



HALEY & ALDRICH, INC.
6500 Rockside Road
Suite 200
Independence, OH 44131
216.739.0555

MEMORANDUM

30 May 2019
File No. 128064-008

TO: Associated Electric Cooperative, Inc.

FROM: Haley & Aldrich, Inc.

SUBJECT: Notification of Unit Closure 40 CFR § 257.102(h)
New Madrid Power Plant – Inactive Cell 002 West

Associated Electric Cooperative, Inc. (AECI) is implementing the U.S. Environmental Protection Agency (U.S. EPA) Federal Coal Combustion Residuals (CCR) Rule (40 CFR § 257 and 261) effective 19 October 2015 (along with subsequent revisions) for the inactive CCR surface impoundment referred to as Cell 002 West at the New Madrid Power Plant, located near Clifton Hill, Missouri. AECI has completed closure of the CCR Unit and has obtained a certification of closure meeting the requirements of 40 CFR § 257.102(f)(3). The certification is attached to this notification.

This memorandum serves as the notification required by 40 CFR § 257.102(h) that the CCR Unit has completed closure as of 30 May 2019.

Enclosures



HALEY & ALDRICH, INC.
6500 Rockside Road
Suite 200
Cleveland, OH 44131
216.739.0555

MEMORANDUM

30 May 2019
File No. 128064-006

SUBJECT: Certification of Closure of CCR Unit - 40 CFR §257.102(f)(3)
Thomas Hill Energy Center
Pond 1 – Cell 002 West
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 002 West (Unit) is an inactive coal combustion residuals (CCR) surface impoundment at the Plant. This demonstration addresses the requirements of 40 CFR §257.102(f)(3) *Completion of Closure Activities* 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.

§257.102(f)(3): Upon completion, 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 verifying that closure has been completed in accordance with the closure plan specified in paragraph (b) of this section and the requirements of this section.

AECI has completed closure of the Unit pursuant to 40 CFR §257.102(c) *Closure by removal of CCR.*

§257.102(c): An owner or operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to § 257.95(h) for constituents listed in appendix IV to this part.

Haley & Aldrich has reviewed available information provided by AECI related to the removal of CCR material from the Unit; and evaluated groundwater monitoring concentrations to determine the completion of CCR removal and decontamination of the Unit. Based on the evaluation, the closure has been completed in accordance with the AECI's Written Closure Plan for the Unit developed pursuant to and in compliance with 40 CFR §257.95(b), CCR has been removed and the Unit has been decontaminated, and Appendix IV groundwater concentrations do not exceed the established groundwater protection standards.



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 in accordance with 40 CFR §257.102(f)(3) that the above-referenced CCR Unit has completed closure pursuant to the requirements of 40 CFR §257.102(c).

Signed: 
Consulting Engineer

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

Professional Engineer's Seal:

