HALEY & ALDRICH, INC.
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14 February 2019
File No. 129342-016

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

Attention: Jenny Burns – Environmental Analyst
Russ Weatherly – Supervisor, Land and Water Resources

Subject: Assessment Monitoring Program September 2018 Sampling Event
Statistically Significant Level Notification
New Madrid Power Plant – Pond 003

Dear Ms. Burns and Mr. Weatherly:

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] Sections §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 Pond 003 groundwater monitoring system that meets the requirements of 40 CFR §257.91 and 40 CFR §257.93. This memorandum documents the results of statistical tests conducted to determine if Appendix IV groundwater monitoring constituents detected in wells downgradient of Pond 003 are present at a statistically significant level (SSL) above groundwater protection standards (GWPS) consistent with the requirements in 40 CFR § 257.95.

The results of the statistical analyses completed on 14 January 2019 of the September 2018 assessment monitoring sampling event data for each analyte/well combination indicate SSLs above GWPS for molybdenum at monitoring wells MW-7, MW-8, MW-9, P-2, P-3, and P-5. Given that there is no use of groundwater downgradient of the AECI site (i.e., between the subject CCR Unit and the Mississippi River), the ultimate point of exposure is the Mississippi River. Furthermore, this condition is unlikely to pose an exposure concern in groundwater or the Mississippi River since there are no known receptors.

Sincerely yours,
HALEY & ALDRICH, INC.

Steve Putrich, P.E.
Project Principal

Mark Nicholls, P.G.
Lead Hydrogeologist