

2025 ANNUAL GROUNDWATER MONITORING AND
CORRECTIVE ACTION REPORT
ASH POND SYSTEM
THOMAS HILL ENERGY CENTER
CLIFTON HILL, MISSOURI

by
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for
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Signature

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Title

January 30, 2026

Date

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1. Introduction

This 2025 Annual Groundwater Monitoring and Corrective Action Report (Annual Report) addresses the Ash Pond System (consisting of the multi-unit system of Cell 001, Cell 003, and Cell 004) at the Thomas Hill Energy Complex (THEC), operated by the Associated Electric Cooperative, Inc. (AECI). This Annual Report was developed in accordance with the U.S. Environmental Protection Agency Coal Combustion Residual (CCR) Rule effective 19 October 2015 (Rule) including subsequent revisions, specifically Title 40 Code of Federal Regulations (40 CFR) § 257.90(e). The Annual Report documents the groundwater monitoring system for the Ash Pond System consistent with applicable sections of 40 CFR §§ 257.90 through 257.98, and describes activities conducted in the prior calendar year (2025) and document compliance with the Rule. The specific requirements listed in 40 CFR § 257.90(e)(1) through (6) of the Rule are provided in Sections 1 and 2 of this Annual Report and are in bold italic font, followed by a short narrative describing how each Rule requirement has been met.

1.1 40 CFR § 257.90(e)(6) SUMMARY

A section at the beginning of the annual report that provides an overview of the current status of groundwater monitoring and corrective action programs for the CCR unit. At a minimum, the summary must specify all of the following:

1.1.1 40 CFR § 257.90(e)(6)(i) – Initial Monitoring Program

At the start of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in § 257.94 or the assessment monitoring program in § 257.95;

At the start of the current annual reporting period (January 1, 2025), the Ash Pond System was operating under a detection monitoring program in compliance with 40 CFR § 257.94.

1.1.2 40 CFR § 257.90(e)(6)(ii) – Final Monitoring Program

At the end of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in § 257.94 or the assessment monitoring program in § 257.95;

At the end of the current annual reporting period (December 31, 2025), the Ash Pond System was operating under a detection monitoring program in compliance with 40 CFR § 257.94.

1.1.3 40 CFR § 257.90(e)(6)(iii) – Statistically Significant Increases

If it was determined that there was a statistically significant increase over background for one or more constituents listed in Appendix III to this part pursuant to § 257.94(e):

1.1.3.1 40 CFR § 257.90(e)(6)(iii)(a) – Statistically Significant Increase Constituents

Identify those constituents listed in Appendix III to this part and the names of the monitoring wells associated with such an increase; and

No statistically significant increases (SSI) over background were identified during the previous calendar year (2025).

1.1.3.2 40 CFR § 257.90(e)(6)(iii)(b) – Assessment Monitoring Program

Provide the date when the assessment monitoring program was initiated for the CCR unit.

No SSIs over background were identified during the previous calendar year (2025); therefore, an assessment monitoring program was not initiated for the Ash Pond System in 2025.

1.1.4 40 CFR § 257.90(e)(6)(iv) – Statistically Significant Levels

If it was determined that there was a statistically significant level above the groundwater protection standard for one or more constituents listed in Appendix IV to this part pursuant to § 257.95(g) include all of the following:

1.1.4.1 40 CFR § 257.90(e)(6)(iv)(a) – Statistically Significant Level Constituents

Identify those constituents listed in Appendix IV to this part and the names of the monitoring wells associated with such an increase;

The Ash Pond System remains in detection monitoring, and no assessment monitoring samples were collected for analysis of Appendix IV constituents in 2025.

1.1.4.2 40 CFR § 257.90(e)(6)(iv)(b) – Initiation of the Assessment of Corrective Measures

Provide the date when the assessment of corrective measures was initiated for the CCR unit;

No assessment of corrective measures was required to be initiated in 2025 for this multi-unit system. The Ash Pond System remained in detection monitoring during 2025.

1.1.4.3 40 CFR § 257.90(e)(6)(iv)(c) – Assessment of Corrective Measures Public Meeting

Provide the date when the public meeting was held for the assessment of corrective measures for the CCR unit; and

An assessment of corrective measures was not required for the Ash Pond System in 2025. Therefore, a public meeting was not held.

1.1.4.4 40 CFR § 257.90(e)(6)(iv)(d) – Completion of the Assessment of Corrective Measures

Provide the date when the assessment of corrective measures was completed for the CCR unit.

No assessment of corrective measures was required to be initiated in 2025 for this multi-unit system. The Ash Pond System remained in detection monitoring during 2025.

1.1.5 40 CFR § 257.90(e)(6)(v) – Selection of Remedy

Whether a remedy was selected pursuant to § 257.97 during the current annual reporting period, and if so, the date of remedy selection; and

The Ash Pond System remains in detection monitoring, and no remedy was required to be selected.

1.1.6 40 CFR § 257.90(e)(6)(vi) – Remedial Activities

Whether remedial activities were initiated or are ongoing pursuant to § 257.98 during the current annual reporting period.

No remedial activities were required to be initiated in 2025; therefore, no demonstration or certification is applicable for this multi-unit system.

2. 40 CFR § 257.90 Applicability

2.1 40 CFR § 257.90(a)

All CCR landfills, CCR surface impoundments, and lateral expansions of CCR units are subject to the groundwater monitoring and corrective action requirements under §§ 257.90 through 257.99, except as provided in paragraph (g) [Suspension of groundwater monitoring requirements] of this section.

AECI has installed and certified a multi-unit groundwater monitoring system at the THEC Ash Pond System. The THEC Ash Pond System is subject to the groundwater monitoring and corrective action requirements described under 40 CFR §§ 257.90 through 257.98. This document addresses the requirement for the Owner/Operator to prepare an Annual Report per 40 CFR § 257.90(e) (Rule).

2.2 40 CFR § 257.90(e) – SUMMARY

Annual groundwater monitoring and corrective action report. For existing CCR landfills and existing CCR surface impoundments, no later than January 31, 2018, and annually thereafter, the owner or operator must prepare an annual groundwater monitoring and corrective action report. For new CCR landfills, new CCR surface impoundments, and all lateral expansions of CCR units, the owner or operator must prepare the initial annual groundwater monitoring and corrective action report no later than January 31 of the year following the calendar year a groundwater monitoring system has been established for such CCR unit as required by this subpart, and annually thereafter. For the preceding calendar year, the annual report must document the status of the groundwater monitoring and corrective action program for the CCR unit, summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and project key activities for the upcoming year. For purposes of this section, the owner or operator has prepared the annual report when the report is placed in the facility's operating record as required by § 257.105(h)(1).

This Annual Report describes monitoring completed and actions taken at the THEC Ash Pond System as required by the Rule. Groundwater sampling and analysis was conducted in accordance with requirements described in 40 CFR § 257.93, and the status of the groundwater monitoring program described in 40 CFR § 257.94 and § 257.95 is also provided in this report. This Annual Report documents the applicable groundwater-related activities completed in calendar year 2025.

2.2.1 Status of the Groundwater Monitoring Program

Statistical analyses of semiannual detection monitoring data collected in August 2024 and February 2025 were completed in 2025 and indicated no Appendix III SSIs at the THEC Ash Pond System. The multi-unit system remains in a detection monitoring program.

2.2.2 Key Actions Completed

The 2024 Annual Groundwater Monitoring and Corrective Action Report was completed in January 2025. Statistical analysis was completed in January 2025 on analytical data from the August 2024 semiannual detection monitoring sampling event. The statistical analysis indicated no SSIs for Appendix III constituents. Semiannual detection monitoring events were completed in February and September 2025. Statistical analysis was completed within 90 days of receipt of verified laboratory data

for the February 2025 sampling event. No SSIs were determined for the sampling event. Statistical analysis of the results from the September 2025 semiannual detection monitoring sampling event are due to be completed in January 2026 and will be reported in the next annual report.

2.2.3 Problems Encountered

Problems (i.e., problems could include damaged wells, issues with sample collection or lack of sampling, or problems with analytical analysis) encountered at the THEC Ash Pond System in 2025 are summarized below:

- Monitoring wells MW-1 and MW-6 were dry and unable to be sampled during the February 2025 semiannual assessment monitoring sampling event. Additional samples were collected from monitoring wells MW-1 and MW-6 in June 2025.
- At monitoring well MW-6, elevated constituent concentrations were observed during the September 2025 semiannual assessment monitoring sampling event. A verification sample was collected in December 2025. The analytical results were revised accordingly.

2.2.4 Actions to Resolve Problems

Actions taken to resolve the problems encountered at the THEC Ash Pond System in 2025 included the collection of additional and verification groundwater samples from MW-1 and MW-6 in June 2025 and MW-6 in December 2025, respectively, as described above. The analytical results for these sampling events were updated and revised accordingly.

2.2.5 Project Key Activities for Upcoming Year

Key activities planned for 2026 include completion of the 2025 Annual Groundwater Monitoring and Corrective Action Report, statistical analysis of analytical data collected in September 2025 semiannual detection monitoring sampling event, and semiannual detection monitoring sampling events and subsequent statistical analysis.

2.3 40 CFR § 257.90(e) – INFORMATION

At a minimum, the annual groundwater monitoring and corrective action report must contain the following information, to the extent available:

2.3.1 40 CFR § 257.90(e)(1)

A map, aerial image, or diagram showing the CCR unit and all background (or up gradient) and down gradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit;

As required by 40 CFR § 257.90(e)(1), a map showing the locations of the CCR units and associated upgradient and downgradient monitoring wells for the Ash Pond System is included in this report as Figure 1. In addition, this information is presented in the CCR Groundwater Monitoring Network Description Report prepared for AECL, which was placed in the facility operating record by October 17, 2017 as required by 40 CFR § 257.105(h)(2) and revised in April 2019.

2.3.2 40 CFR § 257.90(e)(2) – Monitoring System Changes

Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;

No monitoring wells were installed or decommissioned during 2025.

2.3.3 40 CFR § 257.90(e)(3) – Summary of Sampling Events

In addition to all the monitoring data obtained under § 257.90 through § 257.98, a summary including the number of groundwater samples that were collected for analysis for each background and down gradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs;

In accordance with 40 CFR § 257.94(b), two independent detection monitoring samples from each background and downgradient monitoring well were collected during 2025. A summary including the sample names, sample dates, field parameters, and analytical results obtained for the groundwater monitoring program for the THEC Ash Pond System is presented in Table I of this report.

2.3.4 40 CFR § 257.90(e)(4) – Monitoring Transition Narrative

A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels); and

Data from the groundwater sampling events for the downgradient monitoring wells were compared to the calculated prediction limits (PL) for the Appendix III constituents. Once data are verified, a sample concentration greater than the PL is considered to represent a SSI. The statistical analyses completed in 2025 for the August 2024 and February 2025 semiannual detection monitoring sampling events indicated no SSIs for Appendix III constituents. The Ash Pond System remains in detection monitoring. Therefore, there was no transition between monitoring programs in 2025.

2.3.5 40 CFR § 257.90(e)(5) – Other Requirements

Other information required to be included in the annual report as specified in § 257.90 through § 257.98.

This Annual Report documents activities conducted to comply with 40 CFR §§ 257.90 through 257.95 of the Rule. It is understood that there are supplemental references in 40 CFR §§ 257.90 through 257.98 that must be placed in the Annual Report. The following requirements include relevant and required information in the Annual Report for activities completed in calendar year 2025.

2.3.5.1 40 CFR § 257.94(d)(3) – Demonstration for Alternative Detection Monitoring Frequency

The owner or operator must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the demonstration for an alternative groundwater sampling and analysis frequency meets the requirements of this section. The owner or operator must include the demonstration providing the

basis for the alternative monitoring frequency and the certification by a qualified professional engineer or the approval from the Participating State Director or approval from EPA where EPA is the permitting authority in the annual groundwater monitoring and corrective action report required by § 257.90(e).

An alternative groundwater detection monitoring sampling and analysis frequency has not been established for this multi-unit system. Therefore, no demonstration or certification is applicable.

2.3.5.2 40 CFR § 257.94(e)(2) – Detection Monitoring Alternate Source Demonstration

The owner or operator may demonstrate that a source other than the CCR unit caused the statistically significant increase over background levels for a constituent or that the statistically significant increase resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. The owner or operator must complete the written demonstration within 90 days of detecting a statistically significant increase over background levels to include obtaining a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority verifying the accuracy of the information in the report. If a successful demonstration is completed within the 90-day period, the owner or operator of the CCR unit may continue with a detection monitoring program under this section. If a successful demonstration is not completed within the 90-day period, the owner or operator of the CCR unit must initiate an assessment monitoring program as required under § 257.95. The owner or operator must also include the demonstration in the annual groundwater monitoring and corrective action report required by § 257.90(e), in addition to the certification by a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority.

No Appendix III SSIs were indicated by statistical analyses completed in 2025; consequently, no alternative source demonstration or certificate is applicable.

2.3.5.3 40 CFR § 257.95(c)(3) – Demonstration for Alternative Assessment Monitoring Frequency

The owner or operator must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the demonstration for an alternative groundwater sampling and analysis frequency meets the requirements of this section. The owner or operator must include the demonstration providing the basis for the alternative monitoring frequency and the certification by a qualified professional engineer or the approval from the Participating State Director or approval from EPA where EPA is the permitting authority in the annual groundwater monitoring and corrective action report required by § 257.90(e).

The Ash Pond System remains in detection monitoring, and an alternative groundwater assessment monitoring sampling and analysis frequency has not been established for this multi-unit system. Therefore, no demonstration or certification is applicable.

2.3.5.4 40 CFR § 257.95(d)(3) – Assessment Monitoring Concentrations and Groundwater

Include the recorded concentrations required by paragraph (d)(1) of this section, identify the background concentrations established under § 257.94(b), and identify the groundwater protection

standards established under paragraph (d)(2) of this section in the annual groundwater monitoring and corrective action report required by § 257.90(e).

The Ash Pond System remains in detection monitoring; no assessment monitoring samples were collected or analyzed in 2025. Consequently, AECl is not required to establish groundwater protection standards for this multi-unit system, and this criterion is not applicable.

2.3.5.5 40 CFR § 257.95(g)(3)(ii) – Assessment Monitoring Alternate Source Demonstration

Demonstrate that a source other than the CCR unit caused the contamination, or that the statistically significant increase resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. Any such demonstration must be supported by a report that includes the factual or evidentiary basis for any conclusions and must be certified to be accurate by a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority. If a successful demonstration is made, the owner or operator must continue monitoring in accordance with the assessment monitoring program pursuant to this section and may return to detection monitoring if the constituents in appendices III and IV to this part are at or below background as specified in paragraph (e) of this section. The owner or operator must also include the demonstration in the annual groundwater monitoring and corrective action report required by § 257.90(e), in addition to the certification by a qualified professional engineer or the approval from the Participating State Director or approval from EPA where EPA is the permitting authority.

Assessment monitoring statistical analyses were not required or completed in 2025. Therefore, this criterion is not applicable.

2.3.5.6 40 CFR § 257.96(a) – Demonstration for Additional Time for Assessment of Corrective Measures

Within 90 days of finding that any constituent listed in Appendix IV to this part has been detected at a statistically significant level exceeding the groundwater protection standard defined under § 257.95(h), or immediately upon detection of a release from a CCR unit, the owner or operator must initiate an assessment of corrective measures to prevent further releases, to remediate any releases and to restore affected area to original conditions. The assessment of corrective measures must be completed within 90 days, unless the owner or operator demonstrates the need for additional time to complete the assessment of corrective measures due to site-specific conditions or circumstances. The owner or operator must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority attesting that the demonstration is accurate. The 90-day deadline to complete the assessment of corrective measures may be extended for no longer than 60 days. The owner or operator must also include the demonstration in the annual groundwater monitoring and corrective action report required by § 257.90(e), in addition to the certification by a qualified professional engineer or the approval from the Participating State Director or approval from EPA where EPA is the permitting authority.

Assessment monitoring statistical analyses were not required or completed in 2025. Therefore, this criterion is not applicable.

2.4 40 CFR § 257.90(f)

The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in § 257.105(h), the notification requirements specified in § 257.106(h), and the internet requirements specified in § 257.107(h).

In order to comply with the Rule recordkeeping requirements, the following actions must be completed:

- Pursuant to 40 CFR § 257.105(h)(1), this Annual Report must be placed in the facility operating record.
- Pursuant to 40 CFR § 257.106(h)(1), notification must be sent to the relevant State Director and/or Tribal authority within 30 days of this Annual Report being placed on the facility operating record [40 CFR § 257.106(d)].
- Pursuant to 40 CFR § 257.107(h)(1), this Annual Report must be posted to the AECI CCR website within 30 days of this Annual Report being placed on the facility operating record [40 CFR § 257.107(d)].

TABLE

TABLE I
SUMMARY OF ANALYTICAL RESULTS - 2025 GROUNDWATER MONITORING
ASSOCIATED ELECTRIC COOPERATIVE, INC.
THOMAS HILL ENERGY CENTER - ASH POND SYSTEM
CLIFTON HILL, MISSOURI

Location	Upgradient					Downgradient											
	MW-1**	MW-1	MW-1	MW-2R	MW-2R	MW-3	MW-3	MW-3	MW-3	MW-4	MW-4	MW-5	MW-5	MW-6**	MW-6	MW-6	MW-6
Measure Point (TOC)	746.94	746.94	746.94	779.96	779.96	692.19	692.19	692.19	692.19	683.48	683.48	687.53	687.53	705.05	705.05	705.05	705.05
Sample Name	N/A	MW-1	MW-1	MW-2R	MW-2R	MW-3	DUPLICATE-02-2025	MW-3	DUPLICATE-09-2025	MW-5 ¹	MW-4	MW-4 ¹	MW-5	N/A	MW-6	MW-6	MW-6 (resample)
Sample Date	2/11/2025	6/9/2025	09/13/2025	2/11/2025	09/13/2025	02/11/2025	02/11/2025	09/14/2025	09/14/2025	02/11/2025	09/14/2025	02/11/2025	09/14/2025	2/11/2025	6/9/2025	10/08/2025	12/11/2025
Final Lab Report Date	N/A	7/1/2025	11/7/2025	2/28/2025	11/7/2025	2/28/2025	2/28/2025	11/7/2025	11/7/2025	2/28/2025	11/7/2025	2/28/2025	11/7/2025	N/A	7/1/2025	11/7/2025	12/26/2025
Final Lab Report Revision Date	N/A	-	11/18/2025	4/14/2025	11/18/2025	4/14/2025	4/14/2025	11/18/2025	11/18/2025	4/14/2025	11/18/2025	4/14/2025	11/18/2025	N/A	-	-	-
Lab Data Reviewed and Accepted	N/A	-	12/9/2025	5/19/2025	12/9/2025	5/19/2025	5/19/2025	12/9/2025	12/9/2025	5/19/2025	12/9/2025	5/19/2025	12/9/2025	N/A	-	12/9/2025	1/22/2026
Depth to Water (ft btoc)	2.22	1.90	2.20	42.22	42.08	5.32	5.32	9.22	9.22	6.62	7.57	4.46	6.64	DRY	17.85	20.47	20.50
Temperature (Deg C)	-	15.93	17.3	13.00	15.0	13.60	-	14.6	-	11.80	13.3	12.60	14.0	-	14.95	15.6	12.90
Conductivity, Field (µS/cm)	-	1486	3775	3990	2208	3160	-	3489	-	960	738	723	969	-	739	1866	1923
Turbidity, Field (NTU)	-	33.10	4.91	2.62	1.10	9.84	-	11.30	-	9.76	9.19	8.27	8.31	-	23.10	2.93	1.81
pH (field) (su)	-	6.15	6.53	12.51	7.00	6.41	-	6.29	-	7.13	6.88	7.04	6.98	-	6.78	6.47	6.88
Dissolved Oxygen, Field (mg/L)	-	-	2.83	-	0.91	-	-	2.95	-	-	2.02	-	0.04	-	-	0.19	0.20
ORP, Field (mV)	-	-	61.1	-	-115.7	-	-	-57.2	-	-	-83.1	-	-73.6	-	-	102.4	35.6
Boron, Total (mg/L)	-	0.19	0.12	0.042	0.20	0.22	0.22	0.20	0.20	0.057	0.050	0.58	0.51	-	1.1	1.4	1.7
Calcium, Total (mg/L)	-	590	580	300	290	370	380	410	400	93	95	140	140	-	280	280	-
Chloride (mg/L)	-	45	71	4.1	4.1	11	11	11	11	7.3	7.4	7.2	7.5	-	16	19	-
Fluoride (mg/L)	-	0.379	< 0.250	< 0.250	0.517	< 0.250	< 0.250	< 0.250	< 0.250	0.300	0.270	< 0.250	< 0.250	-	-	0.293	-
Sulfate (mg/L)	-	2000	2000	160	760	1300	1300	1600	1500	73	84	280	290	-	630	710	-
pH (lab) (su)	-	6.84	6.84	11.7	7.19	6.75	6.55	6.47	6.52	7.01	7.00	7.25	7.11	-	6.87	6.89	-
TDS (mg/L)	-	3300	3200	890	1500	2400	2400	2600	2600	400	400	630	600	-	1300	1400	-





Notes:
** Well dry, not sampled
¹ Incorrect labelling in field
Bold value: Detection above laboratory reporting limit.
Data presented in this table were verified against the laboratory reports.
µS/cm = micro Siemens per centimeter
Deg C = degrees Celsius
ft btoc = feet below top of casing
mg/L = milligrams per liter
N/A = Not Applicable
NTU = Nephelometric Turbidity Unit
su = standard unit
TDS = total dissolved solids
TOC = top of casing

FIGURE

GIS FILE PATH: \\haleyaldrich.com\haley\phx_common\proj\ae\128064-CCR_Groundwater_Monitoring_Program\Thomas Hill\GIS\MXD\2021_01\ANNUAL_REPORT\128064_006_001_MONITORING_WELL_LOCATION_MAP.mxd — USER: awatson — LAST SAVED: 1/5/2021 3:51:48 PM

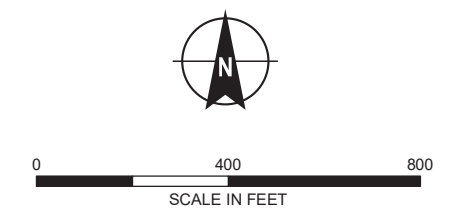


LEGEND

-  MONITORING WELL
-  PIEZOMETRIC OBSERVATION
-  ACTIVE COAL COMBUSTION RESIDUAL
-  INACTIVE/CLOSED CELL

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. THE COAL COMBUSTION RESIDUAL MONITORING ACCOMPLISHED VIA A MULTI-UNIT GROUNDWATER MONITORING SYSTEM, REFERRED TO AS THE ASH POND SYSTEM, THAT INCLUDES: CELL 001, INACTIVE/CLOSED CELL 002, CELL 003, AND CELL 004.
3. AERIAL IMAGERY SOURCE: ESRI



ASSOCIATED ELECTRIC COOPERATIVE, INC.
THOMAS HILL ENERGY CENTER
CLIFTON HILL, MISSOURI

**ASH POND SYSTEM
MONITORING WELL LOCATION MAP**



JANUARY 2026

FIGURE 1