HALEY & ALDRICH, INC.
6500 Rockside Road
Suite 200
Cleveland, OH 44131
216.739.0555

MEMORANDUM

17 July 2020
File No. 129638-007

TO: Associated Electric Cooperative, Inc.
Jenny Jones – Senior Environmental Analyst

FROM: Haley & Aldrich, Inc.
Jason M. Pokorny, P.E. (OH) -
Senior Project Manager
Steve F. Putrich, P.E. – Principal
Consultant

SUBJECT: New Madrid Power Plant
Pond 003 CCR Surface Impoundment
Annual Inspection and Stability Assessments Documentation of Corrective Measures

Mrs. Jones:

Haley & Aldrich, Inc. (Haley & Aldrich) has prepared this documentation on behalf of Associated Electric Cooperative, Inc. (AECI) related to deficiencies identified during annual impoundment inspections or periodic stability assessments (SSA) for the coal combustion residuals (CCR) impoundment referred to as Pond 003 at the New Madrid Power Plant located in New Madrid County, Missouri. The attached table provides a summary of the completed inspection or SSA, the identified deficiencies, and the corrective measures completed by AECI to address the identified deficiency. This documentation has been completed in accordance with the US Environmental Protection Agency's (EPA's) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, 40 CFR Part 257 effective 19 October 2015 including subsequent revisions, specifically related to §257.73(d) and §257.83(b).

Haley & Aldrich has provided a summary of the remedies based on correspondence with AECI regarding the noted deficiencies in the attached Table I.

Associated Electric Cooperative, Inc.
New Madrid Power Plant
New Madrid County, Missouri

Table I
Pond 003 - CCR Rule Inspection and SSA Deficiency Remedies

Document	Reference	Deficiency	Remedy
2019 Annual Inspection	§257.83	None	N/A
2018 Annual Inspection	§257.83	None	N/A
2017 Annual Inspection	§257.83	None	N/A
2016 Structural Stability Assessment	§257.73	Vegetation exceeding 6 in. in height on the upstream slope.	As part of the AECI NMPP's operation and maintenance plan, vegetation is controlled through mowing and other mitigating measures on an as-needed basis to limit vegetation and woody growth.
		Vegetation exceeding 6 in. in height on the downstream slope.	As part of the AECI NMPP's operation and maintenance plan, vegetation is controlled through mowing and other mitigating measures on an as-needed basis to limit vegetation and woody growth.
		Vegetation exceeding 6 in. in height within the riprap on the upstream slope.	As part of the AECI NMPP's operation and maintenance plan, vegetation is controlled through mowing and other mitigating measures on an as-needed basis to limit vegetation and woody growth.
		Two (2) dead trees within 50 feet of toe of downstream slope of the dike.	AECI cut down the trees in June 2020.
		Mature trees in the downstream area of the dike.	As part of the AECI NMPP's operation and maintenance plan, trees and brush on the embankment and proximate to the toe of the embankment are regularly monitored and removed as needed.
2016 Annual Inspection	§257.83	Vegetation exceeding 6 in. in height on the upstream slope.	As part of the AECI NMPP's operation and maintenance plan, vegetation is controlled through mowing and other mitigating measures on an as-needed basis to limit vegetation and woody growth.
		Vegetation exceeding 6 in. in height on the downstream slope.	As part of the AECI NMPP's operation and maintenance plan, vegetation is controlled through mowing and other mitigating measures on an as-needed basis to limit vegetation and woody growth.
		Vegetation exceeding 6 in. in height within the riprap on the upstream slope.	As part of the AECI NMPP's operation and maintenance plan, vegetation is controlled through mowing and other mitigating measures on an as-needed basis to limit vegetation and woody growth.
		Two (2) dead trees within 50 feet of toe of downstream slope of the dike.	AECI cut down the trees in June 2020.
		Mature trees in the downstream area of the dike.	As part of the AECI NMPP's operation and maintenance plan, trees and brush on the embankment and proximate to the toe of the embankment are regularly monitored and removed as needed.

Updated: 07/17/2020