC. DATED JANUARY 1ST, 2013
 50 SCALE MAPPING WITH 1 FOOT CONTOUR INTERVAL

SURVEY FOR BORING, PIEZOMETER AND STAFF GAUGE LOCATIONS AND ELEVATIONS PROVIDED BY BEALS-MOORE & ASSOCIATES, INC. DATED APRIL 15TH, 2016, SEPTEMBER 27, 2016 AND JULY 10, 2017.

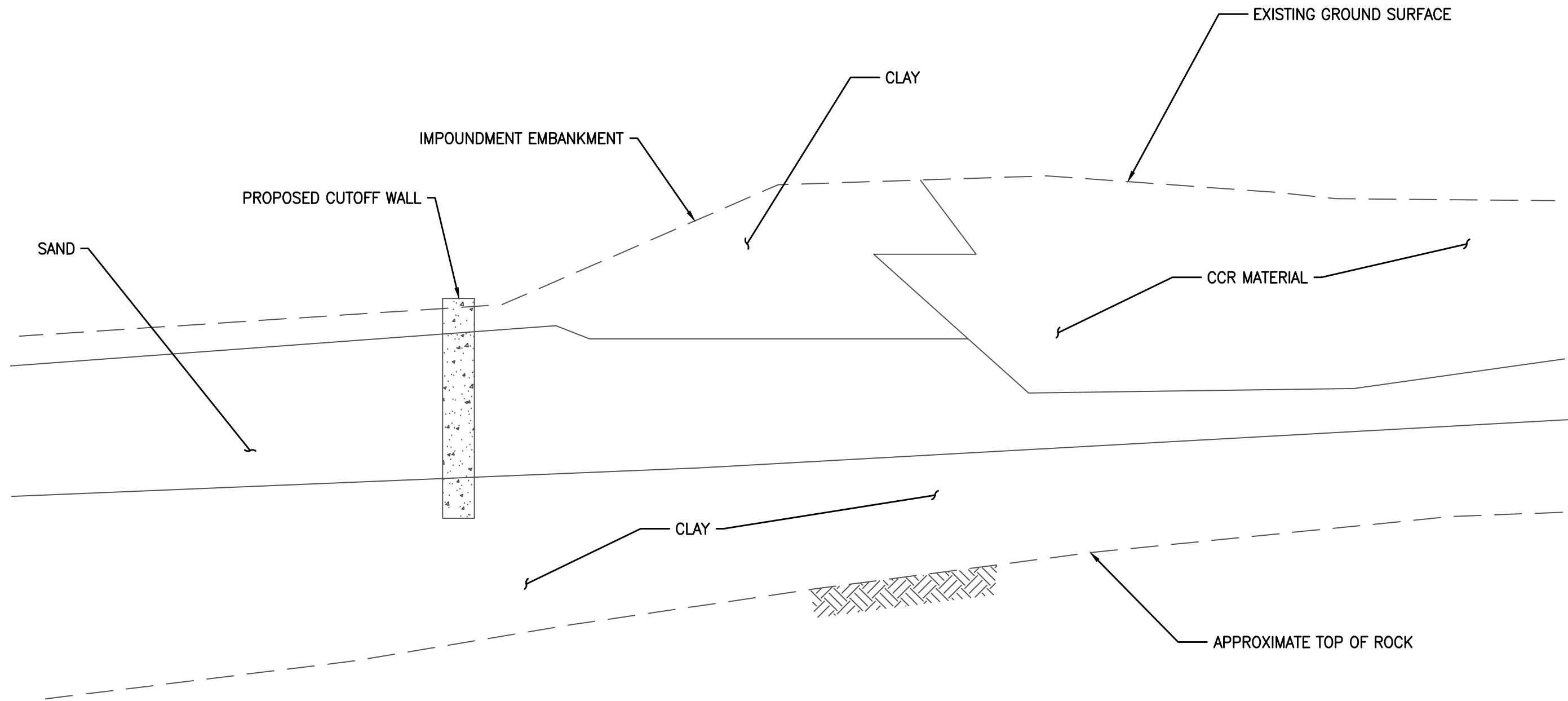


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DRAWING TITLE		
FIGURE 3 - POTENTIOMETRIC SURFACE MAP - SOIL - MARCH 18, 2025		
PROJECT		CLIENT
IMPOUNDMENT CLOSURE WHITewater VALLEY STATION WAYNE COUNTY RICHMOND, INDIANA 47374	gai consultants	RICHMOND POWER & LIGHT 2000 US 27 SOUTH RICHMOND, INDIANA 47374

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RHULL	HENGELM	HENGELM
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1 OF 1		
GAI FILE NUMBER:		
Fig 3 pot surface 2025		
GAI DRAWING NUMBER:		
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DRAWING TITLE		
FIGURE 4 - CONCEPTUAL TYPICAL CROSS SECTION		
PROJECT		CLIENT
IMPOUNDMENT CLOSURE WHITWATER VALLEY STATION WAYNE COUNTY RICHMOND, INDIANA 47374	gai consultants	RICHMOND POWER & LIGHT 2000 US 27 SOUTH RICHMOND, INDIANA 47374

DRAWN BY: KBORTZ	CHECKED BY: KBORTZ	APPROVED BY: KBORTZ
REVISION	SCALE: AS SHOWN	ISSUE DATE: 10/3/2025
<div style="border: 1px solid black; width: 20px; height: 20px; margin: 0 auto; display: flex; align-items: center; justify-content: center;"> 0 </div>	SHEET NO.: 1 OF 1	
GAI FILE NUMBER:		
Fig 4 cross section		
GAI DRAWING NUMBER:		
FIG 4		

This drawing was produced with computer aided drafting technology and is supported by electronic drawing files. Do not revise this drawing via manual drafting methods.

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GAI CAD FILE PATH: Z:\Energy\2015\C151119.25 - RPL Closure Permit\Working Docs\Ground Water\Final Selection Report\Figures\Fig 4 cross section.dwg

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