



HALEY & ALDRICH, INC.
6500 Rockside Road
Suite 200
Cleveland, OH 44131
216.739.0555

1 August 2019
File No. 124064-010

SUBJECT: Cell 002 West
Annual Groundwater Monitoring and Corrective Action Report
Associated Electric Cooperative, Inc.
Thomas Hill Energy Center – Clifton Hill, MO

Associated Electric Cooperative, Inc. (AECI) operates a multi-unit groundwater monitoring system for the coal combustion residuals (CCR) surface impoundments referred to as Cells 001, 002 West, 003, and 004 at the Thomas Hill Energy Center (THEC) located in Clifton Hill, Missouri. This system is required for compliance monitoring under the United States Environmental Protection Agency (EPA) Hazardous and Solid Waste Management System, Disposal of Coal Combustion Residuals from Electric Utilities, set forth at Code of Federal Regulations Title 40 (40 CFR) Part 257 Subpart D (CCR Rule), effective 19 October 2015 along with subsequent revisions. As documented in the letter certified 17 April 2019, the inactive Cell 002 West CCR unit was incorporated into the existing multi-unit groundwater monitoring network.

Pursuant to §257.100(e)(5)(ii) of the CCR Rule, the inactive Cell 002 West is required to complete the initial Annual Groundwater Monitoring and Corrective Action Report (Annual Report) by 1 August 2019. Since this unit has been added to an existing multi-unit monitoring network of that included active CCR units, Annual Reports of the applicable multi-unit groundwater network have been completed by 31 January 2018 and 31 January 2019, respectively. As such, the relevant data and network status has already been available, and no additional Annual Report has been generated since this compliance requirement has already been met by those previous reports. The next Annual Report will be completed in January 2020.