April 14, 2023

File No. 27222352.00

MEMORANDUM

TO: Curtis Spence, Power Plant Manager, Ames Municipal Electric System

FROM: Christine Collier, P.E., SCS Engineers

SUBJECT: Emergency Action Plan for the Inactive CCR Surface Impoundment

Federal code 40 CRF §257.73(a)(2) requires existing coal combustion residuals (CCR) surface impoundments, except for those existing CCR surface impoundments that are incised CCR units, to complete an Emergency Action Plan (EAP) no later than April 17, 2017. The deadline for inactive surface impoundments was extended to October 16, 2018 at 81 Fed. Reg. 51808 (August 5, 2016). This applies to CCR units determined to be either a high hazard potential CCR surface impoundment or a significant hazard potential CCR surface impoundment through the completion of the Hazard Potential Classification Assessment for the impoundment. Impoundments with a low hazard potential CCR surface impoundment classification are not required to complete the EAP.

SCS Engineers completed the initial Hazard Potential Classification Assessment for the City of Ames (COA) inactive CCR surface impoundment on April 13, 2018 and the periodic Hazard Potential Classification Assessment for the City of Ames on April 13, 2023. Based on the 2004 Federal Emergency Management Agency (FEMA) Federal Guidelines for Dam Safety Hazard Classification System, SCS has determined that the City of Ames inactive CCR surface impoundment has a low hazard classification based on the evaluation that in the event of a catastrophic failure, the loss of human life is highly unlikely and the economic and environmental impact of a failure is generally limited to City of Ames property. Please refer to the Potential Hazard Potential Classification Assessment Report – Inactive CCR Surface Impoundment – dated April 13, 2023 for further information.

Based on the low hazard classification, an Emergency Action Plan is not needed for the City of Ames and therefore has not been prepared.