associated electric cooperative, inc.

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August 16, 2011

Mr. Stephen Hoffman
US Environmental Protection Agency
1200 Pennsylvania Avenue, NM
Washington, DC 20460

Dear Mr. Hoffman:

RE: Plan for Addressing Recommendations in the Site Assessment Report
Associated Electric Cooperative Inc., Thomas Hill Energy Center

Associated Electric Cooperative Inc. (AECI) is responding to your July 28, 2011 letter requesting AECI to follow up to the recommendations made in the June 2011 Specific Site Assessment for Coal Combustion Waste Impoundments at the Thomas Hill Energy Center.

The following is our response to the recommendations listed in your letter.

12.1 Corrective Measures and Analyses for the Structures
Seepage and stability analyses should be performed for the dike associated with the Slag Dewatering Basin to properly assess the stability of the embankment.

AECI Response – AECI will perform seepage and stability analyses for the dike associated with the Slag Dewatering Basin to asses the embankment. This work will be conducted under the direction of a licensed geotechnical engineer in 2011.

12.2 Corrective Measures Required for Instrumentation and Monitoring Procedures
No corrective measures are required. We do recommend that instrumentation determined by the engineer performing the seepage and stability analyses be installed and maintained.

AECI Response – Instrumentation determined necessary during the inspection of the dike will be installed and maintained as specified by the licensed geotechnical engineer.

12.3 Corrective Measures Required for Maintenance and Surveillance Procedures
None.

AECI Response – None

12.4 Corrective Measures Required for the Methods of Operation of the Project Works
None.

AECI Response - None

12.5 Summary
The following factors were the main considerations in determining the final rating of the impoundments at Thomas Hill Energy Center.

- *The dikes at each of the impoundments are low-hazard structures based on federal and state classifications.*
- *The impoundments were generally observed to be in good condition in the field assessment.*
- *Hydrologic analyses indicate the dikes at each pond can store the regulatory design flood without overtopping.*
- *Stability and seismic analyses indicate that the dikes for Ash Pond – Cell No. 2 appear to be adequately constructed and will perform as intended.*
- *Seepage and stability analyses of the dike associated with the Slag Dewatering Basin could not be located and should be performed.*
- *Maintenance, surveillance and operational procedures are considered adequate.*
- *An operation plan should be developed and maintained.*

AECI Response – The Thomas Hill Energy Center will develop and maintain an operational plan for the operations of the impoundments in 2011.

Sincerely,

Duane Highley
Director, Power Production

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cc: Kim Dickerson
Brent Ross
Dave White