



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

## MEMORANDUM

27 January 2023  
File No. 128064-031

**SUBJECT:** Notification of Intent to Initiate Closure of a CCR Surface Impoundment  
Associated Electric Cooperative, Inc.  
Thomas Hill Energy Center – Cell 004  
Clifton Hill, Missouri

Associated Electric Cooperative, Inc. (AECI) owns and operated the existing coal combustion residuals (CCR) surface impoundment referred to as Cell 004 (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 THEC as of 29 December 2022. In accordance with 40 C.F.R. §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 C.F.R. 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 known final receipt of waste.

In accordance with 40 C.F.R. §257.102(g) of the EPA's CCR Rule, AECI is providing this notification of their intent to initiate the closure of Cell 004. 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.

Note, Cell 004 was historically operated as part of the "Ash Pond 1" multi-unit wastewater treatment system at THEC, which was comprised of existing CCR surface impoundments Cell 001, Cell 003, and Cell 004. Each surface impoundment in the series was identified separately under the CCR regulations along with a single multi-unit groundwater monitoring system. Cell 001 previously – and separately – initiated closure by removal of CCR following its known final receipt of CCR and non-CCR wastestreams. Cell 003 and Cell 004 were operated collectively as part of a single wastewater treatment system and are being considered as a single CCR unit under the same time frames for the purposes of closure.