MEMORANDUM

October 1, 2026

SUBJECT: Extension of Closure Timeframe – 40 C.F.R. §257.102(f)(2)(i)
Thomas Hill Energy Center – Cell 001
Clifton Hill, Missouri

Associated Electric Cooperative, Inc. (AECI) owns and operates the coal-fired Thomas Hill Energy Center (THEC, Plant) located in Clifton Hill, Missouri. Cell 001 (Unit) is a coal combustion residuals (CCR) surface impoundment at the Plant. This memorandum and demonstration has been prepared to address the extension of closure timeframe requirements of 40 Code of Federal Regulations (C.F.R.) §257.102 (f)(2)(i) of the United States Environmental Protection Agency's (EPA's) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals (CCR) from Electric Utilities, 40 C.F.R. Part 257 (CCR Rule), effective October 19, 2015, including subsequent revisions.

Cell 001 was historically operated as part of the "Ash Pond 1" multi-unit wastewater treatment system at THEC, which was comprised of existing CCR surface impoundments Cell 001, Cell 003, and Cell 004. Each surface impoundment in the series was identified separately under the CCR regulations along with a single multi-unit groundwater monitoring system. Cell 003 and Cell 004 were required to close under 40 C.F.R. §257.101(b)(1)(i) because they did not demonstrate compliance with the placement-above-the-uppermost-aquifer standard in 40 C.F.R. §257.60(a). Cell 001 was required to close based on requirements for existing unlined CCR surface impoundments under 40 C.F.R. §257.101(a). Consequently, AECI was required to cease placing CCR and non-CCR waste streams into Cell 001, Cell 003, and Cell 004 no later than April 11, 2021, and begin closure of the impoundments unless an alternative deadline was approved via a CCR Rule Part A demonstration submitted under 40 C.F.R. §257.103(f)(1).

AECI submitted the required demonstration and successfully developed alternative disposal capacity prior to EPA making a final determination on the submitted demonstration. Specifically, a series of design and construction activities were completed by AECI to provide alternative capacity for these flows. This resulted in AECI constructing a concrete dewatering tank to divert flows from Cell 001 and reconfiguring non-CCR ponds to divert flows from Cell 003 and Cell 004. AECI ceased receipt of CCR and non-CCR wastestreams into Cell 001 on September 2, 2021 and ceased receipt of CCR and non-CCR wastestreams into Cell 003 and Cell 004 on December 29, 2022. Once AECI submitted a complete Part A demonstration, the April 11, 2021 deadline to stop receiving waste was suspended (i.e., tolled) while EPA reviewed the request. AECI continued operating under the alternative deadline provisions during that EPA review period. During the EPA review period, AECI obtained the necessary alternative disposal capacity as discussed above and, as a result, formally withdrew the Part A demonstration submitted for THEC. Within the required 30-day period after alternative disposal capacity was attained, AECI initiated closure of each of the CCR units, respectively, pursuant to 40 C.F.R. §257.102(c) *Closure by removal of CCR*, specifically paragraph (c)(1), for which all removal and decontamination activities including documentation of associated groundwater monitoring requirements are to be completed during the

active life of the CCR unit.

As a result, closure activities for the three functionally connected CCR units commenced and progressed on different schedules. Closure of Cell 001 is being conducted by removal of CCR under 40 C.F.R. §257.102(c)(1), including completion of the associated removal, decontamination, and groundwater-monitoring documentation. Because Cell 001 remains functionally connected to Cell 003 and Cell 004 through the shared groundwater-monitoring and former wastewater-treatment systems, the activities necessary to document completion of closure for Cell 001 cannot be completed independently while closure activities for Cell 003 and Cell 004 remain underway. Specifically, the shared system prevents independent completion due to continued operation of shared wells and the inability to distinguish unit-specific groundwater conditions.

Completion of closure for Cell 001 depends on completion of the interrelated closure activities for Cell 003 and Cell 004. Those activities are currently estimated to be completed no later than January 28, 2028. These physical and operational dependencies prevent completion of Cell 001 closure within the original five-year timeframe. Accordingly, AECI is planning to utilize an extension of just under 16 months, which is within the maximum two-year extension allowed under 40 C.F.R. §257.102(f)(2)(ii)(A) for a CCR unit of 40 acres or smaller.

CERTIFICATION BY FACILITY OWNER OR OPERATOR – 40 C.F.R. §257.102(f)(2)(iii)

40 C.F.R. § 257.102(f)(2)(iii): In order to obtain additional time extension(s) to complete closure of a CCR unit beyond the times provided by paragraph (f)(1) of this section, the owner or operator of the CCR unit must include with the demonstration required by paragraph (f)(2)(i) of this section the following statement signed by the owner or operator or an authorized representative:

> I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Name: Christopher Marquez
Title: Managing Director, Plant Operations

Signed: 15-Oct-20
Date: ~~10/2/2026~~