



associated electric cooperative, inc.

March 24, 2009

2814 S. Golden, P.O. Box 754 Springfield, Missouri 65801-0754 417-881-1204 FAX 417-885-9252

Mr. Richard Kinch US Environmental Protection Agency Two Potomac Yard 2733 S. Crystal Dr. 5th Floor; N-5783 Arlington, VA 22202 2733

Dear Mr. Kinch,

Enclosed is the response to the Request for Information under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act dated March 13, 2009, and received on March 17, 2009, for Associated Electric Cooperative, Inc.'s Thomas Hill and New Madrid Power Plants.

> I certify that the information contained in this response to EPA's request for information and the accompanying documents are true, accurate, and complete. As to the identified portions of this response, I cannot personally verify their accuracy,

> I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Based on my inquiry of the person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature:

Name: Duane Highley, PE

Title:

Director, Power Production

Date:

24/09

bm Enclosures Federal Express

New Madrid Power Plant Enclosure

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals.

 Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

Answer: No ratings have been assigned by any State or Federal regulatory agency to any of our ash and slag management units. Our ash and slag management units are regulated by the Missouri Department of Natural Resources, Water Pollution Control Section.

2. What year was each management unit commissioned and expanded?

Answer: Ash Pond 1 and Slag Pond 1 were placed into operation in 1972, Slag Pond 2 in 1984 and Ash Pond 2 in 1994.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash: (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

Answer: Fly ash is stored in Ash Pond 1 and Ash Pond 2, boiler slag is stored in Slag Pond 1 and Slag Pond 2.

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

Answer: Yes, the waste management units were designed and constructed under the supervision of a Professional Engineer. A comprehensive structural integrity evaluation of the ash ponds is being conducted by a Geotechnical firm who specializes in slope stability and soil

mechanics. The work plan and field work is overseen by a Missouri Certified Professional Geotechnical Engineer and a Missouri Registered Geologist.

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

Answer: Assessment has been on an informal basis by Yard Operating personnel who travel to the ponds on a daily basis to unload fly ash and by our yard maintenance contractor who keeps the levees mowed during the annual growing seasons. These personnel are not credentialed to perform structural integrity assessments or evaluations.

A comprehensive structural integrity evaluation of the ash ponds is has recently been conducted by a Geotechnical firm who specializes in slope stability and soil mechanics. The work plan and field work was overseen by a Missouri Certified Professional Geotechnical Engineer and a Missouri Registered Geologist. We expect a final report by mid-June of 2009.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

Answer: We have had no such inspections and have not been advised of any occurring in the near future.

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

Answer: Not applicable, see answer to Question 6 above.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s)? Please provide the date that the volume measurement was

taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this enclosure.

Answer:

New Madrid Power Plant Ash/Slag Management Units

	Surface ar	ea, acres	Total storage capacity, cubic yards		Volume of material currently stored, cubic yards		Height in feet (estima te)	Date of volume measurement (estimate)
· · · · · · · · · · · · · · · · · · ·	estimated	measured	estimated	measured	estimated	measured		
Ash Pond 1	31		920,000		735,000		12	(March 2009)
Slag Pond 1	62		1,835,000		1,465,000		20	(March 2009)
Slag Pond 2	4	Γ	22,400		4,000	1	20	(March 2009)
Ash Pond 2		78		2,179,800		2,155,850	20	October 2008

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

Answer: No such spills or releases have occurred from any of the ash and slag management units described in this document within the last 10 years.

10. Please identify all current legal owner(s) and operator(s) at the facility.

Answer: Associated Electric Cooperative, Inc. (AECI); headquartered in Springfield, MO. Mailing Address: 2814 South Golden, PO Box 754 Springfield, MO 65801-0754 Phone Number: (417) 881-1204