



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

MEMORANDUM

15 February 2021
File No. 129342-022

TO: Associated Electric Cooperative, Inc.

FROM: Haley & Aldrich, Inc.

SUBJECT: Notification of Unit Closure 40 CFR § 257.102(h)
New Madrid Power Plant – Inactive Lined Ash Pond

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) effective 19 October 2015 (along with subsequent revisions) for the inactive CCR surface impoundment referred to as the Inactive Lined Ash Pond at the New Madrid Power Plant, located near New Madrid, 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). This 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 15 January 2021.

Enclosures:
Certification of Closure of CCR Unit dated 15 January 2021

**CERTIFICATION OF CLOSURE OF CCR UNIT
DATED 15 JANUARY 2021**



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

MEMORANDUM

15 January 2021
File No. 129342-022

SUBJECT: Certification of Closure of CCR Unit - 40 CFR §257.102(f)(3)
New Madrid Power Plant
Inactive Lined Ash Pond
New Madrid, MO

Associated Electric Cooperative, Inc. (AECI) owns and operates the coal-fired New Madrid Power Plant (NMPP, Plant) located in New Madrid, Missouri. The Inactive Lined Ash Pond (Lined Pond; 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, including subsequent revisions.

§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(d) *Closure performance standard when leaving CCR in place* and will be completing post-closure activities in accordance with 40 CFR §257.104.

Steven Putrich, P.E. of Haley & Aldrich has reviewed available information provided by AECI related to the closure activities for 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 §257.102(b).



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 as of 15 January 2021 pursuant to the applicable section requirements of 40 CFR §257.102 (green highlighted §257.102 sections shown below are applicable to this certification) including the Written Closure Plan as developed under 40 CFR §257.102(b).

§257.102 Criteria for conducting the closure or retrofit of CCR units.		
Para.	Description	Applicable to Certification?
(a)	<i>(General overview)</i>	Applicable
(b)	<i>Written closure plan</i>	Completed Previously
(c)	<i>Closure by removal of CCR</i>	Not Applicable
(d)	<i>Closure performance standard when leaving CCR in place</i>	Applicable
(e)	<i>Initiation of closure activities</i>	Completed Previously
(f)	<i>Completion of closure activities</i>	Applicable
(g)	<i>(Notification of intent to close; PE certification for final cover design)</i>	Completed Previously
(h)	<i>(Notification of closure; PE certification of closure)</i>	Completed following Certification
(i)	<i>Deed notations</i>	Completed by Owner following Certification
(j)	<i>(Closure recordkeeping, notification, and CCR website)</i>	Completed by Owner following Certification
(k)	<i>Criteria to retrofit an existing CCR surface impoundment</i>	Not Applicable

Signed: 
 Consulting Engineer

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

Professional Engineer's Seal:

