

NOTIFICATION FOR THE ESTABLISHMENT OF AN ASSESSMENT MONITORING PROGRAM Oak Grove Steam Electric Station Ash Landfill 1

June 9, 2025

In accordance with 40 C.F.R. § 257.94(e) and 30 TAC § 352.941(d), the owner or operator of a coal combustion residuals (CCR) unit must establish an assessment monitoring program meeting the requirements of 40 C.F.R. § 257.95 and 30 TAC § 352.951 if a statistically significant increase (SSI) over background groundwater quality is identified by the detection monitoring program, and prepare a notification stating that an assessment monitoring program has been established. The notification must be placed in the facility's operating record within 30 days of establishing an assessment monitoring program. *See* 40 C.F.R. § 257.105(h)(5) and 30 TAC § 352.1301. The notification must also be posted to the CCR web site within 30 days of the date the information was placed in the operating record and provided to the state director. *See* 40 C.F.R. § 257.106(h)(4); 40 C.F.R. § 257.107(d), (h)(4); 30 TAC § 352.1311; 30 TAC § 352.1321.

Comparison of background groundwater quality with concentrations of parameters in downgradient monitoring wells observed during the 2024 detection monitoring program at Ash Landfill 1 at the referenced site, was completed on November 11, 2024 and identified an SSI for one or more of the 40 C.F.R. Part 257 Appendix III parameters.

As allowed by 40 C.F.R. § 257.94(e)(2) and 30 TAC § 352.941(c), the following were evaluated as potential cause of each SSI:

- A source other than the CCR unit;
- An error in sampling;
- An error in analysis;
- An error in statistical evaluation;
- A natural variation in groundwater quality.

The evaluations were not conclusive in demonstrating an alternate source/cause for the SSI by February 9, 2025. Consequently, an assessment monitoring program was initiated on February 9, 2025, and was established by May 10, 2025, for Ash Landfill 1 at the referenced site.