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MEMORANDUM

8 September 2020
File No. 129342-032

TO: Associated Electric Cooperative, Inc
Jenny Jones – Senior Environmental Analyst

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)
Fall 2020
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 provides the Fall 2020 semi-annual remedy selection progress report and is comprised of activities during the period of April 2020 through September 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 between April 2020 and September 2020 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 reporting period (April 2020 through September 2020):

- Continued Assessment Monitoring: Evaluated the results of the February (semi-annual sample) and May 2020 (annual) sampling events of compliance wells. The February 2020 groundwater monitoring compliance wells were evaluated for statistically significant exceedances and compared to GWPS. No new constituent parameters or compliance wells were determined to exceed GWPS, therefore no additional information was needed to be included in the remedy selection process.
- Efforts to continue evaluation of the nature and extent (N&E) of the Appendix IV molybdenum in exceedance of the CCR Unit's GWPS continued pursuant to § 257.95(g). Groundwater samples were collected from the fifteen N&E monitoring wells in August 2020. The analytical results will be used to supplement and enhance the evaluation of the extent of groundwater impacts, assessment of corrective measures, and selection of remedy. Groundwater characterization of the N&E groundwater monitoring wells is ongoing;
- Refinement of the site conceptual model and associated groundwater modeling with geochemical analyses continued based on N&E results from February 2020 and ongoing compliance monitoring to further refine the extents of the plume;
- 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 (October 2020 through March 2021) include the following (subject to change):

- Continue engineering, design, permitting, and construction of CCR and non-CCR flow reductions to Pond 003;
- Continue efforts to evaluate N&E by evaluating the groundwater analytical data collected during the semi-annual assessment monitoring sampling event that will include the nature and extent monitoring wells from August 2020;
- As appropriate, refine the conceptual site model and associated groundwater modeling;
- Continue to perform an engineering review of the 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 CMA and selection of remedy process;

- Progress towards selecting a remedy that meets the standards of § 257.97(b) including the development of a final report which also contains a schedule for implementing and completing remedial activities as required by that § 257.97(d); and
- Provide a semi-annual progress report that summarizes AECI's progress and status regarding a selection of remedy.