



HALEY & ALDRICH, INC.
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MEMORANDUM

16 April 2020
File No. 129342-028

SUBJECT: Location Restriction Demonstration – 40 CFR §257.61 Wetlands
New Madrid Power Plant
Inactive Lined Pond
New Madrid, MO

Associated Electric Cooperative, Inc. (AECI) owns and operates the coal-fired New Madrid Power Plant (NMPP, Plant) located near New Madrid, Missouri. The Lined Pond (Unit) is an inactive 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, including subsequent revisions, 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, 1-foot resolution aerial imagery (2018), National Resource Conservation Service soil data and the results of field assessments in the vicinity of the Unit, 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:

