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October 13, 2026
File No. 0216303

Associated Electric Cooperative, Inc.
New Madrid Power Plant
P.O. Box 156
Marston, Missouri 63866

Attention: Blake Pinkerton
Manager, Environmental

Subject: Periodic Hazard Potential Classification Assessment
Pond 003
New Madrid Power Plant
Marston, Missouri

Dear Mr. Pinkerton:

This document presents the results of the Periodic Hazard Potential Classification Assessment (HPCA) for the Associated Electric Cooperative, Inc. (AECI) coal combustion residuals (CCR) surface impoundment referred to as Pond 003 (Unit) located at the New Madrid Power Plant (NMPP) near Marston, Missouri.

Haley & Aldrich, Inc. (Haley & Aldrich) completed this Periodic HPCA of Pond 003 on behalf of AECI in accordance with the U.S. Environmental Protection Agency's Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, Title 40 Code of Federal Regulations (CFR) Part 257, Subpart D (CCR Rule), effective October 19, 2015, including subsequent revisions, specifically related to 40 CFR §257.73(a)(2).

The Initial HPCA was completed on October 16, 2016 and the first Periodic HPCA was completed on October 15, 2021. This document serves as the second five-year periodic assessment required by the CCR Rule.

1.1 DESCRIPTION OF POND 003 IMPOUNDMENT

Pond 003 is a CCR surface impoundment located to the southeast of the NMPP. It was originally constructed in 1972 and has a surface area of approximately 110 acres. Historically, Pond 003 was used for process water management and providing settling capacity for fly ash and boiler slag. This Unit ceased receiving CCR and non-CCR wastestreams generated by NMPP and removed the known final volume of CCR material from the Unit for the purpose of beneficial use in 2023. The impoundment is surrounded by earthen embankments on all sides that are constructed from clay fill obtained from an on-site borrow source. The embankments are underlain by naturally deposited alluvial soils consisting of silty sand, poorly graded sand, silt, lean clay, and fat clay.

The outlet structure from Pond 003 consists of a rectangular concrete drop inlet tower equipped with concrete stop logs. Decant water enters the structure and flows through a pipe that penetrates the Pond 003 south embankment and discharges from the National Pollutant Discharge Elimination System permitted Outfall #003 into an earthen, open channel before flowing to the Mississippi River. There is no emergency spillway.

1.2 HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

1.2.1 General

In accordance with 40 CFR §257.73(a)(2)(i), the owner or operator must document the hazard potential classification of the CCR surface impoundment as high, significant, or low and document the basis for that classification. A hazard potential classification addresses the potential consequences of a failure or mis-operation; it does not characterize the likelihood of failure or the current structural stability of the CCR unit.

For this assessment, the hazard potential classification terms are defined in 40 CFR §257.53:

- High hazard potential CCR surface impoundment – A diked surface impoundment where failure or mis-operation will probably cause loss of human life.
- Significant hazard potential CCR surface impoundment – A diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.
- Low hazard potential CCR surface impoundment – A diked surface impoundment where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the surface impoundment owner's property.

1.2.2 Hazard Potential Classification

Based on observations during our September 28, 2026 site visit and our review of available information, Haley & Aldrich has judged the Pond 003 CCR surface impoundment as having a **significant** hazard potential classification in accordance with the CCR Rule. Consistent with the most recent inundation mapping evaluation, no probable loss of human life is anticipated in the event of a failure or mis-operation of Pond 003; however, economic impacts and environmental damage could occur. The **significant** hazard potential classification is based on the potential for economic impacts and environmental damage due to the proximity of the impoundment's berms to the Mississippi River. The findings from this Periodic HPCA are consistent and unchanged from the initial and first periodic HPCA completed in October 2016 and October 2021, respectively.

1.3 CERTIFICATION

40 CFR §257.73(a)(2)(ii): The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer stating that the initial hazard potential classification and each subsequent periodic classification specified in paragraph (a)(2)(i) of this section was conducted in accordance with the requirements of this section.

I certify that this periodic hazard potential classification for the Pond 003 CCR surface impoundment at the AECI New Madrid Power Plant was conducted in accordance with 40 CFR §257.73(a)(2) of the CCR Rule.

Signed: _____
Qualified Professional Engineer

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

Professional Engineer's Seal:



Steven F. Putrich

Digitally signed by Steven F. Putrich
Date: 2026.10.14 15:19:30 -04'00'