



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb  
Governor

Brian C. Rockensuess  
Commissioner

July 01, 2024

**VIA EMAIL** [Rebecca.Warren@duke-energy.com](mailto:Rebecca.Warren@duke-energy.com)

Ms. Rebecca Warren, LPG  
Senior Environmental Specialist  
Duke Energy Indiana, LLC  
WP50-2C/1000 East Main Street  
Plainfield, IN 46168

Re: *First Quarter 2024 Groundwater Monitoring Report*  
Dated May 1, 2024  
VFC # [83633900](#)  
Noblesville Generating Station  
Hamilton County  
SW Program ID 29-UP-01

Dear Ms. Warren:

On May 1, 2024, we received the *First Quarter 2024 Groundwater Monitoring Report* (Report) from you on behalf of the facility. The first quarter groundwater monitoring event took place between March 12-19, 2024. The following comments are the result of our review.

Both reports generally comply with the groundwater monitoring requirements of the following documents:

- Agreed Order Compliance Plan dated May 1, 2018 (VFC # [82536501](#)).
- Proposed Site Closure Implementation Plan dated July 18, 2018 (VFC # [82582356](#)).
- Approval of Closure/Post-Closure Plan dated October 17, 2019 (VFC # [82851197](#)).
- Revised Statistical Evaluation Plan dated December 21, 2021 (VFC # [83256950](#))

Table 2 of the Report shows site-specific groundwater protection standard (GWPS) exceedances occurred for dissolved and total boron in groundwater monitoring wells MW-15D and MW-16D. The exceedances recur from previous events.

In addition to the GWPS, the facility compares dissolved boron concentrations against the alternate water supply limit (AWSL) of 2.0 mg/L to better characterize potential impacts to the residential water wells supplying neighboring homes. Per the Report, the facility bases the AWSL on the United States Environmental Protection



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*We appreciate your input!*



Agency's maximum permissible level of copper and lead to be stricter than the US EPA dissolved boron GWPS of 4 parts per million. Downgradient groundwater monitoring wells MW-13I, MW-14D, MW-15I, MW-15D, and MW-16D exhibited dissolved boron results above the AWSL.

The Report repeats the interpretation from previous reports that GWPS exceedances of boron in MW-16D are the "result of plume migration due to its location near the Consolidated Ash Management Area and the nearby extraction well EW-1 and EW-2R." We currently agree with this interpretation.

The Report shows past facility operations are still affecting the local unconsolidated geologic materials aquifer. However, the facility has documented groundwater quality improvements after initiating corrective actions with the groundwater extraction system. Therefore, the facility needs to continue operating the extraction system and monitoring groundwater quality following requirements specified in the aforementioned documents within this letter.

Thank you for your attention to this matter. If you have questions, please contact Mr. Jeremiah Mickey of my staff at [jmickey@idem.IN.gov](mailto:jmickey@idem.IN.gov) or call (317) 234-7647.

Sincerely,



John A. Guerrettaz, LPG  
Chief, Geology Section  
Permits Branch  
Office of Land Quality

cc: Hamilton County Health Department  
Hamilton County Recycling and Solid Waste District  
Ms. Linda McClure, Compliance and Response Branch, OLQ, IDEM  
Ms. Shyamala Raman, Engineering Section, Permits Branch, OLQ, IDEM  
Ms. Lindsey Hummel, Solid Waste Permits Section, Permits Branch, OLQ, IDEM

bcc: VFC/Duke Energy Noblesville Generating Station/SW/OLQ  
Monitoring/Review/public

Geology Task ID # 46970

Email Addresses:

Ms. Rebecca Warren, Duke Energy Indiana, LLC; [Rebecca.Warren@duke-energy.com](mailto:Rebecca.Warren@duke-energy.com)

**From:** [McCormick, Debra J](#)  
**To:** [Warren, Rebecca E.](#)  
**Cc:** [health@hamiltoncounty.in.gov](mailto:health@hamiltoncounty.in.gov); [Leslie.Taljaard@hamiltoncounty.in.gov](mailto:Leslie.Taljaard@hamiltoncounty.in.gov); [McClure, Linda \(IDEM\)](#); [RAMAN, SHYAMALA](#); [Hummel, Lindsey](#)  
**Bcc:** [Mickey, Jeremiah](#)  
**Subject:** 07012024 SW 29UP-01 Hamilton County  
**Date:** Monday, July 1, 2024 8:43:00 AM  
**Attachments:** [image001.png](#)  
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[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[SW 29-UP-01 Duke Noblesville 202406 GW Report Review.pdf](#)  
[image008.png](#)

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Attached is the letter for the SW 29-UP-01 for Hamilton County . If any questions contact Mr. Jeremiah Mickey, this information is in the last paragraph above Mr. John Guerrettaz signature block



Debra McCormick  
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Permits Branch / Office of Land Quality  
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**From:** [Microsoft Outlook](#)  
**To:** [Warren, Rebecca E.](#)  
**Subject:** Relayed: 07012024 SW 29UP-01 Hamilton County  
**Date:** Monday, July 1, 2024 8:43:31 AM  
**Attachments:** [07012024 SW 29UP-01 Hamilton County .msg](#)

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Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:  
Warren, Rebecca E. (Rebecca.Warren@duke-energy.com) <mailto:Rebecca.Warren@duke-energy.com>  
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