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## MEMORANDUM

28 May 2020  
File No. 129638-007

TO: Associated Electric Cooperative, Inc.  
Jenny Jones – Senior Environmental Analyst

FROM: Haley & Aldrich, Inc.  
Jason M. Pokorny, P.E. (OH) -  
Senior Project Manager  
Steve F. Putrich, P.E. – Principal  
Consultant

SUBJECT: New Madrid Power Plant  
Pond 004 CCR Surface Impoundment  
Annual Inspection and Stability Assessments Documentation of Corrective Measures

Mrs. Jones:

Haley & Aldrich, Inc. (Haley & Aldrich) has prepared this documentation on behalf of Associated Electric Cooperative, Inc. (AECI) related to deficiencies identified during annual impoundment inspections or periodic stability assessments (SSA) for the coal combustion residuals (CCR) impoundment referred to as Pond 004 at the New Madrid Power Plant located in New Madrid County, Missouri. The attached table provides a summary of the completed inspection or SSA, the identified deficiencies, and the corrective measures completed by AECI to address the identified deficiency. This documentation has been 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 effective 19 October 2015 including subsequent revisions, specifically related to §257.73(d) and §257.83(b).

Haley & Aldrich has provided a summary of the remedies based on correspondence with AECI regarding the noted deficiencies in the attached Table I.

Document	CCR Rule Reference	Deficiency	Remedy
2019 Annual Inspection	§257.83	None	N/A
2018 Annual Inspection	§257.83	None	N/A
2017 Annual Inspection	§257.83	None	N/A
2016 Structural Stability Assessment	§257.73	Minor rutting and erosion in the upstream slope.	As part of the AECl NMPP's operation and maintenance plan, seeding and fertilizing is applied to barren and thinly vegetated areas on an as-needed basis.
		Minor erosion and rutting of the gravel access road on the Northern embankment.	As part of the AECl NMPP's operation and maintenance plan, eroded roadway areas are filled and compacted as needed.
		Sparse vegetation exceeding 6 in. in height and minor brush on upstream slope within riprap.	As part of the AECl NMPP's operation and maintenance plan, vegetation is controlled through mowing and other mitigating measures on an as-needed basis to limit vegetation and woody growth.
		Sparse vegetation exceeding 6 in. height and brush on upstream slope.	As part of the AECl NMPP's operation and maintenance plan, vegetation is controlled through mowing and other mitigating measures on an as-needed basis to limit vegetation and woody growth.
		Vegetation exceeding 6 in. in height on the downstream slope.	As part of the AECl NMPP's operation and maintenance plan, vegetation is controlled through mowing and other mitigating measures on an as-needed basis to limit vegetation and woody growth.
2016 Annual Inspection	§257.83	Minor rutting and erosion in the upstream slope.	As part of the AECl NMPP's operation and maintenance plan, seeding and fertilizing is applied to barren and thinly vegetated areas on an as-needed basis.
		Minor erosion and rutting of the gravel access road on the Northern embankment.	As part of the AECl NMPP's operation and maintenance plan, eroded roadway areas are filled and compacted as needed.
		Sparse vegetation exceeding 6 in. in height and minor brush on upstream slope within riprap.	As part of the AECl NMPP's operation and maintenance plan, vegetation is controlled through mowing and other mitigating measures on an as-needed basis to limit vegetation and woody growth.
		Sparse vegetation exceeding 6 in. height and brush on upstream slope.	As part of the AECl NMPP's operation and maintenance plan, vegetation is controlled through mowing and other mitigating measures on an as-needed basis to limit vegetation and woody growth.
		Vegetation exceeding 6 in. in height on the downstream slope.	As part of the AECl NMPP's operation and maintenance plan, vegetation is controlled through mowing and other mitigating measures on an as-needed basis to limit vegetation and woody growth.