



March 13, 2023

## **RD MORROW GENERATING STATION - LANDFILL CCR UNIT FIRST SEMI-ANNUAL 2023 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, WSP USA Inc. (WSP) 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, 2022, and February 28, 2023. 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 detection monitoring and assessment monitoring wells for continued geochemical characterization.
- 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, continued evaluation of post-closure data has been essential to the evaluation of the efficacy of remedies under consideration.
- A public meeting was held on Tuesday, September 27, 2022, to discuss the results of the corrective measures assessment pursuant to 40 CFR § 257.96(e). Cooperative Energy notified the community of the meeting by local newspaper, its website, and physical public announcements in Lamar County (courthouse and libraries). There were two attendees at the meeting. There were no comments received during the meeting. Cooperative Energy provided an opportunity for written comments 30 days after the meeting to a dedicated email address provided during the meeting and on its website. No written comments were received.
- Continued analysis of remedy alternatives, including source control combined with monitored natural attenuation and more aggressive remedy alternatives. Alternatives were evaluated in consideration of more recent geochemical and groundwater monitoring results. Following the public meeting, WSP has prepared a preliminary version of the Remedy Selection Report and updated associated analyses.

### **Planned Activities and Anticipated Schedule**

Cooperative Energy will continue its data collection in support of corrective action for the site. Completion of source control measures have resulted in positive trends in groundwater quality. 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. The following activities are planned for the upcoming semi-annual period:

- Finalize Remedy Selection Report
- Implement the selected remedy
- Preparation the Corrective Action Plan (CAP)
- Sample detection and assessment monitoring wells for Appendix III/IV constituents as part of the semi-annual assessment monitoring program and the long-term corrective action monitoring plan.
- 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.

**WSP USA INC.**



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