



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

MEMORANDUM

9 February 2021
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
Lined Ash Pond 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 the Lined Ash Pond 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
2020 Annual Inspection	§257.83	None	N/A
2019 Annual Inspection	§257.83	None	N/A
2018 Structural Stability Assessment	§257.73	Unseeded areas on the downstream slope and downstream bench area of eastern embankment.	As part of the AECI NMPP's operation and maintenance plan, seeding and fertilizing is applied to barren and thinly vegetated areas on an as-needed basis.
		Erosion rills less than 6 inches deep on downstream slope of eastern embankment.	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.
		Minor erosion and rutting of the gravel access road on the southern embankment.	As part of the AECI NMPP's operation and maintenance plan, eroded roadway areas are filled and compacted as needed.
		Slough on downstream slope of eastern embankment.	AECI completed a rehabilitation of the eastern embankment by importing additional soil and rock to stabilize and flatten slope.
		Grass exceeding 6 inches in height at majority of the areas on downstream slopes of eastern, southern and western embankments.	As part of the AECI 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 inches in height on the upstream and downstream sides of the crest of eastern embankment and downstream side of crest of western embankment.	As part of the AECI 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.
		Accumulation of water, forming within a depression area in downstream toe area of southern embankment.	Periodic observance of minimal water accumulation associated with natural grades and drainage. Continued monitoring.
2017 Annual Inspection	§257.83	None	N/A