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MEMORANDUM

12 March 2020
File No. 129342-020

TO: Associated Electric Cooperative, Inc
Jenny Jones – Senior Environmental Analyst
Russ Weatherly – Supervisor, Land and Water Resources

FROM: Haley & Aldrich, Inc.
Steven F. Putrich, P.E., Senior Associate – Engineering Principal

SUBJECT: Semi-Annual Remedy Selection Progress Report Pursuant to 40 CFR § 257.96(a)
New Madrid Power Plant – Pond 003
New Madrid, Missouri

Associated Electric Cooperative, Inc. (AECI) has implemented the United States Environmental Protection Agency Federal Coal Combustion Residuals (CCR) Rule (Code of Federal Regulations Title 40 [40 CFR] §§ 257 and 261) effective 19 October 2015, along with subsequent revisions for the active CCR surface impoundment referred to as Pond 003 at the New Madrid Power Plant (NMPP) located in New Madrid, Missouri. Section 257.97(a) of the CCR Rule requires the owner or operator of a CCR management unit that has completed a Corrective Measures Assessment (CMA) for groundwater to prepare a semi-annual report describing the progress in selecting and designing the remedy. This report constitutes the first semi-annual remedy selection progress report and is comprised of activities during the period of September 2019 through March 2020.

The CMA was initiated for Pond 003 on 15 May 2019 in response to a statistically significant level (SSL) of an Appendix IV constituent (molybdenum) exceeding Groundwater Protection Standards (GWPS). Pursuant to 40 CFR § 257.96(a), a demonstration of need for a 60-day extension for the assessment of corrective measures was completed on 12 July 2019. The CMA Report was completed and placed in the facility operating record on 13 September 2019, and subsequently amended on 11 October 2019, and posted to AECI's CCR public website. Based on the results of the CMA, AECI must, as soon as feasible in accordance with the CCR Rule, select a remedy that meets the standards listed in 40 CFR § 257.97(b). A summary of the progress in selecting a remedy in compliance with the CCR Rule is provided below.

SUMMARY OF ACTIONS COMPLETED

The following actions have been completed during this initial reporting period (September 2019 through March 2020):

- The determination of the nature and extent of the Appendix IV molybdenum in exceedance of the CCR Unit's GWPS was initiated pursuant to § 257.95(g). Fifteen additional groundwater monitoring wells were installed to assist with collecting additional groundwater data to define the nature and extent. Groundwater samples were collected from the nature and extent monitoring wells in September, October, and November 2019. Groundwater characterization of the nature and extent groundwater monitoring wells is ongoing.
- A public meeting was held on 14 November 2019 in Marston, Missouri to discuss the results of the CMA in accordance with § 257.96(e).
- Engineering, design, permitting, and construction have continued in an effort to convert to dry light ash and dry boiler slag handling that will reduce CCR and non-CCR flows into Pond 003 thus reducing the source material discharged into the unit.

PLANNED ACTIVITIES

Anticipated activities for the upcoming semi-annual corrective measures selection progress period (April 2020 through October 2020) include the following (subject to change):

- Continue engineering, design, permitting, and construction of CCR and non-CCR flow reductions to Pond 003;
- Evaluate the groundwater analytical data collected during the semi-annual sampling event that will include the nature and extent monitoring wells;
- Assess the outcomes of the public meeting (held on 14 November 2019 in Marston, Missouri);
- Continue to perform an engineering review of the five potential CMA alternatives in pursuit of the corrective measures remedy selection. For these reviews, emphases will be placed on understanding and reacting to impacts of newly gathered analytical results, identifying and researching applicability of emerging technologies and their impacts on the selection of remedy process; and
- Provide a semi-annual progress report that summarizes AECl's progress and status regarding a selection of remedy.

If you have any questions or comments regarding this first semi-annual remedy selection progress report, please contact Steve Putrich at 216.706.1322 or by email at sputrich@haleyaldrich.com.