



HALEY & ALDRICH, INC.  
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## MEMORANDUM

17 October 2018  
File No. 129342-012

SUBJECT: Location Restriction Demonstration - 40 CFR §257.61 Wetlands  
Thomas Hill Energy Center  
Pond 1 – Cell 001  
Clifton Hill, MO

Associated Electric Cooperative, Inc. (AECI) owns and operates the coal-fired Thomas Hill Energy Center (THEC, Plant) located near Clifton Hill, Missouri. Pond 1 – Cell 001 (Unit) is an existing coal combustion residuals (CCR) surface impoundment at the Plant. This demonstration addresses the requirements of 40 CFR §257.61 *Wetlands* of the U.S. Environmental Protection Agency's (EPA's) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, 40 CFR Part 257 rule (CCR Rule), effective 19 October 2015, with Amendments effective 29 August 2018, for the Unit.

*§257.61(a): New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located in wetlands, as defined in §232.2 of this chapter, unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that the CCR unit meets the requirements of paragraphs (a)(1) through (5) of this section.*

Based on a review of the U.S. Fish and Wildlife Service's National Wetland Inventory mapping and the results of on-site field assessments, it is Haley & Aldrich's determination that the Unit is not located in wetlands as defined by 40 CFR §232.2.



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*§257.61(b): The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the demonstration meets the requirements of paragraph (a) of this section.*

I, Steven F. Putrich, being a Registered Professional Engineer in good standing in the State of Missouri, do hereby certify, to the best of my knowledge, information, and belief, that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the demonstration that the CCR Unit is not located in a wetland meets the requirements of 40 CFR §257.61(a).

Signed:   
Consulting Engineer

Print Name: Steven F. Putrich  
Missouri License No.: 2014035813  
Title: Project Principal  
Company: Haley & Aldrich, Inc.

Professional Engineer's Seal:

