STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

MISSOURI CLEAN WATER COMMISSION



CONSTRUCTION PERMIT

The Missouri Department of Natural Resources hereby issues a permit to:

Associated Electric Cooperative, Inc. 2814 South Golden Ave. Springfield, MO 65801

for the construction of (descr	ibed facilities):
See attached.	
Permit Conditions:	
See attached.	
	ll be in accordance with the provisions of the Missouri Clean Water Law, Chapter 644, RSMo, and permit may be revoked by the Department of Natural Resources (Department).
As the Department does not examine structuinclude approval of these features.	aral features of design or the efficiency of mechanical equipment, the issuance of this permit does not
	pect the work covered by this permit during construction. Issuance of a permit to operate by the substantially adhering to the approved plans and specifications.
This permit applies only to the construction	of water pollution control components; it does not apply to other environmentally regulated areas.
May 29, 2020	Gelmand B. Falla of
Effective Date	Edward B. Galbraith, Director, Division of Environmental Quality
May 28, 2022	Chie Wieberg
Expiration Date	Chris Wieberg, Director, Water Protection Program

Permit No. CP0002144

CONSTRUCTION PERMIT

I. CONSTRUCTION DESCRIPTION

The AECI-Thomas Hill Energy Center is required to change its existing process wastewater handling methods due to the federal Coal Combustion Residuals (CCR) Rule, 40 CFR 257, and the revised Steam Electric Generating Effluent Limit Guidelines, 40 CFR 423. AECI is proposing to modify the existing ash pond system to allow for the closure of Cells 001, 003 and 004.

This Construction Permit is intended to cover modifications to the existing earthen basin, Cell 002 West. The Cell is intended to be used for the treatment of non-CCR process water and stormwater flows. Cell 002 West is a former CCR impoundment previously closed by material removal. The construction site is adjacent to active CCR impoundments. The project includes, but is not limited to, the reconfiguration of flow routing to the pond and a new inlet channel, construction of a revised subgrade, installation of soil liner, geomembrane liner, and protective cover, roller compacted concrete, aggregate, new outlet structure connection to Cell 002 East, new emergency spillway, and new separation berms.

This project will also include general site work appropriate to the scope and purpose of the project and all necessary appurtenances to make a complete and usable wastewater treatment facility.

II. COST ANALYSIS FOR COMPLIANCE

Pursuant to Section 644.145, RSMo, when issuing permits under this chapter that incorporate a new requirement for discharges from publicly owned combined or separate sanitary or storm sewer systems or publicly owned treatment works, or when enforcing provisions of this chapter or the Federal Water Pollution Control Act, 33 U.S.C. 1251 et seq., pertaining to any portion of a publicly owned combined or separate sanitary or storm sewer system or [publicly owned] treatment works, the Department of Natural Resources shall make a "finding of affordability" on the costs to be incurred and the impact of any rate changes on ratepayers upon which to base such permits and decisions, to the extent allowable under this chapter and the Federal Water Pollution Control Act. This process is completed through a cost analysis for compliance. Permits that do not include new requirements may be deemed affordable.

The Department is not required to complete a cost analysis for compliance because the facility is not a combined or separate sanitary sewer system for a publically-owned treatment works.

III. CONSTRUCTION PERMIT CONDITIONS

The permittee is authorized to construct subject to the following conditions:

1. This construction permit does not authorize discharge.

- 2. All construction shall be consistent with plans and specifications signed and sealed by Steven F. Putrich, P.E. with Haley & Aldrich, Inc. and as described in this permit.
- 3. The Department must be contacted in writing prior to making any changes to the plans and specifications that would directly or indirectly have an impact on the capacity, flow, system layout, or reliability of the proposed wastewater treatment facilities or any design parameter that is addressed by 10 CSR 20-8, in accordance with 10 CSR 20-8.110(11).
- 4. State and federal law does not permit bypassing of raw wastewater, therefore steps must be taken to ensure that raw wastewater does not discharge during construction. If a sanitary sewer overflow or bypass occurs, report the appropriate information to the Department's Northeast Regional Office per 10 CSR 20-7.015(9)(G).
- 5. To accommodate the project schedule of Associated Electric Cooperative, Inc. this construction permit review only covers a portion of the proposed modications to the earthen basin treatment system. A separate construction permit review shall be required prior to the commencement of additional construction on Cell 002 East in accordance with RSMo 644.051.
- 6. The wastewater treatment facility shall be located at least two hundred feet (200') from any dwelling or establishment and fifty feet (50') from the property line.
- 7. The wastewater treatment facility shall be located above the twenty-five (25)-year flood level.
- 8. The wastewater facility structures, electrical equipment, and mechanical equipment shall be protected from physical damage by not less than the one hundred- (100-) year flood elevation per 10 CSR 20-8.140(2)(B). The minimum distance between wastewater treatment facilities and all potable water sources shall be at least three hundred feet (300') per 10 CSR 20-8.140(2)(C)1.
- 9. In addition to the requirements for a construction permit, 10 CSR 20-6.200 requires land disturbance activities of 1 acre or more to obtain a Missouri state operating permit to discharge stormwater. The permit requires best management practices sufficient to control runoff and sedimentation to protect waters of the state. Land disturbance permits will only be obtained by means of the Department's ePermitting system available online at dnr.mo.gov/env/wpp/epermit/help.htm. See dnr.mo.gov/env/wpp/epermit/help.htm. See dnr.mo.gov/env/wpp/stormwater/sw-land-disturb-permits.htm for more information.
- 10. A United States (U.S.) Army Corps of Engineers (COE) permit (404) and a Water Quality Certification (401) issued by the Department or permit waiver may be required for the activities described in this permit. This permit is not valid until these requirements are satisfied. If construction activity will disturb any land below the ordinary high water mark of jurisdictional waters of the U.S. then a 404/401 will be required. Since the COE makes determinations on what is jurisdictional, you must contact the COE to determine permitting requirements. You may call the Department's Water Protection Program at 573-751-1300 for more information. See dnr.mo.gov/env/wpp/401/ for more information.

- 11. All construction must adhere to applicable 10 CSR 20-8 (Chapter 8) requirements listed below.
 - The minimum berm width shall be eight feet (8') to permit access of maintenance vehicles. 10 CSR 20-8.200 (4) (A) 2.
 - Minimum freeboard shall be two feet (2'). 10 CSR 20-8.200 (4) (A) 3.
 - An emergency spillway shall be provided. 10 CSR 20-8.200 (4) (A) 4.
 - An emergency spillway must have the ability for a representative sample to be collected if a discharge occurs. 10 CSR 20-8.200 (4) (A) 4. C.
 - Soil shall be compacted with the moisture content between two percent (2%) below and four percent (4%) above the optimum water content and compacted to at least ninety-five percent (95%) maximum dry density test method. 10 CSR 20-8.200 (4) (B).
 - The lagoon shall be sealed to ensure that seepage loss is as low as possible and has a design permeability not exceeding 1.0 x 10⁻⁷ cm/sec. 10 CSR 20-8.200 (4) (C) 1.
 - Unlined corrugated metal pipe shall not be used for influent lines due to corrosion problems. 10 CSR 20-8.200 (4) (D) 1.

12. Upon completion of construction:

- A. Associated Electric Cooperative, Inc. (AECI) will become the continuing authority for operation and maintenance of these facilities;
- B. Submit an electronic copy of the as builts if the project was not constructed in accordance with previously submitted plans and specifications;
- C. Submit the enclosed form Statement of Work Completed to the Department in accordance with 10 CSR 20-6.010(5)(N)

IV. REVIEW SUMMARY

1. CONSTRUCTION PURPOSE

The AECI-Thomas Hill Energy Center is required to change their existing process wastewater handling methods due to the federal Coal Combustion Residuals (CCR) Rule, 40 CFR 257, and the revised Steam Electric Generating Effluent Limit Guidelines, 40 CFR 423. Modifications to the ash pond system are anticipated to (1) reduce the volume of sluice water discharge at the plant under the current CCR rule (2) cease discharge of current CCR and non-CCR process waters into the active CCR ponds and (3) for the closure of Cells 001, 003 and 004. To allow for the closure of the identified cells, existing Cells 002 West and 002 East will be reconfigured and utilized for the treatment and storage of non-CCR process water and stormwater flows. Additionally Outfall #001 will be relocated from Cell 004 to the southeast corner of Cell 002 East. At the request of AECI, this construction permit will only cover proposed modifications to Cell 002 West. A separate construction permit will be required for further modifications to Cell 002 East, including the proposed outfall relocation.

2. FACILITY DESCRIPTION

The Thomas Hill Energy Center is located at 5693 Highway F, Clifton Hill, in Randolph County, Missouri. The facility is a coal-fired power plant located on the southeastern shore of the Thomas Hill Reservoir and is engaged in the generating and selling of electricity. The facility's existing Missouri State Operating Permit became effective on January 1, 2018 and expires on June 30, 2021 The facility has a total of eighteen (18) active outfall; several non-industrially exposed outfalls also exist.

3. COMPLIANCE PARAMETERS

The proposed project is required to meet the effluent limits as established in Operating Permit MO-0097675. The proposed construction will impact Outfall #001, which has a design average flow of 29 million gallons per day (MGD).

Upon completion of construction, the following effluent limitations will be applicable to Outfall #001:

Parameter	Units	Maximum Daily Limit	Monthly Average Limit
Oil & Grease	mg/L	20	15
Total Suspended Solids - Net	mg/L	100	30
pН	SU	6.5-9.0	6.5-9.0
Copper, Total Recoverable	μg/L	1,000	1,000
Iron, Total Recoverable	μg/L	1,000	1,000

⁻ Monitoring requirements for additional parameters will also apply.

If the facility intends to construct a new discharging outfall from an earthen basin, a construction permit will be required per RSMo 644.051.

4. <u>ANTIDEGRADATION</u>

The Department has reviewed the antidegradation report for this facility and determined the proposed project will not require an antidegradation review according to the *Missouri Antidegradation Rule and Implementation Procedure*. See **APPENDIX** – **ANTIDEGRADATION APPLICABILITY REVIEW**.

5. REVIEW of MAJOR TREATMENT DESIGN CRITERIA

- Cell 002 West Cell 002 West will be divided into three (3) sequential sub-basins for maintenance and operation purposes. A lined, 135 ft inlet channel will be installed in the northwest corner of the Cell. Floating baffles will be used to direct flow and prevent dead zones. The depth from the top of the berms to the Cell floor will vary, with approximately 6 to 12 ft of standing water contained within the Cell at the normal operating elevation of 719 ft. The top of the berm is located at elevation 726 ft, resulting in approximately 7 feet of freeboard from the top of the berm to the normal operating level. The normal volume of water contained within the Cell is approximately 1.7 million cubic feet. Side slopes throughout the cell will vary. The berm width will be 20 ft. An outlet structure and a concrete spillway will connect Cell 002 West with adjacent Cell 002 East. The emergeny spillway is located at elevation 725 ft, one (1) ft below the top of the berm. The maximum volume of water the cell may contain before overtopping occurs of the emergency spillway occurs is 4.1 million cubic feet.
 - The slopes and bottom of the Cell will be covered by a bottom liner system consisting of a 24" compacted soil liner (1x10⁻⁷ cm/sec), a 60 mil HDPE textured geomembrane liner, and a 24" protective soil layer.
 - Existing outlet structure connection to Cell 003 to be grouted and abandoned in place

6. OPERATING PERMIT

These construction activities do not require a modification to the operating permit under 10 CSR 20-6.010. It is expected that the facility owner will include a new facility description and process flow diagram in their next operating permit renewal application to reflect the changes to the wastewater handling at the facility.

V. NOTICE OF RIGHT TO APPEAL

If you were adversely affected by this decision, you may be entitled to an appeal before the Administrative Hearing Commission (AHC) pursuant to Section 621.250 RSMo. To appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC. Any appeal should be directed to:

Administrative Hearing Commission U.S. Post Office Building, Third Floor 131 West High Street, P.O. Box 1557 Jefferson City, MO 65102-1557 Phone: 573-751-2422

> Fax: 573-751-5018 Website: https://ahc.mo.gov

Ellen Modglin, EI Engineering Section Ellen.Modglin@dnr.mo.gov

Cindy LePage, P.E. Engineering Section Cindy.LePage@dnr.mo.gov

APPENDIX – Antidegradation Applicability Review



May 1, 2020

Mr. Rob LeForce AECI-Land and Water Resources 2814 S. Golden Avenue P.O. Box 754 Springfield, MO 65801

Re: Antidegradation Applicability Review for AECI-Thomas Hill Energy Center, MO-0097675, ACT#758, Randolph County

Dear Rob LeForce:

In accordance with the Missouri Antidegradation Rule and Implementation Procedure, your proposed discharge is not subject to an Antidegradation Review. The enclosed Antidegradation Applicability Review summarizes this determination based upon your review request received on April 3, 2020. You propose to modify the stormwater and industrial process water flows at the Thomas Hill Energy Center to comply with United States Environmental Protection Agency (USEPA) regulations related to coal combustion residuals (CCR) and effluent limitation guidelines. The proposed alternations to the discharge will not result in a new or expanded discharge of pollutants from the facility.

This determination does not supersede any requirements of the operating permit or enforcement actions. Nothing in this review removes any obligations to comply with county or other local ordinances or restrictions.

For your convenience, the Water Protection Program has developed a new Internet web page (http://www.dnr.mo.gov/env/wpp/permits/antideg-implementation.htm) where you may access information related to implementation of the antidegradation rule. The Internet web site includes links to forms, data sources, publications, as well as links to related Internet web sites.

You may proceed with submittal of an application for an operating permit modification, an engineering report, or a complete application for a construction permit. These submittals must reflect the design flow, facility description, and general treatment components of this WQAR or this preliminary determination may have to be revisited. 10 CSR 20-6.010 now requires all submittals to include an electronic copy along with a hard paper copy. Typically, this can be accomplished by enclosing a compact disc or other removable electronic media.

Following the department's public notice of a draft Missouri State Operating Permit, the department will review any public notice comments received. If significant comments are made, the project may require another public notice. If no comments are received or



Thomas Hill Energy Page 2

comments are resolved without another public notice, this determination will be considered final. Following issuance of the construction permit and completion of the actual facility construction, the department will proceed with the issuance of the operating permit.

If you should have questions, please contact Ellen Modglin by telephone at (573) 751-7466, by e-mail at Ellen Modglin@dnr.mo.gov, or by mail at the Missouri Department of Natural Resources, Water Protection Program, PO Box 176, Jefferson City, Missouri 65102-0176.

Sincerely,

WATER PROTECTION PROGRAM

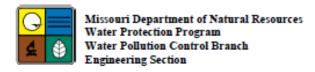
John Rustige, P.E.

Wastewater Engineering Unit Chief

JR:emt

Enclosure

Heather Peters, Water Protection Program



Antidegradation Applicability Review

FACILITY INFORMATION

FACILITY NAME: AECI-Thomas Hill Energy Center PERMIT #: MO-0121827

COUNTY: Randolph UTM COORDINATES: X=530801 / Y=4376802

12-DIGIT HUC: 10280203-0405 LEGAL DESCRIPTION: NW4, NW4, Sec. 30, T55N, R15W

EDU*: Central Plains / Grand ECOREGION: Central Irregular Plains

"Ecological Drainage Unit

CHARACTERISTICS OF IMPACTED OUTFALL

OUTFALL	DESIGN FLOW (MGD)	TREATMENT LEVEL	EFFLUENT TYPE	DISTANCE TO CLASSIFIED SEGMENT (MI)
001	29	Settling, retention, neutralization	Process wastewater	~0.1

RECEIVING WATERBODY INFORMATION

WATERBODY NAME: Middle Fork Little Chariton River (WBID 0691) CLASS: P

PROJECT INFORMATION

DESCRIPTION:

The Thomas Hill Energy Center located in Clifton Hill, MO is owned and operated by Associated Electric Cooperative, Inc. (AECI). The facility is a coal-fired power plant located on the southeastern shore of the Thomas Hill Reservoir and is engaged in the generating and selling of electricity. The Plant is categorized by the Standard Industrial Classification (SIC) # 4911 and North American Industry Classification System (NAICS) # 221112. The facility's existing Missouri State Operating Permit became effective on January 1, 2018 and expires on June 30, 2021. The facility has a total of eighteen (18) active outfalls; several non-industrially exposed outfalls also exist.

PROPOSAL:

According to a letter dated March 20, 2020, AECI is proposing to modify its current stormwater and industrial process water treatment and discharges at the Thomas Hill Energy Center. The modifications are required to comply with United States Environmental Protection Agency regulations related to coal combustion residuals and effluent limitation guidelines. The facility is proposing to replace Cell 001 with a concrete dewatering tank that will

primarily recirculate flows back to the plant. Additionally the facility is proposing to modify existing Cell 002 West and Cell 002 East, which will include the relocation of current Outfall 001 to the southeast corner of Cell 002 East. The relocated outfall will discharge into an existing stormwater ditch, which ultimately discharges to the Tributary to Little Chariton River immediately downstream of the current Outfall 001 location. All discharges will continue to the same receiving waterbody. Following the startup of Cell 002 East and Cell 002 West, Cell 003 and Cell 004 will be taken offline for closure of these impoundments.

Additional upstream modifications to the ash pond system will be made to improve the site's best management practices and enhance sediment removal procedures.

In summary, "modifications to the ash pond system are anticipated to (1) reduce the volume of sluice water discharge at the plant under current coal combustion residual rule (2) cease discharge of current CCR and non-CCR process waters into the active CCR ponds and (3) for closure of Cells 001, 003 and 004."

DISCUSSION:

The proposed modifications to the Thomas Hill Energy Center are considered a reconfiguration of existing process flows. There will be no increase in design flow or discharge of new pollutants of concern associated with the proposed modifications. The current design flow and effluent limitations associated with discharges from Outfall 001 in the effective MSOP will be maintained.

DETERMINATION The proposed upgrade will not require an antidegradation review according to Missouri Antidegradation Rule and Implementation Procedure. The proposed modifications will not result in a new or expanded discharge from the facility. Mass loading to the receiving waterbody, Middle Fork Little Chariton River, will be maintained.

Reviewer: Ellen Modglin, E.I.

Date: April 2020

Unit Chief: John Rustige, P.E.



MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER PROTECTION PROGRAM

FORM A – APPLICATION FOR NONDOMESTIC PERMIT UNDER MISSOURI CLEAN WATER LAW

FOR AGENCY USE ONLY			
CHECK NUMBER			
DATE RECEIVED	FEE SUBMITTED		
JET PAY CONFIRMATION NUMBER			

PLEASE READ ALL THE ACCOMPANYING INSTRUCTIONS BEFORE COMPLETING THIS FORM. SUBMITTAL OF AN INCOMPLETE APPLICATION MAY RESULT IN THE APPLICATION BEING RETURNED.					
IF YOUR FACILITY IS ELIGIBLE FOR A NO EXPOSURE EXEMPTION:					
Fill out t	he No Exposure Certification Form (Mo 780-2828): https	://dnr.mo.gov/forms/780-2828-f.pc	<u>lf</u>		
1. REAS	SON FOR APPLICATION:				
☐ a.	This facility is now in operation under Missouri State Operating Permit (permit) MO –, is submitting an application for renewal, and there is <u>no</u> proposed increase in design wastewater flow. Annual fees will be paid when invoiced and there is no additional permit fee required for renewal.				
☐ b.	This facility is now in operation under permit MO –, is submitting an application for renewal, and there <u>is</u> a proposed increase in design wastewater flow. Antidegradation Review may be required. Annual fees will be paid when invoiced and there is no additional permit fee required for renewal.				
☐ c.	This is a facility submitting an application for a new permit (for a new facility). Antidegradation Review may be required. New permit fee is required.				
☑ d.	☑ d. This facility is now in operation under Missouri State Operating Permit (permit) MO – 0097675 and is requesting a modification to the permit. Antidegradation Review may be required. Modification fee is required.				
2. FACI	LITY				
	homas Hill Energy Center - Power Division		TELEPHON 660-261		WITH AREA CODE
ADDRESS 6693 Hig	(PHYSICAL) hway F	Clifton Hill	STATE MO		P CODE 244
3. OWN	ER				
NAME			_		WITH AREA CODE
	ed Electric Cooperative, Inc.		417-881	-1204	
EMAIL ADD	ress Daeci.org				
ADDRESS	•	CITY	STATE	ZI	P CODE
O Box	`	Springfield	MO		807
4. CON	TINUING AUTHORITY				
NAME			TELEPHON	NE NUMBER	WITH AREA CODE
Same EMAIL ADD	PRESS				
ADDRESS	(MAILING)	CITY	STATE	ZI	P CODE
5. OPE	RATOR CERTIFICATION				
NAME		CERTIFICATE NUMBER	ERTIFICATE NUMBER TELEPHONE NUMBER WITH AREA CODE		
ADDRESS	(MAILING)	CITY	STATE	ZI	P CODE
	LITY CONTACT				
NAME Rvan Be	rnnett TITLE TELEPHONE NUMBER WITH AREA CODE Safety & Environmental Specialis 660-261-3267				
-	an Bennett Safety & Environmental Specialis 660-261-3267 MAIL ADDRESS				
bennett@aeci.org					
7. DOWNSTREAM LANDOWNER(S) Attach additional sheets as necessary.					
NAME Mark C. and Sonia L. Taylor					
ADDRESS 1600 Oct	tober Place	CITY Rolla		STATE MO	ZIP CODE 65401

MO 780-1479 (02-19)

8. ADDITIONAL FACILITY INFORMATION				
8.1 Legal Description of Outfalls. (Attach additional sheets if necessary.) For Universal Transverse Mercator (UTM), use Zone 15 North referenced to North American Data.	ım 1983 (NAD83)			
	W Randolph County			
UTM Coordinates Easting (X): <u>530801</u> Northing (Y): <u>4376802</u> 002	W Randolph County			
* * *	W Randolph County			
	W Randolph County			
8.2 Primary Standard Industrial Classification (SIC) and Facility North American Industrial Classification	assification System (NAICS) Codes.			
Primary SIC 4911 and NAICS SIC 4911 SIC 4911 and NAICS SIC 4911	and NAIC <u>S</u> and NAIC <u>S</u>			
9. ADDITIONAL FORMS AND MAPS NECESSARY TO COMPLETE THIS APPLICATION				
A. Is this permit for a manufacturing, commercial, mining, solid/hazardous waste, or silvice If yes, complete Form C.	ulture facility? YES 🗸 NO 🗌			
B. Is the facility considered a "Primary Industry" under EPA guidelines (40 CFR Part 122, If yes, complete Forms C and D.	Appendix A): YES 🗸 NO 🗌			
C. Is wastewater land applied? If yes, complete Form I.	YES NO 🗹			
 Are sludge, biosolids, ash, or residuals generated, treated, stored, or land applied? If yes, complete Form R. 	YES NO 🗹			
 Have you received or applied for any permit or construction approval under the CWA or environmental regulatory authority? If yes, please include a list of all permits or approvals for this facility. 	r any other YES NO 🗸			
F. Do you use cooling water in your operations at this facility? If yes, please indicate the source of the water: Thomas Hill Reservoir	YES V NO			
G. Attach a map showing all outfalls and the receiving stream at 1" = 2,000' scale.				
10. ELECTRONIC DISCHARGE MONITORING REPORT (eDMR) SUBMISSION SYSTEM				
Per 40 CFR Part 127 National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule, reporting of effluent limits and monitoring shall be submitted by the permittee via an electronic system to ensure timely, complete, accurate, and nationally consistent set of data. One of the following must be checked in order for this application to be considered complete. Please visit http://dnr.mo.gov/env/wpp/edmr.htm to access the Facility Participation Package.				
☐ - You have completed and submitted with this permit application the required documentation to participate in the eDMR system.				
✓ - You have previously submitted the required documentation to participate in the eDMR system and/or you are currently using the eDMR system.				
☐ - You have submitted a written request for a waiver from electronic reporting. See instructions for further information regarding waivers.				
11. FEES				
Permit fees may be paid by attaching a check, or online by credit card or eCheck through the JetPay system. Use the URL provided to access JetPay and make an online payment: https://magic.collectorsolutions.com/magic-ui/payments/mo-natural-resources/				
12. CERTIFICATION				
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.				
NAME AND OFFICIAL TITLE (TYPE OR PRINT) Ken Wilmot, Senior Vice President & Chief Operations Officer	TELEPHONE NUMBER WITH AREA CODE 417-881-1204			
SIGNATURE and by:	DATE SIGNED 4/3/2020			

MO 78047970249)