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MEMORANDUM

15 September 2021
File No. 128064-017

SUBJECT: Notification of Intent to Initiate Closure of a CCR Surface Impoundment – Cell 001
Thomas Hill Energy Center
Clifton Hill, Missouri

Associated Electric Cooperative, Inc. (AECI) owns and operated the existing coal combustion residuals (CCR) surface impoundment referred to as Cell 001 (Unit) at the Thomas Hill Energy Center (THEC) located in Clifton Hill, Missouri. This CCR surface impoundment ceased receiving CCR and non-CCR waste streams generated by the THEC as of 2 September 2021. In accordance with §257.102(e)(1)(i) of 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 (CCR Rule) effective 19 October 2015, including subsequent revisions, AECI must commence closure of the CCR unit no later than 30 days after this date of receipt of the last known final receipt of waste.

In accordance with §257.102(g) of the EPA's CCR Rule, AECI is providing this notification of their intent to initiate the closure of Cell 001. Since the closure will be completed by removal of CCR, a certification of the design of the final cover system is not applicable to this Unit.