



HALEY & ALDRICH, INC.
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MEMORANDUM

17 April 2018
File No. 128064-003

SUBJECT: Updated Notification of Intent to Initiate Closure of an Inactive CCR Surface Impoundment – Inactive Cell 002 West
Associated Electric Cooperative, Inc. – Thomas Hill Energy Center
Clifton Hill, Missouri

Associated Electric Cooperative, Inc. (AECI) prepared an initial Notification of Intent to Initiate Closure of an inactive CCR Surface Impoundment for the Cell 002 West at the Thomas Hill Energy Center (THEC) dated 16 December 2015 in accordance with §257.100(c)(1) of the USEPA CCR Rule, 40 CFR Part 257 (CCR Rule). Based on the USEPA Partial Vacatur (40 CFR Part 257 EPA-HQ-OLEM-2016-0274; FRL-9949-44-OLEM) effective 4 October 2016, the Inactive Pond 2 West is now “subject to all of the requirements of this subpart applicable to existing CCR surface impoundments” [§257.100(a)]. As such, AECI intends to complete the closure of inactive Cell 002 West within five years of the commencement of closure consistent with standard closure timeframes by no later January 2021, in accordance with §257.102(f)(1)(ii).

Proposed Design Description

AECI has initiated closure design and is in the process of completing closure activities through closure by removal. AECI reserves the right to close the unit in accordance with the alternate closure options.

The CCR surface impoundment will be closed by initially unwatering remaining standing water that is impounded within the perimeter dikes. AECI has to date managed the water level within the impoundment in accordance with applicable site NPDES permit. AECI will continue proceeding with excavating and removing CCRs from within the impoundment to meet the requirements of §257.102(c) and placing the material in the on-site mine reclamation project.

AECI will be preparing a closure plan in accordance with the Partial Vacatur for the inactive Cell 002 West consistent with §257.102(b), providing additional closure detail prior to 17 April 2018.

Anticipated Closure Schedule

Commence Closure	October 2015
Closure Completion	October 2020

Notification of Intent to Close

On behalf of AECl, this document serves as an updated notification of intent to close the inactive Cell 002 West at the Thomas Hill Energy Center in accordance with the allowable closure completion timeframes meeting the USEPA's CCR Rule requirements of §257.102(f). If AECl chooses to revise the closure plan by closing the unit in-place, a certifying statement that the final cover system meets the applicable CCR Rule requirements will be completed at that time.

Signed: 

Certifying Engineer

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

Professional Engineer's Seal:

