

August 25, 2026
File No. 0211090-005

SUBJECT: New Madrid Power Plant – Groundwater Monitoring Systems Certification
Pond 003, Utility Waste Landfill, and Inactive Lined Pond
Associated Electric Cooperative, Inc.

Associated Electric Cooperative, Inc. (AECI) operates the existing coal combustion residuals (CCR) management units referred to as Pond 003, the Utility Waste Landfill (UWL), and the inactive Lined Pond at the New Madrid Power Plant (NMPP) located in New Madrid, Missouri. This certification is being made to incorporate the new upgradient monitoring well B-126R, installed to replace existing upgradient monitoring well B-126, into the certification. These CCR units are considered subject to the CCR Rule since they were either active or identified as inactive with a notification to close as of the effective and/or applicable dates of the CCR Rule. This document addresses the requirements of Title 40 Code of Federal Regulations (40 CFR) § 257.91 *Groundwater Monitoring Systems*, specifically section § 257.91(f), of the U.S. Environmental Protection Agency Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, 40 CFR Part 257 (CCR Rule) effective October 19, 2015, and subsequent rulemaking revisions. This document serves as certification that the units comply with the requirements defined in the CCR Rule. This certification has been prepared based upon information made accessible by AECI pursuant to § 257.91(e)(1).

The single-unit groundwater monitoring systems at Pond 003, the UWL, and the inactive Lined Pond have been designed to include, as a minimum, one upgradient and three downgradient monitoring wells pursuant to § 257.91(c). The number, locations, and depths of wells used in the groundwater monitoring systems are sufficient and appropriate to characterize the quality of groundwater flowing beneath each single or multi-unit monitoring system based on site conceptual models and site-specific geologic conditions.

Pursuant to 40 CFR Chapter I Subchapter I Part 257 Subpart D § 257.91(f), I certify that the groundwater monitoring systems for Pond 003, the UWL, and the inactive Lined Pond have been designed and constructed to meet the requirements of § 257.91. The certification submitted is, to the best of my knowledge, accurate and complete.

Signed: 
Certifying Engineer

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