

16 April 2019
File No. 128064-006

SUBJECT: Thomas Hill Energy Center – Groundwater Monitoring System Certification
Cell 001, Inactive Cell 002 West, Cell 003, and Cell 004
Associated Electric Cooperative, Inc.

Associated Electric Cooperative, Inc. (AECI) operates the existing coal combustion residuals (CCR) management units referred to as Cell 001, Inactive Cell 002 West, Cell 003, and Cell 004 at the Thomas Hill Energy Center (THEC) located in Clifton Hill, Missouri. These CCR units are considered subject to the CCR Rule since they were either active or identified as inactive with a notification of intent to close as of the effective and/or applicable dates of the CCR Rule. This document addresses the requirements of §257.91 *Groundwater Monitoring Systems*, specifically section §257.91(f), of the U.S. Environmental Protection Agency (USEPA) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, Code of Federal Regulations Title 40 CFR (40 CFR) Part 257 (CCR Rule) effective 19 October 2015, and subsequent rulemaking revisions. This document serves as certification that the units comply with the requirements defined in the CCR Rule. This certification has been prepared based upon information made accessible by AECI pursuant to §257.91(e)(1).

AECI has determined that a multi-unit groundwater monitoring system is preferred for the Cell 001, Inactive Cell 002 West, Cell 003, and Cell 004 units as allowed pursuant to §257.91(d). This multi-unit monitoring system is as capable of detecting monitored constituents passing through the combined unit waste boundary as individual groundwater monitoring systems.

Pursuant to 40 CFR Chapter I Subchapter I Part 257 Subpart D §257.91(f), I certify that the groundwater monitoring system for Cell 001, Inactive Cell 002 West, Cell 003, and Cell 004 surface impoundments has been designed and constructed to meet the requirements of §257.91. The certification submitted is, to the best of my knowledge, accurate and complete.

Signed: _____

Certifying Engineer



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