

September 12, 2022

RD MORROW GENERATING STATION - LANDFILL CCR UNIT SECOND SEMI-ANNUAL 2022 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, 2022, and August 31, 2022. As required by the rule, this progress report describes the progress made in selecting and designing a remedy and future planned activities.

Summary of Work Conducted

- Sampled assessment and detection monitoring wells for Appendix III and the detected Appendix IV constituents, as part of the first semi-annual assessment monitoring conducted in April 2022.
- Sampled detection monitoring and assessment monitoring wells for continued geochemical characterization.
- Continued refinement of the Groundwater Conceptual Site Model (CSM) – Refine CSM with additional data collected during this Semi-Annual Progress Report period to support evaluation of remedy alternatives and selection. Groundwater monitoring continues to confirm consistent trends in groundwater flow rates and direction.
- Analysis of the impacts of landfill closure and capping source control measures on the CSM and efficacy of remedy alternatives. Since the landfill closure was completed on October 12, 2021, post-closure data has been essential to the evaluation of the efficacy of remedies under consideration.
- Continued analysis of remedy alternatives, including further evaluation of the effectiveness, feasibility, length of time, and degree of certainty that the remedy will be successful. This analysis continues to include analysis of monitored natural attenuation (MNA) and other alternatives presented in the Assessment of Corrective Measures (ACM) report using groundwater data since source control was completed. All remedies are targeted at the statistically significant levels of molybdenum and lithium at MW-05.

Planned Activities and Anticipated Schedule

Cooperative Energy will continue its data collection in support of efforts to refine the CSM and to further evaluate the feasibility of each corrective measure proposed in the ACM report. Completion of source control measures have resulted in positive trends and may impact the results of the remedy analyses. Statistical trends in groundwater show that the landfill closure and capping has reduced the concentrations for constituents of concern. Cooperative Energy will continue monitoring trends and re-evaluate key site groundwater metrics such as the groundwater flow rate and constituent concentration. A public meeting is planned for September 2022 in

which each of the remedial alternatives presented in the ACM report will be discussed. Following the public meeting, RD Morrow can address public comments and take the necessary steps 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:

- Conduct the public meeting to discuss the results of the corrective measures assessment pursuant to 40 CFR § 257.96(e).
- Select remedy and finalize Remedy Selection Report
- Implementation of Remedy
- Continue to sample site monitoring wells for Appendix III/IV constituents as part of the long-term corrective action monitoring following implementation of a remedy alternative.
- Continue geochemical assessment of groundwater characteristics and Evaluate the effectiveness of the selected remedy.

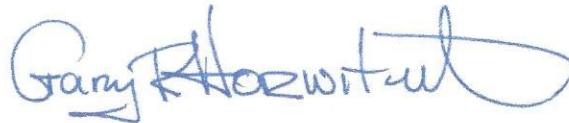
This Cooperative Energy, RD Morrow Generating Station Progress Report has been prepared in compliance with 40 CFR § 257.96 and the applicable requirements of the CCR Rule.

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