

March 10, 2020

RD MORROW GENERATING STATION - LANDFILL CCR UNIT FIRST SEMI-ANNUAL 2020 REMEDY SELECTION AND DESIGN PROGRESS REPORT

In accordance with the United States Environmental Protection Agency (US EPA) Coal Combustion Residuals (CCR) Rule 40 Code of Federal Regulations (CFR) 257 Subpart D, Golder Associates Inc. has prepared this Semi-Annual Remedy Selection and Design Progress Report (Progress Report) for Cooperative Energy's RD Morrow Generating Station's CCR Landfill unit in accordance with § 257.97(a). The Progress Report was prepared to document activities conducted between September 1, 2019 and February 29, 2020. As required by the rules, this progress report describes the progress made in selecting and designing a remedy and future planned activities.

Summary of Work Conducted

- Field investigation to characterize the nature and extent of the release associated with the CCR Landfill Unit in the uppermost aquifer.
 - Installation and development of supplemental monitor points (P-A and P-B);
 - Evaluation of soil sample data, upgradient and downgradient from the CCR Landfill Unit, for mineralogical and chemical analyses;
 - Water-level data collection; and
 - Groundwater sampling and analysis.
- Groundwater Conceptual Site Model (CSM) – Development is ongoing to support the evaluation of potential groundwater remedies for the site.
- CCR Landfill Closure Design – As presented in the Assessment of Corrective Measures Report (Golder, 2019) (ACM Report)¹, Cooperative Energy plans to pair source control with its remedy selection.

Planned Activities and Anticipated Schedule

Cooperative Energy will continue its data collection efforts as necessary in support of efforts to refine the CSM and to further evaluate the feasibility of each corrective measure proposed in the ACM report. Once sufficient data become available to arrive at a focused number of corrective measures or a combination of corrective measures that would provide an effective groundwater remedy, necessary steps will be taken to implement a remedy for the site in accordance with 40 CFR § 257.98.

¹ Assessment of Corrective Measures, RD Morrow Generation Station – Landfill CCR Unit, Golder Associates, September 12, 2019.

The following activities are planned for the upcoming semi-annual period:

- Evaluate alternative source for lithium pending review of geochemical and mineralogical data.
- Resample relevant monitoring and delineation wells for additional characterization. Multiple data sets will be needed to assess temporal variations in conditions.
- Continue to sample site monitoring wells for Appendix III and other Appendix IV constituents detected during assessment monitoring.
- Perform geochemical assessment of groundwater characteristics.

This Cooperative Energy, RD Morrow Generating Station Progress Report, has been prepared in compliance with applicable requirements of the CCR Final Rule. References to the appropriate 40 CFR § 257.96 rules are incorporated throughout this document.

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