



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Michael L. Parson
Governor

Dru Buntin
Director

December 8, 2023

Ryan Bennett, Environmental Analyst
Associated Electric Cooperative
2814 S Golden Ave, Springfield, MO 65807
Via Email Only rbennett@aeci.org

RE: Thomas Hill Energy Center; Special Condition #7 (e); Initial Engineering Certification Statement

Ryan,

The department has reviewed the submissions for the initial engineering certification statement and supporting documentation as required by Missouri State Operating Permit MO-0097675 for the Thomas Hill Energy Center; permit issued November 1, 2022 for the concrete dewatering tank and control of ash handling wastewater.

The documentation provided to the department on October 3, 2023 was on time, was sufficient for the purposes of initial approval, and contained the requirements pursuant to 40 CFR 423.13(k) for ash transport water. The facility may begin to utilize the system. The facility is required to use this system on and after January 1, 2024 according to the state operating permit.

While additional information may still be required to be reviewed by the department regarding the concrete dewatering tank and appurtenances, the facility is obligated to use the ash handling system pursuant to the federal regulations and the operating permit on and after January 1, 2024.

The initial certification statement was required to be submitted to the department pursuant to 40 CFR 423.19(c)(1) and Missouri State Operating permit MO-0095675; was evaluated for the appropriate and complete responses under 40 CFR 423.19 and 40 CFR 423.13(k)(2)(i)(A). The following are findings of the initial engineering certification statement report.

423.19(c) (1) Initial Certification Statement. For sources seeking to discharge bottom ash transport water pursuant to § 423.13(k)(2)(i), an initial certification shall be submitted to the permitting authority by the as soon as possible date determined, or the control authority by October 13, 2023, in the case of an indirect discharger.

The document was received October 3, 2023.

(2) Signature and certification. The certification statement must be signed and certified by a professional engineer.

The certification statement included a signature by a professional engineer.

(3) Contents. An initial certification shall include the following:

(A) A statement that the professional engineer is a licensed professional engineer.

Yes.

(B) A statement that the professional engineer is familiar with the regulation requirements.

Yes.

(C) A statement that the professional engineer is familiar with the facility.

Yes.

(D) The primary active wetted bottom ash system volume in §423.11(aa).

Yes.

(E) Material assumptions, information, and calculations used by the certifying professional engineer to determine the primary active wetted bottom ash system volume.

Yes.

(F) A list of all potential discharges under §423.13(k)(2)(i)(A)(1) through (4), the expected volume of each discharge, and the expected frequency of each discharge.

Yes.

(G) Material assumptions, information, and calculations used by the certifying professional engineer to determine the expected volume and frequency of each discharge including a narrative discussion of why such water cannot be managed within the system and must be discharged.

Yes.

(H) A list of all wastewater treatment systems at the facility currently, or otherwise required by a date certain under this section.

Yes.

(I) A narrative discussion of each treatment system including the system type, design capacity, and current or expected operation.

Yes, each volume identified is appropriate to be included in the volume of the wetted ash system.

The initial engineering certification statement was deemed complete and appropriate. Associated Electric shall continue to meet all expectations of the Missouri State Operating Permit MO-0097675 pertaining to the ash dewatering system pursuant to Special Condition D. 7, and Table A-1 for outfall #01A. All future findings must be uploaded into the eDMR system by the dates identified in the permit. If you have any questions concerning this response, please do not hesitate to contact Pam Hackler at pam.hackler@dnr.mo.gov or Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, MO 65102-0176 or by phone at 573-526-3386.

Sincerely,

WATER PROTECTION PROGRAM



Michael J. Abbott, Chief
Operating Permits Section

MJA/phj

c: Northeast Regional Office (via email)