

2018 ANNUAL CCR INSPECTION

Facility Name: Jeffrey Energy Center (JEC)
 Owner/Operator Name: Westar Energy
 CCR Unit: FGD Landfill
 Inspection Date: November 28, 2018

USEPA CCR Rule Criteria 40 CFR §257.84	FGD Landfill Annual Inspection Results
<p>§257.84(b)(2)(i) stipulates: <i>“(2) Inspection report. The qualified professional engineer must prepare a report following each inspection that addresses the following: (i) Any changes in geometry of the structure since the previous annual inspection;”</i></p>	<p>A visual inspection of the JEC Flue Gas Desulfurization (FGD) Landfill (Landfill) was completed on November 28, 2018 by Mr. Richard Southorn, a qualified professional engineer (QPE). Changes in geometry since the previous annual inspection include placement of an estimated 0 to 15 feet of CCR material within the active filling area (Phase I) and minor grading. Phase II base liner construction and contact water basin construction was underway at the time of the inspection.</p>
<p>§257.84(b)(2)(ii) stipulates: <i>“(ii) The approximate volume of CCR contained in the unit at the time of the inspection;”</i></p>	<p>Based on a 2018 survey by Professional Engineering Consultants, the Landfill is estimated to contain approximately 750,000 cubic yards (cy) of CCR material.</p>
<p>§257.84(b)(2)(iii) stipulates: <i>“(iii) Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit;”</i></p>	<p>During the inspection, slope appearance, stability, and overall Landfill conditions were assessed. No actual or potential structural weaknesses that are or could have the potential to disrupt the operation or safety of the Landfill were noted. No signs of distress or malfunction that may contribute to instability of the Landfill were observed.</p>
<p>§257.84(b)(2)(iv) stipulates: <i>“(iv) Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection;”</i></p>	<p>The last inspection (November 6, 2017) noted a crack on an internal berm, which was repaired. Rip-rap was installed at the culverts and outlets as necessary and vegetation was removed from the culvert outlet and from the riprap lined letdown channel. The Landfill has remained stable during the Phase II base liner construction. The Landfill is in good operating condition and functioning as intended. There were no other changes to the Landfill that may have affected the stability or operations of the Landfill since the previous annual inspection.</p>

PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of the CCR Rule and has visited and examined the Landfill or has supervised examination of the Landfill by appropriately qualified personnel. I hereby certify based on a review of available information within JEC's operating records and observations from my personal on-site inspection, that the Landfill does not exhibit any appearances of actual/potential structural weakness that would be disruptive to the normal operations and safety of the CCR Unit. The unit is being operated and maintained consistent with recognized and generally accepted good engineering standards and practices. This certification was prepared as required by 40 CFR Part §257.84.

Name of Professional Engineer: Richard Southern

Company: APTIM

Professional Engineer Seal:

