



HALEY & ALDRICH, INC.
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MEMORANDUM

14 April 2021
File No. 129342-036

SUBJECT: Certification of Closure of CCR Unit - 40 CFR §257.102(f)(3)
New Madrid Power Plant
Pond 004
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. Pond 004 (Unit) is a 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(c) *Closure by removal of CCR.*

§257.102(c): An owner or operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to §257.95(h) for constituents listed in Appendix IV to this part.


Pond 004 has met the groundwater requirements for closure of a CCR surface impoundment of not having groundwater monitoring concentrations exceeding the groundwater protection standard and has not been required to enter corrective measures, remedies, or corrective actions under §§257.96 through 257.98 due to releases to groundwater.

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 14 April 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 on 4/17/2020
(c)	<i>Closure by removal of CCR</i>	Applicable
(d)	<i>Closure performance standard when leaving CCR in place</i>	Not Applicable
(e)	<i>Initiation of closure activities</i>	Closure Initiated on 20 April 2020
(f)	<i>Completion of closure activities</i>	Applicable
(g)	<i>(Notification of intent to close; PE certification for final cover design)</i>	Completed Previously on 20 April 2020
(h)	<i>(Notification of closure; PE certification of closure)</i>	Completed following Certification
(i)	<i>Deed notations</i>	Not Applicable
(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:

