Big Rivers
ELECTRIC CORPORATION

Your Touchstone Energy® Cooperative

Green Station CCR Landfill

Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule
Run-on and Run-off Control System Plan

October 11, 2016
Revised September 19, 2017

Prepared By:

ASSOCIATED ENGINEERS, INC.
2740 North Main St. • Madisonville, KY 42431
Phone: (270) 821-7732 • Fax: (270) 821-7789

Project ID: 160029 & 170137

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CCR Landfill Information

Name:	Green Station CCR Landfill
Operator:	Sebree Generating Station
Address:	9000 Highway 2096 Robards, Kentucky 42452

Qualified Professional Engineer

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

Regulatory Applicability

As part of the § 257.81 for existing CCR landfill requirements, the owner or operator of an existing or new CCR landfill must design, construct, operate, and maintain a run-on and run-off control system plan as specified below. The owner or operator of the CCR unit must prepare the initial inflow design flood control system plan no later than October 17, 2016.

The owner or operator of an existing CCR landfill must design, construct, operate, and maintain:

(1) A run-on control system to prevent flow onto the active portion of the CCR unit during the peak discharge from a 24-hour, 25-year storm; and

(2) A run-off control system from the active portion of the CCR unit to collect and control at least the water volume resulting from a 24-hour, 25-year storm.

Run-off from the active portion of the CCR unit must be handled in accordance with the surface water requirements under § 257.3-3 (Part 257 - Criteria for Classification of Solid Waste Disposal Facilities and Practices Subpart A - Classification of Solid Waste Disposal Facilities and Practices Section 257.3-3 - Surface water):

Run-on and run-off control system plan:

(1) *Content of the plan.* The owner or operator must prepare initial and periodic run-on and run-off control system plans for the CCR unit. These plans must document how the run-

on and run-off control systems have been designed and constructed to meet the applicable requirements of this section. Each plan must be supported by appropriate engineering calculations. The owner or operator has completed the initial run-on and run-off control system plan when the plan has been placed in the facility's operating record.

(2) *Amendment of the plan*. The owner or operator may amend the written run-on and run-off control system plan at any time provided the revised plan is placed in the facility's operating record. The owner or operator must amend the written run-on and run- off control system plan whenever there is a change in conditions that would substantially affect the written plan in effect.

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 Robards and Delaware topographic quadrangle maps 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 20.3 million cubic yards. This volume was calculated from available flight derived baseline topography compared to December 2015 flight derived topographic contours. The Green CCR landfill is raised above adjacent ground to a maximum elevation of approximately 600 feet AMSL. The original ground surface within the landfill footprint was irregular and the predominant features were small stream valleys draining towards the Green River which is located just east of the landfill; and towards Groves Creek which is located just south of the landfill.

Run-on and Run-off Control System Plan

The initial run-on and run-off control system plan documents that the run-on control system will prevent flow onto the active portion of the CCR unit during the peak discharge from a 24-hour/25-year storm; and that the run-off control system from the active portion of the CCR unit will collect and control at least the water volume resulting from a 24-hour/25-year storm.

Run-on Control Analysis

An evaluation of the Green CCR landfill configuration and topography resulted in the determination that because of the elevated position of active portions of the landfill, no significant run-on can occur and the only drainage onto active areas is storm water generated from direct precipitation; thus the CCR unit run-on system will prevent flow onto the active portion of the CCR unit during the peak discharge from the design storm event.

Run-off Control Analysis

Analysis of the Green CCR landfill drainage and sedimentation basin configurations and designs via SEDCAD modeling demonstrates that the design flood control system adequately

manages flow out of the CCR unit during and following the specified 24-hour/25-year storm event. SEDCAD by Civil Software Design, LLC is a widely recognized comprehensive hydrology and sedimentology package, useful for runoff and sediment control design calculations. The SEDCAD modeling results for the Green CCR landfill are attached to this report.

Leachate Control Analysis

Per Part 257.53 of the CCR rule, the definitions for run-on and run-off both include leachate. Big Rivers Electric Corporation manages leachate through several options. In the event of leachate outbreaks, the leachate drainage would be routed to a sedimentation basin and permitted KPDES outfall. In some instances, other processes such as chemical treatment would be utilized to manage the leachate. In all instances, run-on or run-off water containing leachate would meet applicable KPDES effluent limits for permitted outfalls prior to discharge. Therefore, any leachate drainage would comply with all applicable regulations prior to discharge.

The operating facility has verified that discharge from the Green CCR landfill is handled in accordance with the surface water requirements under § 257.3-3 (Part 257 - Criteria for Classification of Solid Waste Disposal Facilities and Practices Subpart A - Classification of Solid Waste Disposal Facilities and Practices Section 257.3-3 - Surface water).

Sources of Information

Geotechnical and other information provided by Associated Engineers, Inc.

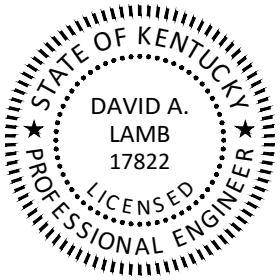
Engineering design drawings and other information provided by Big Rivers Electric Corporation

United States Geological Survey U.S. Geological Survey (USGS) 7.5 minute Robards and Delaware topographic quadrangle maps

Professional Engineer Certification [Per 40 CFR § 257.81]
Green CCR Landfill Run-on and Run-off Control System Plan

I hereby certify that myself or an agent under my review has prepared this Run-on and Run-off Control System 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 257.81. To the best of my knowledge and belief, the information contained in this Plan is true, complete, and accurate.

David A. Lamb, PE
Digitally signed by David A. Lamb, PE
Date: 2017.09.25 08:19:49 -05'00'

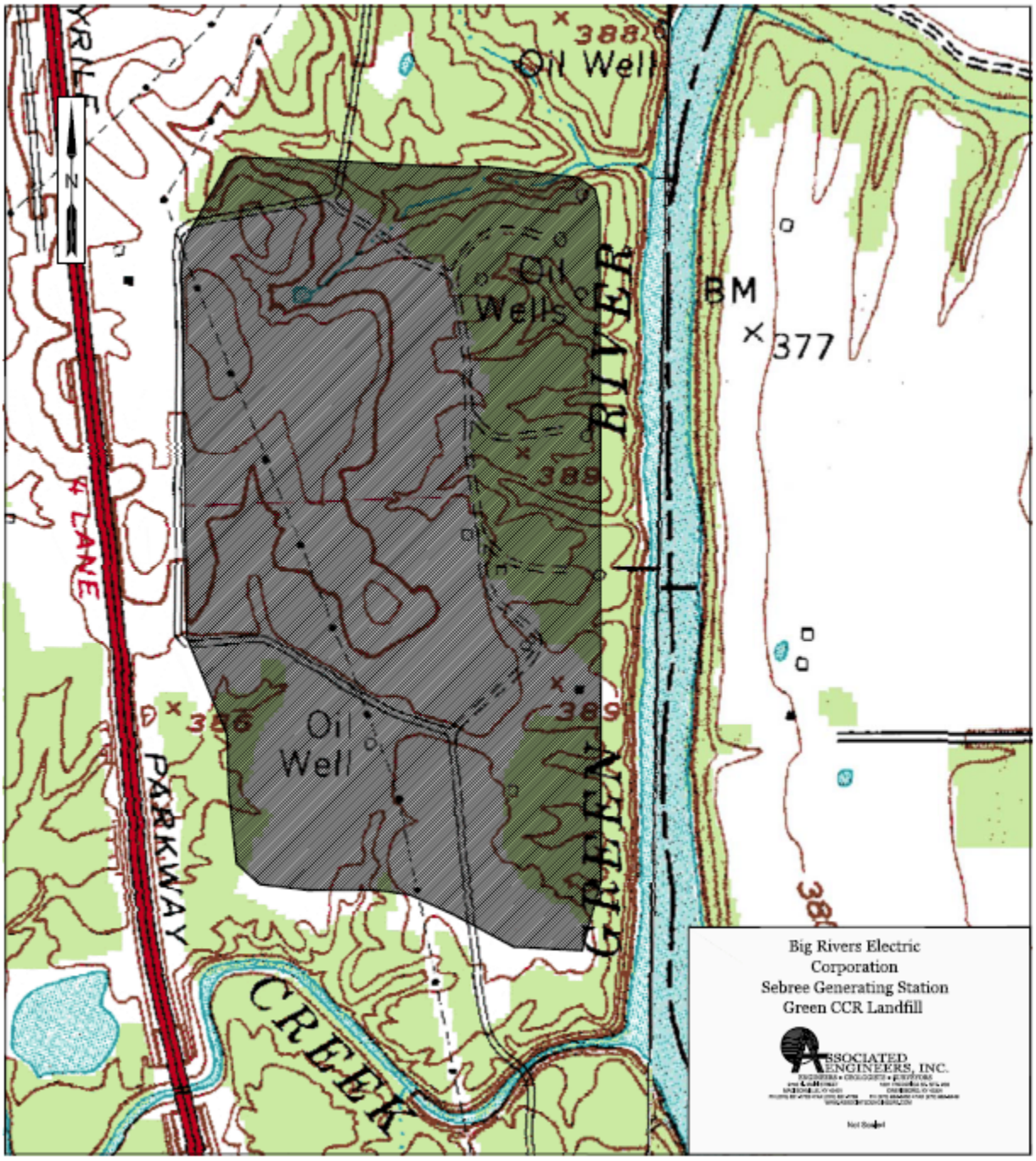


David A. Lamb P.E.

State of Kentucky License No. 17822

Date: ____09/25/2017_____

Attachment A. Aerial Photo of the Green CCR Landfill



Attachment B. Topographic Map showing the Green CCR Landfill