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### MEMORANDUM

17 April 2018 File No. 129342-015

SUBJECT: Inflow Design Flood Control System Plan Inactive Lined Pond Associated Electric Cooperative, Inc. New Madrid Power Plant New Madrid. Missouri

Haley & Aldrich, Inc. (Haley & Aldrich) has developed this Inflow Design Flood (IDF) Control System Plan (Plan) on behalf of Associated Electric Cooperative, Inc. (AECI) for the inactive coal combustion residuals (CCR) surface impoundment referred to as the Inactive Lined Pond (Lined Pond) at the New Madrid Power Plant (NMPP) in New Madrid, Missouri. This has been completed based on requirements of the Environmental Protection Agency (EPA) 40 CFR Parts 257 and 261, "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities" (CCR Rule), specifically section §257.82. Based on the USEPA's issued CCR Rule Partial Vacatur in 2016, the Lined Pond impoundment at NMPP is subject to applicable requirements of the CCR Rule. The inactive status of the impoundment is understood to no longer make the unit exempt from several portions of the CCR Rule. The Lined Pond existing conditions and supporting documentation has been reviewed and associated storm water modeling and analysis performed to satisfy the Inflow Design Flood Control System Plan requirements of CCR Rule section §257.82 as described below.

<u>§257.82(a)</u>: The owner or operator of an existing or new CCR surface impoundment or any lateral expansion of a CCR surface impoundment must design, construct, operate, and maintain an inflow design flood control system as specified in paragraphs (a)(1) and (a)(2) of this section.

<u>§257.82(a)(1)</u>: The inflow design flood control system must adequately manage flow into the CCR unit during and following the peak discharge of the inflow design flood specified in paragraph (a)(3) of this section.

The Lined Pond is a surface impoundment with an approximate footprint of 78 acres located south of Pond 003 and constructed in 1994. Access roads run along the perimeter of the pond and the approximate crest elevation is 307 feet msl. The impoundment is located on the east side of the US Army Corps of Engineers levee system of the Mississippi River. Immediately adjacent to the east side of the Lined Pond is the Raw Water Pond that exists as an overflow for high water elevation conditions and was initially intended as a future expansion of the Lined Pond. Since all four sides of the impoundment consist of embankments constructed above natural grades, no overland inflow discharges into the unit.

AECI managed CCR by directing fly ash and process water to the Lined Pond from 1994 to approximately 2007 when the plant converted to dry fly ash handling. The impoundment relied on evaporation as the main source of discharge from the unit, with no primary spillway existing (emergency flows can be diverted to the Raw Water Pond, Pond 003, or the 003 Outfall discharge channel in accordance with the plant NPDES permit). Since the unit has ceased receiving CCRs, process water is no longer discharged into the unit.

<u>§257.82(a)(2)</u>: The inflow design flood control system must adequately manage flow from the CCR unit to collect and control the peak discharge resulting from the inflow design flood specified in paragraph (a)(3) of this section.

As previously discussed, the Lined Pond does not have an existing outlet control structure (e.g., primary spillway), and relies on manual pumping and evaporation as the main source of discharge from the pond. Pumped flows are discharged to Pond 003 in accordance with the plant NPDES permit. The majority of the Lined Pond is full and contains an unused area in the southeastern corner that collects runoff. For purposes of this model, it is assumed that the plant operating level of 293 ft msl is maintained and that all routing occurs above that elevation.

Hydrologic and hydraulic modeling for this Lined Pond IDF Control System Plan was performed using HydroCAD Stormwater Modeling System, version 10.00-12 (HydroCAD) in conjunction with the appropriate IDF as dictated by the CCR Rule in section §257.82(a)(3).

When the Lined Pond is maintained at its normal water surface elevation (WSEL) (El. 293.0), the results of the HydroCAD analysis confirm the IDF control system for the Lined Pond adequately manages flow into and from the impoundment during and following the IDF peak storm discharge. The output from the HydroCAD model simulation is provided as **Appendix A** with a summary of results provided in **Table I** below. See **Figure 1** for the Lined Pond existing site plan.

Table I: HydroCAD Output Summary – 1,000-yr Flood					
	Normal Operating Conditions				
Peak flood level (ft)	300.4				
Minimum Dike Elevation	307.0				
Minimum freeboard (ft)	6.6				
Peak inflow (cfs)	929				

### §257.82(a)(3): The inflow design flood is:

- i. For a high hazard potential CCR surface impoundment, as determined under § 257.73(a)(2) or § 257.74(a)(2), the probable maximum flood;
- ii. For a significant hazard potential CCR surface impoundment, as determined under § 257.73(a)(2) or § 257.74(a)(2), the 1,000-year flood;



- iii. For a low hazard potential CCR surface impoundment, as determined under § 257.73(a)(2) or § 257.74(a)(2), the 100-year flood; or
- iv. For an incised CCR surface impoundment, the 25-year flood.

The Lined Pond was determined to be a <u>significant</u> hazard potential as determined per the Hazard Potential Classification Assessment performed under separate cover; therefore, the design event is the 1,000-year, 24-hour storm. The basis of the determination is discussed in Initial Hazard Potential Classification Assessment for the Lined Pond. The 1,000-year storm characteristics were detailed in the NOAA Atlas 14, Volume 8, Version 2 Point Precipitation Frequency Estimates: TN dated 15 September 2016 and prepared by the National Weather Service. Pertinent pages providing the required information have been provided as **Appendix B**.

<u>§257.82(b)</u>: Discharge from the CCR unit must be handled in accordance with the surface water requirements under § 257.3–3.

<u>§257.3-3(a):</u> For purposes of section 4004(a) of the Act, a facility shall not cause a discharge of pollutants into waters of the United States that is in violation of the requirements of the National Pollutant Discharge Elimination System (NPDES) under section 402 of the Clean Water Act, as amended.

<u>§257.3-3(b):</u> For purposes of section 4004(a) of the Act, a facility shall not cause a discharge of dredged material or fill material to waters of the United States that is in violation of the requirements under section 404 of the Clean Water Act, as amended.

<u>§257.3-3(c):</u> A facility or practice shall not cause non-point source pollution of waters of the United States that violates applicable legal requirements implementing an areawide or Statewide water quality management plan that has been approved by the Administrator under section 208 of the Clean Water Act, as amended.

Discharge from the Lined Pond is subject to the Missouri State Operating Permit issued by the Missouri Department of Natural Resources.

<u>§257.82(c)(1)</u>: Content of the plan. The owner or operator must prepare initial and periodic inflow design flood control system plans for the CCR unit according to the timeframes specified in paragraphs (c)(3) and (4) of this section. These plans must document how the inflow design flood control system has been designed and constructed to meet the requirements of this section. Each plan must be supported by appropriate engineering calculations. The owner or operator of the CCR unit has completed the inflow design flood control system plan when the plan has been placed in the facility's operating record as required by § 257.105(g)(4).



This document and all attachments serve as the Initial Inflow Design Flood Control Plan and will be placed in the facility's operating record. Periodic Plans will be prepared and placed in the facility operating record at 5-year increments or whenever there is a change in conditions that would affect the Plan.

<u>§257.82(c)(2)</u>: Amendment of the plan. The owner or operator of the CCR unit may amend the written inflow design flood control system plan at any time provided the revised plan is placed in the facility's operating record as required by § 257.105(g)(4). The owner or operator must amend the written inflow design flood control system plan whenever there is a change in conditions that would substantially affect the written plan in effect.

The IDF Plan will be amended at least 60 days prior to a planned change in the operation of the facility or the CCR impoundment, or no later than 60 days after an unanticipated event requires the need to revise the IDF Plan. If the Plan needs to be revised after closure activities have commenced, the Plan will be revised no later than 30 days following the triggering event.

Any amendments to the Plan will include written certification from a qualified professional engineer that the initial and any amendments to the IDF Plan meet the requirements of the CCR Rule.

A record of amendments to the Plan will be tracked below. The latest version of the IDF Plan will be noted on the front cover of the Plan.

Version	Date	Description of Changes Made
1	17 April 2018	Initial Issuance

### §257.82(c)(3): Timeframes for preparing the initial plan

*i.* Existing CCR surface impoundments. The owner or operator of the CCR unit must prepare the initial inflow design flood control system plan no later than October 17, 2016.

Per EPA 40 CFR Part 257 – "Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Extension of Compliance Deadlines for Certain Inactive Surface Impoundments; Response to Partial Vacatur" October 17, 2016 deadline is not applicable. See excerpt below:



<u>257.100(e)(4)(ii):</u> No later than April 17, 2018, prepare the initial inflow design flood control system plan as set forth in § 257.82(c).

This Plan has been prepared within the specified timeframe.

*ii.* New CCR surface impoundments and any lateral expansion of a CCR surface impoundment. The owner or operator must prepare the initial inflow design flood control system plan no later than the date of initial receipt of CCR in the CCR unit.

Not Applicable - the Lined Pond is an existing inactive CCR impoundment.

<u>§257.82(c)(4)</u>: Frequency for revising the plan. The owner or operator must prepare periodic inflow design flood control system plans required by paragraph (c)(1) of this section every five years. The date of completing the initial plan is the basis for establishing the deadline to complete the first periodic plan. The owner or operator may complete any required plan prior to the required deadline provided the owner or operator places the completed plan into the facility's operating record within a reasonable amount of time. In all cases, the deadline for completing a subsequent plan is based on the date of completing the previous plan. For purposes of this paragraph (c)(4), the owner or operator has completed an inflow design flood control system plan when the plan has been placed in the facility's operating record as required by § 257.105(g)(4).

This IDF Plan or any subsequent IDF Plan will be assessed and amended whenever there is a change in operation of the CCR impoundment that would substantially affect the IDF Plan or when unanticipated events necessitate a revision of the Plan either before or after closure activities have commenced.



Associated Electric Cooperative, Inc. – New Madrid Power Plant Lined Pond IDF Control Plan 17 April 2018 Page 6

### **Professional Engineer Certification**

<u>§257.82(c)(5)</u>: The owner or operator must obtain a certification from a qualified professional engineer stating that the initial and periodic inflow design flood control system plans meet the requirements of this section.

I certify that the design of the flood control system referenced in this Inflow Design Flood Control System Plan for AECI's Inactive Lined Pond at the New Madrid Power Plant meets the USEPA's CCR Rule requirements of §257.82.

Signed:

**Certifying Engineer** 

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

Professional Engineer's Seal and date:







Appendix A



# Area Listing (all nodes)

 Area (acres)	CN	Description (subcatchment-numbers)		
80.819	93	Urban industrial, 72% imp, HSG D (LPS)		
26.315	98	Water Surface, HSG A (LPS)		
107.134	94	TOTAL AREA		

# Soil Listing (all nodes)

Area	Soil	Subcatchment
(acres)	Group	Numbers
26.315	HSG A	LPS
0.000	HSG B	
0.000	HSG C	
80.819	HSG D	LPS
0.000	Other	
107.134		TOTAL AREA

# Ground Covers (all nodes)

HSG-A	HSG-B	HSG-C	HSG-D	Other	Total	Ground	Subcatchment
 (acres)	(acres)	(acres)	(acres)	(acres)	(acres)	Cover	Numbers
0.000	0.000	0.000	80.819	0.000	80.819	Urban industrial, 72% imp	LPS
26.315	0.000	0.000	0.000	0.000	26.315	Water Surface	LPS
26.315	0.000	0.000	80.819	0.000	107.134	TOTAL AREA	

Time span=0.00-144.00 hrs, dt=0.01 hrs, 14401 points Runoff by SCS TR-20 method, UH=SCS, Weighted-CN Reach routing by Stor-Ind+Trans method - Pond routing by Stor-Ind method

Subcatchment LPS: Lined Pond	Runoff Area=4,666,755 sf 78.88% Impervious Runoff Depth=10.87" Flow Length=1,314' Tc=29.5 min CN=94 Runoff=929.00 cfs 97.025 af
Pond LP: Lined Pond	Peak Elev=300.36' Storage=5,882,319 cf Inflow=929.00 cfs 97.025 af Outflow=0.00 cfs 0.000 af
Total Runoff Area = 107	134 ac Runoff Volume = 97.025 af Average Runoff Depth = 10.87'

21.12% Pervious = 22.629 ac 78.88% Impervious = 84.505 ac

### Summary for Subcatchment LPS: Lined Pond Subcatchment

Runoff = 929.00 cfs @ 12.22 hrs, Volume= 97.025 af, Depth=10.87"

Runoff by SCS TR-20 method, UH=SCS, Weighted-CN, Time Span= 0.00-144.00 hrs, dt= 0.01 hrs Type II 24-hr 1000-Yr Rainfall=11.60"

	A	rea (sf)	CN C	Description										
80.	1,1	46,263	98 V	Water Surface, HSG A										
	3,5	20,492	93 L	93 Urban industrial, 72% imp, HSG D										
	4,6	66,755	94 V	Veighted A	verage									
	9	85,738	2	1.12% Per	vious Area									
	3,6	81,017	7	8.88% Imp	ervious Are	ea								
						_								
	Tc	Length	Slope	Velocity	Capacity	Description								
	(min)	(feet)	(ft/ft)	(ft/sec)	(cfs)									
	8.4	100	0.0388	0.20		Sheet Flow, Sheet								
						Grass: Short n= 0.150 P2= 2.56"								
	21.1	1,214 0.0092 0.96 Shallow Concentrated Flow, Shallow Concentra												
				. • HERE 80 (1997)		Nearly Bare & Untilled Kv= 10.0 fps								
	29 5	1 314	Total											

# Subcatchment LPS: Lined Pond Subcatchment



# Hydrograph

### Summary for Pond LP: Lined Pond

 Inflow Area =
 107.134 ac, 78.88% Impervious, Inflow Depth = 10.87" for 1000-Yr event

 Inflow =
 929.00 cfs @
 12.22 hrs, Volume=
 97.025 af

 Outflow =
 0.00 cfs @
 0.00 hrs, Volume=
 0.000 af, Atten= 100%, Lag= 0.0 min

Routing by Stor-Ind method, Time Span= 0.00-144.00 hrs, dt= 0.01 hrs Starting Elev= 293.00' Surf.Area= 424,429 sf Storage= 1,656,068 cf Peak Elev= 300.36' @ 25.71 hrs Surf.Area= 727,596 sf Storage= 5,882,319 cf (4,226,251 cf above start)

Plug-Flow detention time= (not calculated: initial storage exceeds outflow) Center-of-Mass det. time= (not calculated: no outflow)

Volume	Invert	Avail.S	Storage	Storage	e Description	
#1	288.00'	11,079	,072 cf	Custor	n Stage Data (	(Prismatic)Listed below (Recalc)
		3			2	
Elevation	Surf.	Area	Inc.	Store	Cum.Stor	e
(feet)	(*	sq-ft)	(cubic	-feet)	(cubic-fee	<u>t)</u>
288.00	241	1,153		0		0
289.00	276	5,448	25	8,801	258,80	1
290.00	312	2,100	29	4,274	553,07	5
291.00	348	3,660	33	0,380	883,45	5
292.00	386	6,069	36	7,365	1,250,81	9
293.00	424	1,429	40	5,249	1,656,06	8
294.00	463	3,699	44	4,064	2,100,13	2
295.00	503	8,858	48	3,779	2,583,91	1
296.00	544	1,919	52	4,389	3,108,29	9
297.00	586	6,640	56	5,780	3,674,07	9
298.00	628	3,400	60	7,520	4,281,59	9
299.00	670	),161	64	9,281	4,930,87	9
300.00	712	2,226	69	1,194	5,622,07	3
301.00	754	1,743	73	3,485	6,355,55	7
302.00	801	1,753	77	8,248	7,133,80	5
303.00	906	5,277	85	4,015	7,987,82	0
304.00	1,001	1,549	95	3,913	8,941,73	3
305.00	1,063	3,433	1,03	2,491	9,974,22	4
306.00	1,146	5,263	1,10	4,848	11,079,07	2

Pond LP: Lined Pond



Hydrograph

Appendix B

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TORR	N Hydrometeo Precipitat	IOAA's National V Drological D ion Frequency	<sup>Veather</sup> Service esign Stuc Data Server (	, lies Center PFDS)		, www.nws.noaa.gov
	Home	Site Map	News	Organization	Search	NWS      AII NOAA Go
General Info		NOAA A	TLAS 14 PO	INT PRECIPITATION	FREQUENCY ESTI	MATES: TN

#### Current Projects FAQ Glossary

 Data description

 Data type:
 Precipitation depth

 V Units:
 English V

 Time series type:
 Partial duration

Precipitation Frequency (PF)

#### Select location 1) Manually:

PF Data Server PF in GIS Format PF Maps Temporal Distr. Time Series Data PFDS Perform. PF Documents

# PF Documents

Probable Maximum Precipitation (PMP) PMP Documents

#### Miscellaneous

Publications AEP Storm Analysis Record Precipitation

### Contact Us Inquiries







#### 2) Use map:



#### POINT PRECIPITATION FREQUENCY (PF) ESTIMATES WITH 90% CONFIDENCE INTERVALS AND SUPPLEMENTARY INFORMATION NOAA Atlas 14, Volume 8, Version 2

	PF tabular	PF gra	aphical -	Supplement	ary information		Print page			
	1	DS-based	precipitation	frequency	estimates w	ith 90% con	fidence inte	rvals (in inc	hes) <sup>1</sup>	
Desertion	Average recurrence interval (years)									
Duration	1	2	5	10	25	50	100	200	500	1000
5-min	0.411 (0.330-0.515)	0.476 (0.382-0.596)	0.581 (0.465-0.730)	0.669 (0.533-0.843)	0.792 (0.611-1.02)	0.886 (0.670-1.15)	0.982 (0.719-1.30)	1.08 (0.761-1.45)	1.21 (0.823-1.66)	1.31 (0.870-1.8
10-min	0.602 (0.484-0.754)	0.696 (0.559-0.873)	0.851 (0.681-1.07)	0.980 (0.780-1.23)	1.16 (0.894-1.49)	1.30 (0.981-1.69)	1.44 (1.05-1.90)	1.58 (1.11-2.13)	1.77 (1.21-2.43)	<b>1.92</b> (1.27-2.66
15-min	0.735	0.849 (0.681-1.06)	1.04 (0.830-1.30)	1.20 (0.951-1.50)	1.41 (1.09-1.82)	1.58 (1.20-2.06)	1.75 (1.28-2.32)	1.93 (1.36-2.59)	2.16 (1.47-2.96)	2.33 (1.55-3.24

http://hdsc.nws.noaa.gov/hdsc/pfds/pfds\_map\_cont.html?bkmrk=mo

#### PFDS: Contiguous US

30-min	1.05 (0.846-1.32)	1.22 (0.981-1.53)	1.50 (1.20-1.88)	1.73 (1.38-2.18)	2.05 (1.58-2.63)	2.29 (1.73-2.98)	2.54 (1.86-3.35)	<b>2.79</b> (1.97-3.75)	3.12 (2.13-4.28)	<b>3.37</b> (2.25-4.68)
60-min	1.39	<b>1.61</b>	1.96	2.27	2.69	3.03	3.38	3.73	4.22	4.59
	(1.12-1.74)	(1.29-2.01)	(1.57-2.46)	(1.80-2.85)	(2.08-3.48)	(2.29-3.95)	(2.48-4.47)	(2.64-5.04)	(2.88-5.80)	(3.05-6.38)
2-hr	1.73	1.99	2.43	2.81	3.34	3.77	4.22	4.68	5.31	5.81
	(1.41-2.14)	(1.61-2.46)	(1.97-3.01)	(2.26-3.49)	(2.62-4.27)	(2.89-4.86)	(3.13-5.52)	(3.35-6.25)	(3.67-7.23)	(3.91-7.98)
3-hr	1.96	2.24	2.73	3.15	3.77	4.26	4.78	5.33	6.09	6.69
	(1.60-2.40)	(1.83-2.75)	(2.22-3.35)	(2.56-3.89)	(2.98-4.78)	(3.29-5.46)	(3.58-6.24)	(3.85-7.09)	(4.24-8.26)	(4.54-9.14)
6-hr	2.39	<b>2.72</b>	3.31	3.82	4.58	5.20	<b>5.85</b>	6.54	7.51	8.29
	(1.98-2.90)	(2.25-3.30)	(2.73-4.02)	(3.14-4.66)	(3.67-5.75)	(4.07-6.59)	(4.44-7.54)	(4.78-8.61)	(5.29-10.1)	(5.68-11.2)
12-hr	2.88	<b>3.29</b>	4.00	4.62	5.53	6.27	7.05	7.87	9.01	9.92
	(2.42-3.44)	(2.76-3.94)	(3.34-4.80)	(3.84-5.56)	(4.48-6.86)	(4.97-7.84)	(5.41-8.97)	(5.81-10.2)	(6.42-11.9)	(6.88-13.3)
24-hr	3.41 (2.90-4.03)	<b>3.93</b> (3.33-4.64)	4.80 (4.06-5.68)	5.55 (4.67-6.59)	6.63 (5.42-8.09)	7.49 (5.99-9.23)	8.37 (6.50-10.5)	9.30 (6.94-11.9)	<b>10.6</b> (7.61-13.8)	<b>11.6</b> (8.12-15.3)
2-day	3.98	4.62	5.68	6.58	7.83	8.81	9.80	10.8	12.2	<b>13.3</b>
	(3.43-4.64)	(3.97-5.39)	(4.87-6.64)	(5.60-7.70)	(6.47-9.40)	(7.13-10.7)	(7.68-12.1)	(8.17-13.7)	(8.88-15.7)	(9.42-17.3)
3-day	4.38	5.07	6.21	7.18	8.53	9.59	<b>10.7</b>	11.8	<b>13.3</b>	<b>14.4</b>
	(3.79-5.05)	(4.38-5.86)	(5.36-7.20)	(6.16-8.34)	(7.10-10.2)	(7.81-11.6)	(8.42-13.1)	(8.94-14.8)	(9.72-17.0)	(10.3-18.7)
4-day	4.68	<b>5.41</b>	6.61	7.63	9.07	10.2	<b>11.3</b>	12.5	14.1	<b>15.4</b>
	(4.08-5.38)	(4.71-6.21)	(5.74-7.62)	(6.59-8.82)	(7.59-10.8)	(8.36-12.2)	(9.01-13.9)	(9.58-15.7)	(10.4-18.1)	(11.1-19.9)
7-day	5.41	6.21	7.55	8.71	10.3	<b>11.6</b>	<b>13.0</b>	14.4	16.3	17.8
	(4.76-6.14)	(5.46-7.06)	(6.62-8.61)	(7.59-9.95)	(8.77-12.2)	(9.65-13.8)	(10.4-15.7)	(11.1-17.8)	(12.1-20.6)	(12.9-22.7)
10-day	6.08	6.93	8.37	9.61	11.4	12.8	14.2	15.7	17.8	<b>19.4</b>
	(5.39-6.86)	(6.14-7.83)	(7.39-9.47)	(8.43-10.9)	(9.70-13.3)	(10.7-15.1)	(11.5-17.1)	(12.2-19.3)	(13.3-22.3)	(14.2-24.6)
20-day	8.19	9.17	10.8	12.2	14.1	15.6	17.1	18.7	20.8	22.4
	(7.35-9.10)	(8.23-10.2)	(9.66-12.0)	(10.8-13.6)	(12.2-16.2)	(13.2-18.1)	(14.0-20.3)	(14.7-22.7)	(15.8-25.8)	(16.6-28.2)
30-day	<b>10.0</b>	<b>11.1</b>	<b>13.0</b>	14.5	16.5	<b>18.1</b>	<b>19.6</b>	21.2	23.2	24.8
	(9.05-11.0)	(10.1-12.3)	(11.7-14.3)	(13.0-16.1)	(14.3-18.7)	(15.4-20.8)	(16.2-23.0)	(16.8-25.5)	(17.8-28.6)	(18.5-31.0)
45-day	<b>12.3</b>	<b>13.7</b>	15.8	<b>17.6</b>	<b>19.8</b>	21.5	23.1	24.7	26.7	28.1
	(11.2-13.5)	(12.5-15.0)	(14.4-17.4)	(15.9-19.3)	(17.3-22.3)	(18.4-24.5)	(19.2-26.9)	(19.7-29.4)	(20.5-32.5)	(21.1-34.9)
60-day	14.3	<b>15.9</b>	<b>18.4</b>	20.3	22.9	24.7	26.4	28.0	<b>30.0</b>	<b>31.3</b>
	(13.1-15.5)	(14.6-17.3)	(16.8-20.0)	(18.5-22.3)	(20.0-25.4)	(21.2-27.9)	(22.0-30.4)	(22.4-33.1)	(23.1-36.2)	(23.7-38.7)

<sup>1</sup> Precipitation frequency (PF) estimates in this table are based on frequency analysis of partial duration series (PDS).

Numbers in parenthesis are PF estimates in this table are based on neglecity analysis of partial duration series (PDS). Numbers in parenthesis are PF estimates at lower and upper bounds of the 90% confidence interval. The probability that precipitation frequency estimates (for a given duration and average recurrence interval) will be greater than the upper bound (or less than the lower bound) is 5%. Estimates at upper bounds are not checked against probable maximum precipitation (PMP) estimates and may be higher than currently valid PMP values.

Please refer to NOAA Atlas 14 document for more information.

Estimates from the table in CSV format: Precipitation frequency estimates 

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