
July 7, 2021

Hillary Young, P.E.
Chief Engineer - Land Protection Division
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73162

Re: April 2021 Assessment Monitoring
Notification: Molybdenum concentrations above upgradient well background concentration
Evans and Associates Construction Co, Inc. / Big Fork Ranch Coal Combustion Residuals (CCR)
Landfill, Ponca City, Noble County, OK / Solid Waste Permit #352014

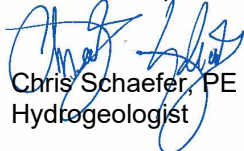
Dear Ms. Young:

Evans and Associates Construction Co., Inc. has been conducting Assessment Monitoring associated with a CCR Unit at its Big Fork Ranch Facility. The laboratory report for April 2021 Assessment Monitoring is enclosed (**Attachment A**). Findings from April 2021 Assessment Monitoring do not indicate Assessment Monitoring Parameters at statistically significant levels (SSLs) above Groundwater Protection Standards (GWPS) as established in the 2018 Annual Groundwater and Corrective Action Report (Altamira; January 31, 2019).

At MW-9A and MW-12A, the upper and lower confidence limits for molybdenum do exceed the upgradient well background concentration (0.005 mg/L) and an SSL can be deemed to exist for molybdenum at these wells when using background instead of the EPA-promulgated alternative risk-based groundwater protection standard as the GWPS. Therefore, this submittal is prepared to address OAC 252:517-9-6(g), which requires the owner/operator to prepare a notification identifying OAC 252:517 Appendix B constituents detected at SSLs above the GWPS.

Changes have been proposed by DEQ to *Oklahoma Administrative Code (OAC) Chapter 517. Disposal of Coal Combustion Residual from Electric Utilities* and are under legislative review which would adopt the EPA-promulgated alternative risk-based groundwater protection standard for molybdenum. If these proposed changes become effective and the EPA-promulgated alternative risk-based groundwater protection standard for molybdenum is adopted then the reported molybdenum concentrations to date will not be at SSLs. Please notify me at 405-701-8215 or at Chris.Schaefer@altamira-us.com if you have any questions.

Sincerely,
Altamira-US, LLC



Chris Schaefer, PE
Hydrogeologist

cc: Saeed Zahrai, P.E. / EMERA, Corp.

ATTACHMENT A

LABORATORY ANALYSIS (APRIL 2021)

