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MEMORANDUM

15 May 2019
File No. 129342-016

TO: Associated Electric Cooperative, Inc.

FROM: Haley & Aldrich, Inc.

SUBJECT: Initiation of Assessment of Corrective Measures Pursuant to 40 CFR § 257.95(g)(3)(i) and 40 CFR § 257.96
New Madrid Power Plant – Pond 003

Associated Electric Cooperative, Inc. (AECI) is implementing the U.S. Environmental Protection Agency (U.S. EPA) Federal Coal Combustion Residuals (CCR) Rule (40 CFR § 257 and 261) effective 19 October 2015 (along with subsequent revisions) for the active CCR surface impoundment referred to as Pond 003 at the New Madrid Power Plant, located in New Madrid, Missouri. AECI has constructed a CCR Rule compliant groundwater monitoring system consistent with 40 CFR § 257.91 and completed detection (40 CFR § 257.94) and assessment monitoring (40 CFR § 257.95) for CCR unit. The statistical analysis of the assessment monitoring results for this unit identified Appendix IV constituents at statistically significant levels above Groundwater Protection Standards (GWPS).

This memorandum serves as notification required by 40 CFR § 257.95(g)(5) that an assessment of corrective measures for Pond 003 has been initiated within 90 days of identifying a statistically significant level above the GWPS for Appendix IV constituents and that the assessment will be completed in accordance with 40 CFR § 257.96.