Report

40 CFR Part 257.98
Corrective Action Groundwater Monitoring Plan

RCPA Surface Impoundment, Rush Island Energy Center, Jefferson County, Missouri

Submitted to:

Ameren Missouri

1901 Chouteau Avenue, St. Louis, Missouri 53103

Submitted by:

Golder Associates Inc.

13515 Barrett Parkway Drive, Suite 260, Ballwin, Missouri, USA 63021

+1 314 984-8800

153140602

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Revision History

Version	Date	Description
0	November 2019	Corrective Action Groundwater Monitoring Plan
1	May 1, 2020	Monitoring Wells P16S, P17I and P19I added to the Corrective Action Monitoring Well Network. Monitoring well P64S removed from the monitoring well network.

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1.0 INTRODUCTION

On August 30th, 2019, Ameren Missouri (Ameren) posted the "Selection of Remedy Report – 40 CFR § 257.97 Rush Island, Labadie, Sioux and Meramec CCR Basins" report to its publicly available website (Ameren 2019). This report selected the final remedy to be implemented to address groundwater contamination from the Rush Island Surface Impoundment (RCPA) at Ameren's Rush Island Energy Center (RIEC or Facility) in Jefferson County, Missouri (see location on **Figure 1**).

This Corrective Action Groundwater Monitoring Plan (GMP) was developed pursuant to § 257.98(a)(1) of "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule" (the CCR Rule). This section of the CCR Rule requires owners or operators establish and implement a Corrective Action GMP within 90 days of selecting a remedy. This Corrective Action GMP presents information on the design of the groundwater monitoring system, groundwater sampling and analysis procedures, groundwater statistical analysis methods, and data evaluation methods needed to complete the selected remedy of source control through installation of a low permeability cover system and use of Monitored Natural Attenuation (MNA) for groundwater impacts.

1.1 Overview of CCR Rule Activities for the RCPA

The CCR Rule was published in the Federal Register on April 17, 2015. This rule required CCR surface impoundments and landfills to monitor groundwater around these CCR units. Prior to the first major deadline of October 17, 2017, Ameren completed the following tasks: (1) installation of a groundwater monitoring well system; (2) a Statistical Method Certification; (3) a Groundwater Monitoring Plan (GMP) that details design, installation, development, sampling procedures, as well as statistical methods; and (4) eight baseline groundwater sampling events for all Appendix III and Appendix IV parameters of the CCR Rule. In November 2017, the first Detection Monitoring event was completed. Results from this event demonstrated some Appendix III parameters were present at concentrations that were a Statistically Significant Increase (SSI) over background and were then verified in January 2018 testing. In accordance with the CCR Rule, Ameren placed a "Notification of the Establishment of a CCR Assessment Monitoring Program" and began Assessment Monitoring within 90 Days.

Results from the Assessment Monitoring Events for the RCPA indicated the presence of molybdenum and arsenic at a Statistically Significant Level (SSL) over the site Groundwater Protection Standard (GWPS) in several of the compliance monitoring wells. As required, Ameren placed a "Notification of the Detection of Statistically Significant Levels Above CCR Groundwater Protection Standards" on its website and commenced an assessment of potential Corrective Measures. On August 30th, 2019 subsequent to a public meeting held to discuss those finding, Ameren selected a final remedy of source control through installation of a low permeability cover system and use of MNA. Ameren has posted a "Notification of intent to Close a CCR Unit and Certification for Final Cover Design" and has commenced closure of the RCPA and intends to complete closure by the end of 2020.

This Corrective Action GMP is designed to support the final remedy selection. At this time, molybdenum and arsenic are the only parameters that were detected at an SSL above a site GWPS and are the focus of the MNA analysis.

2.0 SITE SETTING

The RIEC is located approximately 40 miles south of downtown St. Louis in Jefferson County, Missouri. **Figure 1** depicts the location of the Facility and property boundaries referenced to local features and the Mississippi River. The Facility encompasses approximately 960 acres and is located within the Mississippi River Valley and the adjacent upland areas to the west. The property is bounded to the east by the Mississippi River, to the south by Isle Du Bois Creek, to the north by Muddy Creek and extends into the bluffs to the west.

2.1 Coal Combustion Residuals (CCR) RCPA Surface Impoundment

The RCPA is in the floodplain of the Mississippi River to the south/southeast of the RIEC and is constructed with perimeter berms at an elevation of approximately 410 feet above mean sea level (feet MSL), which is above the 100-year flood elevation of 406 feet MSL. Both fly ash and bottom ash have been historically managed and stored in this surface impoundment. Based on borings and piezometers previously completed by Natural Resource Technology, Inc. (NRT), the thickness of ash within the RCPA ranges from approximately 30 feet below ground surface (bgs) near the perimeter to approximately 109 feet bgs near the center of the impoundment (NRT, 2015). Based on NRT's findings, typical base elevations of ash in the RCPA are approximately 310 feet MSL.

Directly to the east, south and west of the RCPA are low-lying floodplain areas, which have a lower topographic relief ranging from approximately 390 to 400 feet MSL. The eastern portion of the property contains approximately 300 to 400 feet of forested area in a narrow strip between the surface impoundment and the Mississippi River during normal river water levels. The southern portion of the property is forested and contains the Isle Du Bois Creek, which is as close as approximately 100 feet away from the RCPA. The western side of the property is bounded by a small drainage creek that is approximately 100 to 300 feet away from the surface impoundment. Approximately 300 to 500 feet west of the surface impoundment are bedrock bluffs that rise to elevations exceeding 700 feet MSL.

2.2 Geology

2.2.1 Physiographic Setting and Regional Geology

The Facility lies in the eastern margin of the Salem Plateau, a subsection of the Ozark Plateau Physiographic Province (USGS, 1994). The Ozark Plateau is described as a geological uplift or dome that has risen above the surrounding lowlands. The highpoint of this plateau or dome is located in the St. Francois Mountains. In the region of the Facility, the Salem Plateau portion of the Ozark Plateau is comprised of Mississippian and Ordovician-aged dolostones, limestones and sandstones. This portion of the Ozark Plateau consists of bedrock cliffs along the major river channels. Bedrock in the area around the Facility dips approximately 3 to 7 degrees towards the east-northeast with occasional east-northeast trending syncline-anticline pairs located in the bluffs to the west of the Mississippi River Valley (Baker, 2001a, 2001b, 2001c).

2.2.2 Local Geology

The geology immediately surrounding the Facility is comprised of two distinctly different geological terrains; (1) floodplain deposits of the Mississippi River Valley and (2) older sedimentary bedrock formations. Most of the Facility, including all of the plant infrastructure and the RCPA, lies within the Mississippi River Valley on floodplain and alluvial soil deposits. The Mississippi River Valley in this region is an approximately 4- to 5-mile wide area of floodplain with alluvial deposits that are the result of the water flow and deposition from the Mississippi River. Based on boring logs from NRT (NRT 2014a, NRT 2014b, and NRT 2015) and Golder (Golder 2017, Golder 2018, Golder 2019), the alluvial deposits are typically comprised of sands and gravels with lesser amounts of silts

and clays, with an overall fining upward sequence. With depth, silt and clay deposits are less abundant and the sands and gravels typically coarsen. The depth of the alluvial deposits near the surface impoundment ranges from approximately 56 to 147 feet bgs (255 to 331 feet MSL).

Beneath the alluvial deposits of the Mississippi River Valley lie bedrock deposits from the lower part of the Ordovician-aged Plattin group. Based on the borings completed by NRT, this bedrock unit is comprised of massive, gray to brown, micritic, fossiliferous limestone with shale interbeds. The depth to bedrock typically increases towards the Mississippi River and bedrock beneath the surface impoundment dips towards the east-northeast at approximately 3 to 7 degrees. The Plattin group is stratigraphically underlain by the Joachim Dolomite. The higher portions of the bluffs to the west of the facility are comprised of Mississippian-age limestone and shales, which are exposed along the eastern portions of the bluffs.

2.3 Site Hydrogeology

Site hydrogeology has been characterized based on information obtained from over 45 soil borings and 90 piezometer installations completed at the site by NRT (NRT 2014a, NRT 2014b, and NRT 2015), as well as the CCR Rule groundwater monitoring well installations completed by Golder (Golder 2017, Golder 2018, Golder 2019). Figure 2 provides a generalized west-east depiction of the RCPA referenced to local geology, groundwater, and the Mississippi River.

2.3.1 Uppermost Aquifer

As required by the CCR Rule, a groundwater monitoring system was installed in the uppermost aquifer around each CCR Unit (§257.91(a)). As shown on **Figure 2**, the uppermost aquifer beneath the CCR impoundments and landfills is the alluvial deposits consisting primarily of alluvial sands with some silt, clay, and gravel associated with the Mississippi River Valley alluvium. These alluvial deposits (alluvium) overly Ordovician-age limestone of the Plattin group. As generally described above, these alluvial deposits exhibit a fining-upward sequence with some silts and clays present within the shallow zones and mostly coarse sands and gravels present at depth.

2.3.2 Surface Water and Groundwater Elevations

2.3.2.1 CCR Surface Impoundment Water

Prior to initiating closure, pond gauge readings were collected concurrently with groundwater measurements from each CCR Rule sampling event. During this time, RCPA pond levels ranged from approximately 388 to 400 feet MSL. These elevations were approximately 7 to 28 feet above the natural groundwater elevations surrounding the pond (**Table 1**). The difference between the pond level and the natural groundwater elevation was greatest when the Mississippi River level was low and the pond operating in a full condition. Data show water mounding within the RCPA regardless of the river level; however, the mounding was less pronounced at times of high river level.

After initiating closure, however, the static water level in the pond has dropped, and is now approximately equal with the surrounding alluvial aquifer static groundwater levels. This has removed the mounding effects of the active operating conditions. It is expected that the static water level in the RCPA will remain similar to the surrounding alluvial aquifer after closure of the CCR unit is completed.

2.3.2.2 Alluvial Aquifer

Groundwater elevations within the alluvial aquifer at the RIEC have been obtained in several different studies. NRT (2015) obtained groundwater elevation measurements from January 2013 through March 2015 within the

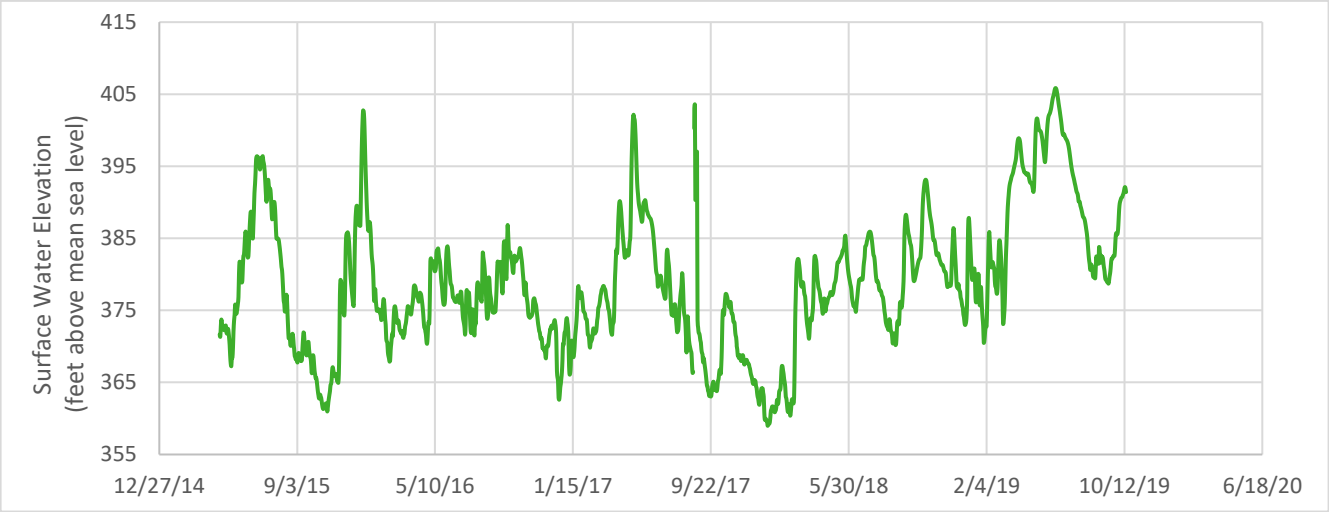
alluvial aquifer in the area in and around the surface impoundment. A total of 39 piezometers were used for the groundwater elevation measurements in the shallow zone of the aquifer with well depths ranging from 4.5 to 61.0 feet bgs and 340.5 to 393.8 feet MSL. Groundwater elevations were also measured within deeper depths (as deep as approximately 325 feet MSL) of the alluvial aquifer adjacent to the surface impoundment (deeper zone). Potentiometric Surface Maps displaying these results are provided in **Appendix A**.

Golder obtained groundwater elevation measurements from March 2016 through October 2019 within the alluvial aquifer. For each of the sampling events, groundwater elevations were measured at monitoring wells within a 24-hour timeframe and a potentiometric map was generated from the data (**Appendix B** and **Table 1**). Groundwater elevations ranged from approximately 459 feet MSL to 489 feet MSL. During any given event, groundwater elevations across the site ranged from 1 to 8 feet between the maximum and minimum groundwater elevations.

2.3.2.3 Alluvial Aquifer Groundwater Flow Direction

Groundwater flow within the alluvial aquifer is dynamic and is influenced by seasonal changes in the water level in the adjacent Mississippi River. River water levels measured at the Facility display large seasonal changes in the elevation of the Mississippi River water surface. For example, since the CCR Rule came into effect (April 2015), river water levels fluctuated between approximately 358 to 406 feet MSL (**Figure 3**). Water flows into and out of the alluvial aquifer as a result of fluctuating river water levels that produce “bank recharge” and “bank discharge” conditions. Under normal aquifer conditions, groundwater flow in the alluvial aquifer would be expected to have a flow direction component parallel to the river and a flow component away from the bluffs, with a likely net flow direction generally to the east.

Figure 3: Mississippi River Elevation at RIEC



Notes:

1) Mississippi River Elevations provided by Ameren.

Although the movement of groundwater within the alluvial aquifer at the Facility is complex, the movement has been characterized by frequent groundwater elevation measurements and the generation of potentiometric surface maps generated by NRT and Golder (**Appendix A**, **Appendix B** and **Table 1**). As expected, the potentiometric surface maps display variability in the groundwater flow direction and these changes in flow direction are related to the water level within the adjacent Mississippi River.

Groundwater flow direction and hydraulic gradient were estimated for the alluvial aquifer wells (Devlin 2002). Estimated results from this analysis are provided in **Table 2**. These results indicate that while groundwater flow direction is variable, overall net groundwater flow 2015 to 2019 was generally toward the east/northeast (toward the river).

Based on the potentiometric surface maps, a general flow direction from the west (bluffs area) to the east (Mississippi River) under normal river conditions is expected. However, during periods of high river levels, groundwater flow can temporarily reverse and flow westward. During these times of high river stage and temporary flow direction changes, horizontal groundwater gradients generally tend to decrease and little net movement of groundwater to the west or north occurs.

Horizontal and vertical groundwater flow within the uppermost aquifer have been locally influenced by operation of the RCPA surface impoundment prior to commencing closure. Ponding of water in the RCPA at elevations greater than the static water levels in the underlying alluvial aquifer groundwater created a localized mounding effect, resulting in localized downward gradients and localized radial groundwater flow outward from the impoundment. Since closure, these downward gradients have been greatly reduced and effectively eliminated. The full effects of the closure on groundwater elevations will continue to be monitored after CCR unit closure is completed, to see if there are any major changes to groundwater flow between active and closed conditions.

2.3.2.4 Horizontal Gradient

Horizontal groundwater gradients in the alluvial aquifer are typically low and flat. The gradients are very dependent on river water levels (bank recharge and bank discharge conditions described earlier). NRT data displayed typical horizontal gradients ranging from <0.001 to 0.005 feet/foot.

Site-wide horizontal gradients were also calculated for each of the CCR groundwater sampling events and the results of these are displayed on **Table 2**. The horizontal groundwater gradients are low, ranging from 0.00004 to 0.002 feet/foot.

A review of the potentiometric surface maps confirms the gradient estimates for a larger scale, but also demonstrates that localized horizontal gradients can be higher especially in areas near the Mississippi River.

2.3.2.5 Vertical Gradient

A review of downward gradients observed in piezometers was completed by comparing groundwater elevations obtained by Golder during CCR Rule monitoring. This analysis was completed by comparing water levels from shallow and intermediate/deep zone piezometer locations where the piezometers are nested (two or more piezometers in close proximity, screened at different elevations). **Figure 4** displays the vertical gradients over time from the different well pairs. From the review of the data, areas away from the RCPA show relatively variable vertical gradients that fluctuate between upward and downward with no consistent vertical gradient present between shallow and deeper zones of the alluvial aquifer. The average vertical gradient in these wells is 0.0022 (very slightly upward), which further demonstrates the relatively flat gradient. In the area adjacent to the RCPA, there has historically been a slight downward gradient when the pond was active, with an average gradient of -0.0058 (slightly downward). This was likely caused by the mounding present in the RCPA during active conditions. However, since the RCPA no longer receives CCR or water, the gradients now appear to be stabilizing and are reflective of the surrounding aquifer.

2.3.3 Hydraulic Conductivity

The hydraulic conductivity of the alluvial aquifer has been investigated by NRT and Golder through the use of slug tests (NRT 2015, Golder 2017). The hydraulic conductivity is highly dependent of the geology present within the screened interval of the piezometer/well. The hydraulic conductivity has been characterized for three distinct areas including:

- The RCPA itself (coal ash pore-water)
- The shallow alluvial groundwater zone
- Intermediate to deep alluvial groundwater zone

NRT completed testing in each zone. Four slug tests were completed in two separate piezometers within the RCPA CCR and all four tests determined a hydraulic conductivity of 1×10^{-4} centimeters per second (cm/sec). Within the shallow alluvial groundwater zone, 43 slug tests were completed at 20 separate piezometers. Results from this testing demonstrate an average hydraulic conductivity of 1.58×10^{-3} cm/sec with a maximum of 7.00×10^{-3} cm/sec and a minimum of 3.00×10^{-5} cm/sec. Within the deep alluvial groundwater zone, 40 slug tests were completed at 14 separate piezometers. Results from this testing demonstrate an average hydraulic conductivity of 2.84×10^{-2} cm/sec with a maximum of 2.00×10^{-1} cm/sec and a minimum of 2.00×10^{-4} cm/sec.

The results of the slug testing program completed by NRT show that the average hydraulic conductivity of the RCPA ash is significantly lower than the surrounding alluvial aquifer. The highest hydraulic conductivities were reported for the deep alluvial zone, which has an average hydraulic conductivity one order of magnitude higher than the shallow zone as tested by NRT. Additionally, the higher hydraulic conductivity and variable graded nature of the alluvial aquifer is expected to lead to relatively high dispersion potential that will likely increase with depth. This is due to the prevalence of coarser particles (gravel, cobbles, etc.) at depth and relatively higher groundwater flow velocities stemming from higher hydraulic conductivities in the deep alluvial groundwater zone.

Golder also performed rising head hydraulic conductivity tests on the 9 original CCR Rule monitoring wells in order to estimate the hydraulic conductivities. The tests were conducted using a pneumatic slug (Hi-K slug) and a downhole pressure transducer. Results from this testing demonstrate an average hydraulic conductivity of 2.03×10^{-2} cm/sec with a maximum of 3.26×10^{-2} cm/sec and a minimum of 1.30×10^{-2} cm/sec. Golder's findings for hydraulic conductivity values are consistent with the conductivities calculated by NRT.

Estimated groundwater flow velocities were calculated using the CCR monitoring well hydraulic conductivity, hydraulic gradients and an estimated value for effective porosity (**Table 2**). Using these values, groundwater flow velocities are estimated to range between 0.006 and 0.2 feet per day, and average approximately 20 feet (net) per year in the prevailing downgradient direction.

2.3.4 Porosity and Effective Porosity

Porosities were estimated based on the grain size distributions of an aquifer soil sample collected during monitoring well drilling. A representative grain size distribution was collected from the screen interval at MW-7 and MW-B2 using the ASTM D6912 Method B and the results are provided in the Detection/Assessment GMP for the RCPA. These samples were similar in field classification to other well drilling samples and the results indicate that the screened intervals of the alluvial aquifer are mostly comprised of sand (at least 90%) with lesser amounts of gravel, silt and clay. Also, the typical grain size of the sand ranges from fine to coarse sand. Textbook values of porosities for sands and sand/gravel mixes range from 25-50% (Fetter, 2000, and Freeze and Cherry, 1979)

and fine sands typically range from 29-46%, whereas coarse sands typically range from 26-43% (Das, 2008). An average porosity of 35% is estimated for the alluvial aquifer based on the site data.

Effective porosity is the porosity that is available for fluid flow. Studies completed in unconsolidated sediments have determined that water molecules pass through all pores and the effective porosity is approximately equal to the total porosity (Fetter, 2000). Therefore, the effective porosity of the alluvial aquifer is also estimated to be 35%.

3.0 GROUNDWATER MONITORING PROGRAM

3.1 Groundwater Monitoring Well Network

For Corrective Action, the CCR Rule requires a demonstration that compliance with the GWPS has been achieved at all points within the plume of contamination that lie beyond the initial Detection and Dssessment Monitoring well networks (§ 257.98(c)(1)). To meet with these requirements, a Corrective Action Monitoring Well Network has been established. Monitoring wells to be used for this network are identified below in **Table 3** and their locations, in addition to the wells used for Detection and Assessment Monitoring networks are provided in **Figure 5**.

Table 3 –Corrective Action Groundwater Monitoring Wells

Shallow Zone of the Alluvial Aquifer	Intermediate/Deep Zone of the Alluvial Aquifer
P05S	P17I
P10S	P17D
P16S	P19I
P17S	P19D
P19S	P21I
P21S	P21D
P22S	P22D
P29S	P29D
P30S	
P31S	

3.1.1 Groundwater Sampling Frequency and Parameters

3.1.2 CCR Rule Minimum Requirements

The CCR Rule has specific minimum requirements for sampling frequency and parameters. At a minimum, sampling must meet the requirements of an Assessment Monitoring Program (§257.95). Therefore, the minimum monitoring well sampling frequency would be three sampling events the first year, followed by semi-annual sampling thereafter. Minimum requirements for sampling parameters are that all Appendix IV parameters must be tested at least annually, with only detected Appendix IV parameters required for subsequent events. Appendix III Parameters must also be tested sampled at least semi-annually. **Table 4** displays the parameters associated with Appendix III and IV, as well as other MNA parameters.

Table 4 – Corrective Action Groundwater Monitoring Well Network

Groundwater Parameters			
Parameter	**Method**	**Parameter**	**Method**
Appendix III Parameters		**Cations & Anions**	
Boron	200.7	Alkalinity	SM 2320B
Calcium	200.7	Iron	200.7
Chloride	EPA 300.0	Magnesium	200.7
Fluoride	EPA 300.0	Manganese	200.7
pH	NA	Potassium	200.7
Sulfate	EPA 300.0	Sodium	200.7
Total Dissolved Solids	SM2540C	**Other Parameters**	
Appendix IV Parameters		Sulfide	SM4500-S2D
Antimony	200.8	**Iron Speciation**	
Arsenic	200.8	Ferrous Iron	SM3500-Fe-D
Barium	200.7	Ferric Iron	Calculation
Beryllium	200.7		
Cadmium	200.8		
Chromium	200.8		
Cobalt	200.7		
Fluoride	EPA 300.0		
Lead	200.7		
Lithium	200.7		
Mercury	EPA7470A		
Molybdenum	200.7		
Radium 226	EPA 903.1		
Radium 228	EPA 904.0		
Selenium	200.8		
Thallium	200.8		

Notes:

1) The methods provided are those currently used for Detection/Assessment Monitoring. Methods may be adjusted in the future as analytical methods evolve and detection limit adjustments are needed.

3.1.3 Prior to Completion of Source Control

The first step in the selected remedy is to provide source control through the installation of a low permeability cover system. In the time prior to the cap completion, the requirements of the CCR Rule will be met with completion of three sampling events for the Corrective Action monitoring wells in 2020 as follows:

1) Q2 2020 (~April) – An initial sampling event for all Appendix IV parameters at all Monitoring Wells

2) Q2 2020 (~May) – Sampling event within 90 days for all detected Appendix IV Parameters and all Appendix III parameters.

3) Q4 2020 (~November) – Semi-annual sampling event for all detected Appendix IV parameters and all Appendix III parameters.

These sampling events are subject to change depending on unforeseen conditions such as flooding, etc.

In addition to the requirements of the CCR Rule, in order to complete Corrective Action statistical analysis, a minimum of 4 samples are required and 8 samples are recommended by the Unified Guidance (USEPA 2009). Parameters that have been detected at an SSL should have a minimum of 8 sample results for analysis prior to completion of the low permeability cover system.

Also, several parameters such as major cations/anions, iron speciation and sulfide are very beneficial for MNA analysis and are needed to demonstrate that MNA is occurring. Major cations and anions will be tested from each Corrective Action monitoring well sample during each sampling event. Iron speciation and sulfide will be tested annually along with the sampling event for all Appendix IV and III parameters. **Table 4** provides a list of the parameters to be sampled for groundwater sampling.

3.2 Long-Term Performance Monitoring

Once source control is completed, long-term monitoring of MNA and statistical compliance will be initiated. In order to comply with the requirements of the CCR Rule, sampling will be completed on a semi-annual basis. For this sampling, the first sampling event each year will test for all Appendix III and IV parameters. Additionally, for MNA evaluation, major cations, anions, iron speciation, and sulfide will be tested. During the second event of each year, samples will be tested for Appendix IV parameters that were detected during that year's first sampling event and all Appendix III parameters and major cations/anions will be tested.

3.3 Groundwater Level Measurements

To meet the requirements of §257.93(c), water level measurements will be taken at all monitoring wells to be sampled and prior to the start of any groundwater purging at the monitoring well. These measurements will be taken within a 24-hour period and will be recorded on the Record of Water Level Readings form or Groundwater Sample Collection Form. Static water levels will be measured in each monitoring well prior to purging using an electric meter accurate to 0.01-foot. The measuring probe will be rinsed with distilled or deionized water before and after use at each well. In addition, other monitoring wells or piezometers that may be beneficial for groundwater elevation mapping may also be measured.

3.4 Groundwater Sampling Methods and Procedures

Sampling will be performed in accordance with generally accepted practices within the industry and Missouri requirements. **Appendix C** provides details of procedures used to collect groundwater samples.

4.0 DATA EVALUATION AND REPORTING

The following sections describe the evaluation and analysis procedures that are followed upon receipt of the laboratory analytical data.

4.1 Evaluation of Rate and Direction of Groundwater Flow

Groundwater elevations will be determined for each sampling event and will be used to develop a groundwater elevation contour map that will be submitted with reports. The direction of groundwater flow will be determined from up- and downgradient relationships as depicted on the potentiometric surface map. Based on these maps, groundwater flow velocities will be estimated for each event, as well as groundwater flow directions. Additional

software or analysis (Modflow, USEPA gradient calculator, etc.) may also be used as applicable for groundwater flow analysis.

4.2 Data Validation

Before the data are used for statistical analysis, they will be evaluated by examining the quality control data in the laboratory report. Relevant quality control data could include measures of accuracy (percent recovery), precision (relative percent difference, RPD), and sample contamination (blank determinations). Data that fail any of these checks will be flagged for further evaluation. A Data Quality Review (DQR) may be initiated with the laboratory for anomalous data.

4.3 Statistical Evaluations for Corrective Action

Upon completion of the data validation, Corrective Action statistical analysis will be completed to determine if groundwater concentrations are present at a level statistically above or below the site-specific GWPS. As required in the CCR Rule, a statistical evaluation of the groundwater data must be completed within 90 days of receiving data from the laboratory. Once the statistical evaluation is completed, the results will be placed in the operating record. The data will be analyzed using the methods and procedures outlined in the Statistical Analysis Plan (**Appendix D**).

As specified in 257.98(C) of the CCR Rule, in order to complete Corrective Action monitoring the following must be demonstrated:

- Compliance with the GWPS at all points within the plume of contamination that lie beyond the Detection/Assessment Monitoring groundwater monitoring well system.
- Compliance with the GWPS where concentrations of constituents listed in Appendix IV to this part have not exceeded the GWPS for a period of three consecutive years.

Additionally, because Corrective Action and its effects on the groundwater regime should result in changes in plume concentrations and size over time, individual monitoring wells may be removed from Corrective Action monitoring once concentrations are below the GWPS for three consecutive years. As outlined in the CCR Rule, the Corrective Action Program will be deemed complete once all points within the plume beyond the Detection/Assessment Monitoring groundwater monitoring well system are statistically within compliance of the GWPS for three consecutive years. Once this demonstration can be made, a notification stating that the remedy has been completed is required to be posted to the operating record and the publicly available website. This notification must be certified by a Professional Engineer.

4.4 Data Evaluation to Demonstrate MNA

The CCR Rule (§ 257.98(a)(1)(ii)) requires that the Corrective Action GMP provide a way to document the effectiveness of the Corrective Action remedy. The statistical analysis is required by the CCR Rule in order to determine when monitoring wells are in compliance with the GWPS and are the basis of removing the CCR unit from Corrective Action, however, these statistical methods do not directly indicate if MNA is occurring. Multiple lines of evidence and analysis can be used to evaluate the effectiveness of the remedy. Methods that may be used for evaluating and demonstrating the MNA is occurring are as follows:

1) **Well Specific Constituent Trend Graphs:** Constituent concentration versus time graphs can be used to determine if concentrations are behaving as anticipated or if unexpected conditions are occurring. Decreasing trends of constituents over time can be used to assess the progress of MNA. Increasing trends

could represent a new source, unanticipated plume behavior, a change in ambient conditions, or a possible increase of transformation products.

2) **Concentration Maps:** Concentrations of constituents plotted in 2D, 3D, or cross-sectional view can be used to define the extents and concentrations within the plume at a given time. Comparison of the plume extents, location, size, configuration, concentrations, and center of mass which will allow for an assessment of MNA progress and an identification of potential migration patterns.

3) **Geochemical Analysis:** Completion of geochemical analysis such as Piper and Stiff diagrams can provide information on water chemistry changed over time and/or spatial area. Changes in chemistry over time can show that MNA is occurring. Changes may also identify possible changes in ambient conditions, which may change estimates of MNA timeframes, etc.

These methods are examples of initial methods to evaluate MNA and remedy effectiveness. Other methods may be used in the evaluation as the monitoring program progresses.

4.5 Verify no Adverse Impacts to Downgradient Receptors

One key objective in any MNA program is to verify that there are no adverse impacts to downgradient receptors. Several human health risk assessments for the site (AECOM 2014 and Haley & Aldrich 2018) have been completed. From these assessments, the only potential downgradient receptors are:

1. Users of the Mississippi River including people who used the river for recreational activities that may bring them into direct contact with the river.
2. The drinking water intake located approximately 30 miles downstream from the RIEC at the Chester Intake.

Multiple rounds of surface water samples collected from the Mississippi River adjacent to the RIEC have shown no impact from the RIEC to the Mississippi River. Calculated Risk-Based Screening Levels for the Mississippi River were generated in the Haley & Aldrich 2018 report that provides a conservative groundwater target level (or threshold) that is protective of the river. For each constituent, the lowest of the human health drinking water, recreational, and ecological screening levels is used. A dilution factor (100,000 for the Mississippi River at the RIEC) is then applied to the lowest screening level for surface water and results in the Calculated Risk-Based Screening Level.

In order to verify that there are no adverse impacts to downgradient receptors, groundwater concentrations adjacent to the Mississippi River will continue to be monitored, and if concentrations in these monitoring wells reach the calculated risk-based thresholds, the following actions will be taken:

- The monitoring well that displayed the impacts will be re-sampled for verification.
- If verified, a surface water sampling plan will be prepared and surface water sampling in the Mississippi River will be completed.

4.6 Monitoring Well Network Review and Long-Term Monitoring Well Network Optimization

Annual review of the monitoring well network will be completed to evaluate if the current network is still accurately monitoring MNA at the site. This review will be completed to determine if any monitoring wells should be added or removed from the network. This review will be based on data reviews completed above, as well as professional

judgment. In addition, monitoring well network optimization programs may be used to determine if any changes to the network are warranted.

4.7 Supplemental Corrective Measures

Groundwater treatment technologies are being evaluated to determine if treatment may be able to supplement the selected remedy. Pilot studies and additional treatment testing may be performed at the RIEC as a supplemental corrective measure. If treatment is to be used as a supplemental corrective measure, this monitoring plan may be updated to include the groundwater monitoring requirements and methods associated with evaluating and monitoring the supplemental corrective measure.

4.8 Annual Groundwater Monitoring and Corrective Action Report

In addition to the periodical reporting listed above, an annual groundwater monitoring report will be prepared according to the requirements of 40 CFR §257.90(e). At a minimum, the annual groundwater monitoring report will contain the following information:

- The current status of the groundwater monitoring program
- A projection of key activities planned for the upcoming year
- A map showing the CCR unit and all background (or upgradient), compliance monitoring wells installed under § 257.91 of the CCR Rule (RCPA GMP, Detection and Assessment Monitoring well network), and the Corrective Action Monitoring well network discussed in this GMP
- A discussion of any monitoring wells that were installed or decommissioned during the preceding year or any other changes made to the groundwater monitoring system
- Analytical results from groundwater sampling required by Detection, Assessment and Corrective Action Monitoring
- A demonstration, if appropriate, for an alternative groundwater sampling frequency for Detection, Assessment or Corrective Action Monitoring
- The monitoring data obtained under §§ 257.90 through 257.98, including a summary of the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the Detection, Assessment or Corrective Action Monitoring
- A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from Detection Monitoring to Assessment Monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels)
- If required, an alternate source demonstration that is certified by a Professional Engineer demonstrating that any new Detection or Assessment Monitoring SSIs or SSLs over background are not due to the release from the Facility
- A listing of GWPS for both Assessment and Corrective Action Monitoring

In addition to the requirements of the CCR Rule, additional information on the evaluation of MNA, treatability studies, or risk assessments may also be included in the Annual Report, if applicable.

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Tables

Table 1
Groundwater Elevation Measurements
Rush Island Energy Center
Jefferson County, Missouri

	Well ID	Location		Top of Casing	Ground Surface Elevation	Date Installed	Date Abandoned	3/10/2016		5/2/2016	
		Northing	Easting	FT MSL	FT MSL			DTW	GWE	DTW	GWE
CCR Rule Groundwater Monitoring Wells	R-MW-1	835384.2	889832.5	395.52	393.50	10/31/2015	NA	21.63	373.89	12.23	383.29
	R-MW-2	834261.5	890364.1	393.87	391.70	10/31/2015	NA	20.23	373.64	10.46	383.41
	R-MW-3	833178.4	890892.7	391.38	389.20	10/31/2015	NA	18.02	373.36	7.97	383.41
	R-MW-4	831647.5	890830.5	392.78	390.80	10/30/2015	NA	19.16	373.62	9.80	382.98
	R-MW-5	831994.9	889984.5	390.36	388.00	10/29/2015	NA	16.17	374.19	7.21	383.15
	R-MW-6	833111.0	888977.0	402.71	401.10	10/28/2015	NA	27.25	375.46	19.05	383.66
	R-MW-7	834476.8	888483.3	407.95	406.10	10/28/2015	6/28/2019	33.25	374.70	25.93	382.02
	R-MW-7-R	834501.4	888496.4	408.22	406.03	9/10/2019	NA	NA	NA	NA	NA
	R-MW-B1	837602.1	887903.9	411.61	409.60	10/28/2015	NA	37.38	374.23	29.77	381.84
	R-MW-B2	837801.7	885337.2	397.85	395.90	10/27/2015	NA	22.57	375.28	16.91	380.94
Additional Nature and Extent Monitoring Wells	R-P-01S	831422.3	890858.9	387.62	385.69	12/3/2012	NA	NA	NA	NA	NA
	R-P-03D	831686.3	890369.8	391.65	389.34	12/11/2013	NA	NA	NA	NA	NA
	R-P-03S	831690.9	890352.1	391.68	389.48	11/30/2012	NA	NA	NA	NA	NA
	R-P-05I	832295.4	889756.1	390.07	387.87	12/11/2013	NA	NA	NA	NA	NA
	R-P-05S	832317.6	889749.7	392.50	390.05	12/5/2012	NA	NA	NA	NA	NA
	R-P-08D	833687.5	888715.1	404.61	401.77	12/11/2013	6/28/2019	NA	NA	NA	NA
	R-P-08S	833692.6	888711.1	404.79	402.03	11/30/2012	6/29/2019	NA	NA	NA	NA
	R-P-10S	834545.1	888099.0	407.23	404.83	12/4/2012	NA	NA	NA	NA	NA
	R-P-13D	834992.6	889105.8	410.40	408.52	12/6/2013	6/28/2019	NA	NA	NA	NA
	R-P-13I	834995.2	889110.6	410.52	408.57	12/7/2013	6/28/2019	NA	NA	NA	NA
	R-P-13S	835005.5	889108.3	411.62	409.25	12/11/2012	6/28/2019	NA	NA	NA	NA
	R-P-17D	834718.8	890158.3	395.56	392.62	9/6/2013	NA	NA	NA	NA	NA
	R-P-17I	834744.2	890148.9	394.86	392.53	12/10/2013	NA	NA	NA	NA	NA
	R-P-17S	834736.7	890152.8	394.65	392.49	11/27/2012	NA	NA	NA	NA	NA
	R-P-19D	833915.6	890552.2	392.08	390.31	12/10/2013	NA	NA	NA	NA	NA
	R-P-19I	833911.3	890550.6	392.75	390.24	12/10/2013	NA	NA	NA	NA	NA
	R-P-19S	833919.0	890546.4	393.31	390.58	11/27/2012	NA	NA	NA	NA	NA
	R-P-21D	832902.9	891031.2	393.39	391.04	12/9/2013	NA	NA	NA	NA	NA
	R-P-21I	832904.2	891027.0	393.53	391.19	12/9/2013	NA	NA	NA	NA	NA
	R-P-21S	832898.0	891024.7	393.87	391.45	11/28/2012	NA	NA	NA	NA	NA
	R-P-22D	832278.2	891018.7	393.76	391.63	12/7/2013	NA	NA	NA	NA	NA
	R-P-22I	832272.1	891018.0	393.52	391.59	12/8/2013	NA	NA	NA	NA	NA
	R-P-22S	832277.0	891007.6	394.30	392.15	11/29/2012	NA	NA	NA	NA	NA
	R-P-29D	837804.9	885389.1	398.27	396.23	12/11/2013	NA	NA	NA	NA	NA
	R-P-29S	837797.9	885383.8	399.11	397.02	1/7/2013	NA	NA	NA	NA	NA
	R-P-30S	836606.9	889007.8	407.75	407.98	1/16/2013	NA	NA	NA	NA	NA
	R-P-31S	835629.4	887488.1	408.68	406.08	12/10/2012	NA	NA	NA	NA	NA
RCPA Wells	P-27S	834319.5	888680.9	413.232	410.332	12/13/2012	6/28/2019	NA	NA	NA	NA
	P-28S	834788.3	889594.3	413.34	410.86	12/12/2012	6/28/2019	NA	NA	NA	NA
Pond Gauge	Pond Gauge	832669	890873	NA	NA	NA	NA	NA	397.0	NA	396.5
River Level	Mississippi River	888823	837705	NA	NA	NA	NA	NA	372.09	NA	382.23

Notes:
1.) CCR - Coal Combustion Residuals.
2.) DTW - Depth to water measured in feet below top of casing.
3.) GWE - Groundwater elevation measured in feet above mean sea level.
4.) MSL - Feet above mean sea level.
5.) NA - Not Applicable.
6.) Horizontal Datum: State Plane Coordinates NAD83 (2000) Missouri East Zone feet.
7.) Vertical Datum: NAVD88 feet.
8.) Mississippi River gauge elevation provided by Ameren.
9.) Mississippi River gauge and pond gauge locations are estimated.

Prepared By: EMS
Checked By: KAB
Reviewed By: MNH

Table 1
Groundwater Elevation Measurements
Rush Island Energy Center
Jefferson County, Missouri

	Well ID	7/14/2016		9/6/2016		11/15/2016		1/19/2017		3/6/2017		6/8/2017	
		DTW	GWE	DTW	GWE	DTW	GWE	DTW	GWE	DTW	GWE	DTW	GWE
CCR Rule Groundwater Monitoring Wells	R-MW-1	22.09	373.43	17.52	378.00	24.97	370.55	25.79	369.73	20.35	375.17	8.48	387.04
	R-MW-2	20.80	373.07	15.10	378.77	23.64	370.23	23.97	369.90	18.74	375.13	7.13	386.74
	R-MW-3	18.70	372.68	12.89	378.49	21.51	369.87	21.73	369.65	16.37	375.01	4.87	386.51
	R-MW-4	19.67	373.11	14.16	378.62	22.44	370.34	23.20	369.58	17.78	375.00	6.19	386.59
	R-MW-5	16.54	373.82	11.29	379.07	19.27	371.09	19.99	370.37	14.96	375.40	3.52	386.84
	R-MW-6	27.78	374.93	23.35	379.36	30.46	372.25	30.52	372.19	26.52	376.19	15.71	387.00
	R-MW-7	32.86	375.09	28.33	379.62	35.90	372.05	38.11	369.84	32.86	375.09	20.33	387.62
	R-MW-7-R	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-MW-B1	37.20	374.41	32.50	379.11	40.15	371.46	42.41	369.20	36.88	374.73	24.34	387.27
	R-MW-B2	22.20	375.65	17.79	380.06	25.00	372.85	28.44	369.41	22.95	374.90	10.45	387.40
Additional Nature and Extent Monitoring Wells	R-P-01S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-03D	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-03S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-05I	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-05S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-08D	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-08S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-10S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-13D	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-13I	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-13S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-17D	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-17I	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-17S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-19D	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-19I	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-19S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-21D	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-21I	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-21S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-22D	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-22I	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-22S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-29D	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-29S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-30S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-31S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
RCPA Wells	P-27S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	P-28S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pond Gauge	Pond Gauge	NA	397.0	NA	397.0	NA	396.5	NA	398.5	NA	398.5	NA	399.2
River Level	Mississippi River	NA	371.84	NA	380.61	NA	371.92	NA	371.33	NA	377.01	NA	386.60

Notes:
1.) CCR - Coal Combustion Residuals.
2.) DTW - Depth to water measured in feet below top of casing.
3.) GWE - Groundwater elevation measured in feet above mean sea level.
4.) MSL - Feet above mean sea level.
5.) NA - Not Applicable.
6.) Horizontal Datum: State Plane Coordinates NAD83 (2000) Missouri East Zone feet.
7.) Vertical Datum: NAVD88 feet.
8.) Mississippi River gauge elevation provided by Ameren.
9.) Mississippi River gauge and pond gauge locations are estimated.

Prepared By: EMS
Checked By: KAB
Reviewed By: MNH

Table 1
Groundwater Elevation Measurements
Rush Island Energy Center
Jefferson County, Missouri

	Well ID	11/9/2017		1/10/2018		4/2/2018		5/24/2018		6/22/2018		7/19/2018		8/20/2018	
		DTW	GWE	DTW	GWE	DTW	GWE	DTW	GWE	DTW	GWE	DTW	GWE	DTW	GWE
CCR Rule Groundwater Monitoring Wells	R-MW-1	26.28	369.24	35.91	359.61	15.40	380.12	11.53	383.99	17.45	378.07	17.03	378.49	24.98	370.54
	R-MW-2	24.98	368.89	33.42	360.45	13.87	380.00	9.96	383.91	15.95	377.92	15.73	378.14	23.53	370.34
	R-MW-3	22.88	368.50	31.38	360.00	11.55	379.83	7.53	383.85	13.60	377.78	13.53	377.85	21.30	370.08
	R-MW-4	23.73	369.05	32.30	360.48	12.89	379.89	9.10	383.68	14.98	377.80	14.64	378.14	22.35	370.43
	R-MW-5	20.57	369.79	28.93	361.43	10.86	379.50	6.40	383.96	12.25	378.11	11.78	378.58	19.27	371.09
	R-MW-6	32.07	370.64	40.26	362.45	20.84	381.87	18.27	384.44	24.50	378.21	24.29	378.42	30.35	372.36
	R-MW-7	37.39	370.56	45.28	362.67	27.62	380.33	24.33	383.62	29.64	378.31	28.23	379.72	36.48	371.47
	R-MW-7-R	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-MW-B1	41.55	370.06	51.69	359.92	31.50	380.11	28.01	383.60	33.50	378.11	31.81	379.80	40.51	371.10
	R-MW-B2	26.94	370.91	35.44	362.41	17.80	380.05	14.55	383.30	19.59	378.26	17.10	380.75	29.50	368.35
Additional Nature and Extent Monitoring Wells	R-P-01S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-03D	NA	NA	NA	NA	NA	NA	7.81	383.84	13.50	378.15	13.05	378.60	20.61	371.04
	R-P-03S	NA	NA	NA	NA	NA	NA	7.80	383.88	13.50	378.18	13.01	378.67	20.52	371.16
	R-P-05I	NA	NA	NA	NA	NA	NA	5.83	384.24	11.69	378.38	11.16	378.91	18.63	371.44
	R-P-05S	NA	NA	NA	NA	NA	NA	8.25	384.25	14.09	378.41	13.71	378.79	20.87	371.63
	R-P-08D	NA	NA	NA	NA	NA	NA	20.58	384.03	26.25	378.36	25.07	379.54	32.97	371.64
	R-P-08S	NA	NA	NA	NA	NA	NA	20.74	384.05	25.87	378.92	23.69	381.10	30.66	374.13
	R-P-10S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-13D	NA	NA	NA	NA	NA	NA	26.59	383.81	32.25	378.15	31.21	379.19	39.42	370.98
	R-P-13I	NA	NA	NA	NA	NA	NA	26.63	383.89	32.30	378.22	31.25	379.27	39.42	371.10
	R-P-13S	NA	NA	NA	NA	NA	NA	27.77	383.85	33.40	378.22	32.26	379.36	40.47	371.15
	R-P-17D	NA	NA	NA	NA	NA	NA	11.43	384.13	17.44	378.12	17.19	378.37	25.03	370.53
	R-P-17I	NA	NA	NA	NA	NA	NA	12.06	382.80	16.72	378.14	16.44	378.42	24.28	370.58
	R-P-17S	NA	NA	NA	NA	NA	NA	10.71	383.94	15.75	378.90	14.24	380.41	18.65	376.00
	R-P-19D	NA	NA	NA	NA	NA	NA	8.46	383.62	14.50	377.58	14.32	377.76	22.10	369.98
	R-P-19I	NA	NA	NA	NA	NA	NA	8.11	384.64	14.14	378.61	13.94	378.81	21.72	371.03
	R-P-19S	NA	NA	NA	NA	NA	NA	9.67	383.64	15.32	377.99	14.86	378.45	22.68	370.63
	R-P-21D	NA	NA	NA	NA	NA	NA	9.39	384.00	15.48	377.91	15.38	378.01	23.16	370.23
	R-P-21I	NA	NA	NA	NA	NA	NA	9.43	384.10	15.51	378.02	15.41	378.12	23.20	370.33
	R-P-21S	NA	NA	NA	NA	NA	NA	10.24	383.63	16.07	377.80	16.77	377.10	23.48	370.39
	R-P-22D	NA	NA	NA	NA	NA	NA	9.86	383.90	15.84	377.92	15.61	378.15	23.46	370.30
	R-P-22I	NA	NA	NA	NA	NA	NA	9.66	383.86	15.67	377.85	15.44	378.08	23.27	370.25
	R-P-22S	NA	NA	NA	NA	NA	NA	10.46	383.84	16.39	377.91	15.93	378.37	23.89	370.41
	R-P-29D	NA	NA	NA	NA	NA	NA	14.73	383.54	19.76	378.51	17.28	380.99	25.68	372.59
	R-P-29S	NA	NA	NA	NA	NA	NA	16.42	382.69	20.52	378.59	17.63	381.48	24.35	374.76
	R-P-30S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	R-P-31S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
RCPA Wells	P-27S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	P-28S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pond Gauge	Pond Gauge	NA	397.1	NA	388.5	NA	398.0	NA	398.0	NA	396.0	NA	394.0	NA	394.0
River Level	Mississippi River	NA	369.56	NA	361.22	NA	380.94	NA	385.38	NA	379.40	NA	379.41	NA	371.69

Notes:
1.) CCR - Coal Combustion Residuals.
2.) DTW - Depth to water measured in feet below top of casing.
3.) GWE - Groundwater elevation measured in feet above mean sea level.
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5.) NA - Not Applicable.
6.) Horizontal Datum: State Plane Coordinates NAD83 (2000) Missouri East Zone feet.
7.) Vertical Datum: NAVD88 feet.
8.) Mississippi River gauge elevation provided by Ameren.
9.) Mississippi River gauge and pond gauge locations are estimated.

Prepared By: EMS
Checked By: KAB
Reviewed By: MNH

Table 1
Groundwater Elevation Measurements
Rush Island Energy Center
Jefferson County, Missouri

	Well ID	9/25/2018		11/1/2018		12/05/2018		1/4/2019		2/25/2019		7/29/2019		09/30/2019	
		DTW	GWE	DTW	GWE	DTW	GWE	DTW	GWE	DTW	GWE	DTW	GWE	DTW	GWE
CCR Rule Groundwater Monitoring Wells	R-MW-1	17.35	378.17	11.61	383.91	11.81	383.71	10.07	385.45	16.19	379.33	8.75	386.77	11.24	384.28
	R-MW-2	16.07	377.80	10.31	383.56	10.19	383.68	8.49	385.38	14.91	378.96	7.41	386.46	9.67	384.20
	R-MW-3	13.87	377.51	8.04	383.34	7.79	383.59	6.08	385.30	12.19	379.19	5.19	386.19	7.48	383.90
	R-MW-4	12.94	379.84	9.29	383.49	9.71	383.07	7.51	385.27	13.63	379.15	6.47	386.31	9.03	383.75
	R-MW-5	12.06	378.30	6.54	383.82	7.24	383.12	4.87	385.49	10.83	379.53	3.77	386.59	6.54	383.82
	R-MW-6	23.56	379.15	18.29	384.42	19.46	383.25	17.11	385.60	21.62	381.09	16.03	386.68	18.91	383.80
	R-MW-7	28.33	379.62	23.48	384.47	25.23	382.72	22.82	385.13	28.89	379.06	NA	NA	NA	NA
	R-MW-7-R	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	24.09	384.13
	R-MW-B1	32.01	379.60	27.21	384.40	28.69	382.92	26.24	385.37	32.10	379.51	24.62	386.99	27.29	384.32
	R-MW-B2	16.69	381.16	12.36	385.49	15.07	382.78	12.23	385.62	17.09	380.76	10.58	387.27	14.26	383.59
Additional Nature and Extent Monitoring Wells	R-P-01S	NA	NA	3.74	383.88	4.68	382.94	2.24	385.38	NA	NA	NA	NA	3.44	384.18
	R-P-03D	13.33	378.32	7.75	383.90	8.36	383.29	6.04	385.61	NA	NA	3.04	388.61	7.66	383.99
	R-P-03S	12.52	379.16	7.65	384.03	8.54	383.14	6.10	385.58	NA	NA	6.72	384.96	8.21	383.47
	R-P-05I	11.41	378.66	5.95	384.12	6.67	383.40	4.31	385.76	NA	NA	3.22	386.85	5.97	384.10
	R-P-05S	12.81	379.69	8.34	384.16	9.12	383.38	6.69	385.81	NA	NA	4.91	387.59	8.42	384.08
	R-P-08D	25.22	379.39	20.04	384.57	21.61	383.00	19.01	385.60	NA	NA	NA	NA	NA	NA
	R-P-08S	22.65	382.14	18.33	386.46	21.95	382.84	19.57	385.22	NA	NA	NA	NA	NA	NA
	R-P-10S	NA	NA	22.16	385.07	24.39	382.84	21.37	385.86	NA	NA	19.46	387.77	22.86	384.37
	R-P-13D	31.46	378.94	26.21	384.19	27.24	383.16	25.04	385.36	NA	NA	NA	NA	NA	NA
	R-P-13I	31.36	379.16	26.11	384.41	27.33	383.19	25.08	385.44	NA	NA	NA	NA	NA	NA
	R-P-13S	32.44	379.18	27.26	384.36	28.46	383.16	26.28	385.34	NA	NA	NA	NA	NA	NA
	R-P-17D	17.51	378.05	11.77	383.79	11.61	383.95	9.96	385.60	NA	NA	7.91	387.65	11.17	384.39
	R-P-17I	14.16	380.70	11.03	383.83	11.00	383.86	9.29	385.57	NA	NA	8.10	386.76	10.49	384.37
	R-P-17S	16.79	377.86	6.96	387.69	10.96	383.69	10.48	384.17	NA	NA	6.76	387.89	12.76	381.89
	R-P-19D	14.68	377.40	8.89	383.19	9.70	382.38	7.01	385.07	NA	NA	5.95	386.13	8.31	383.77
	R-P-19I	14.30	378.45	8.51	384.24	8.37	384.38	6.66	386.09	NA	NA	5.56	387.19	7.95	384.80
	R-P-19S	15.21	378.10	9.10	384.21	9.94	383.37	8.15	385.16	NA	NA	6.49	386.82	9.40	383.91
	R-P-21D	15.73	377.66	9.93	383.46	9.63	383.76	7.89	385.50	NA	NA	7.02	386.37	9.36	384.03
	R-P-21I	15.74	377.79	9.95	383.58	9.68	383.85	7.94	385.59	NA	NA	7.04	386.49	9.39	384.14
	R-P-21S	16.02	377.85	9.91	383.96	10.59	383.28	8.73	385.14	NA	NA	7.27	386.60	10.21	383.66
	R-P-22D	15.93	377.83	10.26	383.50	10.25	383.51	8.33	385.43	NA	NA	7.43	386.33	9.84	383.92
	R-P-22I	15.75	377.77	10.03	383.49	10.11	383.41	8.15	385.37	NA	NA	7.15	386.37	9.66	383.86
	R-P-22S	16.19	378.11	10.60	383.70	11.12	383.18	9.01	385.29	NA	NA	7.85	386.45	10.53	383.77
	R-P-29D	16.86	381.41	12.54	385.73	15.23	383.04	12.39	385.88	NA	NA	10.75	387.52	14.31	383.96
	R-P-29S	16.72	382.39	13.36	385.75	16.08	383.03	13.65	385.46	NA	NA	11.65	387.46	16.29	382.82
	R-P-30S	NA	NA	25.20	382.55	24.53	383.22	22.60	385.15	NA	NA	20.66	387.09	23.53	384.22
	R-P-31S	NA	NA	22.31	386.37	25.38	383.30	22.48	386.20	NA	NA	19.82	388.86	23.00	385.68
RCPA Wells	P-27S	NA	NA	15.85	397.38	18.87	394.36	18.09	395.14	NA	NA	NA	NA	NA	NA
	P-28S	NA	NA	21.35	391.99	23.8	389.54	25.51	387.83	NA	NA	NA	NA	NA	NA
Pond Gauge	Pond Gauge	NA	394.0	NA	394.0	NA	394.5	NA	394.0	NA	390.5	NA	387.0	NA	386.0
River Level	Mississippi River	NA	379.09	NA	384.79	NA	385.29	NA	386.72	NA	380.56	NA	387.97	NA	385.83

Notes:
1.) CCR - Coal Combustion Residuals.
2.) DTW - Depth to water measured in feet below top of casing.
3.) GWE - Groundwater elevation measured in feet above mean sea level.
4.) MSL - Feet above mean sea level.
5.) NA - Not Applicable.
6.) Horizontal Datum: State Plane Coordinates NAD83 (2000) Missouri East Zone feet.
7.) Vertical Datum: NAVD88 feet.
8.) Mississippi River gauge elevation provided by Ameren.
9.) Mississippi River gauge and pond gauge locations are estimated.

Prepared By: EMS
Checked By: KAB
Reviewed By: MNH

Table 2
Generalized Hydraulic Properties of Uppermost Aquifer
Rush Island Energy Center
Jefferson County, Missouri

Baseline Sampling Event Date	Average Groundwater Flow Direction (Azimuth)	Estimated Hydraulic Gradient (Feet/Foot)	Hydraulic Conductivity (Feet/Day)	Mean Hydraulic Conductivity (Cm/Sec)	Estimated Effective Porosity	Estimated Groundwater Velocity (Feet/Day)
3/10/2016	67	0.00061	54.7	1.9E-02	0.35	0.10
5/2/2016	279	0.00040	54.7	1.9E-02	0.35	0.06
7/14/2016	73	0.00079	54.7	1.9E-02	0.35	0.12
9/6/2016	67	0.00053	54.7	1.9E-02	0.35	0.08
11/15/2016	71	0.00083	54.7	1.9E-02	0.35	0.13
1/19/2017	39	0.00048	54.7	1.9E-02	0.35	0.07
3/6/2017	37	0.00022	54.7	1.9E-02	0.35	0.03
6/8/2017	96	0.00015	54.7	1.9E-02	0.35	0.02
11/9/2017	70	0.00069	54.7	1.9E-02	0.35	0.11
1/10/2018	57	0.00121	54.7	1.9E-02	0.35	0.19
4/2/2018	58	0.00023	54.7	1.9E-02	0.35	0.04
5/24/2018	342	0.00009	54.7	1.9E-02	0.35	0.01
6/22/2018	75	0.00013	54.7	1.9E-02	0.35	0.02
7/19/2018	88	0.00058	54.7	1.9E-02	0.35	0.09
8/20/2018	72	0.00042	54.7	1.9E-02	0.35	0.07
9/25/2018	75	0.00093	54.7	1.9E-02	0.35	0.14
11/1/2018	80	0.00047	54.7	1.9E-02	0.35	0.07
12/5/2018	241	0.00026	54.7	1.9E-02	0.35	0.04
1/4/2019	57	0.00018	54.7	1.9E-02	0.35	0.03
7/29/2019	98	0.00019	54.7	1.9E-02	0.35	0.03
9/30/2019	229	0.00004	54.7	1.9E-02	0.35	0.01

Estimated Results	
Resultant Groundwater Flow Direction (Azimuth)	65
Estimated Annual Net Groundwater Movement (Feet/Year)	20

Prepared By: JSI
Checked By: TJG
Reviewed By: MNH

Notes:
1. Azimuth and Hydraulic Gradient calculated using the spreadsheet tool from the 2005 report entitled "A Spreadsheet Method For Estimating Hydraulic Gradient With Heads From Multiple Wells" submitted to Ground Water" by J.F. Devlin.
2. Hydraulic conductivity value is the geometric mean of slug test results for the CCR compliance
3. An effective porosity of 0.35 was used based on grain size distributions and published values (Fetter 2000, Cohen 1953, and Johnson 1967).
4. Azimuth is measured clockwise in degrees from north.
5. Cm/Sec - centimeters per second.
6. Alluvial aquifer wells were used for the calculation.

Figures

LEGEND

- Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

0 1,000 2,000 3,000 4,000
Feet

NOTE(S)
1. ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.

REFERENCE(S)
1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

CONSULTANT
GOLDER

YYYY-MM-DD	2019-11-14
DESIGNED	JSI
PREPARED	JSI
REVIEWED	TJG
APPROVED	MNH

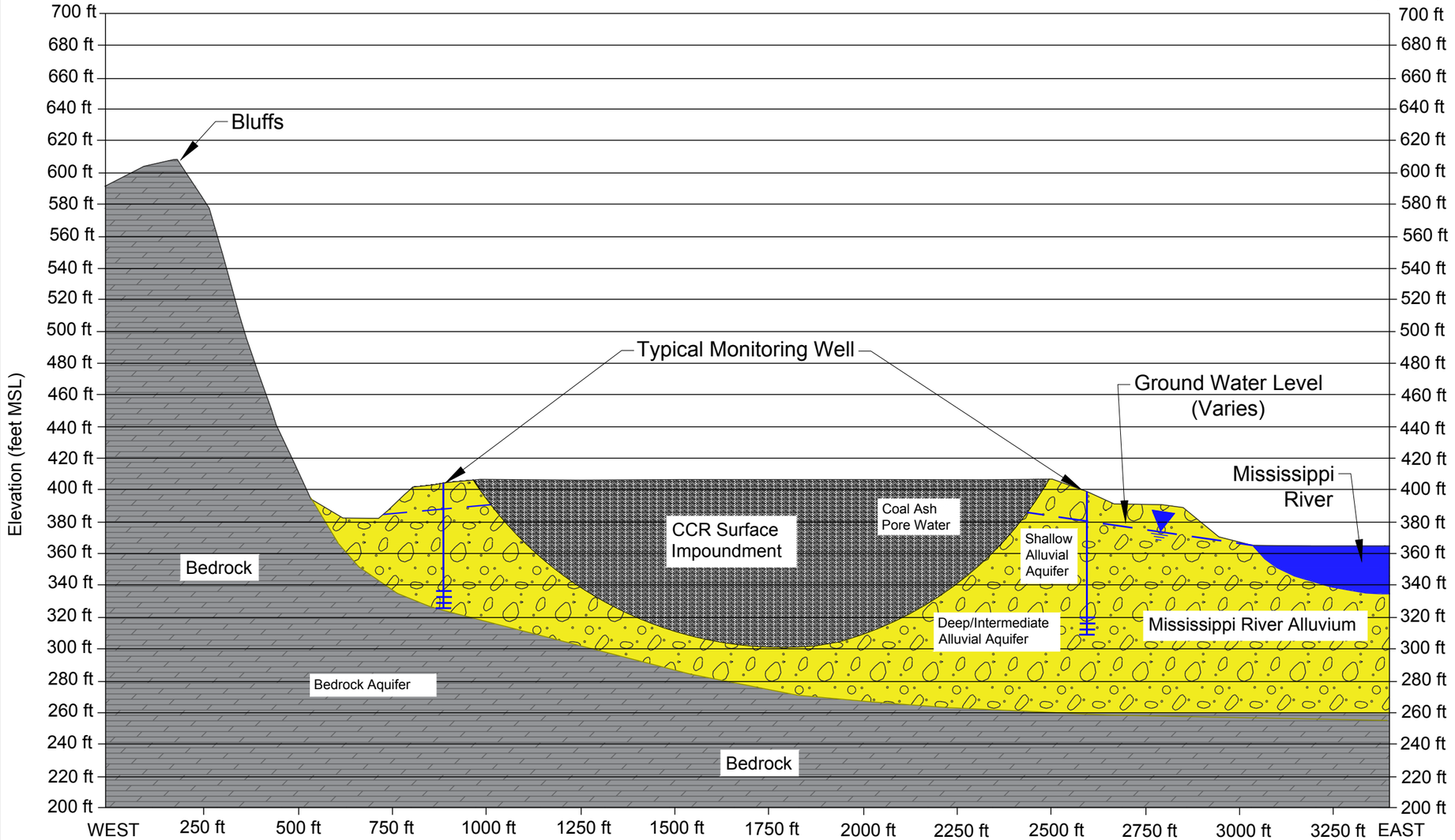
PROJECT
GROUNDWATER MONITORING PROGRAM

TITLE
SITE LOCATION MAP

PROJECT NO.	CONTROL	REV.	FIGURE
153140602	1240	AMEREN_00000389 0	1

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: ANSI B
1 in
0

Generalized Cross-Section



NOT TO SCALE

Overview Map

NOTES
1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) CROSS-SECTION BASED ON BORINGS AND PIEZOMETERS FROM NATURAL RESOURCE TECHNOLOGIES (NRT).
3.) CROSS-SECTION IS NOT TO SCALE AND IS ONLY A VISUAL REPRESENTATION OF THE SUBSURFACE GEOLOGY.
4.) MSL - MEAN SEA LEVEL.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) NRT 2014. RUSH ISLAND IMPOUNDMENT POND CLOSURE GROUNDWATER MONITORING AND SAMPLE PLAN.
3.) NRT 2014. PROPOSED UTILITY WASTE LANDFILL, BASELINE GROUNDWATER MONITORING PLAN. AMEREN MISSOURI RUSH ISLAND ENERGY CENTER.

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

CONSULTANT
GOLDER

YYYY-MM-DD	2015-07-17
DESIGNED	JSI
PREPARED	JSI
REVIEWED	MWD
APPROVED	MNH

PROJECT
GROUNDWATER MONITORING PROGRAM

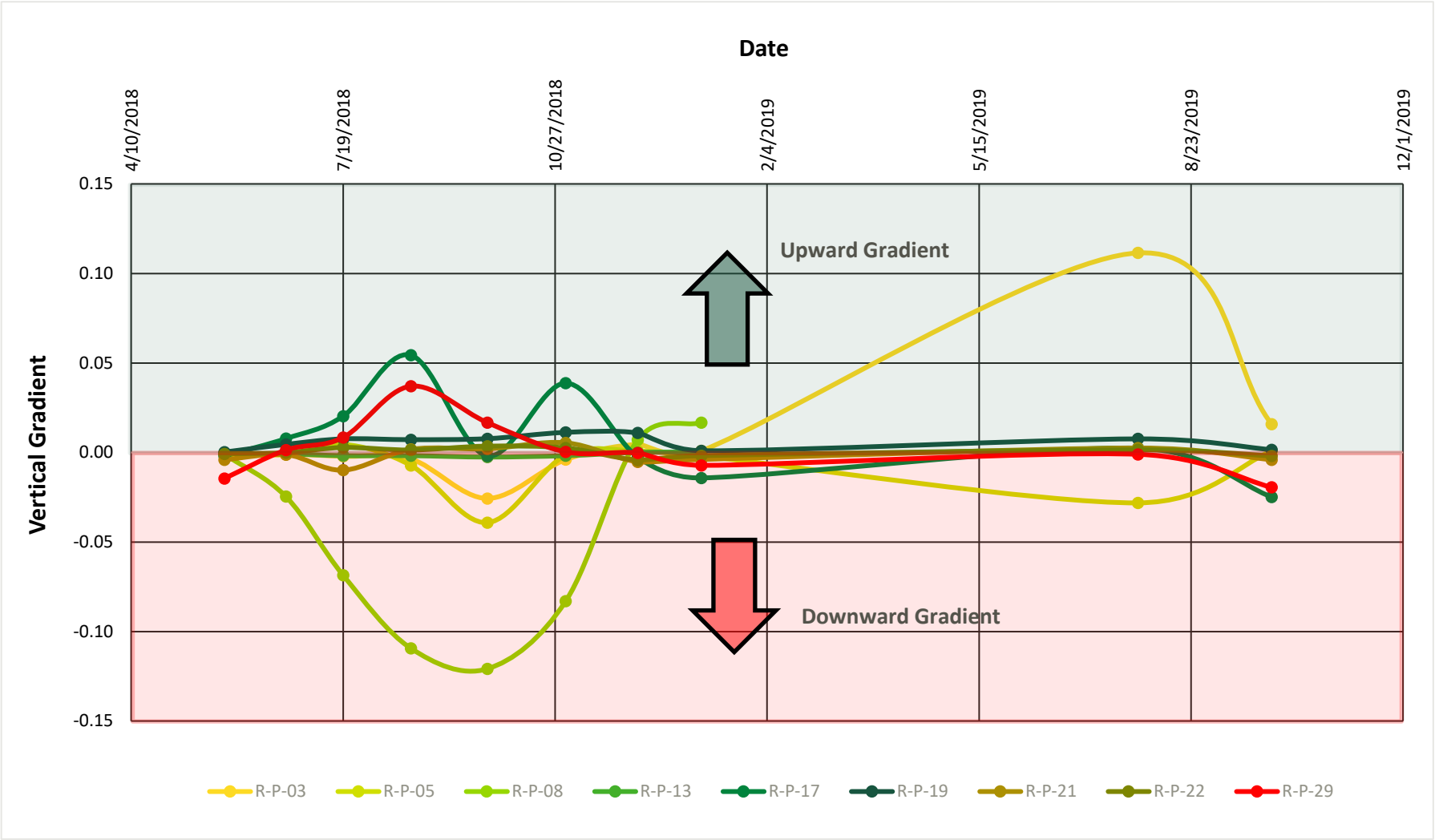
TITLE
GENERALIZED CROSS-SECTION

PROJECT NO. 153140602
Phase 0002
REV. 0.0
AMEREN_00000390
Figure 2

Path: \\atlouis\common\Projects\153 Projects\1531406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Figure 3 - Simplified Cross Section.dwg | File Name: Generalized Cross Section.dwg

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: ANSI B
1 in
0

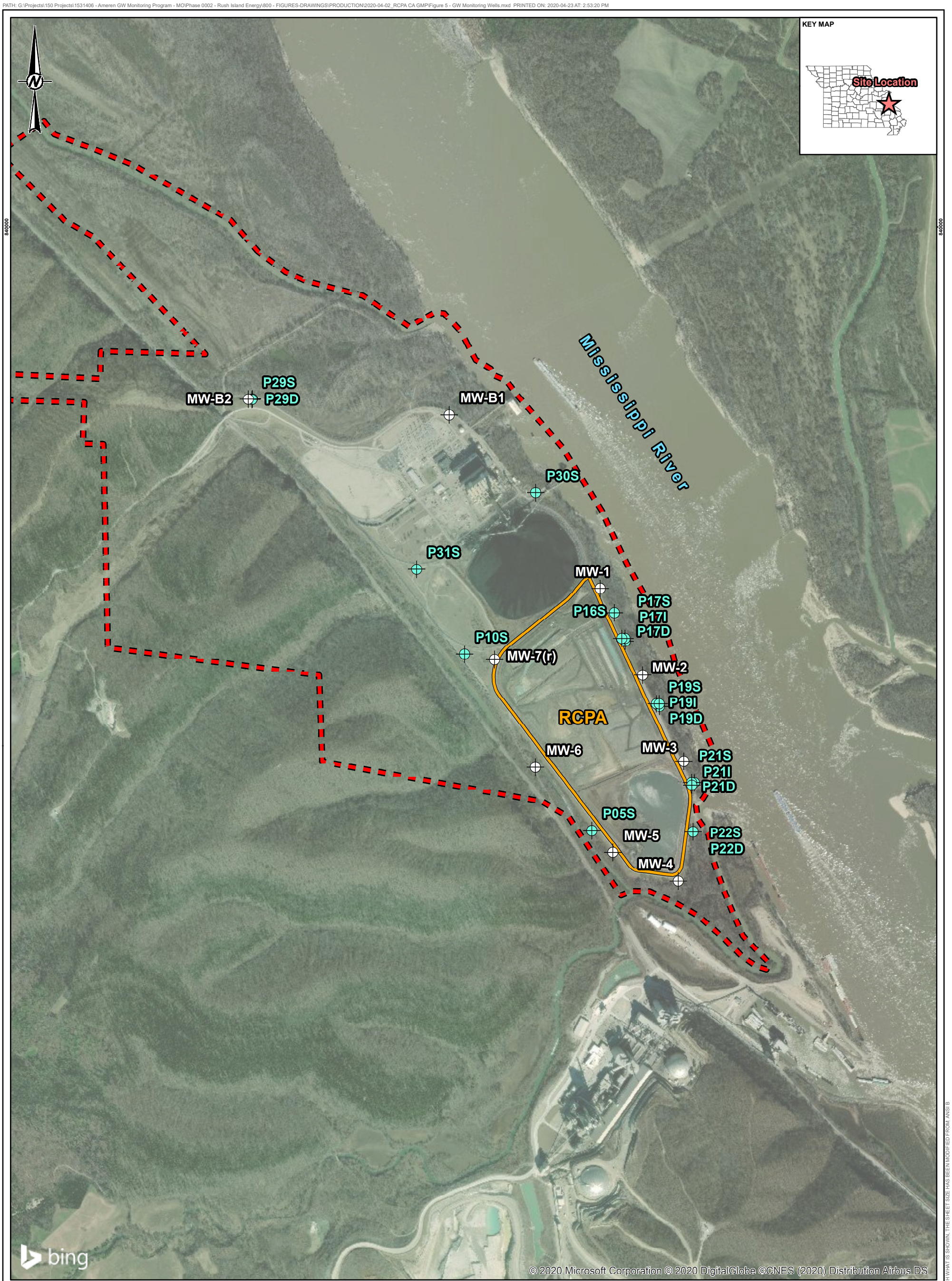
Figure 4: Vertical Gradients



Notes:
1) A positive gradient indicates upward flow and is in the green zone.
2) A negative gradient indicates downward flow and is in the red zone.
3) R-P-29 represents background conditions while all other well pairs represent conditions adjacent to the RCPA.

Prepared By: KAB
Checked By: AMM
Reviewed By:MNH

PATH: G:\Projects\150 Projects\1531406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\2020-04-02_RCPA CA GMP\Figure 5 - GW Monitoring Wells.mxd PRINTED ON: 2020-04-23 AT: 2:53:20 PM



LEGEND

- Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Monitoring Well Networks

- Corrective Action Monitoring Well Network
- RCPA Assessment Monitoring Well Network

0 1,000 2,000 3,000 4,000
Feet

NOTE(S)
1. ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.

REFERENCE(S)
1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

CONSULTANT
GOLDER

YYYY-MM-DD	2020-04-02
DESIGNED	JSI
PREPARED	JSI
REVIEWED	BTT
APPROVED	CMR

PROJECT
GROUNDWATER MONITORING PROGRAM

TITLE
RUSH ISLAND ENERGY CENTER GROUNDWATER MONITORING PROGRAMS MONITORING WELL LOCATION MAP

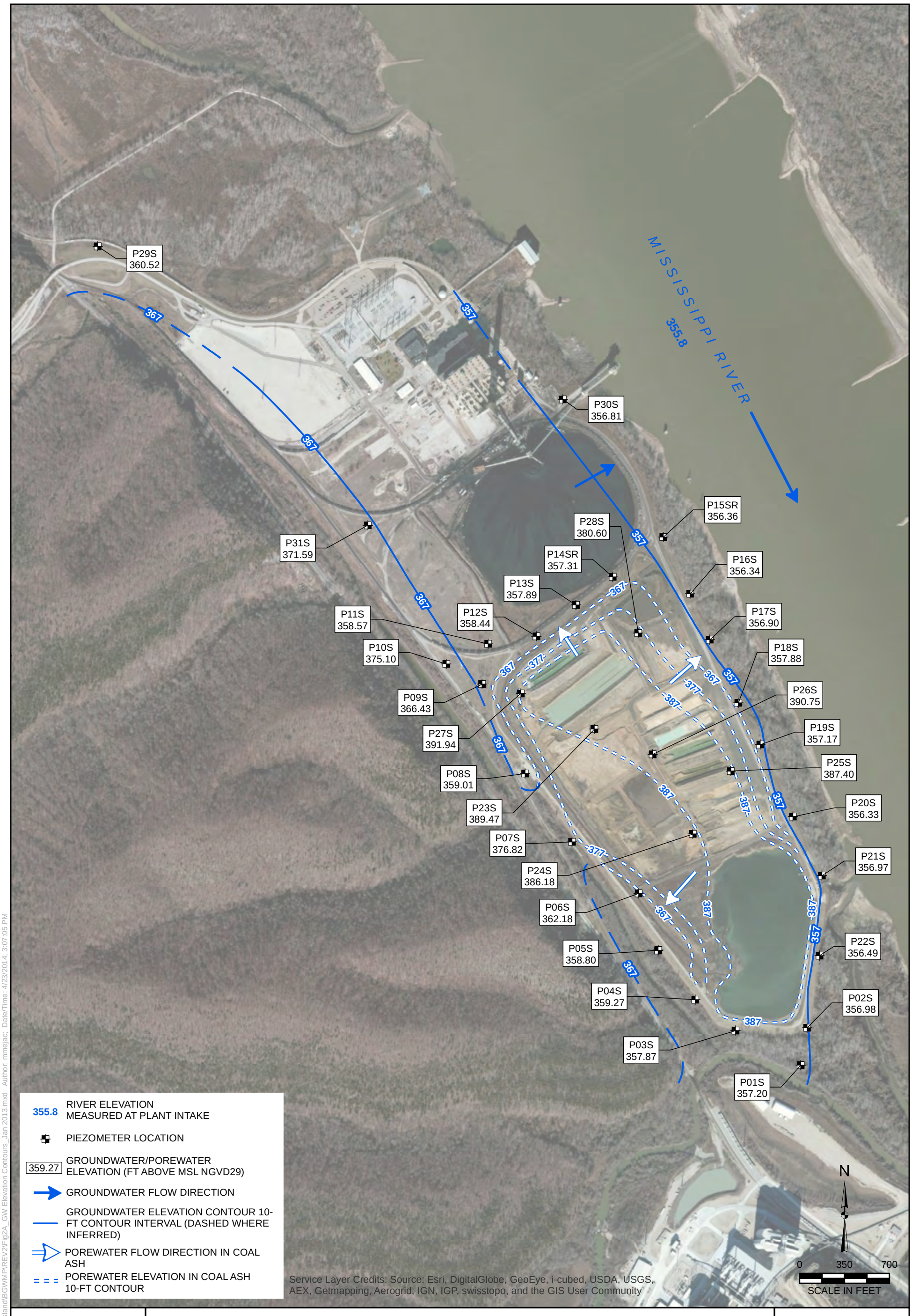
PROJECT NO.	CONTROL	REV.	FIGURE
153140602	1240	1	5

AMEREN_00000392

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: ANSI B
1 in
0

APPENDIX A

Non CCR Rule Program Potentiometric Surface Maps



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MDM 4/8/14
REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
COAL ASH AND SHALLOW ALLUVIUM JANUARY 25, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWP
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 2A

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000394

Y:\GIS\Projects\2012072MXD\Rush Island\BGWMP\REV2\Fig2A_GW Elevation Contours_Jan 2013.mxd Author: mmejac; Date/Time: 4/23/2014, 3:07:05 PM

MISSISSIPPI RIVER
355.8

P28D
(357.22)

P23D
357.98

P26D
357.19

P25D
(356.74)

P24D
357.20

357.8

357.2

355.8 RIVER ELEVATION
MEASURED AT PLANT INTAKE

PIEZOMETER LOCATION

359.27 GROUNDWATER/POREWATER
ELEVATION (FT ABOVE MSL NGVD29)

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR

NOTE:
LOCATIONS P25D AND P28D NOT INCLUDED FOR GROUNDWATER POTENTIOMETRIC SURFACE CONTOURS.

N

0 350 700
SCALE IN FEET

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Y:\GIS\Projects\20\2072\MXD\Rush Island\BGWMP\REV2\Fig2B_GW Pot Surface_Jan 2013.mxd Author: mmejac; Date/Time: 4/23/2014, 1:50:51 PM

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MDM 4/8/14
REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER POTENTIOMETRIC SURFACE
DEEP ALLUVIAL SAND JANUARY 25, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 2B

NATURAL RESOURCE TECHNOLOGY

P29S
362.45

P30S
362.93

P14SR
363.583

P13S
363.08

P31S
372.57

P12S
363.116

P15SR
363.17

P16S
362.999

P23S
390.999

P28S
381.17

P17S
363.288

P11S
362.842

P18S
364.098

P10S
376.258

P26S
396.983

P09S
376.823

P19S
363.491

P27S
390.262

P25S
390.258

P08S
364.209

P20S
363.067

P07S
378.466

P21S
363.233

P24S
392.239

P06S
369.403

P22S
363.233

P05S
364.913

P04S
365.263

P02S
363.451

P03S
364.154

P01S
363.409

MISSISSIPPI RIVER
362.8 ft

363
373
383
393

355.8 RIVER ELEVATION MEASURED AT PLANT INTAKE

PIEZOMETER LOCATION

359.27 GROUNDWATER/POREWATER ELEVATION (FT ABOVE MSL NGVD29)

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR 10-FT CONTOUR INTERVAL (DASHED WHERE INFERRED)

POREWATER FLOW DIRECTION IN COAL ASH

POREWATER ELEVATION IN COAL ASH 10-FT CONTOUR

N

0 350 700
SCALE IN FEET

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Y:\GIS\Projects\20\2072\MXD\Rush Island\BGWMP\REV2\Fig3A_GW Elevation Contours_Feb 2013.mxd Author: mmejac; Date/Time: 4/23/2014, 1:52:50 PM

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MDM 4/8/14
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BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
COAL ASH AND SHALLOW ALLUVIUM FEBRUARY 20, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 3A

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000396

MISSISSIPPI RIVER
362.8 ft

P28D
(363.25)

P23D
363.59

363.4
363.6
363.8

P26D
363.33

P25D
(363.08)

P24D
363.48

355.8 RIVER ELEVATION
MEASURED AT PLANT INTAKE

PIEZOMETER LOCATION

359.27 GROUNDWATER/POREWATER
ELEVATION (FT ABOVE MSL NGVD29)

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR

NOTE:
LOCATIONS P25D AND P28D NOT INCLUDED FOR GROUNDWATER POTENTIOMETRIC SURFACE CONTOURS.

N

0 350 700
SCALE IN FEET

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

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MDM 4/8/14
REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
DEEP ALLUVIAL SAND FEBRUARY 20, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 3B

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000397

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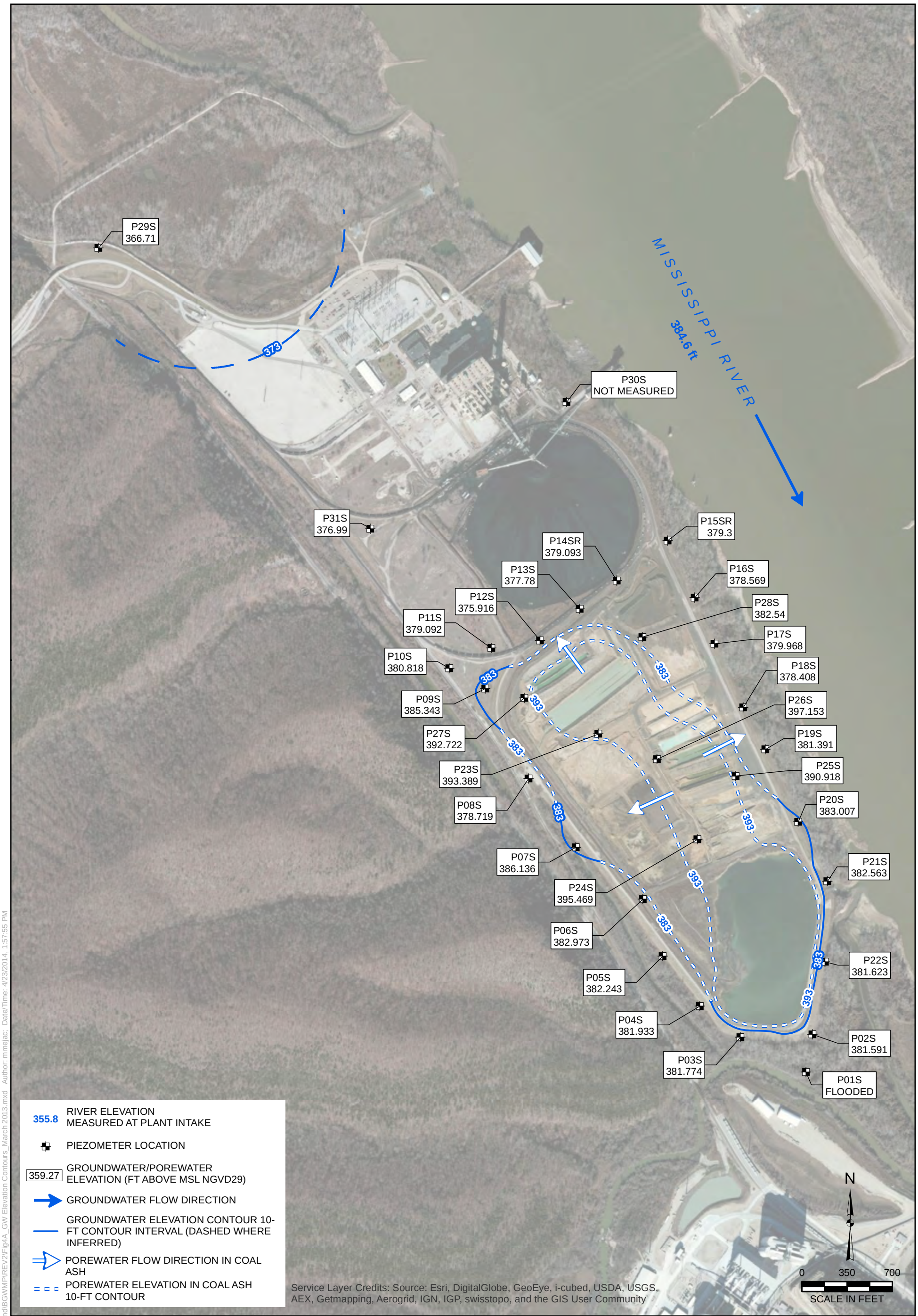

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REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
COAL ASH AND SHALLOW ALLUVIUM MARCH 15, 2013

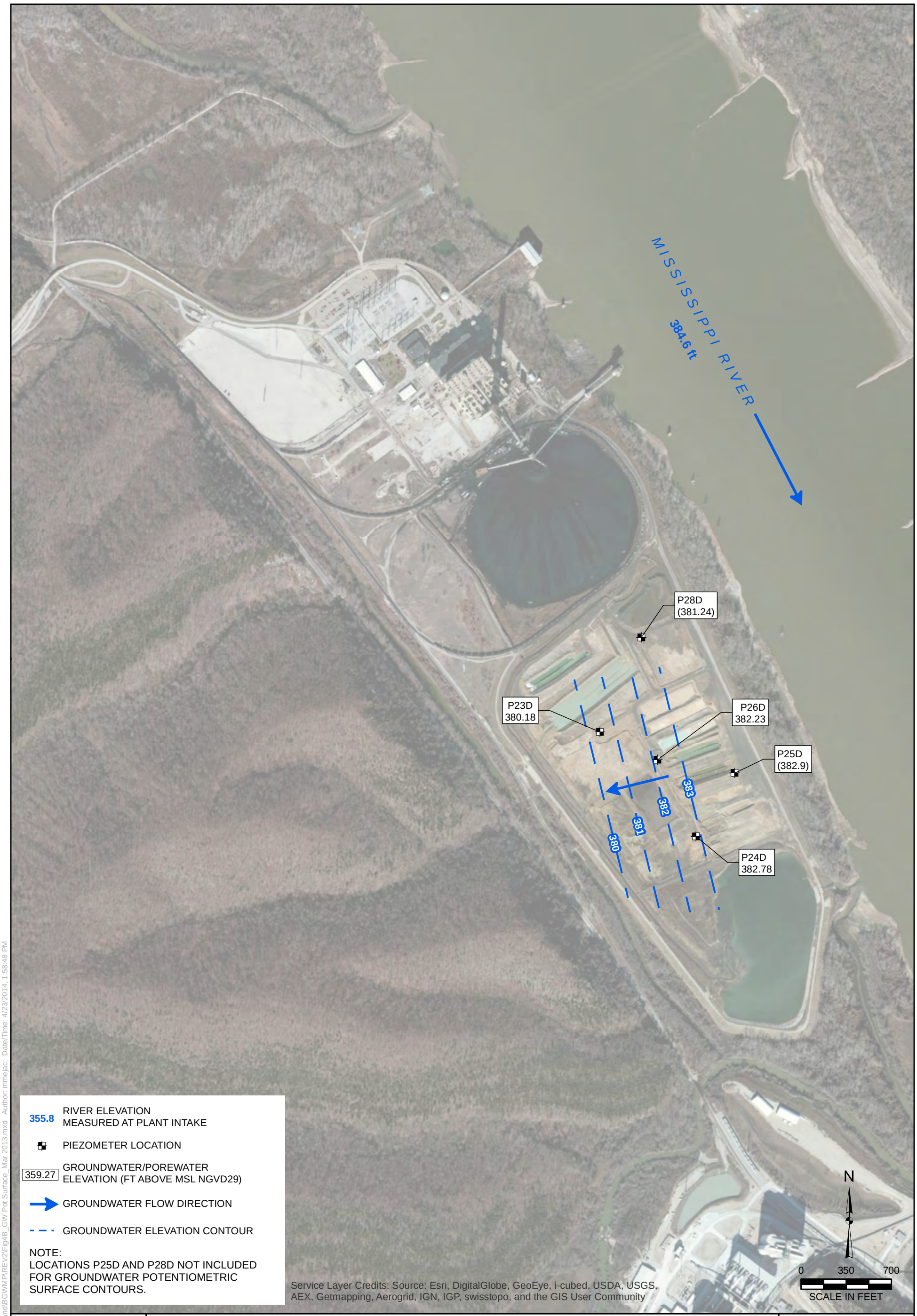
GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 4A

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000398



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MDM 4/8/14
REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
DEEP ALLUVIAL SAND MARCH 15, 2013

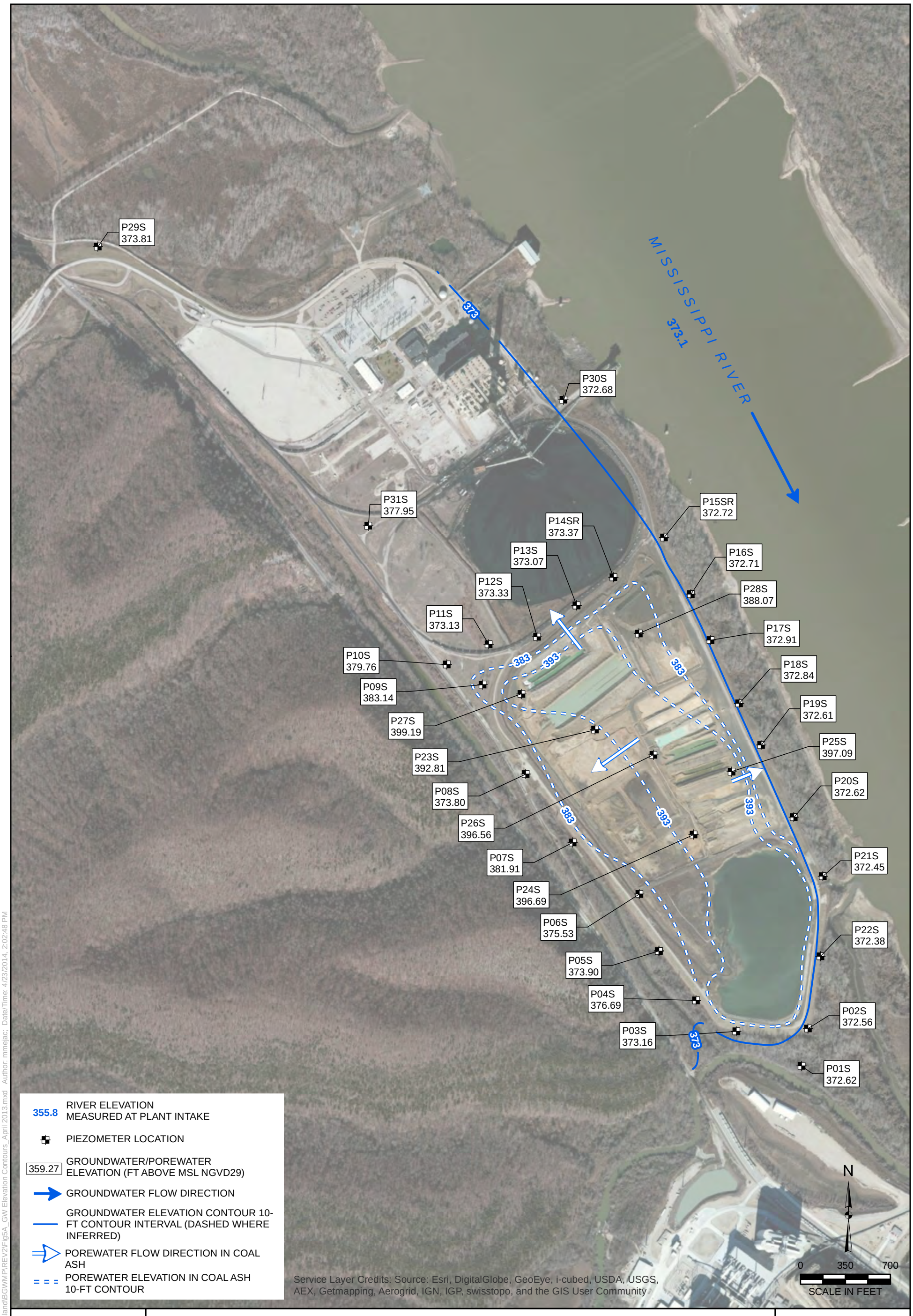
GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 4B

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000399



Y:\GIS\Projects\20\2072\MXD\Rush Island\BGWMP\REV2\Fig5A_GW Elevation Contours_April 2013.mxd Author: mmejac; Date/Time: 4/23/2014, 2:02:48 PM

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MDM 4/8/14
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BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
COAL ASH AND SHALLOW ALLUVIUM APRIL 4, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 5A

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000400

Y:\GIS\Projects\2012072\MXD\Rush Island\BGWMPREV2\Fig5B_GW Pot Surface_April 2013.mxd Author: mmejac; Date/Time: 4/23/2014, 2:04:31 PM

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MDM 4/8/14
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BRH 4/11/14

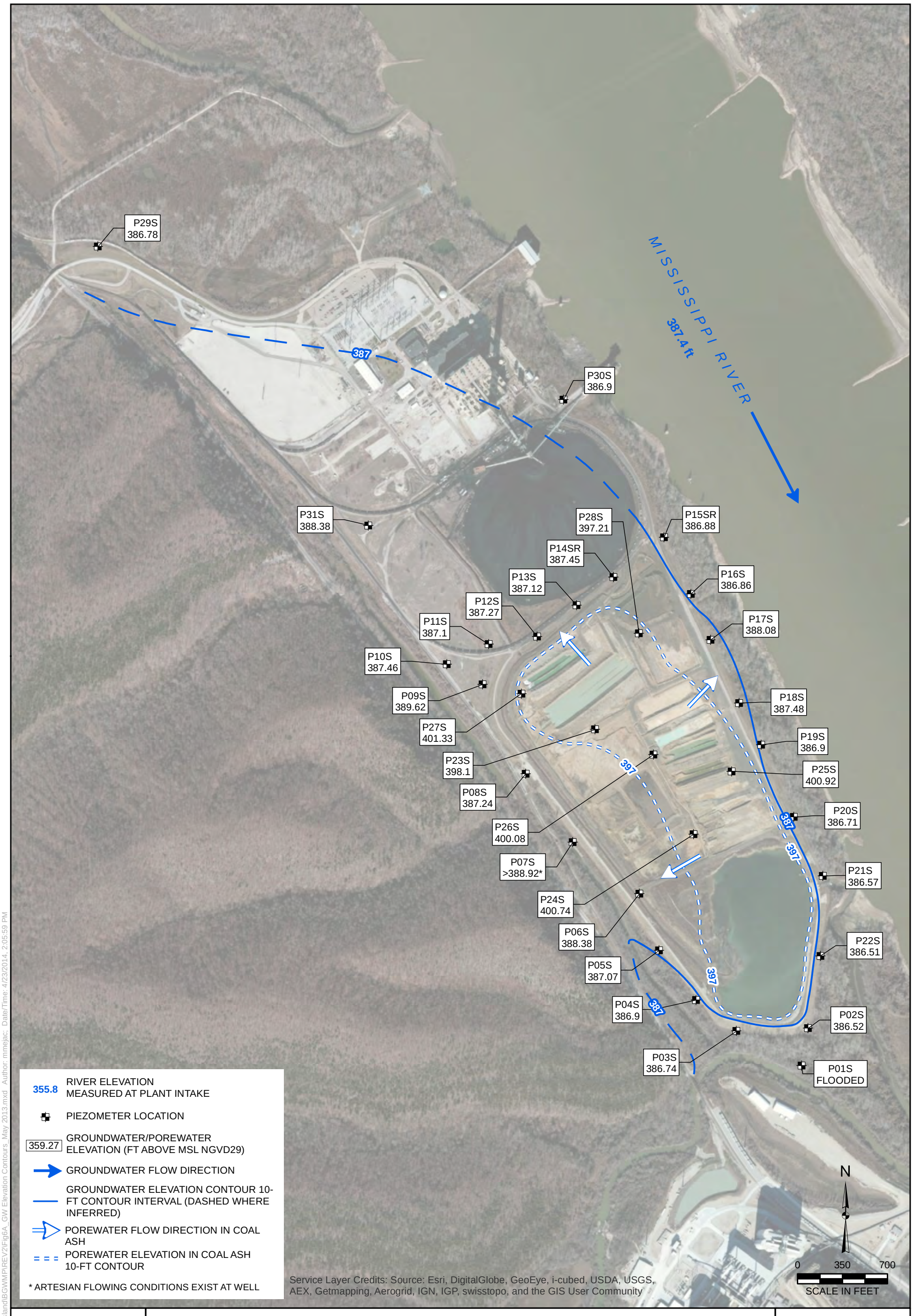
GROUNDWATER POTENTIOMETRIC SURFACE
DEEP ALLUVIAL SAND APRIL 4, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWP
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 5B

NATURAL RESOURCE TECHNOLOGY



DRAWN BY/DATE:
MDM 4/8/14
REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
COAL ASH AND SHALLOW ALLUVIUM MAY 23, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 6A

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000402

Y:\GIS\Projects\2072\MXD\Rush Island\BGWMP\REV2\Fig6A_GW Elevation Contours_May 2013.mxd Author: mmejac; Date/Time: 4/23/2014, 2:05:59 PM

MISSISSIPPI RIVER
387.4ft

P28D
(387.33)

387.2

P23D
387.19

P25D
(387.04)

387.15

P26D
387.17

P24D
387.15

355.8 RIVER ELEVATION MEASURED AT PLANT INTAKE

PIEZOMETER LOCATION

359.27 GROUNDWATER/POREWATER ELEVATION (FT ABOVE MSL NGVD29)

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR

NOTE:
LOCATIONS P25D AND P28D NOT INCLUDED FOR GROUNDWATER POTENTIOMETRIC SURFACE CONTOURS.

N

0 350 700
SCALE IN FEET

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Y:\GIS\Projects\20\2072MXD\Rush Island\BGWMP\REV2\Fig6B_GW Pot Surface_May 2013.mxd Author: mmejac; Date/Time: 4/23/2014, 2:06:46 PM

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MDM 4/8/14
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BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
DEEP ALLUVIAL SAND MAY 23, 2013

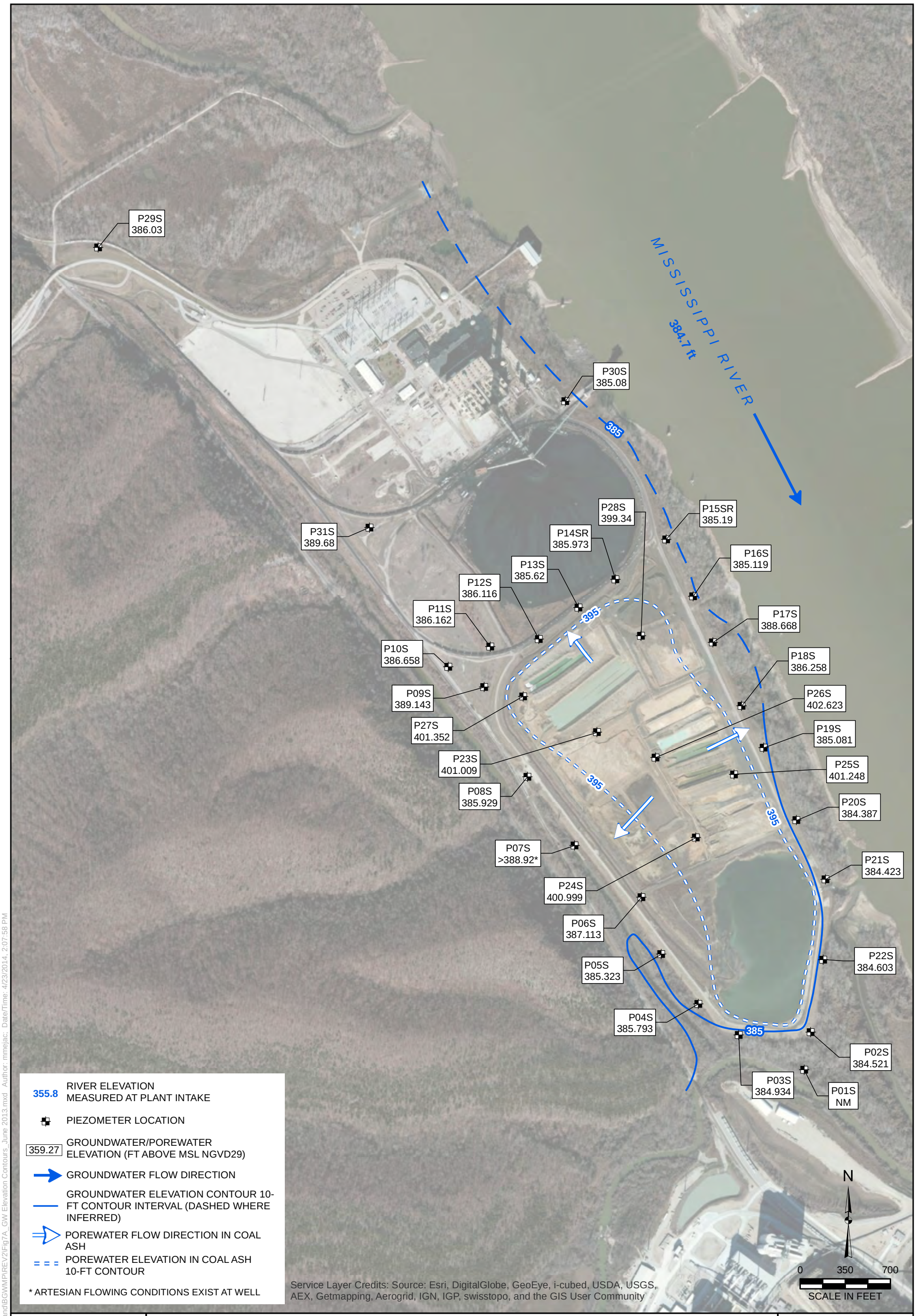
GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 6B

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000403



Y:\GIS\Projects\20\2072\MXD\Rush Island\BGWMP\REV2\Fig7A_GW Elevation Contours_June 2013.mxd Author: mmejac; Date/Time: 4/23/2014, 2:07:58 PM

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REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
COAL ASH AND SHALLOW ALLUVIUM JUNE 26, 2013

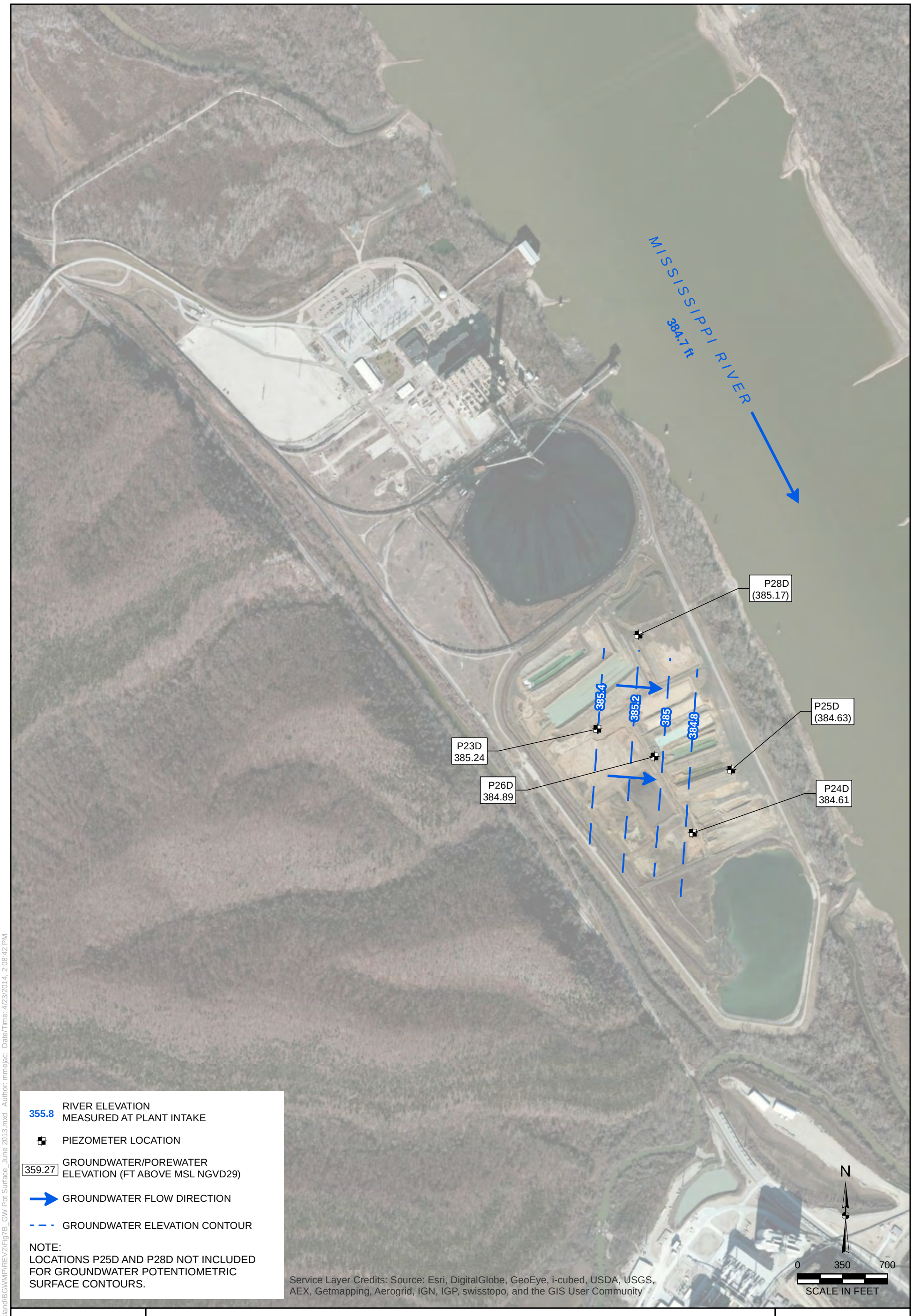
GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 7A

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000404



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DRAWN BY/DATE:
MDM 4/8/14
REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
DEEP ALLUVIAL SAND JUNE 26, 2013

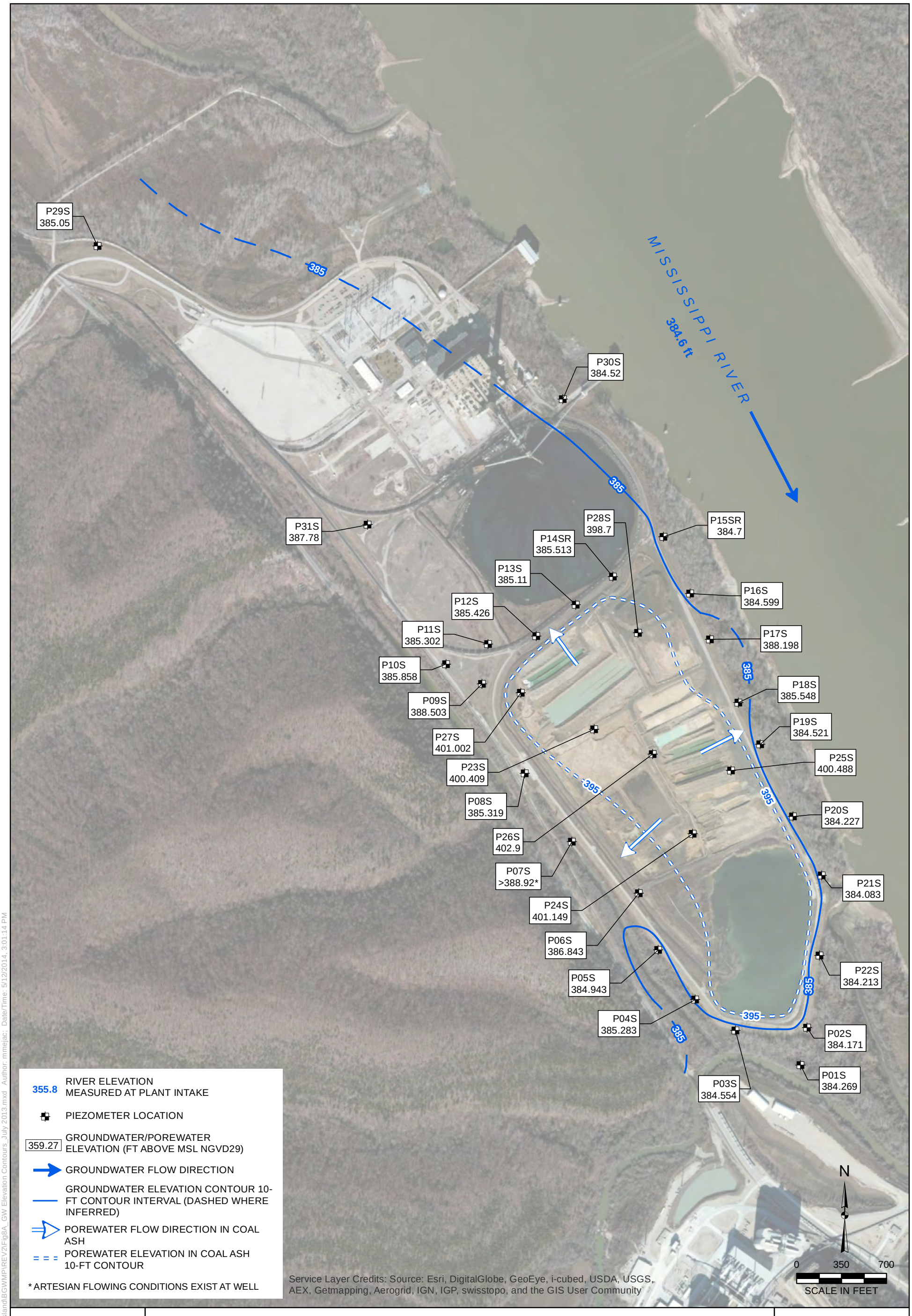
GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 7B

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000405



DRAWN BY/DATE:
MDM 4/8/14
REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
COAL ASH AND SHALLOW ALLUVIUM JULY 9, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 8A

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000406

MISSISSIPPI RIVER
384.6 ft

P28D
(384.82)

P23D
384.84

P26D
384.61

P25D
(384.41)

P24D
384.54

384.8

385

355.8 RIVER ELEVATION
MEASURED AT PLANT INTAKE

PIEZOMETER LOCATION

359.27 GROUNDWATER/POREWATER
ELEVATION (FT ABOVE MSL NGVD29)

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR

NOTE:
LOCATIONS P25D AND P28D NOT INCLUDED FOR GROUNDWATER POTENTIOMETRIC SURFACE CONTOURS.

N

0 350 700
SCALE IN FEET

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Y:\GIS\Projects\20\2072\MXD\Rush Island\BGWMPREV2\Fig8B_GW Pot Surface_July 2013.mxd Author: mmejac; Date/Time: 4/23/2014, 2:10:31 PM

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MDM 4/8/14
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BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
DEEP ALLUVIAL SAND JULY 9, 2013

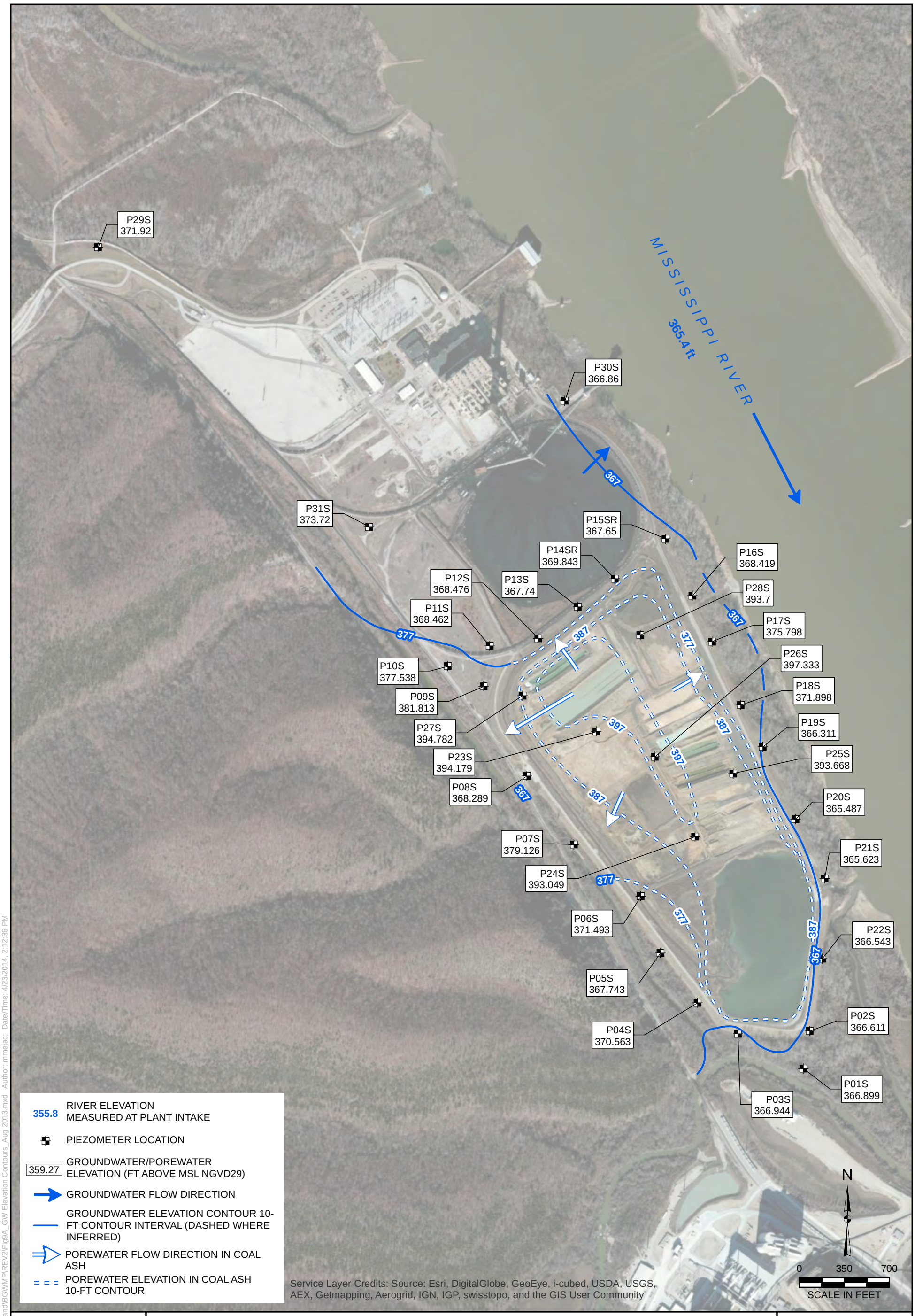
GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 8B

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000407



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REVIEWED BY/DATE:
BRH 4/11/14
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BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
COAL ASH AND SHALLOW ALLUVIUM AUGUST 21, 2013

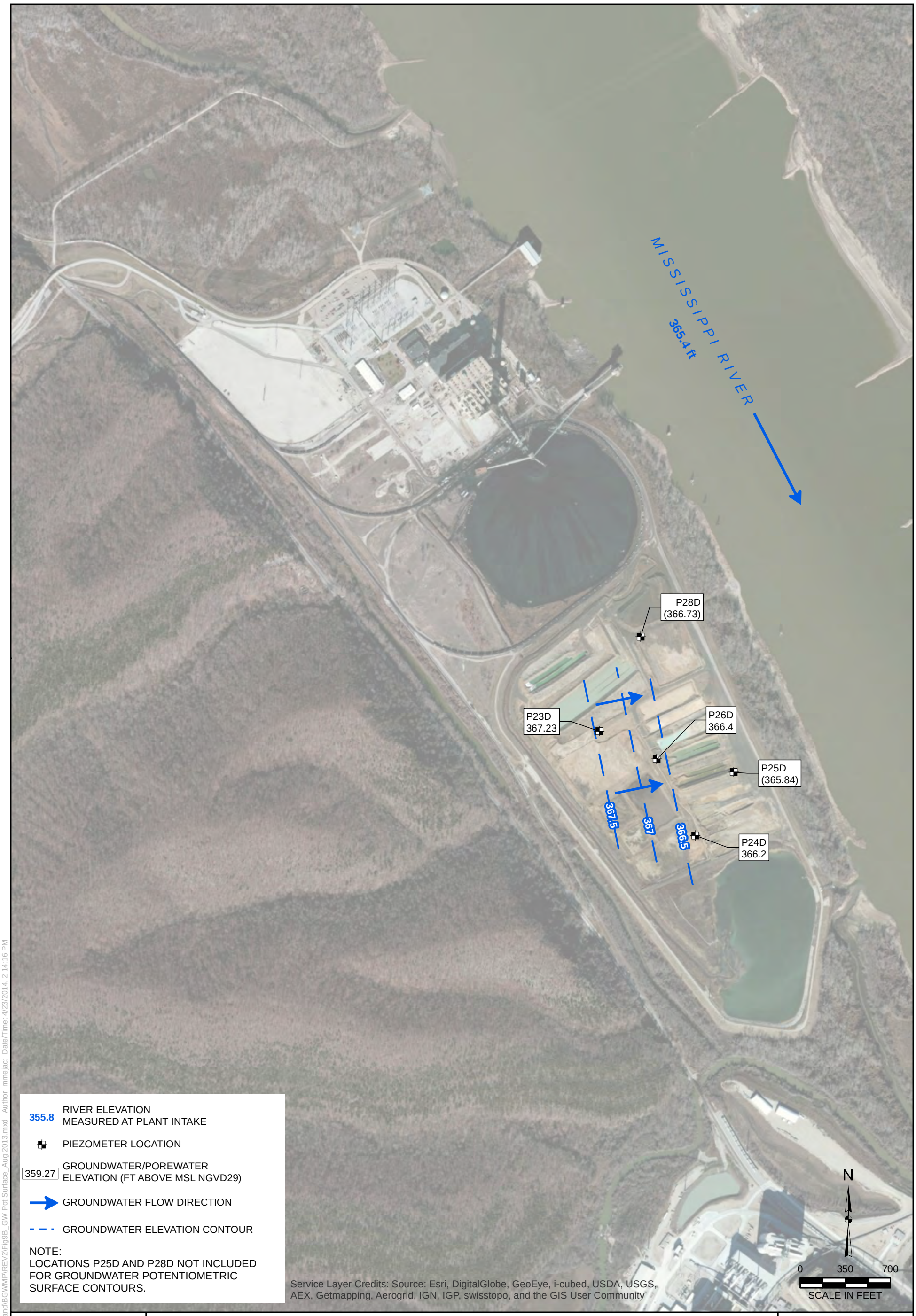
GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 9A

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000408



GROUNDWATER ELEVATION CONTOURS
DEEP ALLUVIAL SAND AUGUST 21, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

DRAWN BY/DATE:
MDM 4/8/14
REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

PROJECT NO: 2072.1

FIGURE NO: 9B

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000409

Y:\GIS\Projects\20\2072\MXD\Rush Island\BGWMP\REV2\Fig9B_GW Pot Surface_Aug 2013.mxd Author: mmejac; Date/Time: 4/23/2014, 2:14:16 PM

MISSISSIPPI RIVER
360.8 ft

P31S 372.95
P14SR 363.953
P15SR 362.74
P13S 363.22
P16S 362.309
P12S 364.456
P28S 392.05
P11S 364.502
P17S 372.378
P10S 375.918
P18S 367.828
P09S 380.503
P19S 361.821
P27S 393.612
P25S 392.338
P23S 393.429
P20S 360.627
P08S 363.989
P26S 396.333
P21S 361.353
P07S 377.506
P24S 393.589
P06S 367.123
P22S 362.363
P05S 363.273
P04S 365.073
P03S 362.284
P02S 361.821
P01S 362.389

362 372 382 392

RIVER ELEVATION MEASURED AT PLANT INTAKE (355.8)
PIEZOMETER LOCATION
GROUNDWATER/POREWATER ELEVATION (FT ABOVE MSL NGVD29) (359.27)
GROUNDWATER FLOW DIRECTION
GROUNDWATER ELEVATION CONTOUR 10-FT CONTOUR INTERVAL (DASHED WHERE INFERRED)
POREWATER FLOW DIRECTION IN COAL ASH
POREWATER ELEVATION IN COAL ASH 10-FT CONTOUR

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

N

0 350 700
SCALE IN FEET

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MDM 4/8/14
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BRH 4/11/14
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BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
COAL ASH AND SHALLOW ALLUVIUM SEPTEMBER 5, 2013

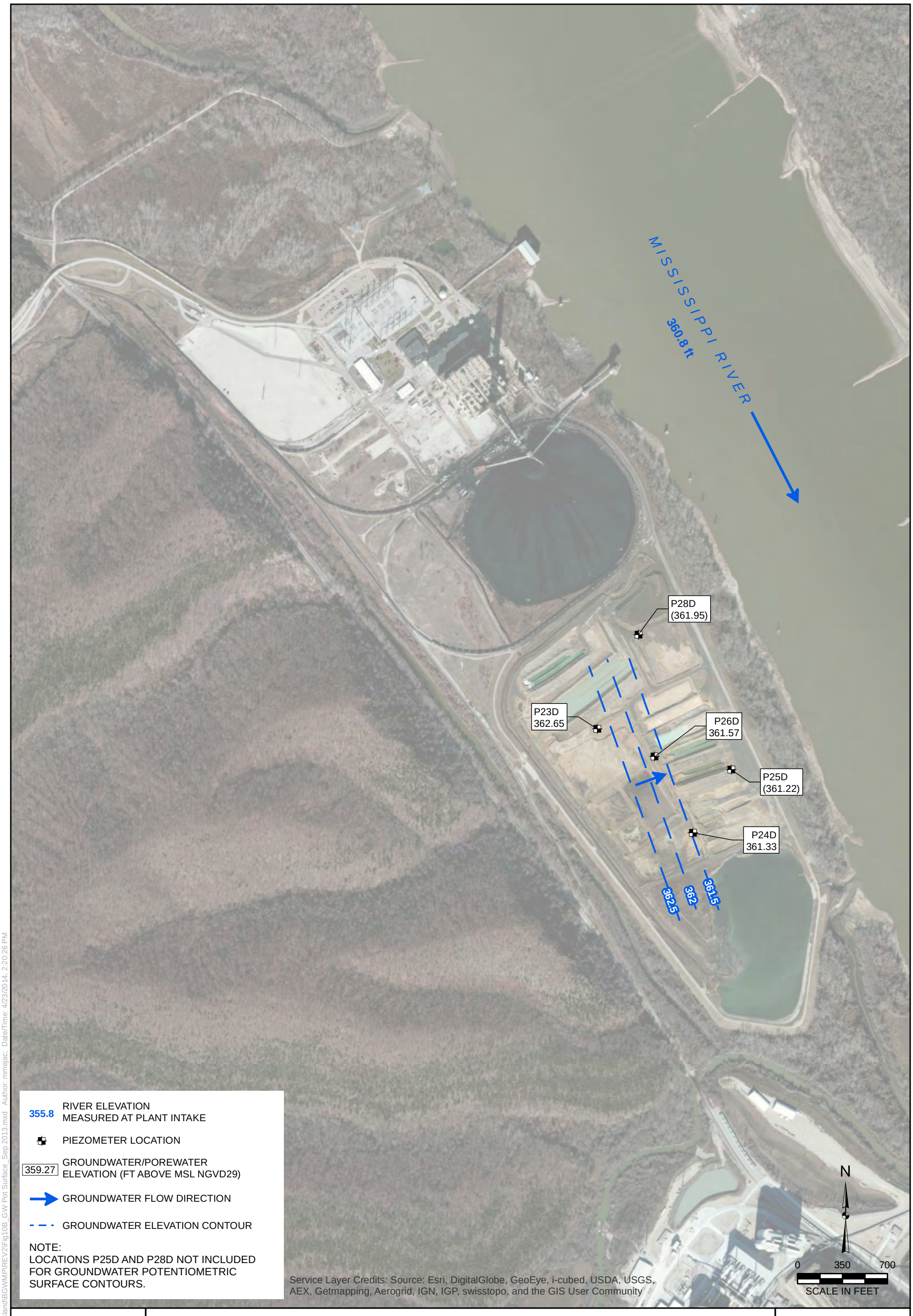
GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 10A

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000410



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REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

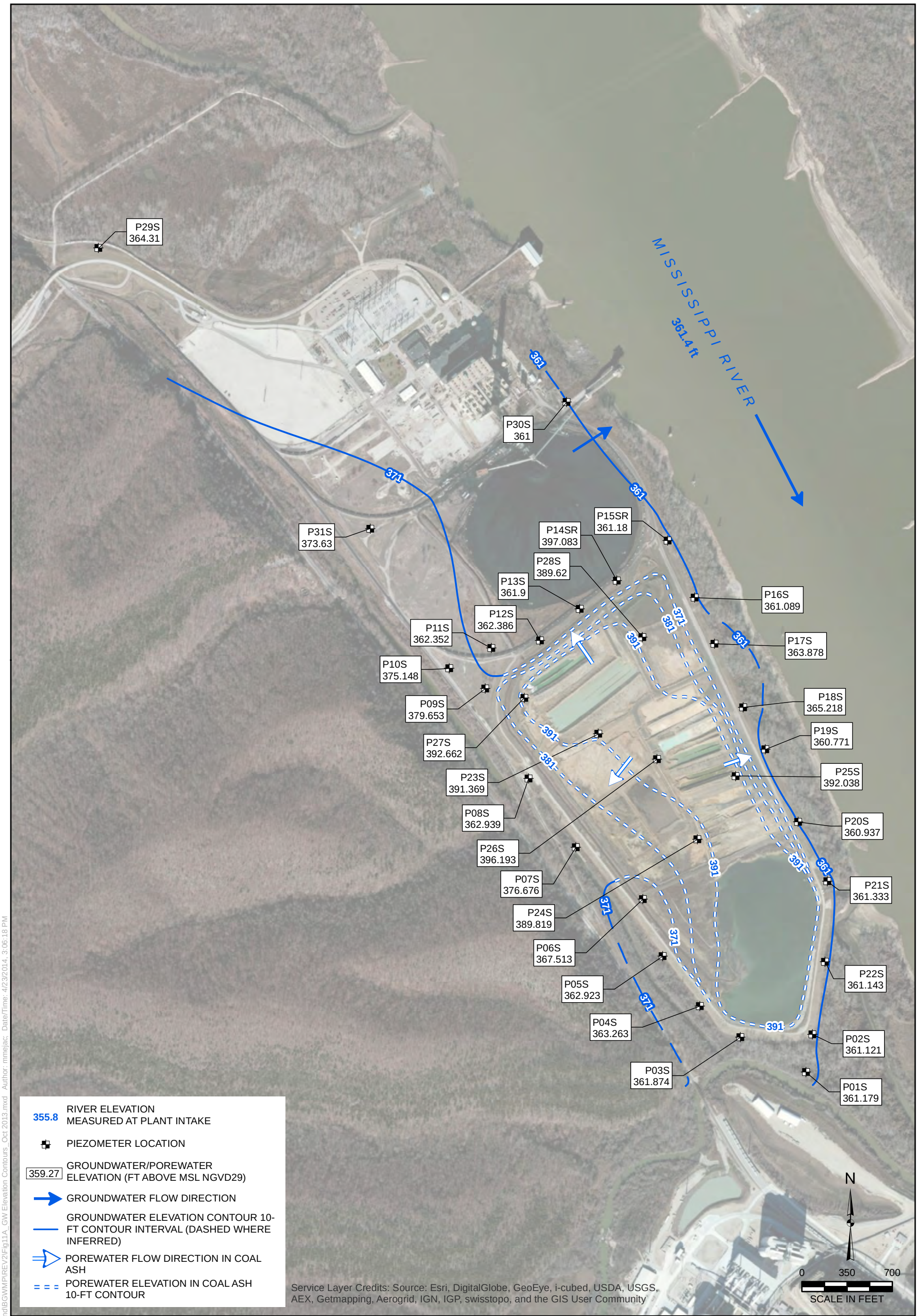
GROUNDWATER ELEVATION CONTOURS
DEEP ALLUVIAL SAND SEPTEMBER 9, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 10B

NATURAL RESOURCE TECHNOLOGY



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GROUNDWATER ELEVATION CONTOURS
COAL ASH AND SHALLOW ALLUVIUM OCTOBER 10, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 11A

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000412

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BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
DEEP ALLUVIAL SAND OCTOBER 10, 2013

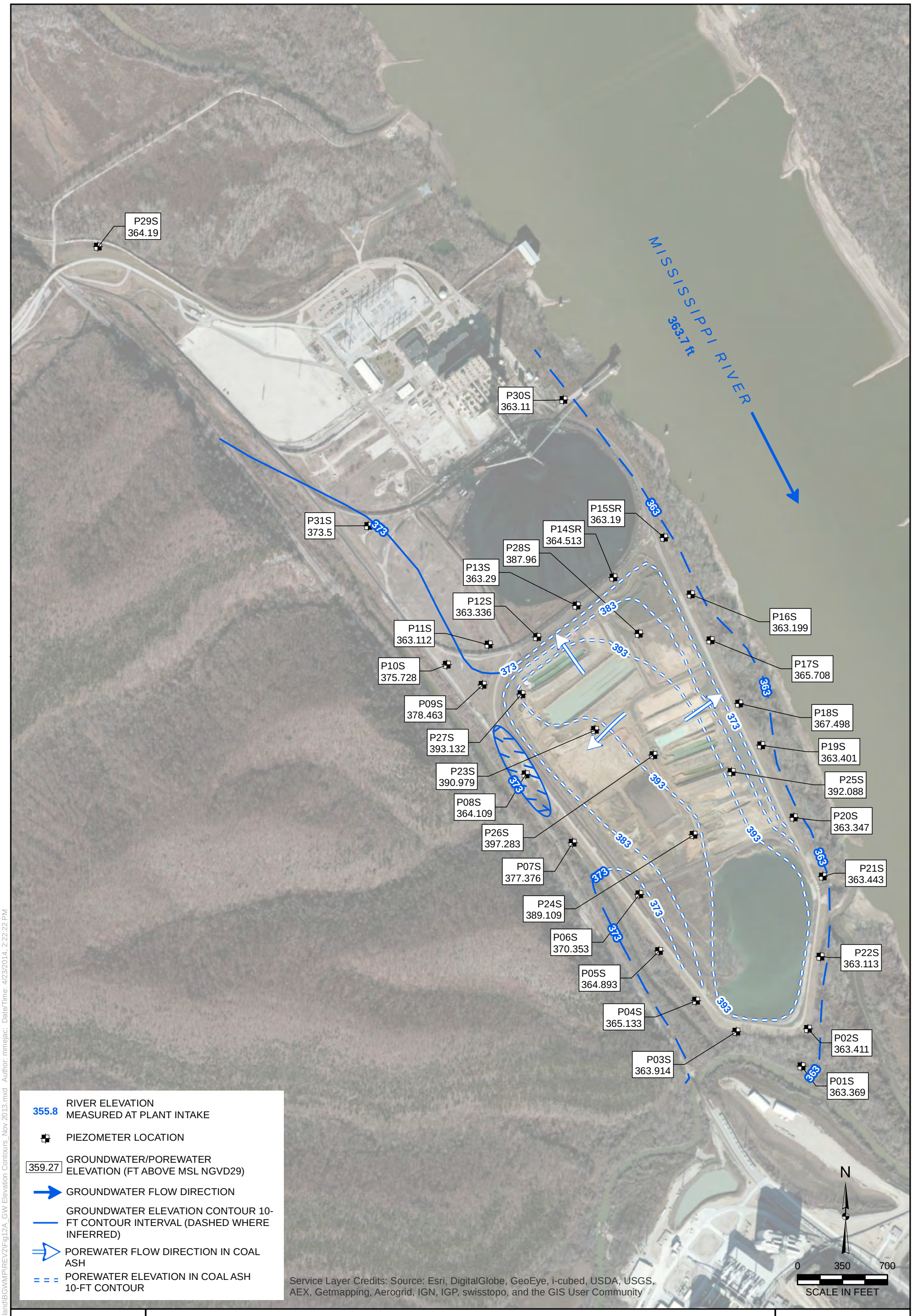
GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 11B

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000413



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MDM 4/8/14
REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
COAL ASH AND SHALLOW ALLUVIUM NOVEMBER 12, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 12A

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000414

Y:\GIS\Projects\2072\MXD\Rush Island\BGWMP\REV2\Fig12A_GW Elevation Contours_Nov 2013.mxd Author: mmejac; Date/Time: 4/23/2014, 2:22:22 PM

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REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

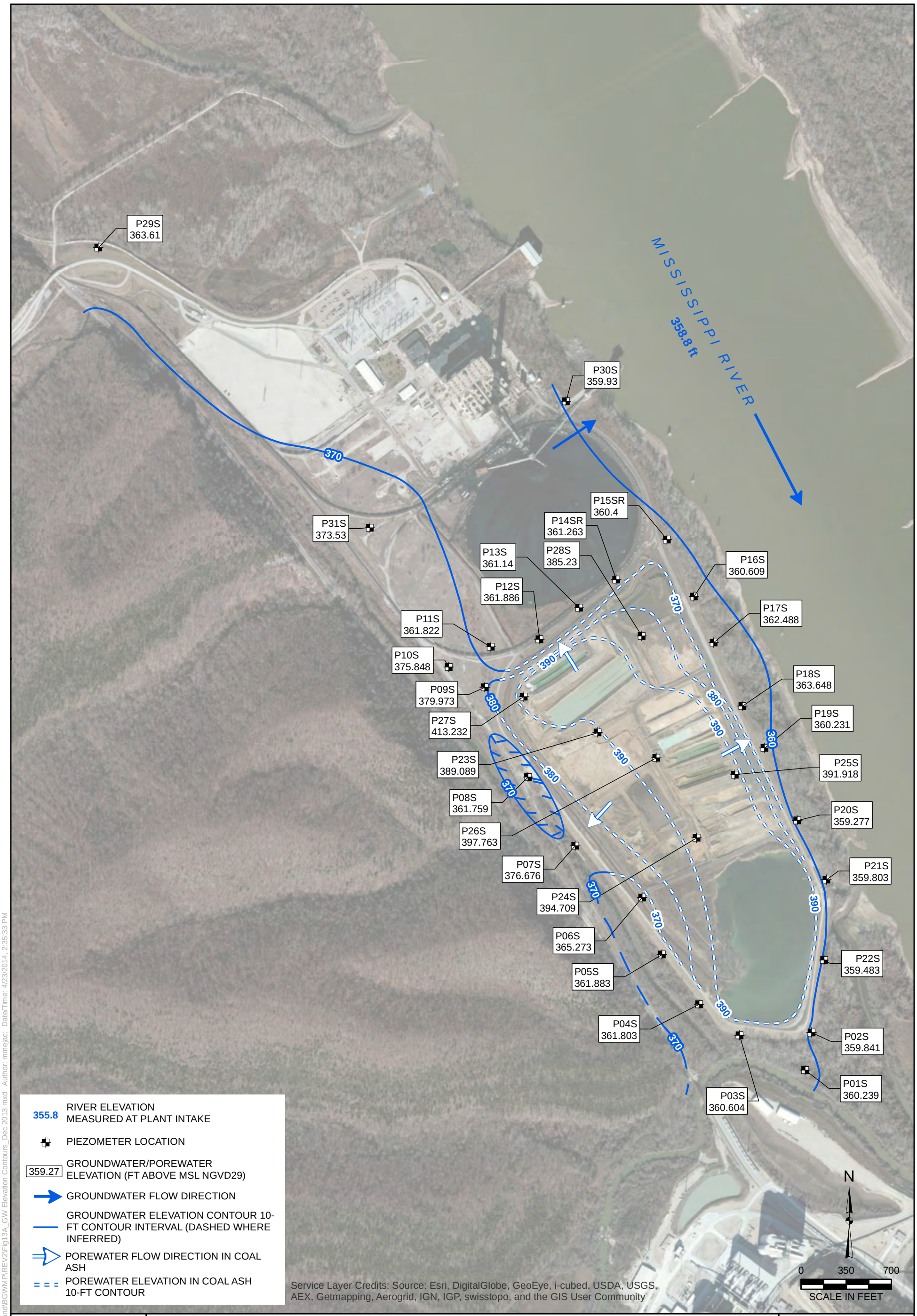
GROUNDWATER ELEVATION CONTOURS
DEEP ALLUVIAL SAND NOVEMBER 12, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 12B

NATURAL RESOURCE TECHNOLOGY



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MDM 4/8/14
REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
COAL ASH AND SHALLOW ALLUVIUM DECEMBER 10, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

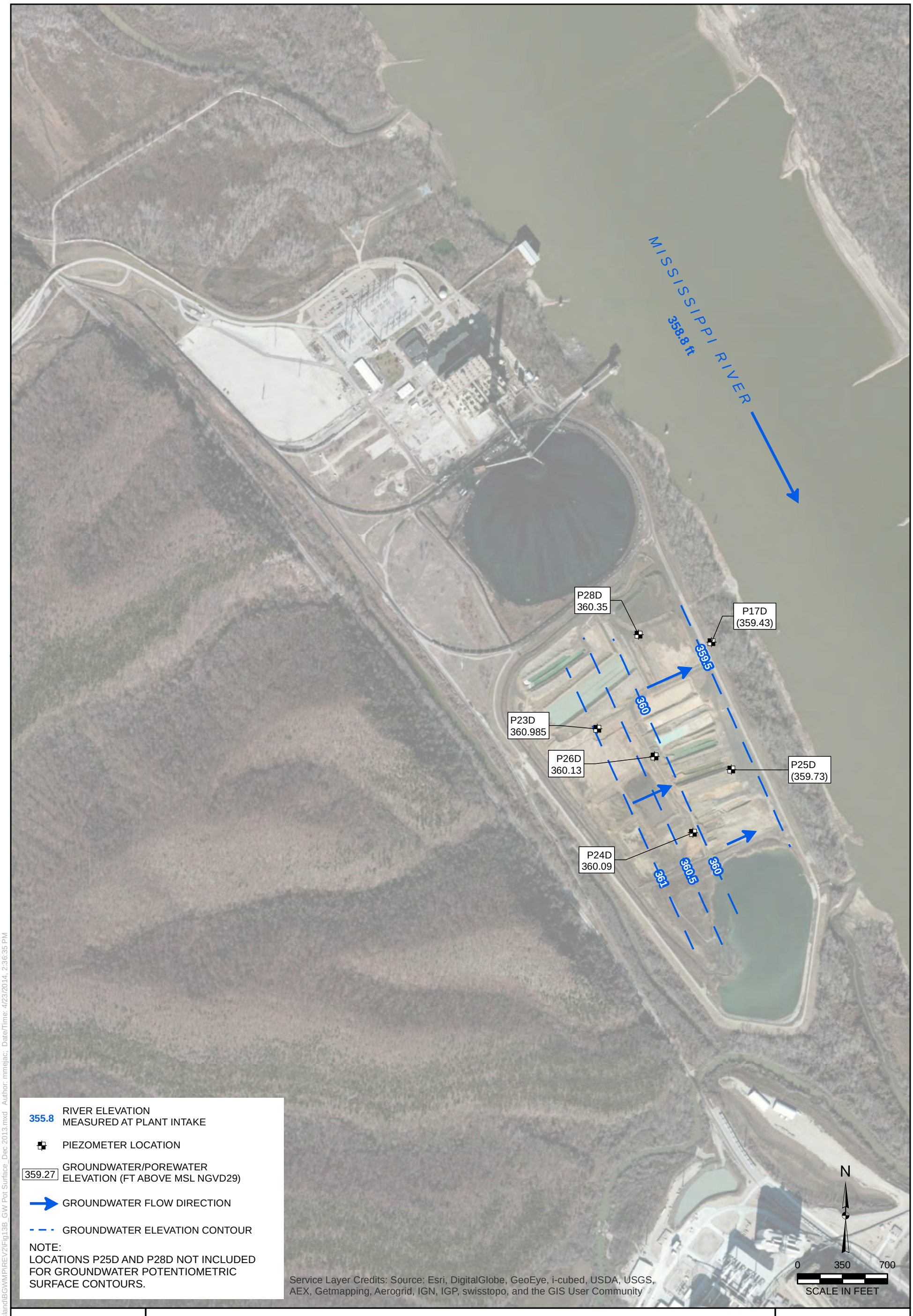
PROJECT NO: 2072.1

FIGURE NO: 13A

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000416

Y:\GIS\Projects\2012072\MXD\Rush Island\BGWMP\REV2\Fig13A_GW Elevation Contours_Dec 2013.mxd Author: mmejac; Date/Time: 4/23/2014, 2:35:33 PM



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MDM 4/8/14
REVIEWED BY/DATE:
BRH 4/11/14
APPROVED BY/DATE:
BRH 4/11/14

GROUNDWATER ELEVATION CONTOURS
DEEP ALLUVIAL SAND DECEMBER 10, 2013

GROUNDWATER MONITORING AND SAMPLING PLAN
RUSH ISLAND ENERGY CENTER PROPOSED UWL
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1

FIGURE NO: 13B

NATURAL RESOURCE TECHNOLOGY

DRAFT

P29S
367.77

P30S
369.98

P31S
375.17

MISSISSIPPI RIVER
371.0 FT

P15SR
370.37

P14SR
372.30

P13S
370.51

P16S
370.14

P12S
370.55

P10S
378.21

P11S
371.51

P28S
392.07

P17S
375.35

P09S
382.30

P27S
399.29

P23S
393.82

P18S
373.16

P08S
371.10

P26S
395.58

P19S
370.44

P25S
391.65

P07S
380.10

P20S
370.40

P24S
389.57

P06S
376.26

P21S
370.51

P05S
371.54

P22S
370.26

P04S
374.11

P02S
370.44

P03S
370.77

P01S
370.02

371.0
381.0
391.0

371.0 RIVER ELEVATION MEASURED AT PLANT INTAKE

P01S 370.02 PIEZOMETER LOCATION, GROUNDWATER ELEVATION, FEET ABOVE MEAN SEA LEVEL (NGVD29)

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR 5-FT CONTOUR INTERVAL (DASHED WHERE INFERRED)

POREWATER ELEVATION IN COAL ASH 5-FT CONTOUR

N

0 300 600
SCALE IN FEET

PRINTED AT 22" x 34" (ANSI D)
1 INCH = 300 FT

PRINTED AT 11" x 17"
1 INCH = 600 FT

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Y:\GIS\Projects\2072\MXD\Rush Island\DSI\Fig_PS-0314 Shallow Alluvial Aquifer Groundwater Porewater Elevation Contour.mxd Author: mmeiac; Date/Time: 2/25/2015, 4:07:02 PM

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MDM 10/15/14
REVIEWED BY/DATE:
THC 7/--/14
APPROVED BY/DATE:
BRH 7/--/14

SHALLOW ALLUVIAL AQUIFER - GROUNDWATER / POREWATER ELEVATION CONTOUR MAP MARCH 25, 2014

DETAILED SITE INVESTIGATION
RUSH ISLAND ENERGY CENTER
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1/10.3

FIGURE NO: PS - 3/14

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000418

DRAFT

P29S
382.23

P30S
384.56

MISSISSIPPI RIVER
385.6 FT

P31S
385.08

P15SR
384.23

P14SR
386.26

385.0

P13S
384.78

P16S
383.77

P11S
384.55

P12S
384.85

385.0

P10S
385.26

P28S
394.94

P17S
384.29

P09S
388.03

P27S
401.46

P23S
395.75

P18S
383.45

P08S
384.84

P26S
396.91

P19S
384.29

395.0

385.0

P25S
396.72

P07S
387.86

P24S
395.88

P20S
384.73

P06S
386.93

P21S
384.59

385.0

395.0

385.0

P05S
384.97

395.0

385.0

P22S
384.13

P04S
384.85

P02S
384.31

P03S
384.69

P01S
NM

N

0 300 600
SCALE IN FEET

PRINTED AT 22" x 34" (ANSI D)
1 INCH = 300 FT

PRINTED AT 11" x 17"
1 INCH = 600 FT

385.6 RIVER ELEVATION MEASURED AT PLANT INTAKE

P01S NM PIEZOMETER LOCATION, GROUNDWATER ELEVATION, FEET ABOVE MEAN SEA LEVEL (NGVD29)

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR 10-FT CONTOUR INTERVAL (DASHED WHERE

POREWATER ELEVATION IN COAL ASH 10-FT CONTOUR

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Y:\GIS\Projects\2012072\MXD\Rush Island\DSI\Fig_PS-0614 Shallow Alluvial Aquifer Groundwater Porewater Elevation Contour.mxd Author: mmeiac; Date/Time: 2/25/2015, 4:08:55 PM

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MDM 10/15/14
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THC 7/--/14
APPROVED BY/DATE:
BRH 7/--/14

SHALLOW ALLUVIAL AQUIFER - GROUNDWATER / POREWATER ELEVATION CONTOUR MAP JUNE 15, 2014

DETAILED SITE INVESTIGATION
RUSH ISLAND ENERGY CENTER
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1/10.3

FIGURE NO: PS - 6/14

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000419

DRAFT

P29S
383.04

P30S
384.97

P31S
384.38

MISSISSIPPI RIVER
386.5 FT

P15SR
384.69

385.5

P14SR
386.22

P13S
385.14

P16S
384.29

P11S
384.75

P12S
385.01

P10S
385.71

P28S
392.52

P17S
383.61

P09S
388.75

P27S
398.51

P23S
396.64

P18S
383.02

P08S
385.41

P26S
392.53

P19S
384.82

P25S
390.99

P07S
388.21

P24S
389.81

P20S
385.55

P06S
386.75

P21S
385.20

P05S
385.54

P22S
384.64

P04S
385.40

P03S
385.28

P02S
384.95

P01S
385.25

N

0 300 600
SCALE IN FEET

PRINTED AT 22" x 34" (ANSI D)
1 INCH = 300 FT

PRINTED AT 11" x 17"
1 INCH = 600 FT

386.5 — RIVER ELEVATION MEASURED AT PLANT INTAKE

P01S 385.71 — PIEZOMETER LOCATION, GROUNDWATER ELEVATION, FEET ABOVE MEAN SEA LEVEL (NGVD29)

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR 10-FT CONTOUR INTERVAL (DASHED WHERE

POREWATER ELEVATION IN COAL ASH 10-FT CONTOUR

DRAWN BY/DATE:
MDM 10/15/14
REVIEWED BY/DATE:
THC 7/--/14
APPROVED BY/DATE:
BRH 7/--/14

SHALLOW ALLUVIAL AQUIFER - GROUNDWATER / POREWATER ELEVATION CONTOUR MAP SEPTEMBER 16, 2014

DETAILED SITE INVESTIGATION
RUSH ISLAND ENERGY CENTER
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1/10.3

FIGURE NO: PS - 9/14

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000420

DRAFT

P29S
372.01

P30S
368.46

MISSISSIPPI RIVER
368.1 FT

P31S
374.57

P15SR
368.79

P64S
368.87

P14SR
375.53

P13S
369.13

P16S
368.78

P11S
369.52

P12S
369.52

P10S
378.54

P28S
396.53

P65S
368.30

P09S
382.66

P17S
378.42

P27S
393.36

P66S
378.79

P23S
396.56

P18S
374.09

P67S
370.90

P26S
403.21

P19S
368.47

P08S
369.94

P25S
399.67

P68S
367.96

P07S
380.05

P24S
408.67

P20S
367.93

P69S
367.95

P06S
376.86

P21S
367.95

P70S
367.54

P05S
369.79

P22S
368.52

P04S
374.83

P71S
368.35

P03S
369.11

P02S
369.92

P01S
368.70

369.0
379.0
389.0
399.0

368.1 RIVER ELEVATION MEASURED AT PLANT INTAKE

P01S 368.70 PIEZOMETER LOCATION, GROUNDWATER ELEVATION, FEET ABOVE MEAN SEA LEVEL (NGVD29)

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR 10-FT CONTOUR INTERVAL (DASHED WHERE

POREWATER ELEVATION IN COAL ASH 10-FT CONTOUR

N

0 300 600
SCALE IN FEET

PRINTED AT 22" x 34" (ANSI D)
1 INCH = 300 FT

PRINTED AT 11" x 17"
1 INCH = 600 FT

DRAWN BY/DATE:
MDM 1/12/15
REVIEWED BY/DATE:
THC 7/--/14
APPROVED BY/DATE:
BRH 7/--/14

SHALLOW ALLUVIAL AQUIFER - GROUNDWATER / POREWATER ELEVATION CONTOUR MAP DECEMBER 11, 2014

DETAILED SITE INVESTIGATION
RUSH ISLAND ENERGY CENTER
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1/10.3

FIGURE NO: PS - 12/14

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000421

DRAFT

P29D
368.72

MISSISSIPPI RIVER
371.0 FT

P13D
370.42

370.5

P28D
(370.94)

P17D
370.59

P23D
(371.04)

P08D
371.09

P26D
(371.04)

P19D
370.09

P25D
(370.82)

P24D
(371.00)

371.0

370.5

P21D
370.26

P05I
371.17

P22D
370.33

P03D
370.73

N

0 300 600
SCALE IN FEET

PRINTED AT 22" x 34" (ANSI D)
1 INCH = 300 FT

PRINTED AT 11" x 17"
1 INCH = 600 FT

371.0 RIVER ELEVATION MEASURED AT PLANT INTAKE

P03D 370.73 PIEZOMETER LOCATION, GROUNDWATER ELEVATION, FEET ABOVE MEAN SEA LEVEL (NGVD29)

GROUNDWATER FLOW DIRECTION

POTENTIOMETRIC SURFACE ELEVATION 0.5 FT CONTOUR INTERVAL (DASHED WHERE INFERRED)

NOTES:
WATER LEVELS AT PIEZOMETERS P23D, P24D, P25D, P26D AND P28D NOT USED FOR CONTOURING.

Y:\GIS\Projects\2012072\MXD\Rush Island\DSI\Fig PD-0314 Deep Alluvial Aquifer Groundwater Porewater Elevation Contour.mxd Author: mmejac; Date/Time: 2/25/2015, 4:00:25 PM

DRAWN BY/DATE:
MDM 10/16/14
REVIEWED BY/DATE:
THC 7/--/14
APPROVED BY/DATE:
BRH 7/--/14

DEEP ALLUVIAL AQUIFER - POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP MARCH 25, 2014

DETAILED SITE INVESTIGATION
RUSH ISLAND ENERGY CENTER
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1/10.3

FIGURE NO: PD - 3/14

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000422

DRAFT

P29D
383.93

MISSISSIPPI RIVER
385.6 FT

P13D
384.81

385.0

P28D
(385.15)

P17D
385.01

385.0

P23D
(385.04)

385.0

P08D
384.84

P26D
(385.15)

P19D
384.48

P25D
(385.08)

384.5

P24D
(385.17)

385.0

P21D
384.8

P05I
384.96

P22D
384.68

P03D
384.73

N

0 300 600
SCALE IN FEET

PRINTED AT 22" x 34" (ANSI D)
1 INCH = 300 FT

PRINTED AT 11" x 17"
1 INCH = 600 FT

Service Layer Credits:

385.6 RIVER ELEVATION MEASURED AT PLANT INTAKE

P03D 384.73 PIEZOMETER LOCATION, GROUNDWATER ELEVATION, FEET ABOVE MEAN SEA LEVEL (NGVD29)

GROUNDWATER FLOW DIRECTION

POTENTIOMETRIC SURFACE ELEVATION 0.5 FT CONTOUR INTERVAL (DASHED WHERE INFERRED)

NOTES:
WATER LEVELS AT PIEZOMETERS P23D, P24D, P25D, P26D AND P28D NOT USED FOR CONTOURING.

Y:\GIS\Projects\2072\MXD\Rush Island\DSI\Fig_PD-0614 Deep Alluvial Aquifer Groundwater Porewater Elevation Contour.mxd Author: mmejac; Date/Time: 2/25/2015, 4:01:14 PM

DRAWN BY/DATE:
MDM 10/16/14
REVIEWED BY/DATE:
THC 7/--/14
APPROVED BY/DATE:
BRH 7/--/14

DEEP ALLUVIAL AQUIFER - POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP JUNE 13, 2014

DETAILED SITE INVESTIGATION
RUSH ISLAND ENERGY CENTER
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1/10.3

FIGURE NO: PD - 6/14

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000423

DRAFT

P29D
384.27

MISSISSIPPI RIVER
386.5 FT

P13D
385.18

P28D
(385.77)

P17D
385.83

P23D
(385.54)

P08D
385.39

P26D
(385.82)

P19D
385.30

P25D
(385.81)

P24D
(385.84)

P21D
385.65

P05I
385.56

P22D
385.46

P03D
385.38

385.5

N

0 300 600
SCALE IN FEET

PRINTED AT 22" x 34" (ANSI D)
1 INCH = 300 FT

PRINTED AT 11" x 17"
1 INCH = 600 FT

386.5 RIVER ELEVATION MEASURED AT PLANT INTAKE

P03D 385.38 PIEZOMETER LOCATION, GROUNDWATER ELEVATION, FEET ABOVE MEAN SEA LEVEL (NGVD29)

GROUNDWATER FLOW DIRECTION

POTENTIOMETRIC SURFACE ELEVATION 0.5 FT CONTOUR INTERVAL (DASHED WHERE INFERRED)

NOTES:
WATER LEVELS AT PIEZOMETERS P23D, P24D, P25D, P26D AND P28D NOT USED FOR CONTOURING.

DRAWN BY/DATE:
MDM 10/16/14
REVIEWED BY/DATE:
THC 7/--/14
APPROVED BY/DATE:
BRH 7/--/14

DEEP ALLUVIAL AQUIFER - POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP SEPTEMBER 16, 2014

DETAILED SITE INVESTIGATION
RUSH ISLAND ENERGY CENTER
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1/10.3

FIGURE NO: PD - 9/14

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000424

DRAFT

P29D
370.01

MISSISSIPPI RIVER
368.1 FT

P13D
369.00

P28D
(368.90)

P17D
368.25

P23D
(369.31)

P08D
369.89

P26D
(368.81)

P19D
367.64

P25D
(368.44)

P24D
(368.73)

P21D
367.77

P05I
369.55

P22D
368.00

P03D
368.99

369.5
369.0
368.5
368.0

368.1 RIVER ELEVATION MEASURED AT PLANT INTAKE

P03D 368.99 PIEZOMETER LOCATION, GROUNDWATER ELEVATION, FEET ABOVE MEAN SEA LEVEL (NGVD29)

GROUNDWATER FLOW DIRECTION

POTENTIOMETRIC SURFACE ELEVATION 0.5 FT CONTOUR INTERVAL (DASHED WHERE INFERRED)

NOTES:
WATER LEVELS AT PIEZOMETERS P23D, P24D, P25D, P26D AND P28D NOT USED FOR CONTOURING.

N

0 300 600
SCALE IN FEET

PRINTED AT 22" x 34" (ANSI D)
1 INCH = 300 FT

PRINTED AT 11" x 17"
1 INCH = 600 FT

DRAWN BY/DATE:
MDM 1/12/15
REVIEWED BY/DATE:
THC 7/--/14
APPROVED BY/DATE:
BRH 7/--/14

DEEP ALLUVIAL AQUIFER - POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP DECEMBER 11, 2014

DETAILED SITE INVESTIGATION
RUSH ISLAND ENERGY CENTER
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1/10.3

FIGURE NO: PD - 12/14

NATURAL RESOURCE TECHNOLOGY

DRAFT

MISSISSIPPI RIVER
385.6 FT

P15SBR
(243.88)

P14SBR
385.01

P16SBR
384.76

P12SBR
(362.45)

P56SBR
384.84

P59SBR
384.73

P17SBR
384.69

384.7

385.0

P55SBR
384.84

P60SBR
384.89

P23SBR
385.02

P18SBR
384.73

385.0

P08SBR
384.99

P19SBR
(381.75)

P54SBR
(382.17)

P25SBR
384.86

P58SBR
384.70

P07SBR
384.86

385.0

P34SBR
384.77

P57SBR
384.76

P36SBR
384.97

385.0

384.7

P21SBR
384.55

P61SBR
385.02

P05SBR
384.90

P22SBR
(277.22)

P04SBR
384.87

P03SBR
(303.91)

P02SBR
(314.54)

385.6 RIVER ELEVATION MEASURED AT PLANT INTAKE

P04SBR 384.87 PIEZOMETER LOCATION, GROUNDWATER ELEVATION, FEET ABOVE MEAN SEA LEVEL (NGVD29)

GROUNDWATER FLOW DIRECTION

POTENTIOMETRIC SURFACE ELEVATION 0.3 FT CONTOUR INTERVAL (DASHED WHERE INFERRED)

NOTES:
WATER LEVELS AT P02SBR, P03SBR, P12SBR, P15SBR, P19SBR, P22SBR AND P54SBR NOT USED FOR CONTOURING.

Service Layer Credits:

N

0 300 600
SCALE IN FEET

PRINTED AT 22" x 34" (ANSI D)
1 INCH = 300 FT

PRINTED AT 11" x 17"
1 INCH = 600 FT

Y:\GIS\Projects\2012072\MXD\Rush Island\DSI\Fig_PBR-0614 Shallow Bedrock Piezometers Potentiometric.mxd Author: mmejac; Date/Time: 2/25/2015, 3:55:26 PM

DRAWN BY/DATE:
MDM 10/16/14
REVIEWED BY/DATE:
THC 7/--/14
APPROVED BY/DATE:
BRH 7/--/14

SHALLOW BEDROCK PIEZOMETERS - POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP JUNE 13, 2014

DETAILED SITE INVESTIGATION
RUSH ISLAND ENERGY CENTER
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1/10.3

FIGURE NO: PBR - 6/14

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000426

DRAFT

MISSISSIPPI RIVER
386.5 FT

P15SBR
(248.91)

P14SBR
385.63

P16SBR
385.55

P12SBR
(375.66)

P56SBR
385.53

P59SBR
384.96

P17SBR
385.51

P55SBR
385.53

P60SBR
385.21

P23SBR
385.53

P18SBR
385.57

P08SBR
385.44

P19SBR
385.32

P54SBR
(380.85)

P25SBR
385.6

P07SBR
385.44

P58SBR
385.54

P34SBR
385.53

P57SBR
385.59

P36SBR
385.52

P21SBR
385.36

P61SBR
385.63

P05SBR
385.52

P22SBR
(281.16)

P04SBR
385.49

P03SBR
(305.03)

P02SBR
(352.73)

385.5
385.0

386.5 RIVER ELEVATION MEASURED AT PLANT INTAKE

P04SBR 385.49 PIEZOMETER LOCATION, GROUNDWATER ELEVATION, FEET ABOVE MEAN SEA LEVEL (NGVD29)

GROUNDWATER FLOW DIRECTION

POTENTIOMETRIC SURFACE ELEVATION 0.5 FT CONTOUR INTERVAL (DASHED WHERE INFERRED)

NOTES:
WATER LEVELS AT P02SBR, P03SBR, P12SBR, P15SBR, P22SBR AND P54SBR NOT USED FOR CONTOURING.

N

0 300 600
SCALE IN FEET

PRINTED AT 22" x 34" (ANSI D)
1 INCH = 300 FT

PRINTED AT 11" x 17"
1 INCH = 600 FT

SHALLOW BEDROCK PIEZOMETERS - POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP SEPTEMBER 16, 2014

DETAILED SITE INVESTIGATION
RUSH ISLAND ENERGY CENTER
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

DRAWN BY/DATE:
MDM 10/16/14
REVIEWED BY/DATE:
THC 7/--/14
APPROVED BY/DATE:
BRH 7/--/14

PROJECT NO: 2072.1/10.3

FIGURE NO: PBR - 9/14

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000427

DRAFT

MISSISSIPPI RIVER
368.1 FT

P15SBR
(254.37)

P14SBR
368.63

P16SBR
368.03

P12SBR
(371.34)

P56SBR
368.39

P59SBR
369.64

P17SBR
368.01

P55SBR
368.30

P60SBR
369.79

P18SBR
368.08

P23SBR
369.23

P19SBR
368.14

P08SBR
369.92

P54SBR
369.10

P25SBR
368.21

P58SBR
368.02

P07SBR
370.61

P34SBR
368.15

P57SBR
368.15

P36SBR
369.58

P21SBR
367.95

P61SBR
369.80

P05SBR
369.48

P22SBR
(283.72)

P04SBR
369.36

P03SBR
(306.24)

P02SBR
(359.38)

368.0
368.5
369.0
369.5
370.0

368.11 RIVER ELEVATION MEASURED AT PLANT INTAKE

P04SBR 369.36 PIEZOMETER LOCATION, GROUNDWATER ELEVATION, FEET ABOVE MEAN SEA LEVEL (NGVD29)

GROUNDWATER FLOW DIRECTION

POTENTIOMETRIC SURFACE ELEVATION 0.5 FT CONTOUR INTERVAL (DASHED WHERE INFERRED)

NOTES:
WATER LEVELS AT P02SBR, P03SBR, P12SBR, P15SBR, AND P22SBR NOT USED FOR CONTOURING.

N

0 300 600
SCALE IN FEET

PRINTED AT 22" x 34" (ANSI D)
1 INCH = 300 FT

PRINTED AT 11" x 17"
1 INCH = 600 FT

DRAWN BY/DATE:
MDM 1/12/15
REVIEWED BY/DATE:
THC 7/--/14
APPROVED BY/DATE:
BRH 7/--/14

SHALLOW BEDROCK PIEZOMETERS - POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP DECEMBER 11, 2014

DETAILED SITE INVESTIGATION
RUSH ISLAND ENERGY CENTER
100 BIG HOLLOW ROAD
FESTUS, MISSOURI

PROJECT NO: 2072.1/10.3

FIGURE NO: PBR - 12/14

NATURAL RESOURCE TECHNOLOGY

AMEREN_00000428

APPENDIX B

CCR Rule Program Potentiometric Surface Maps

LEGEND

- Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

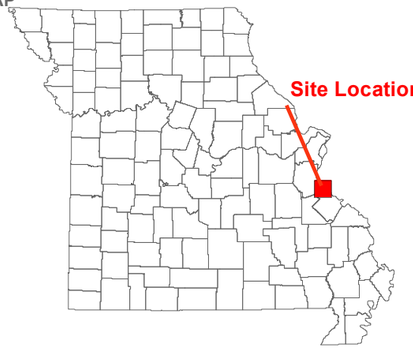
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- = = = Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Groundwater Monitoring Well
- Mississippi River Gauge
- RCPA Pond Gauge
- Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER MONITORING WELLS SURVEYED BY ZAHNER AND ASSOCIATES, INC. ON DECEMBER 1, 2015.
3.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
4.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
5.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
6.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000
Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA - POTENTIOMETRIC SURFACE MAP
BACKGROUND EVENT 1 - MARCH 10, 2016

CONSULTANT
Golder Associates

YYYY-MM-DD	2016-03-10
PREPARED	JSI
DESIGN	JSI
REVIEW	JS
APPROVED	MNH

PROJECT No. 153-1406
PHASE 0002A
Rev. 0.0
AMEREN_00000430
FIGURE **B1**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:
1in
0

Path: G:\Projects\153\Projects\1531406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\RCPA-E1.mxd

LEGEND

Rush Island Energy Center Property Boundary

RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

Groundwater Elevation Contour (FT MSL)

Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

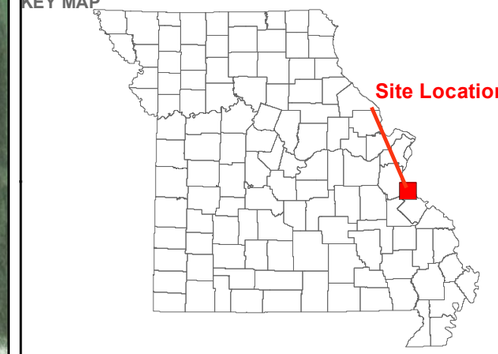
Groundwater Monitoring Well

Mississippi River Gauge

RCPA Pond Gauge

Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER MONITORING WELLS SURVEYED BY ZAHNER AND ASSOCIATES, INC. ON DECEMBER 1, 2015.
3.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
4.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
5.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
6.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA - POTENTIOMETRIC SURFACE MAP
BACKGROUND EVENT 2 - MAY 2, 2016

CONSULTANT
Golder Associates

YYYY-MM-DD	2016-05-24
PREPARED	JSI
DESIGN	JSI
REVIEW	JS
APPROVED	MNH

PROJECT No. 153-1406
PHASE 0002A
Rev. 0.0
AMEREN_00000431
FIGURE **B2**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:

Path: G:\Projects\153\Projects\1531406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\RCPA-E2.mxd

LEGEND

- Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

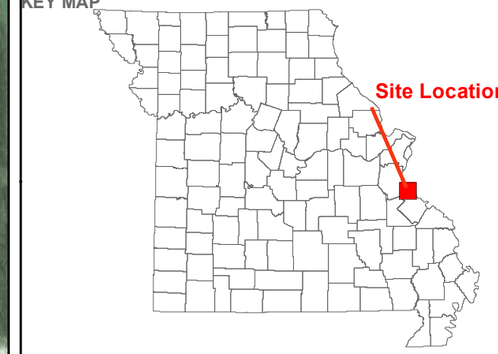
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Groundwater Monitoring Well
- Mississippi River Gauge
- RCPA Pond Gauge
- Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER MONITORING WELLS SURVEYED BY ZAHNER AND ASSOCIATES, INC. ON DECEMBER 1, 2015.
3.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
4.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
5.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
6.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000
Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA - POTENTIOMETRIC SURFACE MAP
BACKGROUND EVENT 3 - JULY 14, 2016

CONSULTANT
Golder Associates

YYYY-MM-DD	2016-08-16
PREPARED	JS
DESIGN	JSI
REVIEW	JSI
APPROVED	MNH

PROJECT No. 153-1406
PHASE 0002A
Rev. 0.0
AMEREN_00000432
FIGURE **B3**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:
1in
0

Path: G:\Projects\153\Projects\1531406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\RCPA-E3.mxd

LEGEND

- Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

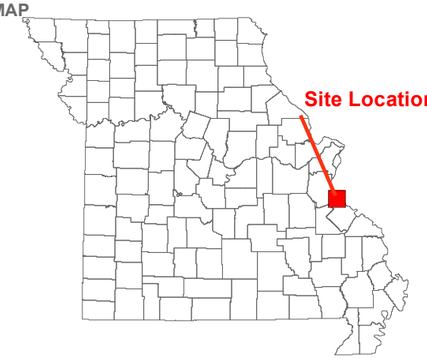
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- = = = Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Groundwater Monitoring Well
- Mississippi River Gauge
- RCPA Pond Gauge
- Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER MONITORING WELLS SURVEYED BY ZAHNER AND ASSOCIATES, INC. ON DECEMBER 1, 2015.
3.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
4.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
5.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
6.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000
Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA - POTENTIOMETRIC SURFACE MAP
BACKGROUND EVENT 4 - SEPTEMBER 6, 2016

CONSULTANT
Golder Associates

YYYY-MM-DD	2016-09-27
PREPARED	JSI
DESIGN	JSI
REVIEW	JS
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002A | Rev. 0.0 | AMEREN_00000433 | FIGURE **B4**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:
1in
0

Path: G:\Projects\153\Projects\1531406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\RCPA-E4.mxd

LEGEND

- Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

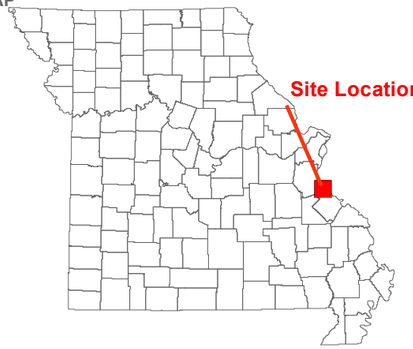
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- = = = Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Groundwater Monitoring Well
- Mississippi River Gauge
- RCPA Pond Gauge
- Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER MONITORING WELLS SURVEYED BY ZAHNER AND ASSOCIATES, INC. ON DECEMBER 1, 2015.
3.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
4.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
5.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
6.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000
Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA - POTENTIOMETRIC SURFACE MAP
BACKGROUND EVENT 5 - NOVEMBER 15, 2016

CONSULTANT
Golder Associates

YYYY-MM-DD	2016-11-15
PREPARED	JSI
DESIGN	JSI
REVIEW	MSG
APPROVED	MNH

PROJECT No. 153-1406
PHASE 0002A
Rev. 0.0
AMEREN_00000434
FIGURE **B5**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 11in 0

Path: G:\Projects\153\Projects\1531406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\RCPA-E5.mxd

LEGEND

- Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

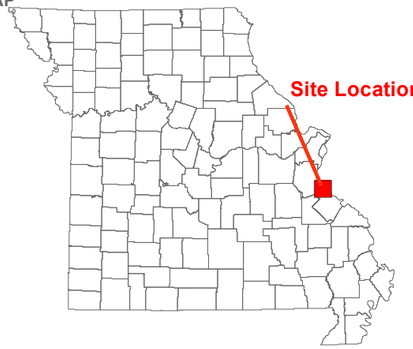
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Groundwater Monitoring Well
- Mississippi River Gauge
- RCPA Pond Gauge
- Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER MONITORING WELLS SURVEYED BY ZAHNER AND ASSOCIATES, INC. ON DECEMBER 1, 2015.
3.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
4.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
5.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
6.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000
Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA - POTENTIOMETRIC SURFACE MAP
BACKGROUND EVENT 6 - JANUARY 19, 2016

CONSULTANT
Golder Associates

YYYY-MM-DD	2017-01-23
PREPARED	JS
DESIGN	JSI
REVIEW	BEF
APPROVED	MNH

PROJECT No. 153-1406
PHASE 0002A
Rev. 0.0
AMEREN_00000435
FIGURE **B6**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 1in 0

Path: G:\Projects\153\Projects\1531406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\RCPA-E6.mxd

LEGEND

- Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

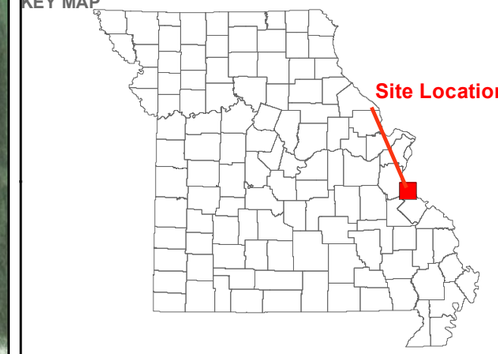
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Groundwater Monitoring Well
- Mississippi River Gauge
- RCPA Pond Gauge
- Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER MONITORING WELLS SURVEYED BY ZAHNER AND ASSOCIATES, INC. ON DECEMBER 1, 2015.
3.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
4.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
5.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
6.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA - POTENTIOMETRIC SURFACE MAP
BACKGROUND EVENT 7 - MARCH 6, 2017

CONSULTANT
Golder Associates

YYYY-MM-DD	2017-03-14
PREPARED	JSI
DESIGN	JSI
REVIEW	JS
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002A | Rev. 0.0 | AMEREN_00000436 | FIGURE **B7**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 11in 0

Path: G:\Projects\153\Projects\1531406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\RCPA-E7.mxd

LEGEND

- Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

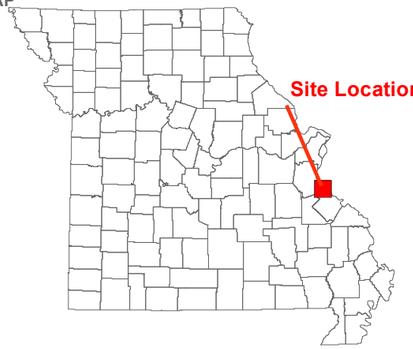
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- = = = Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Groundwater Monitoring Well
- Mississippi River Gauge
- RCPA Pond Gauge
- Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
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5.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
6.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000
Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA - POTENTIOMETRIC SURFACE MAP
BACKGROUND EVENT 8 - JUNE 8, 2017

CONSULTANT
Golder Associates

YYYY-MM-DD	2017-06-20
PREPARED	JSI
DESIGN	JSI
REVIEW	RJF
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002A | Rev. 0.0 | AMEREN_00000437 | FIGURE **B8**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 11in 0

Path: G:\Projects\153\Projects\1531406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\RCPA-EB.mxd

LEGEND

- Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

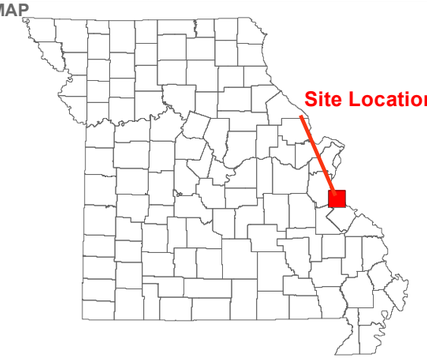
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- = = = Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Groundwater Monitoring Well
- Mississippi River Gauge
- RCPA Pond Gauge
- Groundwater Flow Direction

KEY MAP



NOTES

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5.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
6.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA - POTENTIOMETRIC SURFACE MAP
DETECTION MONITORING, NOVEMBER 9, 2017

CONSULTANT
Golder Associates

YYYY-MM-DD	2017-11-17
PREPARED	RJF
DESIGN	JSI
REVIEW	JSI
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002A | Rev. 0.0 | AMEREN_00000438 | FIGURE **B9**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 11in 0

Path: G:\Projects\153\Projects\1531406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\2017-11-09 - DM Pot Map.mxd

LEGEND

- Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Groundwater Monitoring Well
- Mississippi River Gauge
- RCPA Pond Gauge
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER MONITORING WELLS SURVEYED BY ZAHNER AND ASSOCIATES, INC. ON DECEMBER 1, 2015.
3.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
4.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
5.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
6.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 400 800 1,600 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA - POTENTIOMETRIC SURFACE MAP - APRIL 2, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2019-01-08
PREPARED	EFT
DESIGN	JSI
REVIEW	EMS/JSI
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | Rev. 0.0 | AMEREN_00000439 | FIGURE B10

Path: G:\Projects\153\Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\Potentiometric_Surface_Maps\RCPA-AM-April2018.mxd

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:

LEGEND

- Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Ground/Surface Water Measurement Locations

- Groundwater Monitoring Well Monitoring Well Locations
- Mississippi River Gauge
- Mississippi River Gauge at NPDES Outfall
- RCPA Pond Gauge

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER MONITORING WELLS SURVEYED BY ZAHNER AND ASSOCIATES, INC.
3.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
4.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
5.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
6.) POND LEVEL OBTAINED ONSITE BY GOLDER.
7.) MISSISSIPPI RIVER LEVEL AT THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) OUTFALL IS OBSERVED BY GOLDER FIELD STAFF AND IS CONSIDERED THE MOST ACCURATE MEASUREMENT.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 250 500 1,000
Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA - POTENTIOMETRIC SURFACE MAP - MAY 24, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2019-01-10
PREPARED	EFT
DESIGN	JSI
REVIEW	EMS
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | Rev. 0.0 | AMEREN_00000440 | FIGURE **B11**

Path: G:\Projects\1150 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\Potentiometric_Surface_Maps\RCPA-May-2018.mxd

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 1 in

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- Mississippi River Gauge at NPDES Outfall
- RCPA Pond Gauge
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.
6.) MISSISSIPPI RIVER LEVEL AT THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) OUTFALL IS OBSERVED BY GOLDER FIELD STAFF AND IS CONSIDERED THE MOST ACCURATE MEASUREMENT.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - SHALLOW ALLUVIAL AQUIFER - MAY 24, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-08-14
PREPARED	JS
DESIGN	JSI
REVIEW	EMS/JSI
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | Rev. 0.0 | AMEREN_00000441 | FIGURE **B12**

Path: G:\Projects\153 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\8000 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\P-xtentiometric Surface Maps\Updated Pot Maps\NE1S - RCPA-NE-May-2018 -shallow-JS.mxd

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:
1in
0

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- Mississippi River Gauge at NPDES Outfall
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES
1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.
6.) MISSISSIPPI RIVER LEVEL AT THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) OUTFALL IS OBSERVED BY GOLDER FIELD STAFF AND IS CONSIDERED THE MOST ACCURATE MEASUREMENT.

REFERENCES
1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000
Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - INTERMEDIATE ALLUVIAL AQUIFER - MAY 24, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-08-14
PREPARED	JS
DESIGN	JSI
REVIEW	EMS/JSI
APPROVED	MNH

PROJECT No. 153-1406
PHASE 0002
REV. 0.0
AMEREN_00000442
FIGURE **B13**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:
1in
0

Path: G:\Projects\153\Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\NE11 - RCPA-NE-May-2018 - intermediate-JS.mxd

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

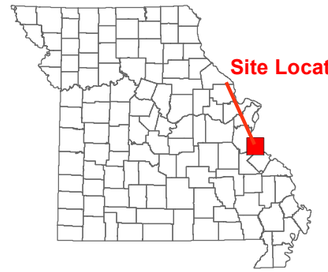
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- Mississippi River Gauge at NPDES Outfall
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.
6.) MISSISSIPPI RIVER LEVEL AT THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) OUTFALL IS OBSERVED BY GOLDER FIELD STAFF AND IS CONSIDERED THE MOST ACCURATE MEASUREMENT.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - DEEP ALLUVIAL AQUIFER - MAY 24, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-08-14
PREPARED	JS
DESIGN	JSI
REVIEW	EMS/JSI
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | Rev. 0.0 | AMEREN_00000443 | FIGURE **B14**

Path: G:\Projects\153\Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\NE1D - RCPA-NE-May-2018 - deep-JS.mxd

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 11in

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- RCPA Pond Gauge
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - SHALLOW ALLUVIAL AQUIFER - JUNE 22, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-08-14
PREPARED	JS
DESIGN	JSI
REVIEW	EMS/JSI
APPROVED	MNH

PROJECT No. 153-1406
PHASE 0002
Rev. 0.0
AMEREN_00000444
FIGURE **B15**

Path: G:\Projects\150 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\NE2S - RCPA-NE-June-2018 -shallow-JS.mxd

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent

- Groundwater Flow Direction

KEY MAP

NOTES
1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES
1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000
Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - INTERMEDIATE ALLUVIAL AQUIFER - JUNE 22, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-08-14
PREPARED	JS
DESIGN	JSI
REVIEW	EMS/JSI
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | Rev. 0.0 | AMEREN_00000445 | FIGURE B16

Path: G:\Projects\153 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\NE2I - RCPA-NE-June-2018 - Intermediate-JS.mxd

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES
1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
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5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES
1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - DEEP ALLUVIAL AQUIFER - JUNE 22, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-08-14
PREPARED	JS
DESIGN	JSI
REVIEW	EMS/JSI
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | Rev. 0.0 | AMEREN_00000446 | FIGURE B17

Path: G:\Projects\150 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\NE\2D - RCPA-NE-June-2018 - deep-JS.mxd

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 11in

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- RCPA Pond Gauge
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
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REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000
Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - SHALLOW ALLUVIAL AQUIFER - JULY 19, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-08-14
PREPARED	JS
DESIGN	JSI
REVIEW	EMS/JSI
APPROVED	MNH

PROJECT No. 153-1406
PHASE 0002
Rev. 0.0
AMEREN_00000447
FIGURE **B18**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 11in

Path: G:\Projects\150 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\ME3S - RCPA-NE-July-2018 -shallow-JS.mxd

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

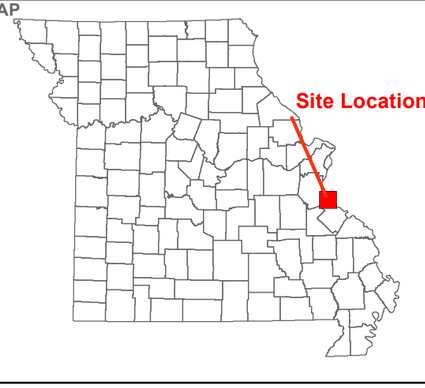
- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent

Groundwater Flow Direction

KEY MAP



NOTES
1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES
1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000
Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - INTERMEDIATE ALLUVIAL AQUIFER - JULY 19, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-08-14
PREPARED	JS
DESIGN	JSI
REVIEW	EMS/JSI
APPROVED	MNH

PROJECT No. 153-1406
PHASE 0002
Rev. 0.0
AMEREN_00000448
FIGURE B19

Path: G:\Projects\150 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\NE3I - RCPA-NE-July-2018 - intermediate-JS.mxd

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
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3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
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5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - DEEP ALLUVIAL AQUIFER - JULY 19, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-08-14
PREPARED	JS
DESIGN	JSI
REVIEW	EMS/JSI
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | Rev. 0.0 | AMEREN_00000449 | FIGURE **B20**

Path: G:\Projects\150 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\NE\3D - RCPA-NE-July-2018 - deep-JS.mxd

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 11in

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- RCPA Pond Gauge
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.
6.) R-P-17S NOT USED FOR CONTOUR MAPPING.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - SHALLOW ALLUVIAL AQUIFER - AUGUST 20, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-10-18
PREPARED	JSI
DESIGN	JSI
REVIEW	TJG
APPROVED	MNH

PROJECT No. 153-1406
PHASE 0002
Rev. 0.0
AMEREN_00000450
FIGURE B21

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:
1in
0

Path: G:\Projects\150 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\NE4S - RCPA-NE-AUG-2018 -shallow-JSI.mxd

R-MW-B2
368.35
R-P-29D
372.59
R-MW-B1
371.10
Mississippi River Gauge
371.69
RUSH ISLAND
ENERGY CENTER
372
371
MISSISSIPPI RIVER
R-MW-1
370.54
R-P-13I
371.10
R-P-17I
370.58
R-MW-7
371.47
R-MW-2
370.34
R-P-19I
371.03
R-P-08D
371.64
RCPA
R-MW-6
372.36
R-MW-3
370.08
R-P-21I
370.33
Pond Gauge
395.0
R-P-05I
371.44
R-P-22I
370.25
R-MW-5
371.09
R-P-03D
371.04
R-MW-4
370.43

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bing

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - INTERMEDIATE ALLUVIAL AQUIFER - AUGUST 20, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-10-18
PREPARED	JSI
DESIGN	JSI
REVIEW	TJG
APPROVED	MNH

PROJECT No. 153-1406
PHASE 0002
Rev. 0.0
AMEREN_00000451
FIGURE B22

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:
1in
0

Path: G:\Projects\150 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\NE4I - RCPA-NE-Aug-20-18 - Middle - JSI.mxd

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - DEEP ALLUVIAL AQUIFER - AUGUST 20, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-10-18
PREPARED	JSI
DESIGN	JSI
REVIEW	TJG
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | Rev. 0.0 | FIGURE B23

AMEREN_00000452

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 11in

Path: G:\Projects\150 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\NE4D - RCPA-NE-Aug-2018 -Deep-JSI.mxd

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- RCPA Pond Gauge
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
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5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000
Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - SHALLOW ALLUVIAL AQUIFER - SEPTEMBER 25, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-10-18
PREPARED	JSI
DESIGN	JSI
REVIEW	TJG
APPROVED	MNH

PROJECT No. 153-1406
PHASE 0002
Rev. 0.0
AMEREN_00000453
FIGURE B24

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 1in

Path: G:\Projects\150 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\MXD\S - RCPA-NE-SEP1-2018 -shallowJSI.mxd

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

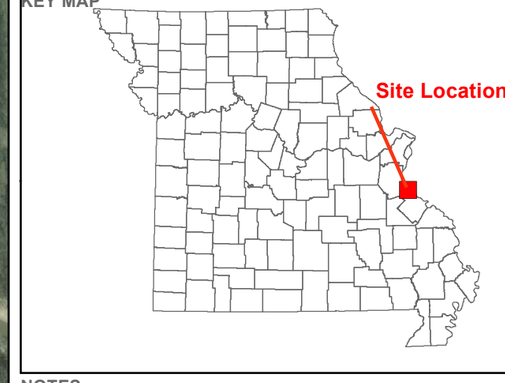
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
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5.) POND LEVEL OBTAINED ONSITE BY GOLDER.
6.) R-P-17I NOT USED FOR CONTOURING.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - INTERMEDIATE ALLUVIAL AQUIFER - SEPTEMBER 25, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-10-18
PREPARED	JSI
DESIGN	JSI
REVIEW	TJG
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | Rev. 0.0 | AMEREN_00000454 | FIGURE B25

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 11in

Path: G:\Projects\150 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\ME5I - RCPA-NE-sept-2018 -Middle-JSI.mxd

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
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2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
NATURE AND EXTENT POTENTIOMETRIC SURFACE MAP - DEEP ALLUVIAL AQUIFER - SEPTEMBER 25, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-10-18
PREPARED	JSI
DESIGN	JSI
REVIEW	TJG
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | Rev. 0.0 | AMEREN_00000455 | FIGURE **B26**

Path: G:\Projects\153 Projects\153-1406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\900 - FIGURES-DRAWINGS\PRODUCTION\GMP Figures\Potentiometric Surface Maps\Updated Pot Maps\NE50 - RCPA-NE-SEP1-2018 - Deep-JSI - .mxd

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 11in

MW-B2
385.49

MW-B1
384.40

Mississippi
River Gauge
384.79

RUSH ISLAND
ENERGY CENTER

385

384

MISSISSIPPI RIVER

MW-1
383.91

MW-7
384.55

MW-2
383.56

MW-6
384.42

MW-3
383.34

Pond Gauge
394.00

MW-5
383.82

MW-4
383.49

Service Layer Credits: © 2019 Microsoft Corporation © 2019 DigitalGlobe ©CNES (2019) Distribution Airbus DS

bing

N

LEGEND

Rush Island Energy Center Property Boundary

RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

Groundwater Elevation Contour (FT MSL)

Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

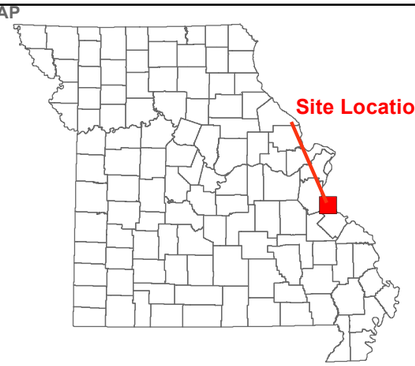
Groundwater Monitoring Well

Mississippi River Gauge

RCPA Pond Gauge

Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER MONITORING WELLS SURVEYED BY ZAHNER AND ASSOCIATES, INC. ON DECEMBER 1, 2015.
3.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
4.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
5.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
6.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

Ameren

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA - POTENTIOMETRIC SURFACE MAP - NOVEMBER 1, 2018

CONSULTANT

GOLDER

YYYY-MM-DD	2019-01-29
PREPARED	EFT
DESIGN	JSI
REVIEW	JAP
APPROVED	MNH

PROJECT No.
153-1406

PHASE
0002

AMEREN_00000456

FIGURE
B27

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:
1 in
0

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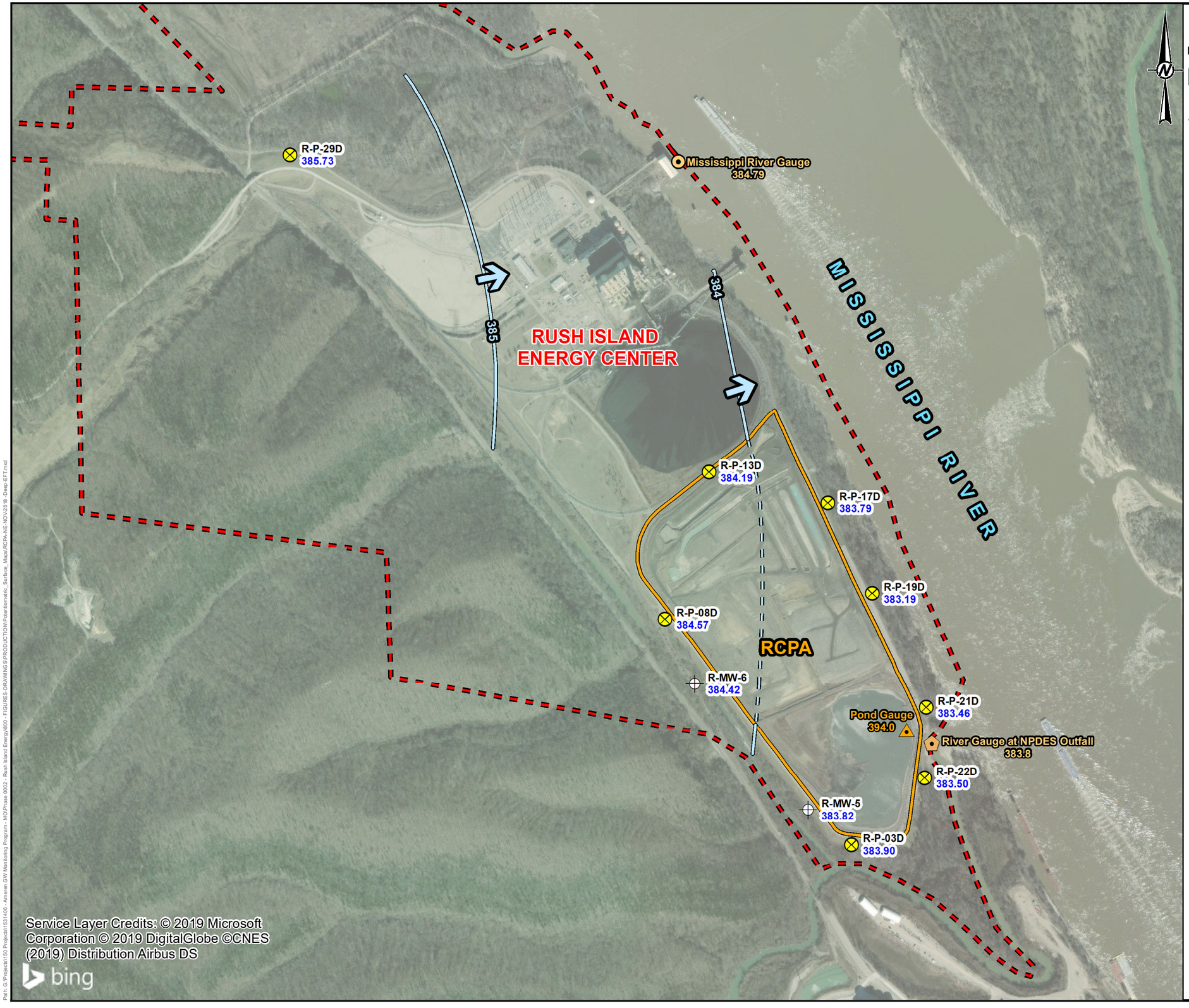

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- Mississippi River Gauge at NPDES Outfall
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA POTENTIOMETRIC SURFACE MAP - DEEP ALLUVIAL AQUIFER ZONE - NOVEMBER 1, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-12-18
PREPARED	EFT
DESIGN	JSI
REVIEW	EMS
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | Rev. 0.0 | AMEREN_00000457 | FIGURE **B28**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 1 in 0

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LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

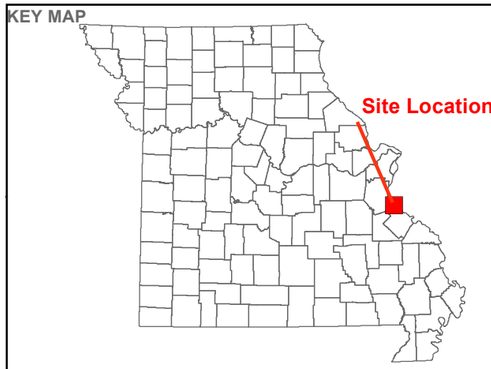
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- Mississippi River Gauge at NPDES Outfall
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA POTENTIOMETRIC SURFACE MAP - INTERMEDIATE ALLUVIAL AQUIFER ZONE - NOVEMBER 1, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2018-12-18
PREPARED	EFT
DESIGN	JSI
REVIEW	EMS
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | REV. 0.0 | AMEREN_00000458 | FIGURE **B29**

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IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 1 in

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

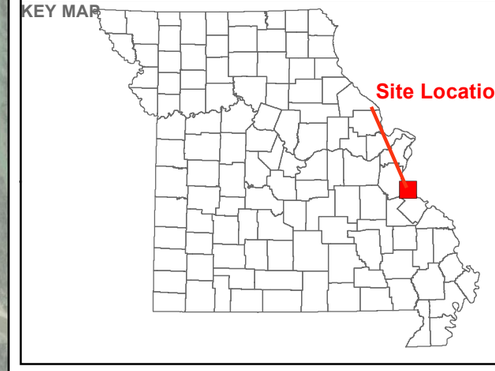
- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- Mississippi River Gauge at NPDES Outfall
- RCPA Pond Gauge
- Monitoring Wells used for Nature and Extent

Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.
6.) R-P-17S IS NOT USED FOR CONTOUR MAPPING.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA POTENTIOMETRIC SURFACE MAP - SHALLOW ALLUVIAL AQUIFER ZONE - NOVEMBER 1, 2018

CONSULTANT
GOLDER

YYYY-MM-DD	2019-08-26
PREPARED	JSI
DESIGN	JSI
REVIEW	EMS
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | Rev. 0.0 | AMEREN_00000459 | FIGURE **B30**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 1in 0

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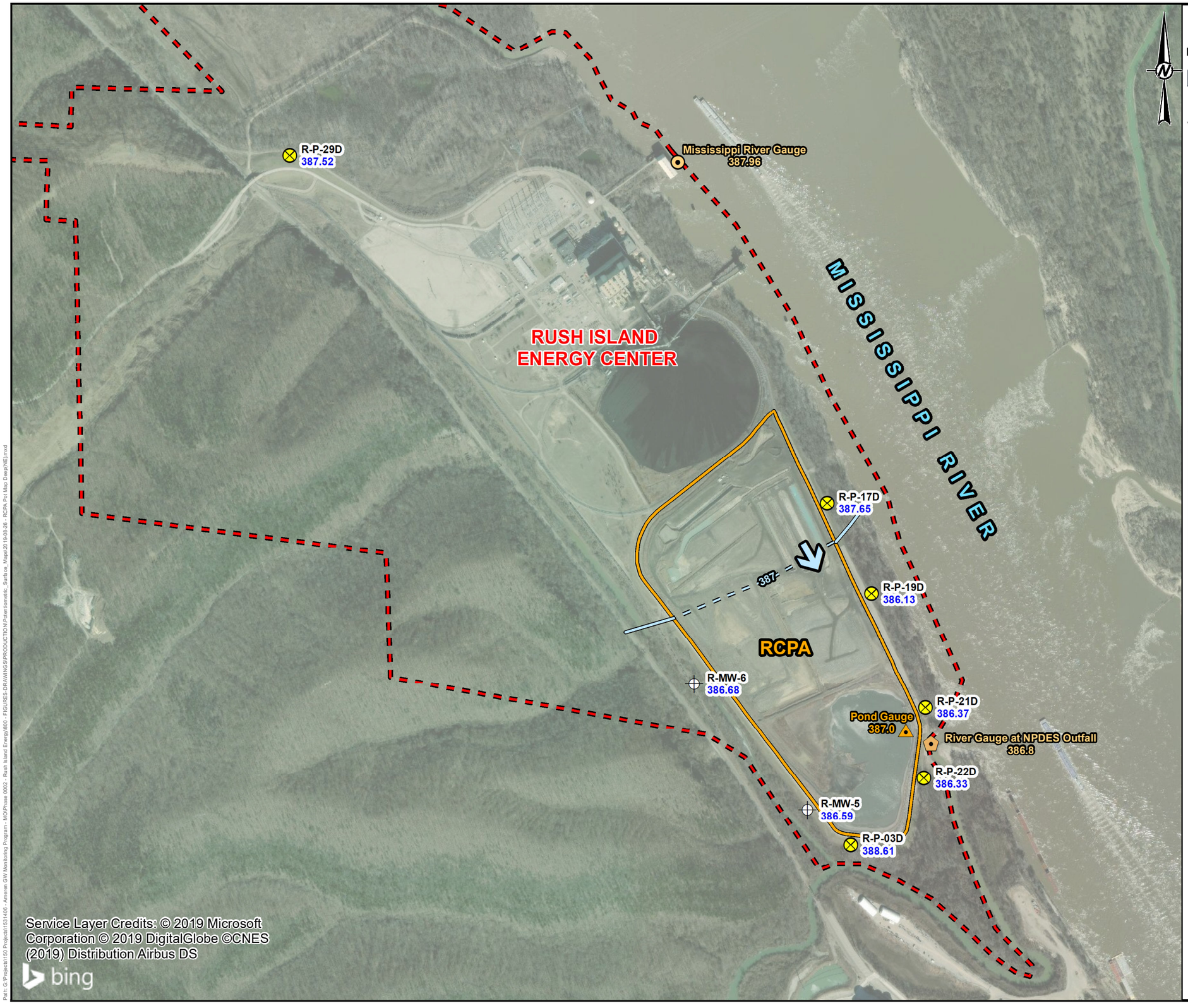


LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

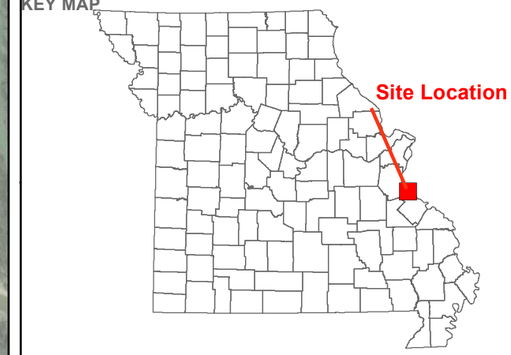
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- Mississippi River Gauge at NPDES Outfall
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA POTENTIOMETRIC SURFACE MAP - DEEP ALLUVIAL AQUIFER ZONE - JULY 29, 2019

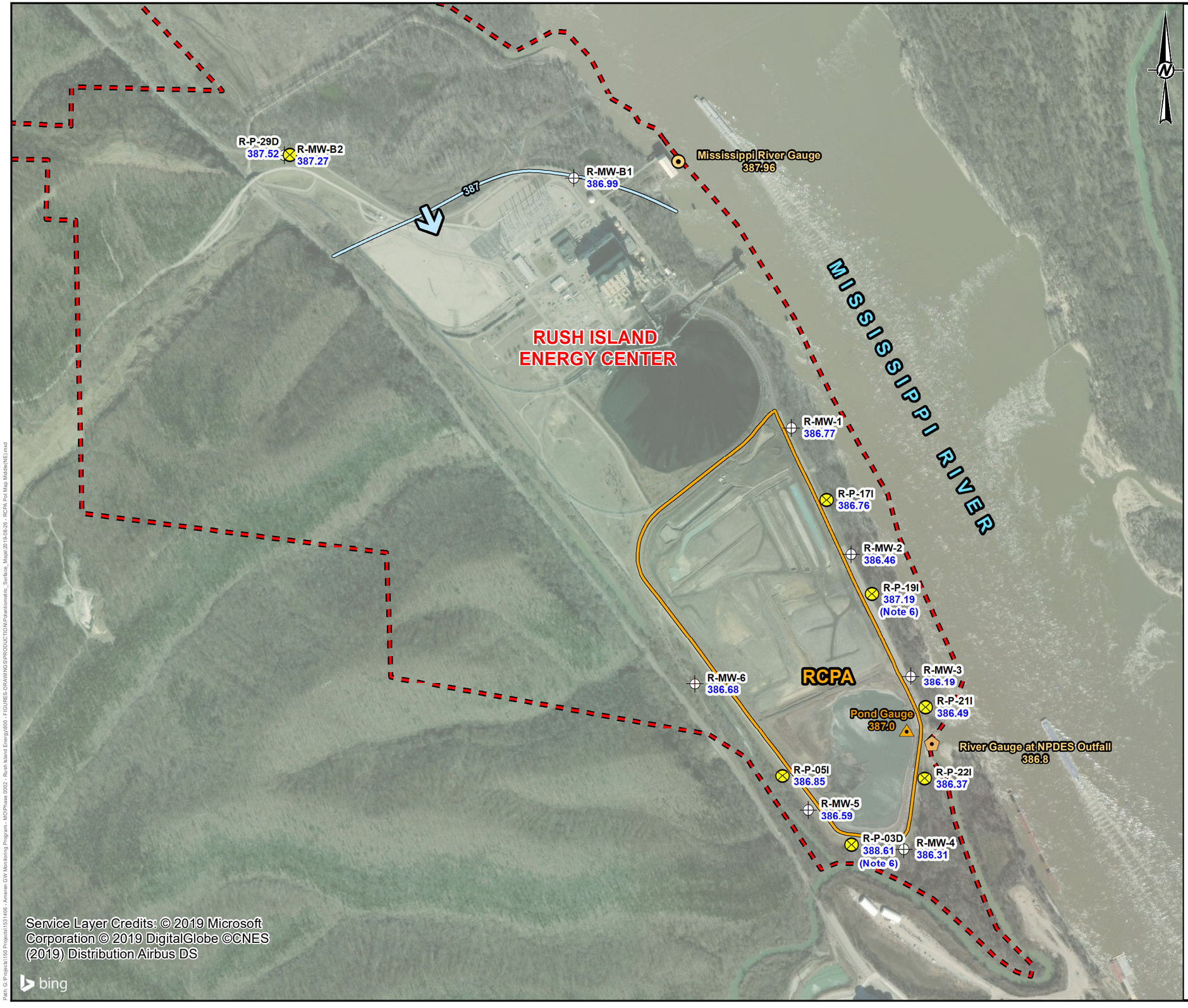
CONSULTANT
GOLDER

YYYY-MM-DD	2019-8-18
PREPARED	JSI
DESIGN	JSI
REVIEW	EMS
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | AMEREN_00000460 | REV. 0.0 | FIGURE **B31**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 1 in 0

Path: G:\Projects\153\Projects\15314406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\Potentiometric_Surface_Maps\2019-08-26 - RCPA Pot Map Dwgs(NE).mxd



LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

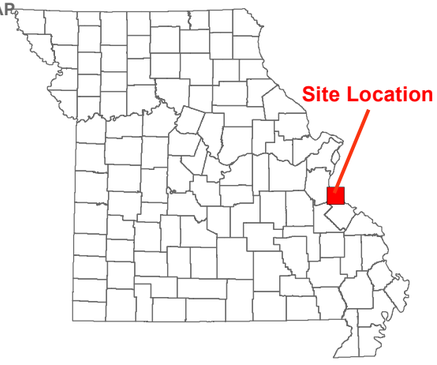
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- Mississippi River Gauge at NPDES Outfall
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP



NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.
6.) R-P-19I AND R-P-03D NOT USED FOR CONTOUR MAPPING.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000
Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA POTENTIOMETRIC SURFACE MAP - INTERMEDIATE ALLUVIAL AQUIFER ZONE - JULY 29, 2019

CONSULTANT
GOLDER

YYYY-MM-DD	2018-12-18
PREPARED	JSI
DESIGN	JSI
REVIEW	EMS
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | REV. 0.0 | AMEREN_00000461 | FIGURE **B32**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 1 in

Path: G:\Projects\1501 Projects\1531406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\Potentiometric_Surface_Maps\2019-08-26 - RCPA Pot Map Middle(NE).mxd

LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

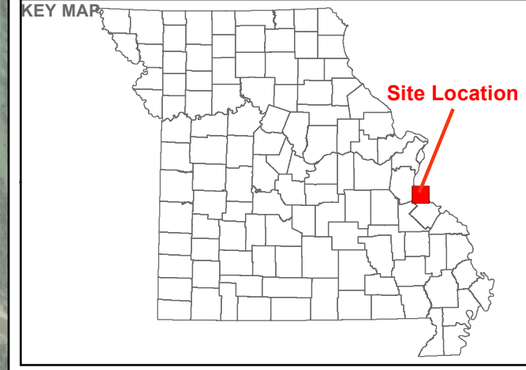
Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- Mississippi River Gauge at NPDES Outfall
- RCPA Pond Gauge
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP



NOTES

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3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA POTENTIOMETRIC SURFACE MAP - SHALLOW ALLUVIAL AQUIFER ZONE - JULY 29, 2019

CONSULTANT
GOLDER

YYYY-MM-DD	2019-08-26
PREPARED	JSI
DESIGN	JSI
REVIEW	EMS
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | REV. 0.0 | FIGURE **B33**

AMEREN_00000462

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 1 in

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LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- Mississippi River Gauge at NPDES Outfall
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
2.) GROUNDWATER ELEVATIONS DISPLAYED IN FT MSL (FEET ABOVE MEAN SEA LEVEL).
3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA POTENTIOMETRIC SURFACE MAP - DEEP ALLUVIAL AQUIFER ZONE - SEPTEMBER 30, 2019

CONSULTANT
GOLDER

YYYY-MM-DD	2019-10-21
PREPARED	AMM
DESIGN	JSI
REVIEW	BCW
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | AMEREN_00000463 | REV. 0.0 | FIGURE **B34**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: 1in 0

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LEGEND

- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- Mississippi River Gauge at NPDES outfall
- RCPA Pond Gauge
- CCR Rule Monitoring Wells
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction

KEY MAP

NOTES

1.) ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.
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3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
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5.) POND LEVEL OBTAINED ONSITE BY GOLDER.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA POTENTIOMETRIC SURFACE MAP - INTERMEDIATE ALLUVIAL AQUIFER ZONE - SEPTEMBER 30, 2019

CONSULTANT
GOLDER

YYYY-MM-DD	2019-10-18
PREPARED	AMM
DESIGN	JSI
REVIEW	BCW
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | Rev. 0.0 | AMEREN_00000464 | FIGURE **B35**

Path: G:\Projects\153\Projects\15314406 - Ameren GW Monitoring Program - MO\Phase 0002 - Rush Island Energy\800 - FIGURES-DRAWINGS\PRODUCTION\Potentiometric_Surface_Maps\2019-09-30 - RCPA Pot Map Middle(NE)2.mxd

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM:

LEGEND

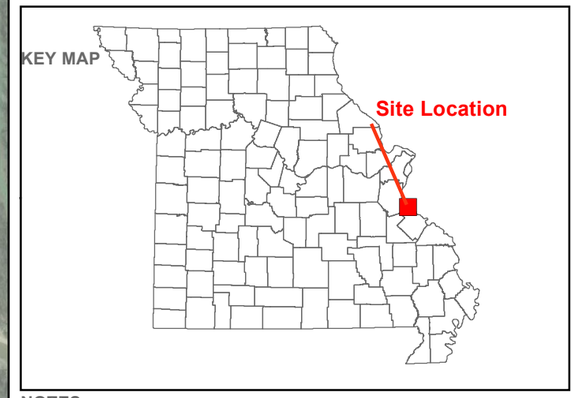
- Approximate Rush Island Energy Center Property Boundary
- RCPA Surface Impoundment

Groundwater Elevation Contour (FT MSL)

- Groundwater Elevation Contour (FT MSL)
- Inferred Groundwater Elevation Contour (FT MSL)

Ground/Surface Water Measurement Locations

- Mississippi River Gauge
- Mississippi River Gauge at NPDES Outfall
- RCPA Pond Gauge
- Monitoring Wells used for Nature and Extent
- Groundwater Flow Direction



NOTES

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3.) GROUNDWATER ELEVATION MEASUREMENTS OBTAINED BY GOLDER.
4.) MISSISSIPPI RIVER LEVEL PROVIDED BY AMEREN.
5.) POND LEVEL OBTAINED ONSITE BY GOLDER.
6.) R-P-17S WAS NOT USED FOR CONTOUR MAPPING.

REFERENCES

1.) AMEREN MISSOURI RUSH ISLAND ENERGY CENTER, RUSH ISLAND PROPERTY CONTROL MAP, JANUARY 2012.
2.) COORDINATE SYSTEM: NAD 1983 STATE PLANE MISSOURI EAST FIPS 2401 FEET.

0 500 1,000 2,000 Feet

CLIENT
AMEREN MISSOURI
RUSH ISLAND ENERGY CENTER

PROJECT
CCR GROUNDWATER MONITORING PROGRAM

TITLE
RCPA POTENTIOMETRIC SURFACE MAP - SHALLOW ALLUVIAL AQUIFER ZONE - SEPTEMBER 30, 2019

CONSULTANT
GOLDER

YYYY-MM-DD	2019-10-21
PREPARED	AMM
DESIGN	JSI
REVIEW	BCW
APPROVED	MNH

PROJECT No. 153-1406 | PHASE 0002 | REV. 0.0 | AMEREN_00000465 | FIGURE **B36**

APPENDIX C

Groundwater Sampling Methods and Procedures

Groundwater Sampling Methodology and Procedures

Groundwater Monitoring Plan

Ameren Missouri
1901 Chouteau Avenue, St. Louis, Missouri 63103

Golder Associates Inc.
13515 Barrett Parkway Drive, Suite 260, Ballwin, Missouri, USA 63021

+1 314 984-8800

153140601

November 2019

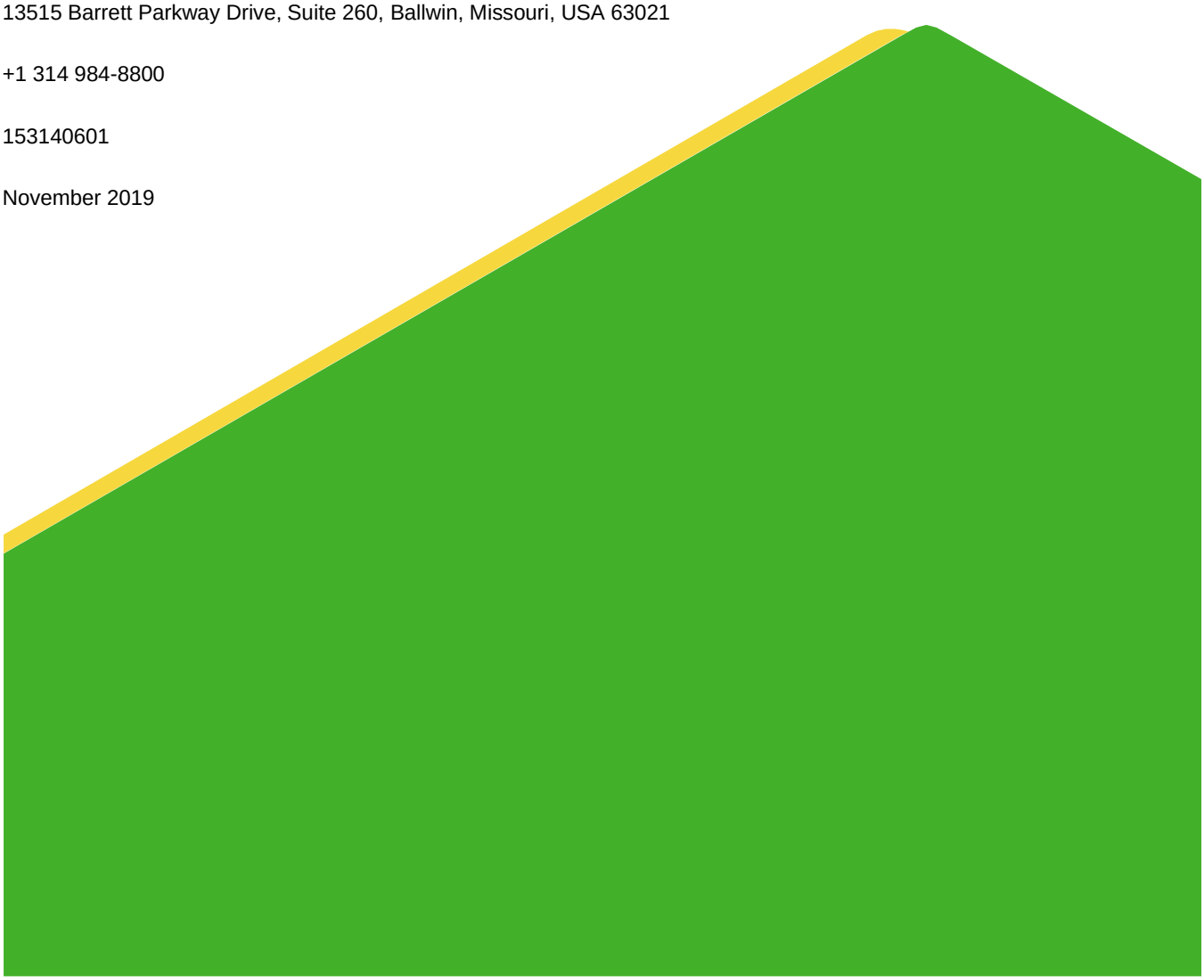


Table of Contents

1.0 INTRODUCTION

Sampling will be performed in accordance with generally accepted practices within the industry and with the provisions of Missouri regulations. This document is an appendix to the Groundwater Monitoring Plan and provides details regarding the procedures that will be used to collect groundwater samples. Although this appendix provides references to specific forms, the use of other equivalent forms to record the necessary data is permissible.

2.0 GROUNDWATER SAMPLING METHODOLOGY

2.1 Monitoring Well Inspection

Prior to performing any water purging or sampling, each monitoring well will be inspected to assess its integrity. The condition of each monitoring well will be evaluated for any physical damage or other breach of integrity. The security of each monitoring well will be assessed in order to confirm that no outside source constituents have been introduced to the monitoring well.

2.2 Monitoring Well Purging

Prior to collecting samples, each monitoring well will be purged. Purging will be accomplished using either:

- Low-flow (a.k.a., minimal drawdown, or micropurge) techniques
- Traditional purging techniques where at least three well volumes are evacuated before samples are collected

2.2.1 Low-Flow Sampling Technique

Low-flow groundwater sampling procedures will be used for purging and sampling monitoring wells that are equipped with dedicated pumps/tubing and will sustain a pumping rate of at least 100 milliliters per minute (ml/min). Water will be purged from these wells at low rates in order to minimize drawdown in the well during purging and sampling. Depth to water measurements and field water quality parameters (temperature, pH, turbidity, and conductivity) recorded during purging will be used as criteria to determine when purging has been completed. Sample collection will be initiated immediately after purging at each well.

During water purging, wells will be pumped at rates that minimize drawdown in the well. Purging rates in the range of 100-500 ml/min typically will be used; however, higher rates may be used if sustained by the well. Stabilization of the water column is achieved when three consecutive water level measurements vary by 0.3-foot or less at a pumping rate of no less than 100 ml/min (United States Environmental Protection Agency [USEPA], 2010).

At a minimum, field water quality parameter measurements of temperature, pH, turbidity, and conductivity, will be measured during purging at each well. Prior to collecting the initial set of field water quality parameters, the water in the sampling pump and discharge tubing (i.e., pump system volume) remaining from the previous sampling event will be removed.

After evacuating the water in the pump system, field measurements will begin. Depth to water measurements and field water quality parameter measurements will be made during purging. If a field meter equipped with a flow cell is used, an amount of water equal to the volume of the flow cell should be allowed to pass through the flow cell between individual field stabilization measurements. Stabilization will be attained and purging considered complete when three consecutive measurements of each field parameter vary within the following limits:

- ± 0.2 for pH

- ± 3% for Conductivity
- ± 10% for Temperature
- Less than 10 nephelometric turbidity units (NTU) or ± 10% for Turbidity

All data gathered during monitoring well purging will be recorded on a form, an example of which is included in **Appendix A**.

2.3 Traditional Purge Techniques

If low-flow sampling is not performed, wells will be purged a minimum of 3 well volumes before collecting a sample. Purging procedures will generally follow those for low-flow sampling including measurement of the field parameters listed above with two exceptions:

- Higher flow rate may be used during purging
- Purging is completed after a minimum of 3 well volumes have been removed (see below)

Even where low-flow sampling is not performed, the sampling goals are to:

- Stabilize field parameters (listed in previous section) prior to collecting samples
- Minimize drawdown in the well

When traditional purge techniques are used, field stabilization measurements will be collected at the beginning of purging and between each well volume purged. The stability criteria will be those described above for low-flow sampling.

2.3.1 Low Yielding Wells

If a monitoring well purges dry, it will be allowed to recover up to 24 hours before samples are collected. No additional purging will be performed after initially purging the monitoring well dry. If recharge is insufficient to fill all necessary sample containers, samplers will note this on the field form, and fill as many sample containers as possible.

3.0 CALIBRATION, FIELD DOCUMENTATION, AND LABORATORY DOCUMENTATION

3.1 Equipment Calibration

Equipment used to record field water quality parameters will be calibrated each day prior to use following manufacturers' recommendations. Calibration solutions for standardization materials will be freshly prepared or from non-expired stock. In the absence of manufacturer or regulatory guidance, field equipment should be calibrated to within +/- 10 percent of the standard (or 0.1 standard units for pH meters). Equipment that fails calibration may not be used. Calibration records will be maintained. A sample field Instrument Calibration Form is included in **Appendix A.**

3.1.1 Sample Collection

Sampling should take place immediately after purging is complete. Samples will be transferred directly from field sampling equipment into containers supplied by the analytical laboratory appropriate for the constituents being monitored. Sample containers will be kept closed until the time each set of sample containers is filled.

3.1.2 Equipment Decontamination

All non-dedicated field equipment that is used for purging or sample collection shall be cleaned with a phosphate-free detergent and triple-rinsed, inside and out, with deionized or distilled water prior to use and between each monitoring well. Decontamination water shall be disposed of at an Ameren approved location. Any disposable tubing used with non-dedicated pumps should be discarded after use at each monitoring well. Clean latex or nitrile gloves will be worn by sampling personnel during monitoring well purging and sample collection.

3.1.3 Sample Preservation and Handling

In accordance with §257.93 of the CCR Rule, groundwater samples collected as part of the monitoring program will not be filtered prior to analysis. Once groundwater samples have been collected and preserved in laboratory supplied containers, they will be packed into insulated, ice-filled coolers to be maintained at a temperature as close as possible to 4 degrees Celsius. Groundwater samples will be collected in the designated size and type of containers required for specific parameters. Sample containers will be filled in such a manner as not to lose preservatives by spilling or overfilling. Samples will be delivered to the laboratory or sent via overnight courier following chain-of-custody procedures.

3.1.4 Chain-of-Custody Program

The chain-of-custody (COC) program will allow for tracing sample possession and handling from the time of field collection through laboratory analysis. The COC program includes sample labels, sample seals, field Groundwater Sample Collection Forms, and COC record. A sample Chain-of-Custody (COC) form is provided in **Appendix A**.

Each sample will be assigned a unique sample identification number to be recorded on the sample label. The sample identification number for all samples will be designated differently based on the nature of the samples. Each sample identification number and description will be recorded on the field Groundwater Sample Collection Form and on the COC document.

3.1.5 Sample Labels

Sample labels sufficiently durable to remain legible when wet will contain the following information, written with indelible ink:

- Site and sample identification number
- Monitoring well number or other location
- Date and time of collection
- Name of collector
- Parameters to be analyzed
- Preservative, if applicable

3.1.6 Sample Seal

The shipping container will be sealed to prevent the samples from being disturbed during transport to the laboratory.

3.1.7 Field Forms

All field information must be completely and accurately documented to become part of the final report for the groundwater monitoring event. Example field forms are included in **Appendix A**. The field forms will document the following information:

- Identification of the monitoring well
- Sample identification number
- Field meter calibration information
- Water level depth
- Purge volume
- Time monitoring well was purged
- Date and time of collection
- Parameters requested for analysis
- Preservative used
- Field water quality parameter measurements
- Field observations on sampling event
- Name of collector(s)
- Weather conditions including air temperature and precipitation

3.1.8 Chain-of-Custody Record

The COC record is required for tracing sample possession from time of collection to time of receipt at the laboratory. The National Enforcement Investigations Center (NEIC) of USEPA considers a sample to be in custody under any of the following conditions:

- It is in the individual's possession
- It is in the individual's view after being in their possession
- It was in the individual's possession and they locked it up
- It is in a designated secure area

All environmental samples will be handled under strict COC procedures beginning in the field. The field team leader will be the field sample custodian and will be responsible for ensuring that COC procedures are followed. A COC record will accompany each individual shipment. The record will contain the following information:

- Sample destination and transporter
- Sample identification numbers
- Signature of collector
- Date and time of collection
- Sample type
- Identification of monitoring well
- Number of sample containers in shipping container
- Parameters requested for analysis
- Signature of person(s) involved in the chain of possession
- Inclusive dates of possession

A copy of the completed COC form will be placed in a water-resistant bag and accompany the shipment and will be returned to the shipper after the shipping container reaches its destination. The COC record will also be used as the analysis request sheet. When shipping by courier, the courier does not sign the COC record: copies of shipping forms are retained to document custody.

3.1.9 Temperature Control and Sample Transportation

After collection, sample preservation, and labeling, sample containers will be placed in coolers containing water-ice with the goal of reducing the groundwater samples to a temperature of approximately 4°C or less. All samples included in the shipping container will be packed in such a manner to minimize the potential for container breakage. Samples will be either hand-delivered or shipped via commercial carrier to the certified analytical laboratory. Custody seals will be placed on the shipping containers if a third-party courier is used.

4.0 ANALYTICAL AND QUALITY CONTROL PROCEDURES

4.1.1 Data Quality Objectives

As part of the evaluation component of the Quality Assurance (QA) program, analytical results will be evaluated for precision, accuracy, representativeness, completeness, and comparability (PARCC). These are defined as follows:

- Precision is the agreement or reproducibility among individual measurements of the same property, usually made under the same conditions
- Accuracy is the degree of agreement of a measurement with the true or accepted value
- Representativeness is the degree to which a measurement accurately and precisely represents a characteristic of a population, parameter, or variations at a sampling point, a process condition, or an environmental condition
- Completeness is a measure of the amount of valid data obtained from a measurement system compared with the amount that was expected to be obtained under correct normal conditions
- Comparability is an expression of the confidence with which one data set can be compared with another data set in regard to the same property

The accuracy, precision and representativeness of data will be functions of the sample origin, analytical procedures and the specific sample matrices. Quality Control (QC) practices for the evaluation of these data quality indicators include the use of accepted analytical procedures, adherence to hold time, and analysis of QC samples (e.g., blanks, replicates, spikes, calibration standards and reference standards).

Quantitative QA objectives for precision and accuracy, along with sensitivity (detection limits) are established in accordance with the specific analytical methodologies, historical data, laboratory method validation studies, and laboratory experience with similar samples. The Representativeness of the analytical data is a function of the procedures used to process the samples.

Completeness is a qualitative characteristic which is defined as the fraction of valid data obtained from a measurement system (e.g., sampling and analysis) compared to that which was planned. Completeness can be less than 100 percent due to poor sample recovery, sample damage, or disqualification of results which are outside of control limits due to laboratory error or matrix-specific interferences. Completeness is documented by including sufficient information in the laboratory reports to allow the data user to assess the quality of the results. The overall completeness goal for each task is difficult to determine prior to data acquisition. For this project, all reasonable attempts will be made to attain 90% completeness or better (laboratory).

Comparability is a qualitative characteristic which allows for comparison of analytical results with those obtained by other laboratories. This may be accomplished through the use of standard accepted methodologies, traceability of standards to the National Bureau of Standards (NBS) or USEPA sources, use of appropriate levels

of quality control, reporting results in consistent, standard units of measure, and participation in inter-laboratory studies designed to evaluate laboratory performance.

Data quality and the standard commercial report package will be evaluated with respect to PARCC criteria using the laboratory's QA practices, use of standard analytical methods, certifications, participation in inter-laboratory studies, temperature control, adherence to hold times, and COC documentation (also called Data Validation).

4.1.2 Quality Assurance/Quality Control Samples

This section describes the various Quality Assurance/Quality Control (QA/QC) samples that will be collected in the field and analyzed in the laboratory and the frequency at which they will be performed.

4.1.2.1 Field Equipment Rinsate Blanks

In cases where sampling equipment is not dedicated or disposable, an equipment rinsate blank will be collected. The equipment rinsate blanks are prepared in the field using laboratory-supplied analyte-free water. The water is poured over and through each type of sampling equipment following decontamination and submitted to the laboratory for analysis of target constituents. **One rinsate blank will be collected for every 10 samples.**

4.1.2.2 Field Duplicates

Field duplicates are collected by sampling the same location twice, but the field duplicate is assigned a unique sample identification number. Samplers will document which location is used for the duplicate sample. **One field duplicate will be collected for every 10 samples.**

4.1.2.3 Field Blank

Field blanks are collected in the field using laboratory-supplied analyte-free water. The water is poured directly into the supplied sample containers in the field and submitted to the laboratory for analysis of target constituents. **One field blank will be collected for every 10 samples.**

4.1.2.4 Laboratory Quality Control Samples

The laboratory will have an established QC check program using procedural (method) blanks, laboratory control spikes, matrix spikes, and duplicates. Details of the internal QC checks used by the laboratory will be found in the laboratory QAP and the published analytical methods. These QC samples will be used to determine if results may have been affected by field activities or procedures used in sample transportation or if matrix interferences are an issue. **One (1) Matrix Spike (MS)/ Matrix Spike Duplicate (MSD) set** (i.e. one sample plus one MS, and one MSD sample at one location) **will be collected per 20 samples.** MS/MSD samples will have a naming convention as follows:

- Sample: MW-1
- MS: MW-1-MS
- MSD: MW-1-MSD

5.0 REFERENCES

MDNR. 2011. Missouri Well Construction Rules. Missouri Department of Natural Resources Division of Geology and Land Survey. Rolla, MO. August 2011.

USEPA. 2010. Low Stress (Low Flow) Purging and Sampling Procedure for the Collection of Groundwater Samples From Monitoring Wells., U.S. Environmental Protection Agency, Revised January 19, 2010.

APPENDIX A

Example Field Forms

GOLDER

WELL DEVELOPMENT/PURGING FORM

Project Ref: _____ **Project No.:** _____

Location

Monitored By: _____ Date _____ Time _____

Well Piezometer Data

(*circle one*)

Depth of Well (from top of PVC or ground)		feet
Depth of Water (from top of PVC or ground)		feet
Radius of Casing		inches
		feet
Casing Volume		cubic feet
		gallons

Development / Purging Discharge Data

Purging Method				
Start Purging	Date		Time	
Stop Purging	Date		Time	

Monitoring

Date	Time	Volume Discharge (gals)	Temp (°__)	pH	Spec.Cond. (__S/cm)	Turbidity (NTU)	Dissolved Oxygen (mg/L)	Redox Potential (+/- mV)	WL (ft BTOC)	Appearance of Water and Comments

GROUNDWATER SAMPLE COLLECTION FORM

Project Ref: __ _____ **Project No. :**_____

WEATHER CONDITIONS

Temperature _____ Weather _____

SAMPLE INFORMATION

Sample Location _____ Sample No. _____

Sample Date _____ Time _____ Sample By_____

Sample Method _____ Sample Type_____

Water Level Before Purging: _____

Well Volume: _____

Volume Water Removed Before Sampling: _____

Water Level Before Sampling: _____

Water Level After Sampling: _____

Appearance of Sample: _____

FIELD MEASUREMENTS

Parameter	Units	Measurement	Measurement	Measurement	Measurement	Sample
Time	hhmm					
Volume Discharge	gals					
pH	Standard					
Spec. Cond.	___S/CM					
Turbidity	NTU					
Temperature	°___					
Dissolved Oxygen	mg/l					
Redox Potential	+/- mV					

LABORATORY CONTAINERS

Sub-Sample	Analysis Requested	Type and Size of Sample Container	Filtered (Yes or No)	Type of Preservative
1				
2				
3				
4				
5				
6				
7				
8				

REMARKS: _____

NA = Not applicable

SAMPLING METHODS:

Bailer: PVC/PE Peristaltic Pump Air-Lift Pump

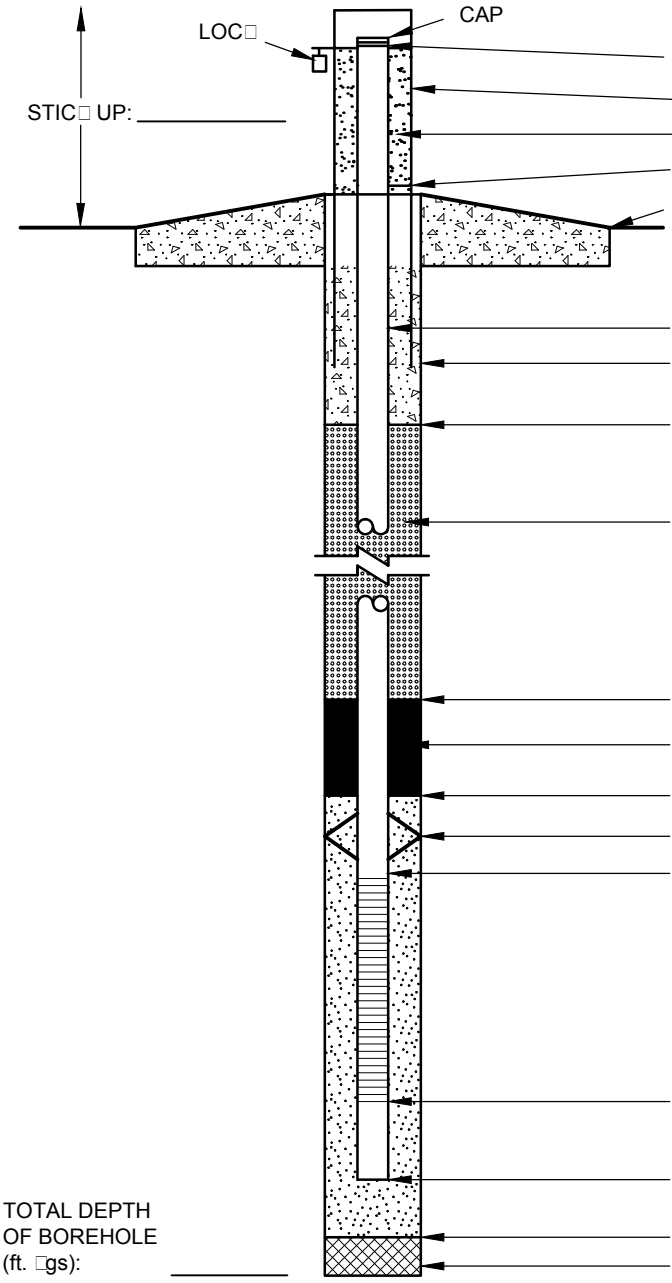
Stainless Steel Submersible Pump Other_____

Teflon Hand Pump

GOLDER

ABOVE GROUND MONITORING WELL CONSTRUCTION LOG _____

PROJECT NAME:		PROJECT NUMBER:
SITE NAME:		LOCATION:
CLIENT:		SURFACE ELEVATION:
GEOLOGIST:	NORTHING:	EASTING:
DRILLER:	STATIC WATER LEVEL:	COMPLETION DATE:
DRILLING COMPANY:		DRILLING METHODS:



TOP OF CASING ELEVATION: _____

PROTECTIVE CASING (yes / no): _____

PEA GRAVEL OR SAND

WEEP HOLE

GROUND SURFACE ELEVATION: _____

DIAMETER OF RISER PIPE (in.): _____

DIAMETER OF BOREHOLE (in.): _____

CONCRETE SEAL DEPTH (ft. □gs): _____

TYPE AND AMOUNT OF ANNULAR SEAL: _____

TOP OF BENTONITE SEAL DEPTH (ft. □gs): _____

TYPE AND AMOUNT OF BENTONITE SEAL: _____

TOP OF SAND PAC□ DEPTH (ft. □gs): _____

CENTRALIZER (yes / no) - TYPE: _____

TOP OF SCREEN DEPTH (ft. □gs): _____

TYPE OF SCREEN: _____

SCREEN SLOT SIZE (in.): _____

SIZE OF SAND PAC□: _____

AMOUNT OF SAND: _____

BOTTOM OF SCREEN DEPTH (ft. □gs): _____

BOTTOM OF WELL DEPTH (ft. □gs): _____

TOTAL DEPTH OF BOREHOLE (ft. □gs): _____

BOTTOM OF FILTER PAC□ (ft. □gs): _____

TYPE AND AMOUNT OF BAC□FILL: _____

ADDITIONAL NOTES: _____

CHEC□ED BY: _____

DATE CHEC□ED: _____

PREPARED BY: _____

GOLDER

RECORD OF WATER LEVEL READINGS

Project Name: _____ **Location:** _____ **Project No.:** _____

Borehole No.	Date	Time	Measuring Device / Serial No.	Measurement Point (M.P)	Water Level Below M.P.	Correction To Survey Mark	Survey Mark Elevation	Water Level Elevation	By	Comments

Sheet ___ of ___

GOLDER

INSTRUMENT CALIBRATION FORM

Project Name: _____ **Project No:** _____

Calibration By: _____

Instrument Details

Instrument Name	
Serial No.	
Model No.	

Calibration Details

Required Calibration Frequency/Last Calibration	
Calibration Standard	
Calibration Standard(s) Expiration Date	

Calibration:

Date	Time	**Calibration Standard** Units: _____	**Instrument Reading** Units: _____

Comments:

>>> Select a Laboratory <<<

#N/A
#N/A
#N/A
#N/A

Chain of Custody Record

Regulatory Program: ☐ DW ☐ NPDES ☐ RCRA ☐ Other:

Client Contact	**Project Manager:**	**Site Contact:**	**Date:**	COC No:
Your Company Name here	**Tel/Fax:**	**Lab Contact:**	**Carrier:**	_____ of _____ COCs
Address	**Analysis Turnaround Time**			Sampler:
City/State/Zip	☐ CALENDAR DAYS ☐ WORKING DAYS			**For Lab Use Only:**
(xxx) xxx-xxxx Phone	TAT if different from Below _____			Walk-in Client:
(xxx) xxx-xxxx FAX	☐ 2 weeks			Lab Sampling:
Project Name:	☐ 1 week			
Site:	☐ 2 days			Job / SDG No.:
P O #	☐ 1 day			

Sample Identification	Sample Date	Sample Time	Sample Type (C=Comp, G=Grab)	Matrix	# of Cont.	Filtered Sample (Y / N)	Perform MS / MSD (Y / N)															Sample Specific Notes:

Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other _____

Possible Hazard Identification:
Are any samples from a listed EPA Hazardous Waste? Please List any EPA Waste Codes for the sample in the Comments Section if the lab is to dispose of the sample.

☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)

☐ Return to Client ☐ Disposal by Lab ☐ Archive for_____ Months

Special Instructions/QC Requirements & Comments:

Custody Seals Intact: ☐ Yes ☐ No	Custody Seal No.:		Cooler Temp. (°C): Obs'd:_____ Corr'd:_____ Therm ID No.:_____		
Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:
Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:
Relinquished by:	Company:	Date/Time:	Received in Laboratory by:	Company:	Date/Time:

Golder Associates

Field Boring Log

DEPTH HOLE _____ **PROJ. NO.** _____ **PROJECT** _____ **BORING NO.** _____

DEPTH SOIL DRILL _____ **GA INSP.** _____ **DRILLING METHOD** _____ **SHEET** _____ **OF** _____

DEPTH ROCK CORE _____ **WEATHER** _____ **DRILLING COMPANY** _____ **SURFACE ELEV.** _____

ABANDONMENT _____ **DRILL RIG** _____ **DRILLER** _____ **DATUM** _____

DEPTHS _____/_____/_____/_____ **SAMPLER HAMMER TYPE** _____ **WT.** _____ **DROP** _____ **STARTED** _____/_____
WATER LEVEL CAVE-IN DATE-TIME NOTE TIME DATE

DEPTHS _____/_____/_____/_____ **HOLE LOCATION** _____ **COMPLETED** _____/_____
(DELAYED) WATER LEVEL CAVE-IN DATE-TIME NOTE TIME DATE

SAMPLE TYPES

	A.S.	AUGER SAMPLE
	C.S.	CHUNK SAMPLE
*	D.O.	DRIVE OPEN (SPT)
	D.S.	DENISON SAMPLE
	F.S.	FOIL SAMPLE
	P.S.	PITCHER SAMPLE
	S.C.	SOIL CORE
*	T.O.	THIN-WALLED, OPEN
*	T.P.	THIN-WALLED, PISTON
	W.S.	WASH SAMPLE
*	____	_____
*	____	_____
*	____	_____

* NOTE SIZE

ABBREVIATIONS

ANG	ANGULAR	GR	GRAY	R	RED
BL	BLACK	HE	HETEROGENEOUS	RES	RESIDUAL
BR	BROWN	HO	HOMOGENEOUS	RX	ROCK
C	COARSE	LYD	LAYERED	RND	ROUNDED
CIN	CAVE-IN	M	MEDIUM	SAT	SATURATED
CO	COHESIVE	MIC	MICACEOUS	SD	SAND
CL	CLAY	MOT	MOTTLED	SI	SILT
CLY	CLAYEY	MST	MOIST	SIY	SILTY
D	DRY	NC	NON-COHESIVE	SM	SOME
EL	ELONGATED	NP	NON-PLASTIC	TR	TRACE
F	FINE	OG	ORANGE	WL	WATER LEVEL
FL	FLAT	ORG	ORGANIC	WH	WEIGHT OF HAMMER
FRAG	FRAGMENTS	PP	POCKET PEN.	WR	WEIGHT OF RODS
GL	GRAVEL	PL	PLASTIC LIMIT	Y	YELLOW

ORDER OF DESCRIPTION

CONSTITUENTS
1) GROUP SYMBOL
2) SOIL GROUP NAME
3) PRIMARY COMPONENTS
4) SECONDARY COMPONENTS
5) MINOR COMPONENTS ;

PLUS DESCRIPTION:
CL/SI: PLASTICITY
SD: SIZE, GRADING
GL: SIZE, GRADING, SHAPE, ROCK TYPE

GENERAL
6) COLOR
7) WEATHERING
8) STRUCTURE
9) SENSITIVITY
10) CONTAMINATION
11) MINEROLOGY
12) ORIGIN ;

BEHAVIOR
13) BEHAVIOR (CO/NC)
14) MOISTURE/WATER CONTENT
15) DENSITY/CONSISTENCY

PROPORTIONS

"TRACE"	0 – 5%
"SOME"	5 – 12%
PREFIX "-Y"	12 – 35%
"AND"	35 – 50%

NON-COHESIVE SOILS

RELATIVE DENSITY		BLOWS
VERY LOOSE	VLS	0 – 4
LOOSE	LS	4 – 10
COMPACT	CP	10 – 30
DENSE	DN	30 – 50
VERY DENSE	VDN	>50

MOISTURE CONDITION

DRY	SOIL FLOWS
MOIST	FEELS COOL
WET	WITH FREE WATER

COHESIVE SOILS

CONSISTENCY		PP(TSF)	FINGER PRESSURE
VERY SOFT	VS	<0.25	EXTRUDES
SOFT	S	0.25 - 0.5	MOLDS EASILY
FIRM	FM	0.5 – 1	MOLDS
STIFF	ST	1 – 2	THUMB INDENTS
VERY STIFF	VST	2 – 4	THUMBNAIL INDENTS
HARD	H	>4	RESISTS THUMBNAIL

WATER CONTENT - W

W < PL	CANNOT ROLL 4 mm THREAD
W ~ PL	CAN ROLL THREAD 2 – 4 mm
W > PL	CAN ROLL THREAD <2 mm

ELEV. / DEPTH	LITHOLOGY	SAMPLES						CONSTITUENTS			BEHAVIOR			USCS	SAMPLE DESCRIPTION AND DRILLING NOTES
		NO.	TYPE	DEPTH	SPT N / PP(TSF)	BLOWS PER 6 IN	REC / ATT	GL	SD	CL/SI	CO or NC	MOIST. or W	DENS./ CONS.		
								PROPORTION; SIZE, SHAPE, GRADING; PLASTICITY							

APPENDIX D

Statistical Analysis Plan

Corrective Action Statistical Analysis Plan

Rush Island Energy Center - Jefferson County, Missouri

Submitted to:

Ameren Missouri

1901 Chouteau Avenue, St. Louis, Missouri 63103

Submitted by:

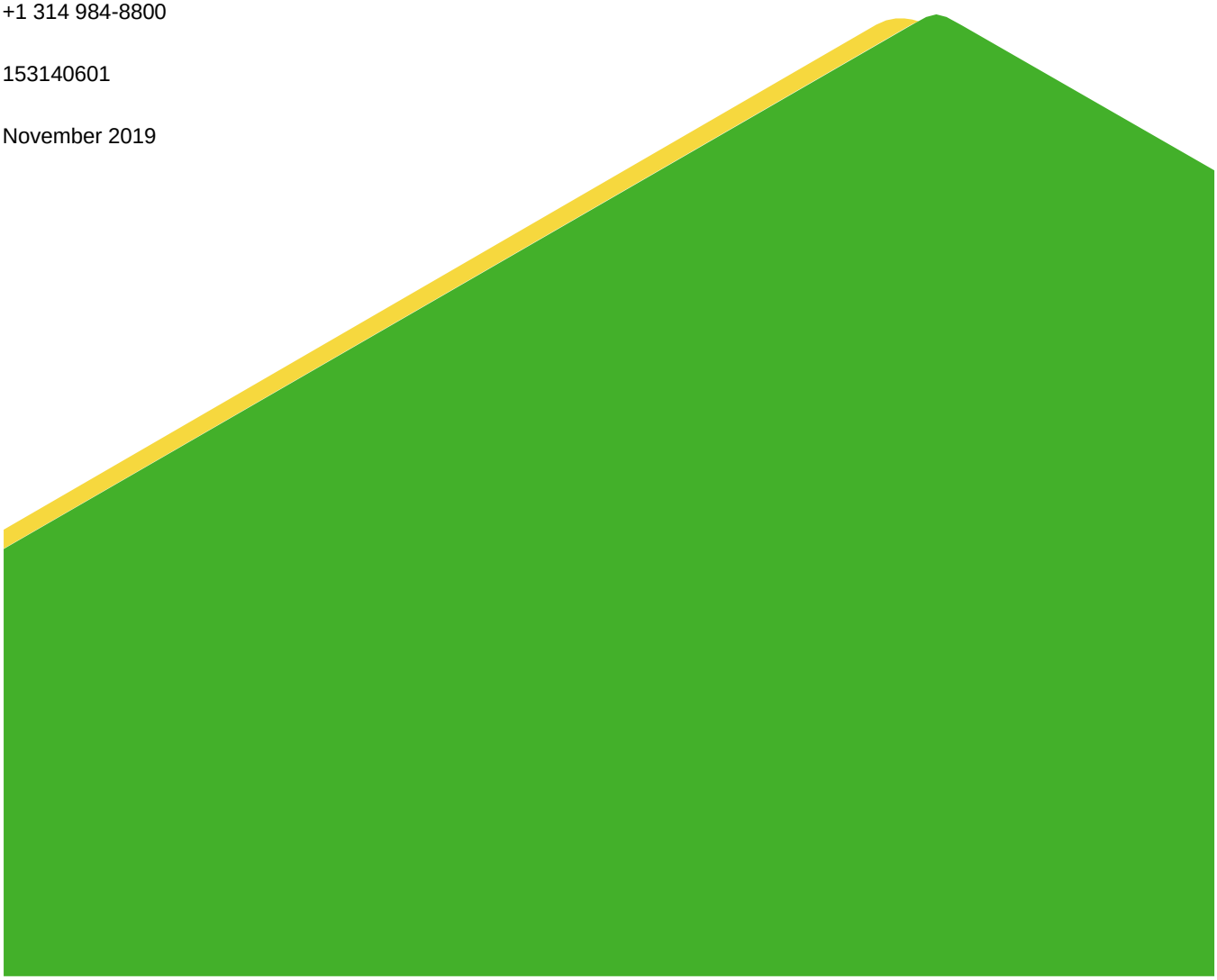
Golder Associates Inc.

13515 Barrett Parkway Drive, Suite 260, Ballwin, Missouri, USA 63021

+1 314 984-8800

153140601

November 2019



Executive Summary

This Corrective Action Statistical Analysis Plan (SAP) was developed to meet the requirements of United States Environmental Protection Agency (USEPA) 40 CFR Part 257 “Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule” (the Rule or CCR Rule), specifically § 257.98(a)(1) on the Implementation of a Corrective Action Program. This section of the CCR Rule requires owners or operators establish and implement a Corrective Action Groundwater Monitoring Plan (GMP) within 90 days of selecting a remedy. On August 30, 2019 Ameren Missouri (Ameren) selected the remedy of source control through installation of a low permeability cover system and use of Monitored Natural Attenuation (MNA) for groundwater impacts from the RCPA Surface Impoundment at the Rush Island Energy Center (RIEC).

As a part of the groundwater sampling and analysis requirements of the Rule, statistical methods as described in Section §257.93(f) of the Rule need to be implemented to statistically evaluate groundwater quality. The selected statistical method must then be certified by a qualified Professional Engineer stating that the statistical method is appropriate for evaluating the groundwater monitoring data for the CCR Unit. Detailed descriptions of the acceptable statistical data methods are provided in the USEPA’s “Statistical Analysis of Groundwater Data at RCRA Facilities, Unified Guidance” (USEPA, 2009) (Unified Guidance). The Unified Guidance is also recommended in the CCR Rule to be used for guidance in the selection of the appropriate statistical evaluation method.

This SAP details the statistical procedures to be used for Corrective Action monitoring for Ameren Missouri at the above mentioned CCR Unit. Details on statistical analysis for detection monitoring and assessment monitoring are provided in the GMP for the RCPA and are not included in this document. Detailed information on collection, sampling techniques, preservation, etc. are provided in the Corrective Action Groundwater Monitoring Plan (GMP) for the CCR Unit specified above. This SAP is a companion document to the GMP and assumes that data analyzed by the procedures described in this SAP are from samples that were collected in accordance with the Corrective Action GMP.

This SAP was prepared by Golder Associates Inc. (Golder), on behalf of Ameren, to document appropriate methods of groundwater data evaluation in compliance with CCR Rules. The methods and groundwater data evaluation techniques used in this SAP are appropriate for evaluation of the groundwater monitoring data for the above mentioned CCR Unit and are in compliance with performance standards outlined in the CCR Rule.

Table of Contents

1.0 INTRODUCTION

This SAP discusses the procedures, methods, and processes that will be implemented as part of the Corrective Action statistical evaluation. Corrective Action statistical analysis will begin once source control through the installation of a low permeability cover system is complete. Additionally, as specified in the Corrective Action GMP, a minimum of eight rounds of sampling for all constituents present at a Statistically Significant Level (SSL) from Assessment Monitoring will be collected prior to initiating statistical analysis. This background monitoring period provides baseline data for each monitoring well which can be used as the basis of the statistical evaluation.

2.0 STATISTICAL DATA PREPARATION AND INITIAL REVIEW

Many of the statistical comparison tests used in Corrective Action monitoring require various analyses to be completed prior to the data being used for the calculation of statistical limits. This section discusses the methods and procedures for completing the initial review of the data. The analyses required include testing for statistical independence, physical independence, and procedures to evaluate potential outliers.

2.1.1 Physical and Statistical Independence of Groundwater Samples

Corrective Action Monitoring statistical evaluations assume that background and downgradient sampling results are statistically independent. The Unified Guidance states that *"Physical independence of samples does not guarantee statistical independence, but it increases the likelihood of statistical independence."* (Section 14.1, Unified Guidance). Physical independence is most likely achieved when consecutive groundwater samples are collected from independent volumes of water within a given aquifer zone. Using the Darcy Equation, minimum time intervals between sampling events can be calculated to confirm the minimum time interval for groundwater to travel through the borehole is less than the time between sampling events (**Table 1, Physical Independence**). This minimum time can be calculated as displayed in Section *14.3.2* of the Unified Guidance. This table displays the range of conductivities collected onsite. If a sampling frequency less than those provided below are to be used, then well specific calculations will need to be completed to ensure that the samples will be physically independent.

Table 1: Physical Independence

Well ID	Hydraulic Conductivity	Average Hydraulic Gradient	Effective Porosity	Well Bore Volume	Minimum Time
Symbol	K	I	n	D	T_{min}
Units	Feet/Day	Feet/Foot	%	Feet	Days
Detailed Site Investigation (DSI)					
Shallow Average	4.5	0.0005	0.35	0.5	86.8
Deep Average	81	0.0005	0.35	0.5	4.8
CCR Rule Monitoring Wells					
Minimum	37	0.0005	0.35	0.5	10.6
Geomean	58	0.0005	0.35	0.5	6.8
Maximum	92	0.0005	0.35	0.5	4.2

Notes:

1. Average hydraulic gradient and effective porosity obtained from GMP
2. Hydraulic conductivity obtained from ranges provided in GMP
3. Calculation completed using the Darcy Equation as outlined in section 14.3.2 of the Unified Guidance.

2.1.2 Data Review – Testing for Outliers

Careful review of the data is critical for verifying that there is an accurate representation of the groundwater conditions. Early identification of anomalous data (outliers) helps play a key role in a successful SAP. Possible causes for outliers include:

- Sampling error or field contamination;
- Analytical errors or laboratory contamination;
- Recording or transcription errors;
- Faulty sample preparation, preservation, or shelf-life exceedance; or
- Extreme, but accurately detected environmental conditions (e.g., spills, migration from the facility).

The following sections outline a few graphical and statistical tests that should be completed prior to using the data to calculate statistical limits.

2.1.2.1 Time Series Plots

Time Series plots are a quick and simple method to check for possible outliers. Time series plots should be generated with the concentration of the analyte on the Y-axis and the sample date (time) on the X-axis. If any data points look to be potential outliers, the data should be flagged and further evaluated as described in Section 2.1.2.2 below.

2.1.2.2 Dixon's and Rosner's Tests

If graphical methods demonstrate that potential outliers exist, further investigation of these data points can be completed using Dixon's test for datasets with fewer than 25 samples and Rosner's test with datasets greater than 20 samples. Formal testing should only be performed if an observation seems particularly high compared to the rest of the dataset. If statistical testing is to be completed to whether an outlier exists, it should be cautioned

that these outlier tests assume that the rest of the data (other than the outlier) are normally distributed. Additionally, because log-normally distributed data often contain one or more values that appear high relative to the rest, it is recommended that the outlier test be run on the transformed values instead of their original observations. This way, one can avoid classifying a high log-normal measurement as an outlier just because the test assumptions were violated. Most groundwater statistical packages can complete Dixon's and Rosner's tests and more information about Dixon's and Rosner's tests is provided in Sections 12.3 and 12.4 of the Unified Guidance. If the test designates an observation as a statistical outlier, the source of the abnormal measurement should be investigated. In general, if a data point is found to be a statistical outlier, it should not be used for statistical evaluation. However, outlier removal should be performed carefully, and typically only when a specific cause for the outlier can be identified.

In some cases where a specific cause for an outlier cannot be identified, professional judgment can be used to determine whether the outlier significantly affects the statistical results to the extent that removal is deemed necessary. If an outlier value with much higher concentration than other background observations is not removed from background prior to statistical testing, it will tend to increase both the background sample mean and standard deviation. In turn, this may substantially raise the magnitude of the prediction limit or control limit calculated from that data set. Thus, experience shows that it is a good practice to remove obvious outliers from the database even when independent evidence of the source of the outlier does not exist. The removal of outliers tends to normalize the data and therefore produce a more robust statistical limit. Outlier removal also tends to produce a more conservative statistical limit, since the data variability is decreased, thereby decreasing the standard deviation.

2.1.3 Calculate for Mean and Standard Deviation

Following outlier removal, initial summary statistics including mean and standard deviation should be calculated for the background monitoring well datasets. While these summary statistics are easily completed in many groundwater statistical software packages, it is important to account for values that have low or zero values as described below.

2.1.3.1 Reporting of Low and Zero Values

2.1.3.1.1 Estimated Values (J Flag)

Estimated values are values that have a concentration between the method detection limit (MDL[1]) and the practical quantitation limit (PQL[2]) for any given compound. These values are typically displayed with a J flag in laboratory report packages and are often referred to as "J-values". In most cases, The Unified Guidance recommends using the estimated value provided for statistical evaluation. Estimated values are typically used because the accuracy and power of most statistical evaluations lose power as the percentage of non-detects (NDs) increases. While they are below the PQL, estimated values are considered detectable concentrations for statistical calculations, which has the effect of lowering the percentage of NDs.

[1] MDL = lowest level of an analyte (substance) that the laboratory can reliably detect with calibrated instrumentation; generally based on results of an annual "MDL study" performed in accordance with 40 CFR Part 136, Appendix B; MDLs are generally set using laboratory grade deionized water spiked with a known concentration and thus do not account for effects of matrix interference inherent in typical groundwaters.
[2] PQL = minimum concentration of an analyte (substance) that can be measured with a high degree of confidence that the analyte is present at or above that concentration (typically 5-10x higher than the MDL).

This “rule” should be applied with care, as there is an exception. Estimated values are not considered detectable concentrations if all values for a single constituent are less than the PQL. In these cases, the Double Quantification Rule (DQR) as described in this CCR Units GMP should be used.

2.1.3.1.2 Non-Detects Values (ND)

Non-Detect Values (ND) are concentrations that were not detected at a concentration above the MDL. ND values are typically displayed with a “U” or “ND” flag in laboratory data report packages. The following approaches for managing ND values are based on recommendations in the Unified Guidance and are applicable for use with the statistical evaluation procedures that will be further discussed and used in this SAP (prediction intervals, confidence intervals, and tolerance intervals):

- If <15% ND below the PQL, substitute ½ the PQL;
- If between 15% to 50% ND below the PQL, use the Kaplan-Meier or robust regression on ordered statistics to estimate the mean and standard deviation;
- If >50% but less than 100% ND below the PQL, use a non-parametric test; or
- If 100% of values are less than the PQL, use the Double Quantification Rule (If necessary)

2.1.4 Data Distribution

Statistical evaluations of groundwater data require an understanding of the data distribution for each analyte in each monitoring well. Data typically fall into one of the following distributions:

- **Normal distribution** – Sometimes referred to as Gaussian distribution, a normal distribution is a common continuous distribution where data form a symmetrical bell-shaped curve around a mean. Normally distributed data are tested using parametric methods.
- **Transformed-normal distribution** – Similar to a normal distribution, however, data are asymmetrical until transformation is applied to all data which then causes it to form a bell-curve. Transformed-normal data distributions are also tested use parametric methods.
- **Non-Normal Distribution** – When the data are not or cannot be transformed into a symmetrical distribution. Non-normal data distributions are tested using Non-parametric methods.

Testing for data distributions can be completed in several different ways including the skewness coefficient, probability plots with Filliben’s test, or the Shapiro-Wilk/Shapiro-Francia Test. All of these methods may be employed, however, the Shapiro-Wilk and Shapiro-Francia tests are generally considered the best method according to the Unified Guidance. The Shapiro-Wilk test is best for sample sizes under 50 while the Shapiro-Francia test is best with larger datasets of 50 or more observations. Most groundwater statistical software packages can complete both Shapiro-Wilk and Shapiro-Francia tests and a detailed discussion of the testing procedures is provided in Section *10.5.1* of the Unified Guidance.

Based on the outcome of the data distribution testing, data will use either Parametric or Non-parametric tests. It is important to note that non-parametric testing usually requires larger datasets in order to minimize the Site Wide False Positive Rate (SWFPR) therefore when the raw data are not normally distributed, a transformed-normal distribution is preferred when possible.

2.1.5 Temporal Trend

Most statistical tests assume that the sample data are statistically independent and identically distributed. Therefore, samples collected over a period of time should not exhibit a time dependence. A time dependence could include the presence of trends or cyclical patterns when observations are graphed on a time series plot. Trend analysis methodologies test to see whether the dataset displays an increasing, decreasing, or seasonal trend.

If a trend is suspected, a Theil-Sen trend line should be used to estimate slope and the Mann-Kendall Trend Test should be used to evaluate the slope significance (Chapter 14, Unified Guidance). Following implementation of a successful remediation strategy, it is expected that CCR-related groundwater constituents concentrations will decrease with time. If a statistically significant trend is reported, based on a Sen's slope/Mann-Kendall trend test, it is inappropriate to perform "normal" statistical calculations (see Section 21.3 of the Unified Guidance). In such cases, an adjustment or an alternate method is required.

3.0 CORRECTIVE ACTION STATISTICAL EVALUATION

Following the removal of outliers and the performance of general statistics described in Section 2.0, the specific Corrective Action Statistical Evaluation will be completed. This evaluation is very similar to the Assessment Monitoring statistical procedures except the null hypothesis for the confidence intervals is reversed. For Corrective Action, the Unified Guidance states that the appropriate null hypothesis is that the groundwater population (mean) exceeds the GWPS for those constituents that exceed the GWPS under Assessment Monitoring program. Therefore, in Corrective Action the Upper Confidence Limit (UCL) is compared to the Groundwater Protection Standard (GWPS) instead of the Lower Confidence Limit (LCL) [as was used during Assessment Monitoring].

3.1 Statistical Power

One of the primary goals of the selection of a proper statistical evaluation method is to limit the potential for results to falsely trigger a compliance while also maintaining sufficient statistical power to detect when compliance is achieved. Falsely triggering compliance when groundwater concentrations are still statistically above the GWPS occurred is referred to as a false positive in corrective action. The False Positive Rate (FPR), typically denoted by the Greek letter α, is also known as the "significance level". The FPR is the probability that a future compliance observation will be declared to be from a different statistical distribution than the background data. If the FPR is set too high, it can lead to the conclusion that there is evidence of impact when none exists. Conversely, if the FPR is set too low, it can lead to a false conclusion that no contamination exists, when it actually does exist (also known as a "false negative"). Ultimately, the ability to accurately identify compliance depends on the selection of an appropriate FPR, which is referred to as the statistical power. However, statistical analysis programs and the resulting decision making do not depend on each individual measurement/comparison error rates but are dependent on the collective error rate from all of the individual comparisons.

In Corrective Action monitoring, it is not possible to calculate a FPR or a site-wide false positive rate, as is calculated during Detection Monitoring. The Unified Guidance gives two methods for determining the statistical power in Corrective Action monitoring, both methods are dependent on the minimizing the FPR and at the same time minimizing the false negative rate. As stated in the Unified Guidance, ultimately, the statistical power of the confidence interval test will increase as the sample size increases, as long as the FPR is held constant. For this CCR Unit, an initial FPR of 0.05 is proposed for the confidence interval test methodology. Initially, when sample sizes are low, the overall power of the test will also be relatively low, but the power (and thus the confidence in

making sound judgements relative to the success of the remedial efforts) will increase over time, as the sample size increases.

Ultimately, the goal of Corrective Action monitoring is to determine whether the selected remedy has been effective in cleaning up the groundwater to a point at which continued monitoring is no longer required. In that sense, the power of the statistical approach is important for confirming that the statistical method is accurately determining the end point of the remedial effort. Thus, particular caution will be exercised in situations where the compliance statistic (in this case, the upper confidence level (UCL), is at or near the compliance limit (in this case, the groundwater protection standard [GWPS]). Corrective Action monitoring will only be discontinued if it can be clearly demonstrated that the UCL is and will remain below the GWPS. Additional discussion is provided below regarding the specifics of the confidence interval method that will be used in Corrective Action monitoring.

3.2 Confidence Interval Approach

The statistical method for evaluating data in Correction Action is similar to the method that was used during Assessment Monitoring. Thus, intrawell confidence intervals will be calculated for each detected Appendix IV constituent in each well and the resulting confidence intervals will be compared with the appropriate Groundwater Protection Standard (GWPS). During the Assessment Monitoring phase of the program, a site wide GWPS generated for each detected Appendix IV constituent. Over time, as additional background data are collected, the GWPS will be updated accordingly, as described in Section 3.2.2, below.

3.2.1 Maximum Contaminant Level (MCL) Based GWPS

All the Appendix IV analytes have either an USEPA MCL or a health based GWPS that was adopted for Appendix IV parameters without an MCL (i.e. cobalt, lithium, molybdenum, and lead). As specified in Section §257.95(b) of the CCR Rule, the GWPS must either be the MCL (or adopted heath based standard), or a limit based on site-specific background data, whichever is greater. This section describes the methods to be used for statistical analysis when the MCL (or adopted heath based standard) is to be used as the GWPS. Additional discussion is provided below in Section 3.2.2 for situations where the site-specific background is greater than the MCL or health based standard.

For Corrective Action, the Unified Guidance recommends the confidence interval method to evaluate for potential compliance under the GWPS (Chapter 22, Unified Guidance). Using confidence intervals, potential compliance under the GWPS is identified by comparing the calculated confidence interval against the GWPS. A confidence interval statistically defines the upper and lower bounds of a specified population within a stipulated level of significance. Confidence intervals are required to be calculated based on a minimum of 4 independent observations, but a more representative confidence interval can be developed when all of the available data are used. As discussed in Section 3.1, above, the statistical power of the method increases with an increasing number of observations, so it is generally preferred that all available data be used to calculate the confidence interval. However, if trends are noted in the data, it may be necessary to exclude historical data prior to the trend, so that the confidence interval can be more accurately calculated. As described in preceding sections, it is expected that trends will develop following the implementation of remedial actions, and thus, it is likely that the well specific data sets will require adjustment over time to account for trends.

The specific type of confidence interval should be based the attributes of the data being analyzed, including: (1) the data distribution, (2) the detection frequency, and (3) potential trends in the data. **Table 2** below is based on Table 4-5 from the Electric Power Research Institute's *Groundwater Monitoring Guidance for the Coal Combustion Residual Rule* (2015), which displays the criteria for selecting an appropriate confidence interval.

The method and procedure for calculating the UCL and LCL is provided in the section reference from the Unified Guidance, which is listed in the last column of **Table 2**, below.

Table 2: Confidence Interval Method Selection

Data Distribution	Non-detect Frequency	Data Trend	Confidence Interval Method
Normal	Low	Stable	Confidence Interval Around Normal Mean (Section 21.1.1)
Transformed Normal (Log-Normal)	Low	Stable	Confidence Interval Around Lognormal Arithmetic Mean (Section 21.1.3)
Non-normal	N/A	Stable	Nonparametric Confidence Interval Around Median (Section 21.2)
Cannot Be Determined	High	Stable	Nonparametric Confidence Interval Around Median (Section 21.2)
Statistical Trend Noted in Well Specific Data Set	Low	Trend	Confidence Band Around Theil-Sen Line (Section 21.3.2)

In a Corrective Action monitoring program, the UCL is of primary interest. If the UCL exceeds the GWPS, the constituent is still present at a concentration that is statistically above the GWPS; however, if the UCL is less than the GWPS, the constituent is below the GWPS. If the UCL is lower than the GWPS for three consecutive years, then the monitoring well is in considered to be in full compliance.

As discussed above in Section 3.1, during Corrective Action, a per test FPR (α) of 0.05 will be used as an initial error level for calculating the two-tailed confidence intervals for the compliance wells (which actually means 2.5% FPR per tail). In some cases, based on recommendations from the Unified Guidance, it is appropriate to adjust the FPR of the confidence interval based on the number of data points available as well as the distribution of the data being evaluated. If deemed necessary based on recommendations from the Unified Guidance, an approach is provided in Section 22 of the Unified Guidance for determining an appropriate per test FPR based on the data characteristics.

When performing Corrective Action monitoring statistical evaluations, it is important to evaluate the compliance data for shifts. If no shifts have occurred, then all of the available Appendix IV data for a particular constituent can be used in the statistical evaluation. If shifts are noted (typically based on qualitative evaluation of a time series plot), only the data collected after the shift should be used in the statistical evaluation.

3.2.2 Updating the GWPS

In general, the GWPS have already been established for each Appendix IV constituent at this CCR Unit. However, it may be necessary to update the GWPS in the future to account for changes in background constituent concentrations. Recalculating the GWPS by incorporating additional background data over time

typically results in a more robust value for the GWPS. During Corrective Action monitoring, background or historical concentration limits should be assessed using the following techniques for each of the detected Appendix IV analytes. These concentration limits should then be compared with the MCL or health-based value, and the higher of these two values will be used as the GWPS. Updates to the GWPS will only apply to those constituents whose site-specific background concentration is above the established MCL or health-based value. Additional details regarding the timeframes for updating the GWPS are provided in Section 3.4, below.

The Unified Guidance provides two acceptable approaches for establishing a non-MCL based GWPS. As described in the SAP of the this CCR Units GMP, for situations where the site-specific background is greater than the MCL/health base limit, the two methods for calculating the GWPS include the tolerance interval approach or the prediction interval approach, described further below.

3.2.2.1 Tolerance Interval Approach

If the background dataset is normally or transformed normally distributed, the Unified Guidance recommends Tolerance Intervals over the Prediction Intervals for establishing a GWPS. The GWPS should be based on a 95 percent coverage/95 percent confidence tolerance interval. If the background data are non-normal (even after transformation), then a large number of background observations are required to calculate a non-parametric tolerance interval (typically a minimum of 60 background observations are required to meet these requirements). If there is an insufficient number of background observations to calculate a non-parametric tolerance interval, then a non-parametric Prediction Interval approach should be used, as described in Section 3.2.2.2 below.

The Upper Tolerance Limit (UTL) is calculated for each required Appendix VI constituent. Tolerance Limits, as outlined in the Unified Guidance (Section 17.2), are a concentration limit that is designed to contain a pre-specified percentage of the dataset population. Two coefficients associated with tolerance intervals are (1) the specified population proportion and (2) the statistical confidence. The coverage coefficient (γ), which is used to contain the population portion, and the tolerance coefficient (or confidence level ($1-\alpha$)), which is used to set the confidence of the test. Typically, the UTL is calculated to have both a coverage and a confidence of 95%. When the background concentrations are greater than the MCL, the calculated UTL for each constituent is used as the GWPS. The intrawell confidence interval for each required Appendix IV constituent is then compared with the GWPS.

In order to calculate a valid confidence interval, a minimum of four data points are necessary for each of the required Appendix IV constituents in each compliance monitoring well; however a dataset of at least eight samples is recommended by the Unified Guidance. Using the Tolerance Interval Approach, a monitoring well is considered “in compliance” when the calculated UCL for each parameter in that well is less than the GWPS for three consecutive years.

Tolerance Intervals can be completed using both parametric (Section 17.2.1 of Unified Guidance) or non-parametric methods (Section 17.2.2 of Unified Guidance). However, as described above, the non-parametric method requires at least 60 background (or historical) measurements in order to achieve 95% confidence with 95% coverage. Tolerance Intervals can be calculated using most groundwater statistical software packages.

3.2.2.2 Prediction Interval Approach

If Tolerance Intervals cannot be used to calculate the GWPS (based on recommendation from the Unified Guidance, such as non-parametric datasets, etc.), then a Prediction Interval method should be used. This method is very similar to the methods used for Detection Monitoring as specified in the SAP of the GMP for this

CCR Unit; however, for Corrective Action, the Unified Guidance suggests using a prediction interval about a future mean for normally/transformed-normally distributed datasets or a prediction interval about a future median for datasets with a high percent of ND or non-normally distributed data.

When using prediction intervals to calculate for a GWPS, a one-sided prediction interval is calculated using background (or historical) datasets based on a specified number of future comparisons - four future comparisons is typical. The Upper Prediction Limit that is calculated as a product of this method then becomes the GWPS and is compared against the confidence interval for the compliance data, as described in Section 3.2.2.1 above. As also described above, if the UCL is less than the calculated prediction limit for each constituent for three consecutive years then the monitoring well is “in compliance”.

3.3 Completing Corrective Action Monitoring

As specified in 257.98(C) of the CCR Rule, because the selected remedy (capping and closure) depends on a monitored natural attenuation approach, in order to complete corrective action monitoring and declare the remedial efforts completed the following must be demonstrated:

- Compliance with the GWPS at all points within the plume of contamination that lie beyond the Detection/Assessment Groundwater Monitoring Well Network.
- Compliance with the GWPS where concentrations of constituents listed in Appendix IV have not exceeded the GWPS for a period of three consecutive years.

Additionally, because Corrective Action can be a dynamic process, with frequent changes in plume concentrations and size, individual monitoring wells may be removed from corrective action once they are under the GWPS for three consecutive years. The Corrective Action Program, however, will only be deemed competed once all points within the plume beyond the detection/assessment monitoring groundwater monitoring well system are statistically within compliance of the GWPS.

3.4 Updating Background Values

The Unified Guidance suggests that updating statistical limits should only be completed after a minimum of 4 to 8 new measurements are available (i.e., every 2 to 4 years of semiannual monitoring). The periodic update of background, during which additional data are incorporated into the background, improves statistical power and accuracy by providing a more conservative estimate of the true background population. Prior to incorporating new data into the background dataset, a test should be performed to demonstrate that the “new data” are from the same statistical population as the existing background results. Below are three methods that can be used in determining whether the “new” data should be included in the background:

- Time Series Graphs – As described in Section 2.1.2.1, time series graphs can be used as a qualitative test to assist with the determination whether a new group of data match the historical data or if there is a concentration trend that could be indicative of a release or evolving groundwater conditions.
- Box-Whisker plots can also be used to determine whether or not the datasets are similar.
- Mann-Whitney (or Wilcoxon Rank) Test – Used to evaluate the ranked medians of both the historical and new dataset populations. An α of 0.05 should be used for this evaluation. After calculation, if the Mann-Whitney statistic does not exceed the critical point, the test assumes that the two data populations have equal medians, and therefore are likely similar.

Ultimately, the Mann-Whitney (Wilcoxon Rank Sum) Test is the statistical test that will be used to determine whether new observations should be included in the background dataset. It is important to note that a difference in background datasets does not automatically prevent the new data from being used; however, if differences are noted, a review of the new data will be conducted to determine if the noted difference is a result of a change in the natural conditions of the groundwater or if it is the result of a potential release from the CCR Unit. If the new data are included in the background dataset, the GWPS will be recalculated, as described above.

3.5 Alternative Source Demonstrations

If the Corrective Action statistical evaluation for detected Appendix IV parameters determines that a constituent has a UCL above the GWPS that was not identified as an SSL in Assessment Monitoring, then the data must be evaluated to determine if the cause of elevated UCL is due to a release from the CCR Unit or from an alternative source. Possible alternative sources may include new or previously unknown CCR constituent sources, nearby source areas, laboratory or sampling causes, statistical evaluation causes, or natural variation. If the value can be attributed to one of these alternative sources and was not caused by an SSL directly related to impacts from the CCR Unit, then an alternate source demonstration (ASD) can be completed. An ASD must be certified by a qualified Professional Engineer and completed in writing within 90 days of completing the statistical evaluation for a particular sampling event.

4.0 REFERENCES

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