



HALEY & ALDRICH, INC.
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6 August 2020
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File No. 129342-020

Associated Electric Cooperative, Inc.
2814 South Golden Avenue
P.O. Box 754
Springfield, Missouri 65801-0754

Attention: Jenny Jones – Senior Environmental Analyst

Subject: Assessment Monitoring Program February 2020 Sampling Event
Statistically Significant Level Notification
New Madrid Power Plant – Lined Pond

Dear Ms. Jones:

Associated Electric Cooperative, Inc. (AECI) has implemented the U.S. 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 New Madrid Power Plant in New Madrid, Missouri. AECI provided Haley & Aldrich, Inc. with groundwater monitoring data collected from the Lined Pond groundwater monitoring system that meets the requirements of 40 CFR §§ 257.91 and 257.93. This memorandum documents the results of statistical analyses conducted to determine if Appendix IV groundwater monitoring constituents detected in wells downgradient of the Lined Pond are present at a statistically significant level (SSL) above groundwater protection standards (GWPS) consistent with the requirements in 40 CFR § 257.95.

Results of the statistical analyses completed on 7 July 2020 of the February 2020 assessment monitoring sampling event data for each analyte/well combination indicate SSLs above GWPS for molybdenum at monitoring wells MW-8 and MW-9 at the Lined Pond.

Following identification of the SSLs at the Lined Pond, an evaluation was completed in accordance with 40 CFR § 257.95(g)(3)(ii) which successfully demonstrated that a source other than the CCR unit is responsible for the SSLs. As such, AECI will continue monitoring the Lined Pond in accordance with the assessment monitoring program.

Sincerely yours,
HALEY & ALDRICH, INC.

Steve Putrich, P.E.
Project Principal

Mark Nicholls, P.G.
Lead Hydrogeologist