

October 10, 2018

Attn: Mr. Roddy Rogers, P.E., D.WRE, F.ASCE
City Utilities of Springfield Missouri
P.O. Box 551
Springfield MO 65801

Subject: **Notification of Groundwater Protection Standard Exceedance**

Dear Mr. Rogers,

Pursuant to the Coal Combustion Residuals Rule 40 Code of Federal Regulations 257.95(g), Jacobs provides notification to City Utilities of Springfield Missouri that one constituent parameter (i.e., antimony) was detected at a statistically significant level exceeding the Groundwater Protection Standard (GWPS) based on background upgradient statistical data. In July 2018, samples were collected across the groundwater monitoring network over a two-week period. Analytical procedures/measurements were reviewed and final data validation and statistical analyses were completed on October 5, 2018. The GWPS for antimony is 9.82 micrograms per liter ($\mu\text{g/l}$). Antimony was detected at 9.9 $\mu\text{g/l}$ in a single monitoring well (i.e., MW-SA-2A) during the most recent sample collection and validation period.

Historical antimony analytical results from MW-SA-2A range from non-detect to 15 $\mu\text{g/l}$, so the result of 9.9 $\mu\text{g/l}$ is within the historical range for this well. Statistical analyses for JTEC use two upgradient wells, but Jacobs has also calculated the GWPS using only one upgradient well (MW-PZ-01D). If the GWPS is compared against the single upgradient well, the antimony result of 9.9 $\mu\text{g/l}$ would not have exceeded the corresponding statistical limit of 10.79 $\mu\text{g/l}$.

In accordance with 40 CFR 257.95(g)(3) and as directed by City Utilities, Jacobs will conduct an alternative source determination for antimony at the JTEC site. If an alternative source is not identified, an assessment of corrective measures will be initiated pursuant to 40 CFR 257.96.

Should you have any other questions, please contact Jeff Farah or me at (865) 220-6045 or by email at christopher.hickman@jacobs.com.

Sincerely,



Chris Hickman
Technical Lead
Jacobs Engineering Group Inc.

CC: J. Farah, Jacobs