Big Rivers
ELECTRIC CORPORATION

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# D.B. Wilson Station CCR Landfill

## Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule Closure and Post-closure Care Plan

**October 11, 2016**

**Prepared By:**

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**Project ID: 160030A**

**Big Rivers Electric Corporation**
**Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule**
**Closure and Post-closure Care Plan**

## CCR Landfill Information

| | |
|---|---|
| Name: | D.B. Wilson Station CCR Landfill |
| Operator: | D.B. Wilson Generating Station |
| Address: | 5663 State Route 85 West<br>Centertown, KY 42328 |

## Qualified Professional Engineer

| | |
|---|---|
| Name: | David A. Lamb |
| Company: | Associated Engineers, Inc. |
| Kentucky P.E. Number: | 17822 |

## Regulatory Applicability

The owner or operator of a CCR unit must prepare a written closure plan that describes the steps necessary to close the CCR unit at any point during the active life of the CCR unit and a written post-closure care plan consistent with recognized and generally accepted good engineering practices as specified below. The owner or operator of an existing CCR unit must prepare the written initial closure and post-closure care plans no later than October 17, 2016 as follows:

**§ 257.102 Criteria for conducting the closure or retrofit of CCR units.**

(a) Closure of a CCR unit or any lateral expansion of a CCR unit must be completed either by leaving the CCR in place and installing a final cover system or through removal of the CCR and decontamination of the CCR unit, as described in paragraphs (b) through (j) of this section. Retrofit of a CCR surface impoundment must be completed in accordance with the requirements in paragraph (k) of this section.

(b) *Written closure plan* - (1) *Content of the plan*. The owner or operator of a CCR unit must prepare a written closure plan that describes the steps necessary to close the CCR unit at any point during the active life of the CCR unit consistent with recognized and generally accepted good engineering practices. The written closure plan must include, at a minimum, the information specified in paragraphs (b)(1)(i) through (vi) of this section.

(i) A narrative description of how the CCR unit will be closed in accordance with this section.

(ii) If closure of the CCR unit will be accomplished through removal of CCR from the CCR unit, a description of the procedures to remove the CCR and decontaminate the CCR unit in accordance with paragraph (c) of this section.

(iii) If closure of the CCR unit will be accomplished by leaving CCR in place, a description of the final cover system, designed in accordance with paragraph (d) of this section, and the methods and procedures to be used to install the final cover. The closure plan must also discuss how the final cover system will achieve the performance standards specified in paragraph (d) of this section.

(iv) An estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit.

(v) An estimate of the largest area of the CCR unit ever requiring a final cover as required by paragraph (d) of this section at any time during the CCR unit's active life.

(vi) A schedule for completing all activities necessary to satisfy the closure criteria in this section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including identification of major milestones such as coordinating with and obtaining necessary approvals and permits from other agencies, the dewatering and stabilization phases of CCR surface impoundment closure, or installation of the final cover system, and the estimated timeframes to complete each step or phase of CCR unit closure. When preparing the written closure plan, if the owner or operator of a CCR surface impoundment estimates that the time required to complete closure will exceed the timeframes specified in paragraph (f)(1) of this section, the written closure plan must include the site-specific information, factors and considerations that would support any time extension sought under paragraph (f)(2) of this section.

(c) Closure by removal of CCR. An owner or operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to § 257.95(h) for constituents listed in appendix IV to this part.

(d) Closure performance standard when leaving CCR in place - (1) The owner or operator of a CCR unit must ensure that, at a minimum, the CCR unit is closed in a manner that will:

(i) Control, minimize or eliminate, to the maximum extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate, or contaminated run-off to the ground or surface waters or to the atmosphere;

(ii) Preclude the probability of future impoundment of water, sediment, or slurry;

(iii) Include measures that provide for major slope stability to prevent the sloughing or movement of the final cover system during the closure and post-closure care period;

(iv) Minimize the need for further maintenance of the CCR unit; and

(v) Be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices.

**§ 257.103 Alternative closure requirements.**
The owner or operator of a CCR landfill, CCR surface impoundment, or any lateral expansion of a CCR unit that is subject to closure pursuant to § 257.101(a)[detected at statistically significant levels above the groundwater protection standard], (b)(1) [ not demonstrated compliance with any location standard], or (d)[not demonstrated compliance with the location restriction for unstable areas], may continue to receive CCR in the unit provided the owner or operator meets the requirements of either paragraph (a) or (b) of this section.

(a)(1) *No alternative CCR disposal capacity*. Notwithstanding the provisions of § 257.101(a), (b)(1), or (d), a CCR unit may continue to receive CCR if the owner or operator of the CCR unit certifies that the CCR must continue to be managed in that CCR unit due to the absence of alternative disposal capacity both on-site and off-site of the facility.

(b)(1) *Permanent cessation of a coal-fired boiler(s) by a date certain.* Notwithstanding the provisions of § 257.101(a), (b)(1), and (d), a CCR unit may continue to receive CCR if the owner or operator certifies that the facility will cease operation of the coal- fired boilers within the timeframes specified in paragraphs (b)(2) through (4) of this section, but in the interim period (prior to closure of the coal-fired boiler), the facility must continue to use the CCR unit due to the absence of alternative disposal capacity both on- site and off-site of the facility.

**§ 257.104 Post-closure care requirements.**
(a) *Applicability.*

(1) Except as provided by either item (2) or (3) of this section, post-closure requirements apply to the owners or operators of CCR landfills, CCR surface impoundments, and all lateral expansions of CCR units that are subject to the closure criteria under § 257.102.

(2) An owner or operator of a CCR unit that elects to close a CCR unit by removing CCR as provided by § 257.102(c) is not subject to the post- closure care criteria under this section.

(3) An owner or operator of an inactive CCR surface impoundment that elects to close a CCR unit pursuant to the requirements under § 257.100(b) [Inactive Surface Impoundments] is not subject to the post-closure care criteria under this

section.

(b) *Post-closure care maintenance requirements.* Following closure of the CCR unit, the owner or operator must conduct post-closure care for the CCR unit, which must consist of at least the following:

(1) Maintaining the integrity and effectiveness of the final cover system, including making repairs to the final cover as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover;

(c) *Post-closure care period.*

(1) Except as provided by paragraph (c)(2) of this section, the owner or operator of the CCR unit must conduct post-closure care for 30 years.

(2) If at the end of the post-closure care period the owner or operator of the CCR unit is operating under assessment monitoring in accordance with § 257.95 [Assessment Monitoring Program], the owner or operator must continue to conduct post-closure care until the owner or operator returns to detection monitoring in accordance with § 257.95.

(d) *Written post-closure plan*

(1) *Content of the plan*. The owner or operator of a CCR unit must prepare a written post-closure plan that includes, at a minimum, the information specified in paragraphs (d)(1)(i) through (iii) of this section.

(i) A description of the monitoring and maintenance activities required in paragraph (b) of this section for the CCR unit, and the frequency at which these activities will be performed;

(ii) The name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure care period; and

(iii) A description of the planned uses of the property during the post-closure period. Post-closure use of the property shall not disturb the integrity of the final cover, liner(s), or any other component of the containment system, or the function of the monitoring systems unless necessary to comply with the requirements in this subpart. Any other disturbance is allowed if the owner or operator of the CCR unit demonstrates that disturbance of the final cover, liner, or other component of the containment system, including any removal of CCR, will not increase the potential threat to human health or the environment. The demonstration must be certified by a qualified professional engineer, and notification shall be provided to the State Director that the demonstration has been placed in the operating record and on the owners or operator's publicly accessible Internet site.

(2) Deadline to prepare the initial written post-closure plan - Existing CCR landfills and

existing CCR surface impoundments. No later than October 17, 2016.

(3) Amendment of a written post-closure plan.

(i) The owner or operator may amend the initial or any subsequent written post-closure plan developed pursuant to paragraph (d)(1) of this section at any time.

(ii) The owner or operator must amend the written closure plan whenever:

(A) There is a change in the operation of the CCR unit that would substantially affect the written post-closure plan in effect; or

(B) After post-closure activities have commenced, unanticipated events necessitate a revision of the written post-closure plan.

(iii) The owner or operator must amend the written post-closure plan at least 60 days prior to a planned change in the operation of the facility or CCR unit, or no later than 60 days after an unanticipated event requires the need to revise an existing written post-closure plan. If a written post-closure plan is revised after post-closure activities have commenced for a CCR unit, the owner or operator must amend the written post-closure plan no later than 30 days following the triggering event.

(4) The owner or operator of the CCR unit must obtain a written certification from a qualified professional engineer that the initial and any amendment of the written post-closure plan meets the requirements of this section.

(e) *Notification of completion of post-closure care period*. No later than 60 days following the completion of the post-closure care period, the owner or operator of the CCR unit must prepare a notification verifying that post-closure care has been completed. The notification must include the certification by a qualified professional engineer verifying that post-closure care has been completed in accordance with the closure plan specified in paragraph (d) of this section and the requirements of this section. The owner or operator has completed the notification when it has been placed in the facility's operating record.

**Description of Landfill**

An aerial photo of the CCR unit is provided as Attachment A and an excerpt from U.S. Geological Survey (USGS) 7.5 minute Equality topographic quadrangle map showing the location of the CCR unit is provided as Attachment B.

The CCR unit is used for the placement of coal combustion residual material; currently fly ash, bottom ash and related material. The approximate total volume of CCR contained in the unit at the time of inspection is 1.8 million cubic yards. This volume was calculated from available flight derived pre-disposal baseline topography compared to December 2015 flight derived topographic contours. The D.B. Wilson CCR landfill is raised above adjacent ground to a

maximum elevation of approximately 520 feet AMSL. The original ground surface within the landfill footprint was irregular and the predominant features were the headwaters of Elk Creek and small stream valleys draining south. Other small tributaries drained west towards the Green River and north towards the Rough River.

**D.B. Wilson CCR Landfill Closure Plan**

The closure plan for the D.B. Wilson CCR landfill includes, at a minimum:

1. Narrative description of how the CCR unit will be closed in accordance with this section:

   At any time that closure may occur, the D.B. Wilson CCR landfill will be closed by either removing CCR, with existing CCR in place, or a combination of both. Temporary cover will be placed on areas where placement of CCR has been completed until such time as the required final low permeability cover material is placed. The final cover system will be designed to minimize infiltration and erosion, and at a minimum, meet the requirements listed below or the requirements of an alternative final cover system.

   a. The permeability of the final cover system must be less than or equal to the permeability of any bottom liner system or natural subsoils present, or a permeability no greater than $1x10^{-5}$ centimeters/second (cm/sec), whichever is less.

   b. The infiltration of liquids through the CCR unit must be minimized by the use of an infiltration layer that contains a minimum of 18 inches of earthen material.

   c. The erosion of the final cover system must be minimized by the use of an erosion layer that contains a minimum of 6 inches of earthen material that is capable of sustaining native plant growth.

   d. The disruption of the integrity of the final cover system must be minimized through a design that accommodates settling and subsidence.

2. If closure of the CCR unit will be accomplished through removal of CCR from the CCR unit, a description of the procedures to remove the CCR and decontaminate the CCR unit in accordance with paragraph (c) of this section.

   If CCR material is removed, it will be placed on the CCR landfill area which will be covered in place. CCR removal and decontamination of the CCR unit will be considered complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to this rule.

3. If closure of the CCR unit will be accomplished by leaving CCR in place, a description of the final cover system, designed in accordance with paragraph (d) of this section, and the methods and procedures to be used to install the final cover. The closure plan must also discuss how the final cover system will achieve the performance standards specified in paragraph (d) of this section.

   The D.B. Wilson CCR landfill will be closed and covered with the CCR material in place. CCR material will be covered by 24 inches of temporary cover material until the final low permeability soil cover is placed to facilitate closure. The 18-inch low permeability soil cover will be placed and compacted to meet the required permeability of not more than $1x10^{-5}$ centimeters/second (cm/sec). Appropriate soils testing will be conducted to document that the required thickness and permeability specifications have been met and may include laboratory and field testing procedures. The final cover will be vegetated with appropriate cover species and erosion of the final cover system must be minimized by the use of an erosion layer that contains a minimum of 6 inches of earthen material that is capable of sustaining native plant growth. The disruption of the integrity of the final cover system must be minimized through a design that accommodates settling and subsidence.

4. An estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit.

   The approximate total volume of CCR contained in the unit at the time of inspection is 1.8 million cubic yards. This volume was calculated from available flight derived pre-disposal baseline topography compared to December 2015 flight derived topographic contours. The D.B. Wilson CCR landfill is raised above adjacent ground to a maximum elevation of approximately 520 feet AMSL.

5. An estimate of the largest area of the CCR unit ever requiring a final cover at any time during the CCR unit's active life.

   The estimated largest area of the CCR unit ever requiring a final cover at any time during the CCR unit's active life is approximately 65 acres.

6. A schedule for completing all activities necessary to satisfy the closure criteria in this section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including identification of major milestones such as coordinating with and obtaining necessary approvals and permits from other agencies, the dewatering and stabilization phases of CCR surface impoundment closure, or installation of the final cover system, and the estimated timeframes to complete each step or phase of CCR unit closure. When preparing the written closure plan, if the owner or operator of a CCR surface impoundment estimates that the time required to complete closure will exceed the timeframes specified in paragraph (f)(1) of this section, the written closure plan must include the site-specific information, factors and considerations that would support any time extensions sought

under paragraph (f)(2) of this section.

The closure of the D.B. Wilson CCR landfill will be implemented within any required timeframes per applicable environmental rules and regulations and in consideration of any operational and financial constraints. The time required to complete closure is proposed not to exceed five years from commencing closure activities. Based on the current fill rate the landfill will not be closed until beyond the year 2050.

**D.B. Wilson CCR Landfill Post-closure Plan**

The post-closure plan for the D.B. Wilson CCR landfill includes, at a minimum:

1. The monitoring and maintenance activities will include maintaining the integrity and effectiveness of the final cover system, including making repairs to the final as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover.

2. The name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure care period follows:

   Thomas Shaw, Director Environmental
   Big Rivers Electric Corporation
   Address: 201 3rd Street Henderson, KY 42420
   Telephone Number: 270-844-6031
   Email Address: Thomas.Shaw@bigrivers.com

3. The planned uses of the property during the post-closure period will consist of maintaining the integrity of the power generating facility. Post-closure use of the property will not disturb the integrity of the final cover, liner(s), or any other component of the containment system, or the function of the monitoring systems unless necessary to comply with the requirements in the rule or other environmental regulations or to facilitate operating considerations that are allowed if the owner or operator of the CCR unit demonstrates that disturbance of the final cover, liner, or other component of the containment system, including any removal of CCR, will not increase the potential threat to human health or the environment. The demonstration must be certified by a qualified professional engineer.

**Sources of Information**

Geotechnical and other information provided by Associated Engineers, Inc.

Engineering design drawings and other information provided by Big Rivers Electric Corporation

United States Geological Survey U.S. Geological Survey (USGS) 7.5 minute Equality topographic quadrangle map

**Professional Engineer Certification [Per 40 CFR § 257.102-104]**
**D.B. Wilson CCR Landfill Closure and Post-closure Care Plan**

I hereby certify that myself or an agent under my review has prepared this Closure and Post-closure Care Plan (Plan), and being familiar with the provisions of the final rule to regulate the disposal of coal combustion residuals (CCR) as solid waste under subtitle D of the Resource Conservation and Recovery Act (RCRA), attest that this Plan has been prepared in accordance with good engineering practices and meets the intent of 40 CFR Part 257.102-104. To the best of my knowledge and belief, the information contained in this Plan is true, complete, and accurate.

David A. Lamb, P.E.
State of Kentucky License No. 17822

STATE OF KENTUCKY
DAVID A. LAMB
17822
LICENSED
PROFESSIONAL ENGINEER

Date: 10/11/16


BIG RIVERS ELECTRIC

D.B. WILSON GENERATING STATION
D.B. WILSON CCR LANDFILL

| | |
|---|---|
| Job Number: | 15-0141A |
| Date: | 1/05/2016 |
| Scale: | AS SHOWN |
| Drawn By: | E.J.A. |

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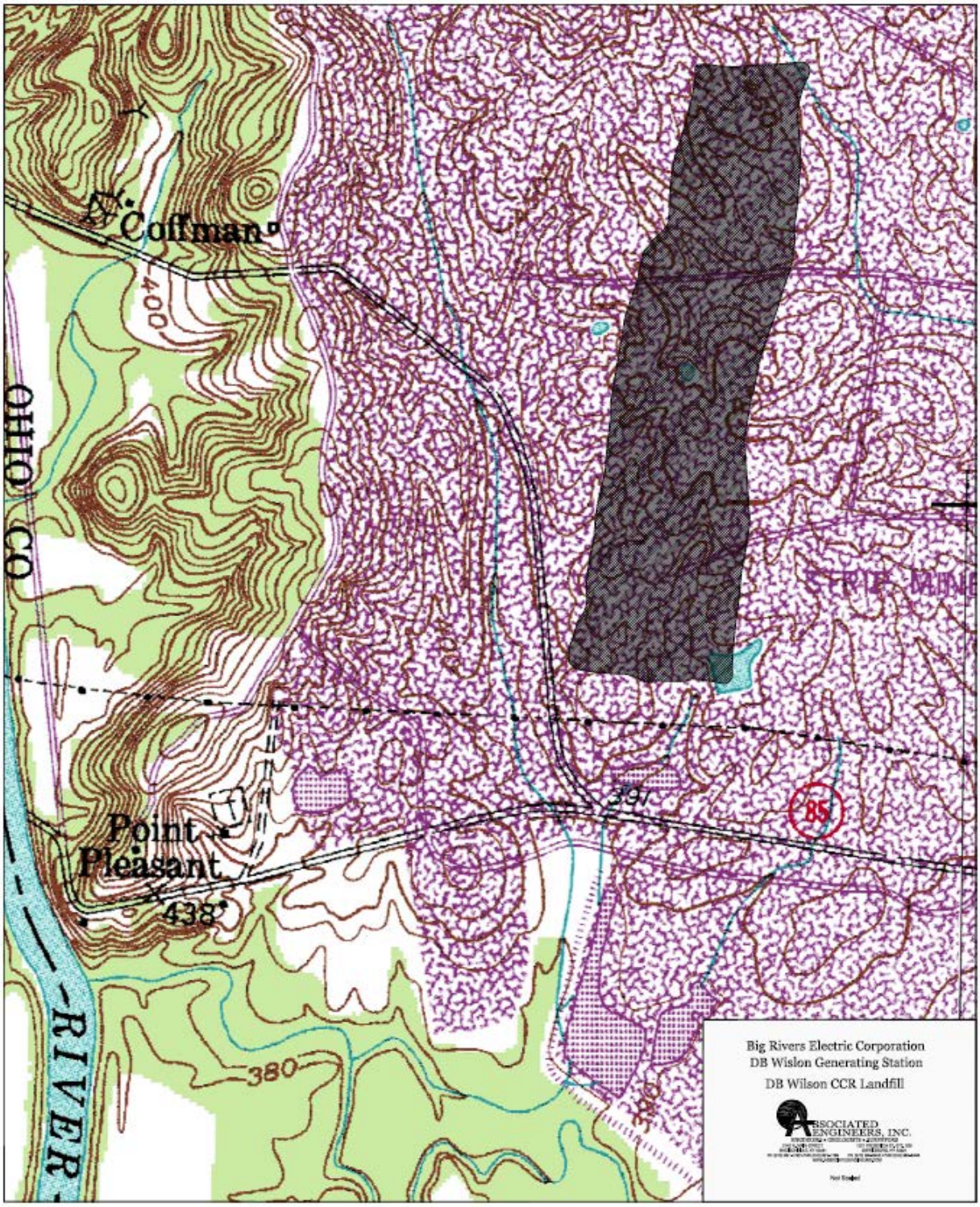
Attachment A. Aerial Photo of the D.B. Wilson CCR Landfill




Attachment B. Topographic Map showing the D.B. Wilson CCR Landfill