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Associated Electric Cooperative, Inc.
New Madrid Power Plant
P.O. Box 156
New Madrid, MO 63869

Attention: Ms. Jennifer Burns
Environmental Analyst

Subject: Initial Hazard Potential Classification Assessment
Inactive Lined Pond
New Madrid Power Plant
New Madrid, Missouri

Ms. Burns:

This letter presents the results of our Initial Hazard Potential Classification Assessment for the Associated Electric Cooperative, Inc. (AECI) coal combustion residuals (CCR) surface impoundment referred to as the Inactive Lined Pond (Lined Pond) located at the New Madrid Power Plant (NMPP) in New Madrid, Missouri.

Haley & Aldrich, Inc. (Haley & Aldrich) was contracted by AECI to perform this Initial Hazard Potential Classification Assessment for the Lined Pond. This work was completed in accordance with the US Environmental Protection Agency's (EPA's) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, 40 CFR Part 257, specifically §257.73(a)(2). Based on the USEPA's issued CCR Rule Partial Vacatur in 2016, the inactive Lined Pond impoundment at the NMPP is subject to applicable requirements of the CCR Rule.

1.1 DESCRIPTION OF LINED POND IMPOUNDMENT

The Lined Pond is a surface impoundment with an approximate footprint of 78 acres located south of Pond 003. The Lined Pond was constructed in 1994. Access roads run along the perimeter of the pond and the crest elevation is approximately 307 feet msl. The impoundment is located on the east side of the US Army Corps of Engineers (USACOE) levee system of the Mississippi River. Immediately adjacent to the east side of the Lined Pond is the Raw Water Pond that exists as an overflow for high water elevation conditions.

AECI managed CCRs in the unit from approximately 1994 to 2007. The impoundment does not receive plant process water with the only source of water accumulation in the unit through precipitation. The water elevation within the impoundment is managed in accordance with the site NPDES permit.

1.2 HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

1.2.1 General

The Hazard Potential Classification of a surface impoundment is based on the potential for loss of human life, economic losses, environmental damage, and/or disruption to lifelines caused by failure or mis-operation of the surface impoundment.

EPA's Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, 40 CFR Part 257 requires the owner or operator of a CCR surface impoundment to determine which of the following three hazard potential classifications characterizes their CCR unit:

- High Hazard Potential Classification – A diked surface impoundment where failure or mis-operation will probably cause loss of human life.
- Significant Hazard Potential Classification – A diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.
- Low Hazard Potential Classification – A diked surface impoundment where failure or mis-operation results in no probable loss of life, and low economic and/or environmental losses. Losses are principally limited to the surface impoundment's owner's property.

1.2.2 Hazard Potential Classification

Based on observations during our previous site visit and our review of available information, Haley & Aldrich has classified the Lined Pond CCR surface impoundment as having a **Significant** Hazard Potential Classification in accordance with 40 CFR Part 257. The **Significant** Hazard Potential Classification is due to the potential for economic impacts and potential environmental damage due to potential impact on Mississippi River through a breach of the embankment(s) of the Lined Pond. Impacts to the USACOE levee system also contributed to this classification. Due to the limited amount of water in the unit and the surrounding environs, no probable loss of human life exists.

1.3 CERTIFICATION

§257.73(a)(2)(ii): The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer stating that the initial hazard potential classification and each subsequent periodic classification specified in paragraph (a)(2)(i) of this section was conducted in accordance with the requirements of this section.

I certify that this initial hazard potential classification for the Inactive Lined Pond CCR surface impoundment at the AECI New Madrid Power Plant was conducted in accordance with §257.73(a)(2) of the CCR Rule.

Signed: _____



Certifying Engineer

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Title: Project Principal
Company: Haley & Aldrich, Inc.

Professional Engineer's Seal:

