

October 17, 2017

The Empire District Electric Company  
602 South Joplin Street  
PO Box 127  
Joplin, MO 64802-0127

Re: **Groundwater Monitoring for Existing CCR Surface Impoundments**  
EPA CCR Rule Section 40 CFR 257.90 (b)  
Empire District Electric Company – Asbury Power Plant  
Asbury, Missouri

2009 E. McCarty St.  
Suite 2  
Jefferson City, MO 65101  
voice: 573.636.9454  
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To Whom it May Concern:

The following presents the status of the Groundwater Monitoring for the Empire District Electric Company's CCR Impoundment at the Asbury Power Plant. This letter serves as certification that the facility is in compliance with 40 CFR 257.90 (b) of the EPA CCR.

1350 E. Kingsley St.  
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Springfield, MO 65804  
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**40 CFR 257.90 (b) states:**

*1) Existing CCR landfills and existing CCR surface impoundments. No later than October 17, 2017, the owner or operator of the CCR unit must be in compliance with the following groundwater monitoring requirements:*

- (i) Install the groundwater monitoring system as required by § 257.91;*
- (ii) Develop the groundwater sampling and analysis program to include selection of the statistical procedures to be used for evaluating groundwater monitoring data as required by § 257.93;*
- (iii) Initiate the detection monitoring program to include obtaining a minimum of eight independent samples for each background and downgradient well as required by § 257.94(b); and*
- (iv) Begin evaluating the groundwater monitoring data for statistically significant increases over background levels for the constituents listed in appendix III of this part as required by § 257.94.*

The Asbury Power Plant has completed the following tasks and documentation has been placed in the Operating Record.

1. *Install the groundwater monitoring system as required by § 257.91:* The groundwater monitoring system for the CCR impoundment area consists of nine (9) groundwater monitoring wells. Two (2) wells are considered upgradient. One (1) well is considered sidegradient and is only monitored for groundwater elevation. The remaining six (6) wells are downgradient. This system has been reviewed by a Missouri Registered Geologist and has been found to be adequate. The Site Characterization Work Plan,

Coal Combustion Residuals Impoundments was prepared by Geotechnology, Inc. and has been placed in the Operating Record.

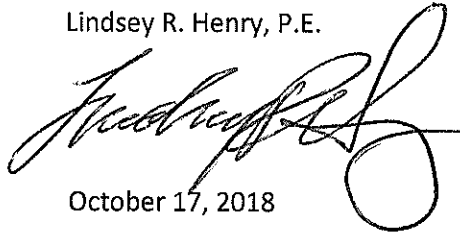
2. *Develop the groundwater sampling and analysis program to include selection of the statistical procedures to be used for evaluating groundwater monitoring data as required by § 257.93:* The Groundwater Monitoring Plan, Coal Combustion Residuals Impoundments was completed by Midwest Environmental Consultants and sealed by a Missouri Professional Engineer. This plan included both a Sampling and Analysis Plan and a Statistical Analysis Plan developed in accordance with the CCR Rule. This report has been placed in the Operating Record.
3. *Initiate the detection monitoring program to include obtaining a minimum of eight independent samples for each background and downgradient well as required by § 257.94(b):* Eight independent groundwater samples were obtained and analyzed as required by the CCR Rule. Groundwater Monitoring Reports were completed for each sampling event and have been placed in the Operating Record. A listing of each event is below:
  - 1) January 2016
  - 2) March 2016
  - 3) May 2016
  - 4) August 2016
  - 5) October 2016
  - 6) March 2017
  - 7) June 2017
  - 8) August 2017
4. *Begin evaluating the groundwater monitoring data for statistically significant increases over background levels for the constituents listed in appendix III of this part as required by § 257.94:* The first compliance groundwater sample was obtained the first week of October 2017. Upon receipt of the laboratory results the groundwater monitoring data will be evaluated to determine if any statistically significant increases exist. In accordance with the CCR Rule this evaluation will be completed and placed in the Operating Record by January 31, 2018.

**CERTIFICATION 257.90 (b)**

The undersigned Professional Engineer (P.E.) is familiar with the requirements of 40 CFR Part 257. The above summarizes the status of the Groundwater Monitoring for the Empire District Electric Company's CCR Impoundment at the Asbury Power Plant. I hereby certify that the facility is in compliance with 40 CFR 257.90 (b) and all information has been placed in the Operating Record. Notification of availability of this document should be provided to the State Director as required in section 257.107(h).

Name: Lindsey R. Henry, P.E.

Signature:



Date: October 17, 2018

Registration Number: E-21592

State: Missouri

Seal

