

December 13, 2024

The Empire District Electric Company d/b/a Liberty Utilities
Asbury Power Plant
21133 Uphill Lane
Asbury, Missouri 64832

RE: Periodic Inflow Design Flood Control System Plan –
CCR Rule Section 257.82
Asbury Power Plant
Asbury, Missouri
PPI Project Number 231518-2024

To Whom It May Concern:

In March 2020, The Empire District Electric Company d/b/a Liberty stopped coal-fired power generation at the Asbury Power Plant and planned for the plant's retirement. A demolition contractor imploded the Power Plant in June 2023, removed the residual materials, and reclaimed the site by June 2024. Closure of the Asbury Coal Combustion Residuals (CCR) Impoundment began in early June 2022 and was completed in January 2023. The facility is now called the Asbury Renewable Operations Center (AROC), which manages operations of wind farms and solar generation.

Free liquids were removed to the extent possible, and the existing CCR materials were sufficiently stabilized to support the placement of the final fill and final cover system. Any discharge was discharged through a NPDES permitted outfall. This discharge was in compliance with the current NPDES permit. The CCR materials were graded to provide positive drainage of stormwater. A final cover system was installed to minimize infiltration and erosion.

The chosen final cover system was the ClosureTurf system. ClosureTurf is a patented, three component system that is EPA Subtitle D landfill compliant that is specifically designed to address and solve soil erosion, slope integrity, installation and maintenance cost control, EPA regulation compliance, and longevity of structure and appearance. The anticipated design life of ClosureTurf is 100 years. ClosureTurf consists of the following components, top to bottom.

- Specialized sand infill
- Engineered artificial turf
- Flexible geomembrane liner (FML)
- Prepared CCR subgrade.

Because stormwater no longer comes in contact with CCR, completion of the Periodic Inflow Design Flood Control System Plan no longer applies.

In accordance with Section 257.105(g)(4), a copy of this document should be placed in The Empire District Electric Company d/b/a Liberty Utilities operating record. In accordance with Section 257.107(g)(4), this document should also be posted to The Empire District Electric Company d/b/a Liberty Utilities CCR Compliance website. Notification of the availability of this document should be provided to the State Director, as required in Section 257.106(g)(4). No further documentation of the Periodic Inflow Design Flood Control System Plan will be provided going forward.

PALMERTON & PARRISH, INC.

By:



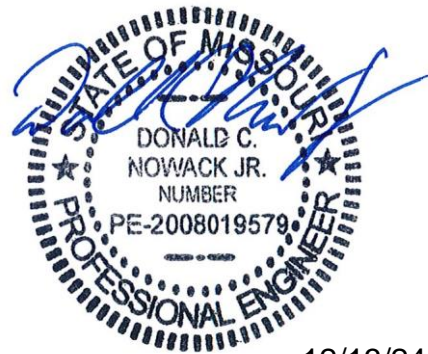
Brandon R. Parrish, P.E.
MO P.E. 2010000852

PALMERTON & PARRISH, INC.

By:



Donald C. Nowack, P.E., R.G.
MO P.E. 2008019579
MO R.G. 2001011344



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