

September 11, 2020

RD MORROW GENERATING STATION - LANDFILL CCR UNIT SECOND 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 March 1, 2020 and August 31, 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

- Sampled monitoring and delineation wells for additional characterization.
- Sampled site monitoring wells for Appendix III and other Appendix IV constituents detected during April 2020 as part of the first semi-annual assessment monitoring.
- Prepared an alternative source demonstration for lithium with supporting geochemical and mineralogical data for monitoring wells MW-03 and MW-04. As a result, the ACM will only evaluate appropriate remedies for constituents of concern (COC)s at MW-05.
- Perform geochemical assessment of groundwater characteristics.
- Groundwater Conceptual Site Model (CSM) – Developed to support the evaluation of potential groundwater remedies for the site.
 - Groundwater modeling has been conducted to evaluate the feasibility of monitored natural attenuation along with source control for the SSLs of molybdenum and lithium at MW-05.
- Source control (Landfill Closure and Capping): Site preparation and earthwork is being conducted to commence landfill closure. Specifically, earthwork is ongoing to reroute landfill stormwater, facilitate closure grading, and establish perimeter access around the RD Morrow Landfill. The closure geosynthetics are stockpiled onsite and awaiting deployment which is planned to start in the fourth quarter of 2020.

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

- Abandonment of supplemental monitor points (P-A and P-B). Each of these temporary locations are no longer needed for assessment monitoring because a successful alternate source demonstration has been prepared.
- 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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