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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
Utility Waste Landfill
Annual Inspection 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 landfill inspections for the coal combustion residuals (CCR) landfill referred to as Utility Waste Landfill at the New Madrid Power Plant located in New Madrid County, Missouri. The attached table provides a summary of the completed inspection, 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 §257.84(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	257.84	None	N/A
2018 Annual Inspection	257.84	None	N/A
2017 Annual Inspection	257.84	None	N/A
2016 Annual Inspection	257.84	Erosion rills in ash of approximately 6-12 inches were observed on side slopes.	As part of the AECI NMPP's operation and maintenance plan, all eroded areas are fill, compacted, re-seeded, fertilized and mulched to establish a thick erosion resistant cover.