Annual CCR Landfill PE Inspection

Utility Waste Landfill
New Madrid Power Plant
New Madrid, MO

Associated Electric Cooperative, Inc.

Inspection

Visual Inspection

On July 7th, 2025, a visual inspection of the landfill was completed to identify signs of distress or malfunction. The following subsections and enclosed inspection report describe the conditions observed during the inspection.

Changes in Geometry

Since the last inspection, the geometry has not changed significantly as ash placement has begun in the bottom of the second cell.

Volumes

The landfill storage volume is estimated to be approximately 1,942,705 cubic yards. This estimate is based on topographic survey data from November 2021 (1,392,496 cubic yards) plus disposal volumes (November 2021 to June 2025) of 325,104 cubic yards.

Inspection for Structural Weaknesses

The landfill was visually inspected for any appearances of an actual or potential structural weakness of the CCR unit. Some burrowing animals were discovered. These animals were identified as prairie voles and a contractor removed approximately 35 of them. The contractor will be on site at least quarterly to remove any voles that are found. The burrows, about an inch in diameter, have not damaged the embankment and have been filled in. Details of this inspection can be found in the enclosed inspection checklist.

Changes Since Previous Inspection

No significant changes other than continuing to place ash in Cell 2.

Certification

The assessment of the general condition of the landfill is based upon available data and visual observation as required by 40 CFR 257.84 (b) – Inspection Requirements for CCR Landfills. In reviewing this report, it should be realized that the described condition of the landfill is based on observations of field conditions at the time of inspection. Conditions of landfills depend on numerous internal and external conditions, therefore it should be noted that the estimates and observations only represent the conditions at the time of inspection.

Signed: Lowell Dennis Cox

Print Name: Lowell Dennis Cox

Missouri License Number: E -200100 4579

Date: 7/15/2025

Annual CCR Landfill Inspection Report

Facility Name: <u>AECI NMPP UWL</u> Inspection Date: <u>July 7th, 2025</u>

Owner/Operator: <u>AECI New Madrid Power Plant</u>

Persons Present During Inspection				
Name	Title/Position	Representing		
<u>Dennis Cox</u>	Supervisor Plant Engineering	<u>AECI</u>		
Person Responsible for Inspection				
<u>Dennis Cox</u>	Supervisor Plant Engineering	<u>AECI</u>		

Operations Record Review				
ltem	Comments/Observations	NO ACTION	MONITOR	REPAIR
Are weekly inspections being performed and records kept in the facility record?	Yes, weekly inspections and reports are performed by AECI and kept in the landfill operating record.	Х		
Has facility record been reviewed as part of this inspection?	Yes, 7-day inspection records were reviewed.	Х		

Facility Operations	Comments/Observations	NO ACTION	MONITOR	REPAIR
Is facility access restricted by fences, gates, etc. to control access?	Yes, access is restricted by fencity and security check-in to plant facility.	х		
Is CCR placement consistent with design plans?	Yes, placement of CCR and configuration of the landfill appears to be in accordance with Phase I and II Construction Drawings and Construction Permit Application.	Х		
Is CCR being placed in lifts and compactive effort applied?	Yes, CCR is trucked in and spread in 4-6 inch lifts. Compactive effort is achieved through dozer compaction.	Х		
Is CCR being placed in a manner to promote positive drainage?	Yes, positive drainage was being maintained.	Х		
Is there evidence of water ponding in the active fill area?	No evidence of water was observed at the time of the inspection.	Х		
Is the liner system and leachate collection system being maintained and operating properly?	Yes. The leachate collection system, including the Phase I pump and the leachate collection pond loadout pump were operating as designed, per discussion with plant personnel.	х		
Are haul roads properly maintained and generally in good condition?	Yes. No further comment.	Х		

Facility Operations (cont'd)	Comments/Observations	NO ACTION	MONITOR	REPAIR
Are stormwater run-on and run-off controls being maintained?	Yes. Perimeter berms control both run-on and run-off. The stormwater pipes, ditch, and sedimentation pond were operating in accordance with intended design.	х		
Is there evidence of discharges to Waters of the U.S. ?	No. Run-off is controlled by perimeter berms.	Х		

Stability	Comments/Observations	NO ACTION	MONITOR	REPAIR
Is there evidence of erosion on fill slopes or in-active landfill areas?	None observed at the time of inspection. Perimeter berms control both run-on and run-off. The stormwater pipes, ditch, and sedimentation pond were operating in accordance with intended design.	х		
Is there evidence of surface cracking at top of CCR fill or along any slope benches?	None observed at the time of the inspection.	Х		
Is there evidence of sinkholes or animal burrows?	Small animal burrows have been noted, See additional comments		Х	
Are fill slopes in accordance with design plans?	Yes, positive drainage was being maintained.	Х		
Is there evidence of slides, sloughs or scarps?	None observed at the time of the inspection.	Х		
Is there any evidence of water seepage through fill slopes or at toe of fill slopes?	None observed at the time of the inspection.	х		
Is there evidence of movement, erosion, or instability in any soil embankments retaining CCR at the landfill?	No evidence of movement, erosion, or instability in the perimeter berms was observed.	х		
Is vegetation present in in- active/closed landfill areas? Comment on density, height, and type.	Final cover has been established on Cell 1 North and West slopes and vegitation is fully established.	Х		

Additional Comments: Prairie voles were found on the north slope of the impoundment. A Contractor removed approximately 35 and will return quarterly to ensure the voles to not return.

Also researching other methods to repel voles on a long term basis.