

Post-Closure Plan Lawrence Energy Center Industrial Landfill #0847

Prepared for:

Westar Energy
Lawrence Energy Center
Lawrence, Kansas

Prepared by:

Aptim Environmental & Infrastructure, Inc.

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Figure 1 – Lawrence Landfill, Site Location Plan

Figure 2 – Lawrence Landfill, Existing Site Topography

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Plan Review/Amendment Log §257.104(d)(3)

Date of Review	Reviewer Name	Amendment Required (YES/NO)	Sections Amended and Reason
3-20-18	APTIM	Yes	Report amended due to redesign



CCR Regulatory Requirements

USEPA CCR Criteria 40 CFR §257.104	Jeffrey Energy Center Post-Closure Plan
§257.104(a)(1) stipulates:	
(a) Applicability. (1) Except as provided by either paragraph (a)(2) or (3) of this section, §257.104 applies 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.	Section 1.0
§257.104(b)(1) stipulates:	
(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;	Section 7.1
§257.104(b)(2) stipulates:	
(2) If the CCR unit is subject to the design criteria under §257.70, maintaining the integrity and effectiveness of the leachate collection and removal system and operating the leachate collection and removal system in accordance with the requirements of §257.70; and	Section 7.2



USEPA CCR Criteria 40 CFR §257.104	Jeffrey Energy Center Post-Closure Plan
§257.104(b)(3) stipulates: (3) Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of §257.90 through §257.98.	Section 7.3
§257.104(c)(1) stipulates: (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.	Section 4.0
§257.104(d)(1)(i) stipulates: (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;	Section 7.0
§257.104(d)(1)(ii) stipulates: (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.	Section 10.0



USEPA CCR Criteria 40 CFR §257.104	Jeffrey Energy Center Post-Closure Plan
§257.104(d)(1)(iii) stipulates:	
(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.	Section 4.0
§257.104(d)(2)(i) stipulates:	
(2) Deadline to prepare the initial written post-closure plan: (i) Existing CCR landfills and existing CCR surface impoundments. No later than October 17, 2016, the owner or operator of the CCR unit must prepare an initial written post-closure plan consistent with the requirements specified in paragraph (d)(1) of this section.	Report submitted prior to October 17, 2016.
§257.104(d)(2)(ii) stipulates:	
(ii) The owner or operator has completed the written post-closure plan when the plan, including the certification required by paragraph (d)(4) of this section, has been placed in the facility's operating record as required by §257.105(i)(4).	Will be completed after approval



USEPA CCR Criteria 40 CFR §257.104	Jeffrey Energy Center Post-Closure Plan
§257.104(d)(3) stipulates:	
(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.	Section 11.0
(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.	
§257.104(d)(4) stipulates: (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.	Section 12.0



USEPA CCR Criteria 40 CFR §257.104	Jeffrey Energy Center Post-Closure Plan
§257.104(e) stipulates:	
(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 as required by §257.105(i)(13).	Section 8.0
§257.104(f) stipulates:	
(f) The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in §257.105(i), the notification requirements specified in §257.106(i), and the Internet requirements specified in §257.107(i).	Section 9.0



1.0 INTRODUCTION

Aptim Environmental and Infrastructure, Inc. (APTIM) formerly named CB&I Environmental and Infrastructure, Inc. has prepared the following Post-Closure Plan (Plan) at the request of Westar Energy (Westar) for the Industrial Landfill No. 0847 (Landfill) located at its coal-fired power plant, Lawrence Energy Center (LEC) in Lawrence, Kansas. The Landfill is used for ash disposal associated with the plants and has been deemed to be a regulated coal combustion residual (CCR) unit by the United States Environmental Protection Agency (USEPA) through the Disposal of Coal Combustion Residuals from Electric Utilities Final Rule (CCR Rule) 40 CFR §257 and §261.

Design modifications for the Landfill were necessary to conform to new design requirements promulgated under the CCR Rule. A report entitled *Lawrence Energy Center Comprehensive Design Modification Report – Industrial Landfill #0847* was submitted to the Kansas Department of Health and Environment (KDHE) Bureau of Waste Management (BWM) at the beginning of 2018. This Plan reflects the design modifications provided in the aforementioned design modification report.

Following closure of the Landfill per §257.102 for closure of CCR material in place, Westar intends to conduct the post-closure care of the Landfill in line with the requirements outlined in §257.104 *Post-Closure Care Requirements*. The criteria for conducting the post-closure care of the Landfill are detailed in Section 2.0. All post-closure care processes have been established to control, minimize, and eliminate infiltration of liquids into waste and the release of leachate.



2.0 REGULATORY OVERVIEW OF CCR POST-CLOSURE PLAN REQUIREMENTS

On April 17, 2015, the USEPA published the CCR Rule under Subtitle D of the Resource Conservation and Recovery Act (RCRA) as 40 CFR Parts §257 and §261. The purpose of the CCR Rule is to regulate the management of CCR material in regulated units for landfill and surface impoundments. The Landfill has been deemed to be a regulated CCR unit at LEC.

Section 257.104(d) of the CCR Rule requires owners or operators of CCR landfills and surface impoundments to prepare a written Plan describing the monitoring and maintenance activities, contact personnel during the post-closure care period, the planned use of the unit during the post-closure care period, and the schedule for implementation of the Plan. The following citations from the CCR Rule are applicable for the Landfill as discussed in this Plan:

§257.104(d)(1) stipulates:

"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..."



3.0 LEC LANDFILL OVERVIEW

3.1 Location, Topography, and Description

Bottom ash, fly ash, and flue gas desulfurization (FGD) by-product are deposited within the Landfill at LEC. The closure of the Landfill will be accomplished by leaving the CCR material in place and covering the CCR material with an engineered cap.

The Landfill is located in Lawrence, Kansas, within Sections 13 and 14, Township 12 South, Range 19 East in Douglass County. The Landfill is located within LEC, on the east side of property. It is surrounded by the Kansas River to the north, the Burlington Northern and Santa Fe Railway along the north and east, industrial buildings to the west, and prairies, industrial buildings, and residential housing to the south, as detailed in **Figure 1**.

The Landfill has eight permitted Cells which are being filled in numerical order. Cell 1 also shares the northwestern border with the closed 333 Landfill at LEC, which is permitted under KDHE-BWM Permit Number 0333. In total, the completed Landfill will cover approximately 58.9 acres. Once CCR material disposal and final cover installation/closure is complete, final cover slopes will be 3.25H:1V in Cells 1 through 3 and 4H:1V in Cells 4 through 8 with transition areas occurring between changes in slope grades. The final cover plateau of the Landfill will have a 5.0% slope with a peak elevation of approximately 992 ft. MSL. Existing and proposed site topography is depicted in **Figure 2** and **Figure 3**, respectively.

3.2 Existing Regulatory Permits and Consents

Westar was granted an Industrial Landfill Permit at LEC by the Kansas Department of Health and Environment – Bureau of Waste Management (KDHE-BWM) for the Landfill through Industrial Landfill Permit No. 0847, in accordance with Kansas Statutes Annotated (KSA) 65-3407. KDHE modified the solid waste permit, per K.A.R. 28-29-6a, in response to the CCR Rule to include all on-site CCR material units as disposal areas under the existing solid waste permit for LEC. The current Industrial Landfill Permit modification was approved on October 15, 2015. This allows CCR material to be generated on-site at LEC and to be properly recycled and/or disposed within the Landfill Permit boundary.



4.0 POST-CLOSURE OVERVIEW AND PLANNED USE (§257.104(d)(1)(iii))

This Plan applies to existing and proposed disposal units in LEC's Landfill. The total area requiring post-closure care after a specific phase is closed is the total area of the Landfill. The post-closure care of the Landfill must and will be conducted for 30 years, as required by §257.104(c)(1) and KAR 28-29-12.

The currently proposed end use of the Landfill is a natural area of passive open space that will not disturb the integrity of the final cover system. No waste will remain exposed after completion of the Landfill closure. Entrance to the Landfill is only granted through the secured entrance to LEC's generation facility. The Landfill will be closed to the public.



5.0 INSPECTION ACTIVITIES

As part of the post-closure care phase for the Landfill, it is anticipated that the current routine inspections will revert to quarterly inspections; annual reporting will continue for the duration of the post-closure care period. The annual report will provide any recommendations for inspections and monitoring which will be undertaken as part of the post-closure care phase for the Landfill. State inspections will occur as required by federal regulations and/or as deemed necessary by KDHE-BWM.

The inspection of the closed Landfill will be conducted by LEC personnel or their designee(s). The purpose of the visual inspections during the post-closure care phase will be to detect any damage, distress, or malfunctions to the Landfill final cover, cover soils, vegetation, and stormwater management systems for the Landfill. Any detection will be repaired to maintain the erosion control measures and prevent a breach of the containment structures.



6.0 GROUNDWATER AND SURFACE WATER MONITORING ACTIVITIES

Water quality monitoring will occur throughout the post-closure care period. Monitoring will include groundwater and surface water at the designated monitoring wells and any designated sampling points. The groundwater monitoring system maintenance and monitoring will be in accordance with the requirements in §257.90 through §257.98, as required by §257.104(b)(3). The groundwater monitoring, sampling requirements and methodology, and reporting procedures are provided in the Sampling and Analysis Plan (SAP) for the Landfill. The LEC groundwater network will be sampled semi-annually or as required by federal regulations and/or KDHE. All groundwater wells shall be inspected at least annually to ensure any damage due to settlement or other means is repaired. No assessment monitoring is anticipated to be required.

The sampling of surface water is described in the LEC's NPDES Permit No. I-KS31-PO09.



7.0 MAINTENANCE ACTIVITIES (§257.104(d)(1)(i) and §257.104(b))

Per §257.104(d)(1)(i) Written post-closure plan and §257.104(b) Post-closure care maintenance requirements: "Following the 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
- 2. If the CCR unit is subject to the design criteria under §257.70, maintaining the integrity and effectiveness of the leachate collection and removal system and operating the leachate collection and removal system in accordance with the requirements of §257.70; and
- **3.** Maintaining the groundwater monitoring system and monitoring groundwater in accordance with the requirements of §257.90 through §257.98"

7.1 Final Cover System Maintenance and Repair Plan (§257.104(b)(1))

The final cover system may experience minor settlement over time due to waste or foundation consolidation/settlement. Only minor settlement is anticipated due to the physical characteristics of CCR material, the CCR material is compacted during placement, and most of the settlement will have already occurred shortly after landfilling. Minor regrading and repair of the soil component above the erosion control layer may be required in the event that future non-uniform settlement is observed to be impacting the functional design and/or operation of the Landfill and surrounding areas. The proposed geosynthetic final cover components are flexible and will retain their integrity under minor differential settlement.

Maintenance of the final cover will include periodic mowing of the vegetative cover and reseeding as necessary. The grass will be maintained at such a level as to facilitate inspection. This will help to discourage the inhabitance of burrowing animals. Mowing activities will be conducted on an as-need basis. The erosion control layer on the final covers system will be inspected, filled with appropriate soil, regraded, and seeded if the erosion channels are approximately 6-inches deep.

Routine maintenance of run-on and run-off control structures include cleaning sediment from structures such as ditches, culverts, letdown pipes, and outfall structures. Repair of these structures will typically be performed by bringing in heavy equipment such as backhoes, dump trucks, dozers, and scrapers. Materials such as silt fence, straw bales, and soil will be kept on-site to implement short-term repairs while waiting for permanent repairs. By maintaining the system of perimeter stormwater berms and channels, run-on/run-off will be prevented from eroding or damaging the final cover system.

7.2 Maintain Leachate Collection and Removal System (§257.104(b)(2))

The existing portions of Cells 1 through 3 are equipped with a leachate collection and removal system that was designed and permitted prior to the commencement of the CCR Rule. Cells 4 through 8 have been designed to utilize separate leachate conveyance pipes from Cells 1 through 3, although the pipes drain to a common pond. The physical separation of the leachate collection systems will allow for independent monitoring of leachate, if required. To facilitate cleanout, each collection pipe will be connected to a cleanout riser (or daylight into the pond) at one or both ends. The leachate collection pipes will most likely be cleaned by



hydraulic jetting or flushing, which requires access from only one end of the pipe. The leachate collection pipes will be cleaned and maintained as necessary. The leachate collection and management system will be routinely inspected for evidence of clogging or general system repair. Any observed damage or deficiencies will be quickly repaired following detection.

Hydraulic flushing or jetting typically uses a 1-inch hose connected to a 3-inch diameter nozzle assembly to deliver high-pressure water to remove obstructions. The hose and nozzle will fit through the 6-inch diameter leachate collection pipe. The 3-inch diameter nozzle can produce approximately 3,000 pounds per square inch (psi) of hydraulic pressure, allowing it to easily breakup any obstructions.

7.3 Maintenance Groundwater Monitoring Systems (§257.104(b)(3))

Monitoring of the groundwater and routine maintenance of groundwater monitoring wells, such as replacing locks, painting, pad repairs, and regrading of soil areas around the wells, will be performed in accordance with 40 CFR §257.90 through §257.98. Any routine maintenance required by the groundwater monitoring system will be performed by LEC personnel or their designee(s). Other maintenance work such as protective casing repair, well replacement, and repair of sampling pumps will be performed by specialty contractors. The groundwater monitoring wells will be abandoned in compliance with KDHE regulations and the SAP.

7.4 Maintenance of Landfill Roads

Routine maintenance will be performed on Landfill roads if settlement, subsidence, or displacement has occurred. This may include the application of on-site materials and/or surface grading.



8.0 NOTICE OF COMPLETION OF POST-CLOSURE CARE (§257.104(e))
Westar will complete a Notice of Completion of post-closure care period within 60 (sixty) days of completion of post-closure of the Landfill. The notification will include the certification by a registered professional engineer as required by §257.104(e).



9.0 RECORDKEEPING, NOTIFICATION AND INTERNET REQUIREMENTS (§257.104(f))

Per §257.104(f), Westar maintains an operating record consisting of the following documents specified in §257.105(i):

- Inspection records that are conducted for the disposal of materials;
- Groundwater sampling and analysis results for the Landfill, records of by-product material recycled, major operational problems, complaints or difficulties, records associated with corrective measures, and employee training records;
- A copy of the SWPPP and the SWPPP Record Forms;
- The Closure and Post-Closure Plans, as well as closure CQA certification and postclosure inspection documentation;
- Proof of financial insurance;
- A copy of the current operating permit and any subsequent addenda; and
- Copies of the permit applications and all supporting documents.

Additionally per §257.104(f), Westar will comply with the notification requirements specified in §257.106(i). This includes submitting the following notification documents and any amendments to these documents to the state director:

- Intent to initiate post-closure care;
- Availability of annual progress reports of post-closure care implementation;
- Closure, Post-Closure Plans, and any alternative closure requirements:
- Any required time extensions;
- Completion of post-closure care of a CCR unit; and
- Deed notation.

Internet requirements specified in §257.107(i) will be placed on owner and operators publicly accessible website, per §257.104(f). These documents include any notification on the closure or post-closure care intent or completion, annual progress reports, the written Plan, Closure Plan, and any amendments, demonstrations for time extensions, and the record of the deed.

All records that are relevant within the past five years will be maintained at LEC and/or by Westar. The records are available to KDHE representatives for review upon request.



10.0 KEY CONTACT INFORMATION (§257.104(d)(1)(ii))

Name: Brandon Griffin

Environmental Services, Environmental Compliance Analyst

Address: Westar Energy

818 South Kansas Avenue Topeka, Kansas 66601

E-mail Address: westarccr@westarenergy.com

Phone Number: (800) 383-1183



11.0 PROCEDURES FOR PLAN ASSESSMENTS AND AMENDMENTS (§257.104(d)(3))

This Plan will continue to undergo review as the Landfill continues phased construction activities. The Plan will be amended if there is a situation stated in §257.104(d)(3)(i-iii), which includes any change in operation of the CCR unit that would affect the Plan. The Plan would also be amended 60 days prior to a planned change of the LEC facility or Landfill, or no later than 60 days after an unanticipated event that would necessitate a revision and no later than 30 days after an unanticipated event after post-closure care activities have commenced.

Any amended Plan will be reviewed and recertified by a registered professional engineer and will be placed in LEC's facility operating record as required per §257.105(i)(4). Amended Plans will supersede and replace any prior versions. Availability of an amended Plan will be noticed to the State Director per §257.106(i) and posted to the publicly accessible internet site per §257.107(i).



12.0 PROFESSIONAL ENGINEER CERTIFICATION (§257.104(d)(4))

The undersigned registered professional engineer is familiar with the requirements of §257.104 of the CCR Rule and has visited and examined LEC or has supervised examination of LEC by appropriately qualified personnel. The undersigned registered professional engineer attests that this CCR Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and meets the requirements of §257.104, and that this Plan is adequate for LEC's facility. This certification was prepared as required by §257.104(d)(4).

Name of Professional Engineer:	Richard Southorn
Company:	APTIM
Signature:	75
Date:	3/20/16
PE Registration State:	Kansas
PE Registration Number:	PE25201

Professional Engineer Seal:





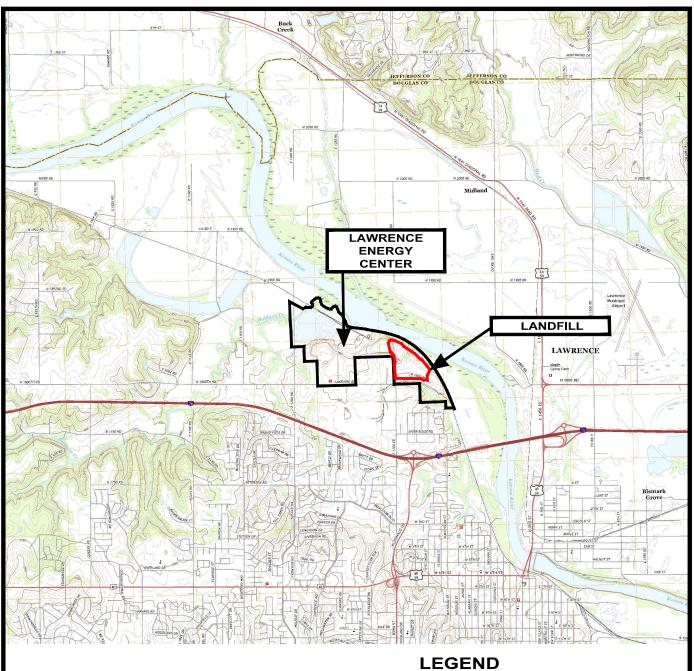
FIGURES

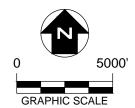
Figure 1 – Site Location Plan

Figure 2 – Existing Site Topography

Figure 3 – Proposed Final Landform







LAWRENCE ENERGY CENTER FACILITY **BOUNDARY**

CCR UNIT BOUNDARY

NOTES

- AERIAL TOPO OBTAINED FROM USGS 7.5-MINUTE SERIES, LAWRENCE EAST, LAWRENCE WEST, MIDLAND AND WILLIAMSTOWN QUADRANGLE, KANSAS, 2014.
- 2. ALL BOUNDARIES ARE APPROXIMATE.

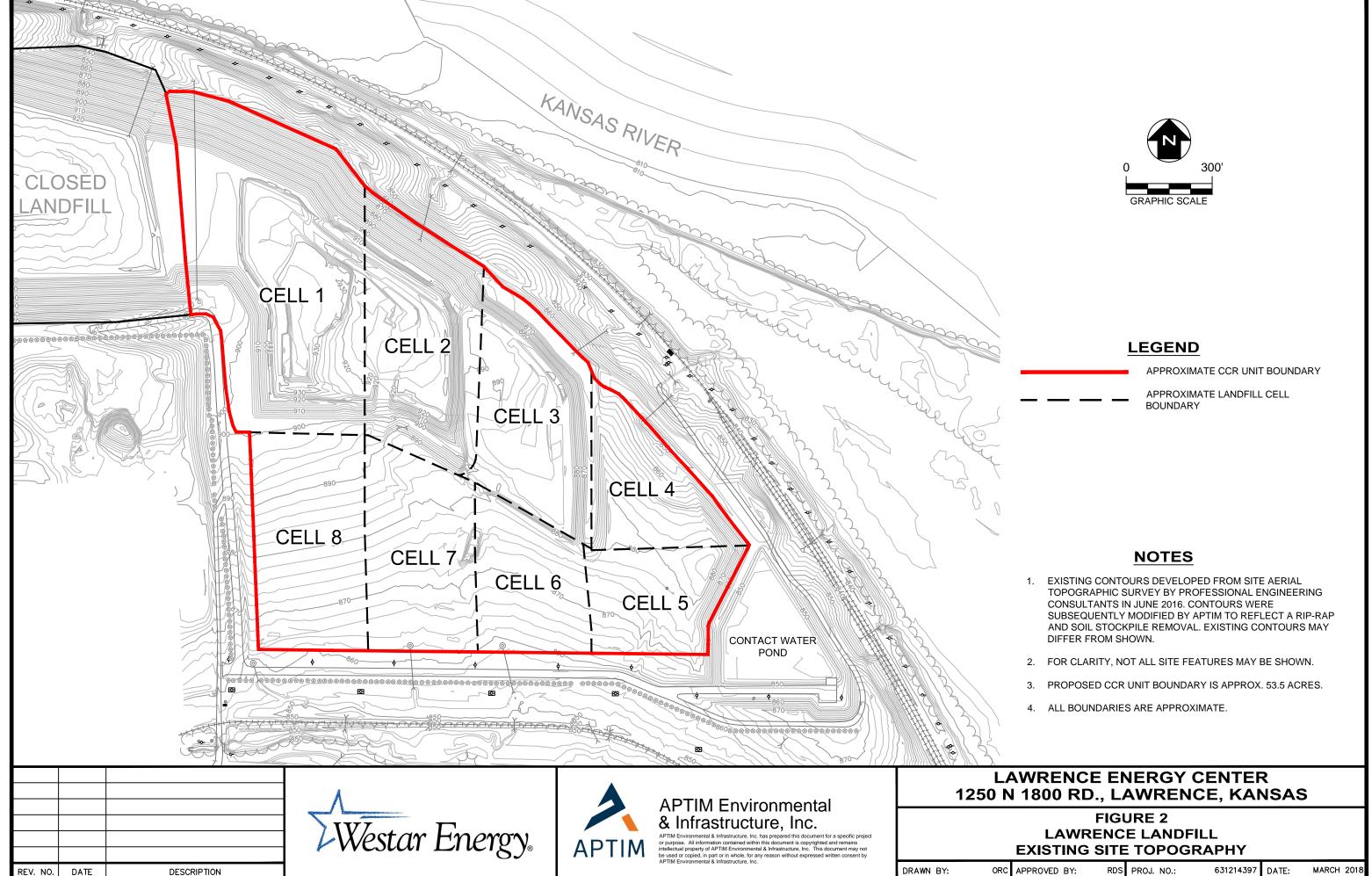


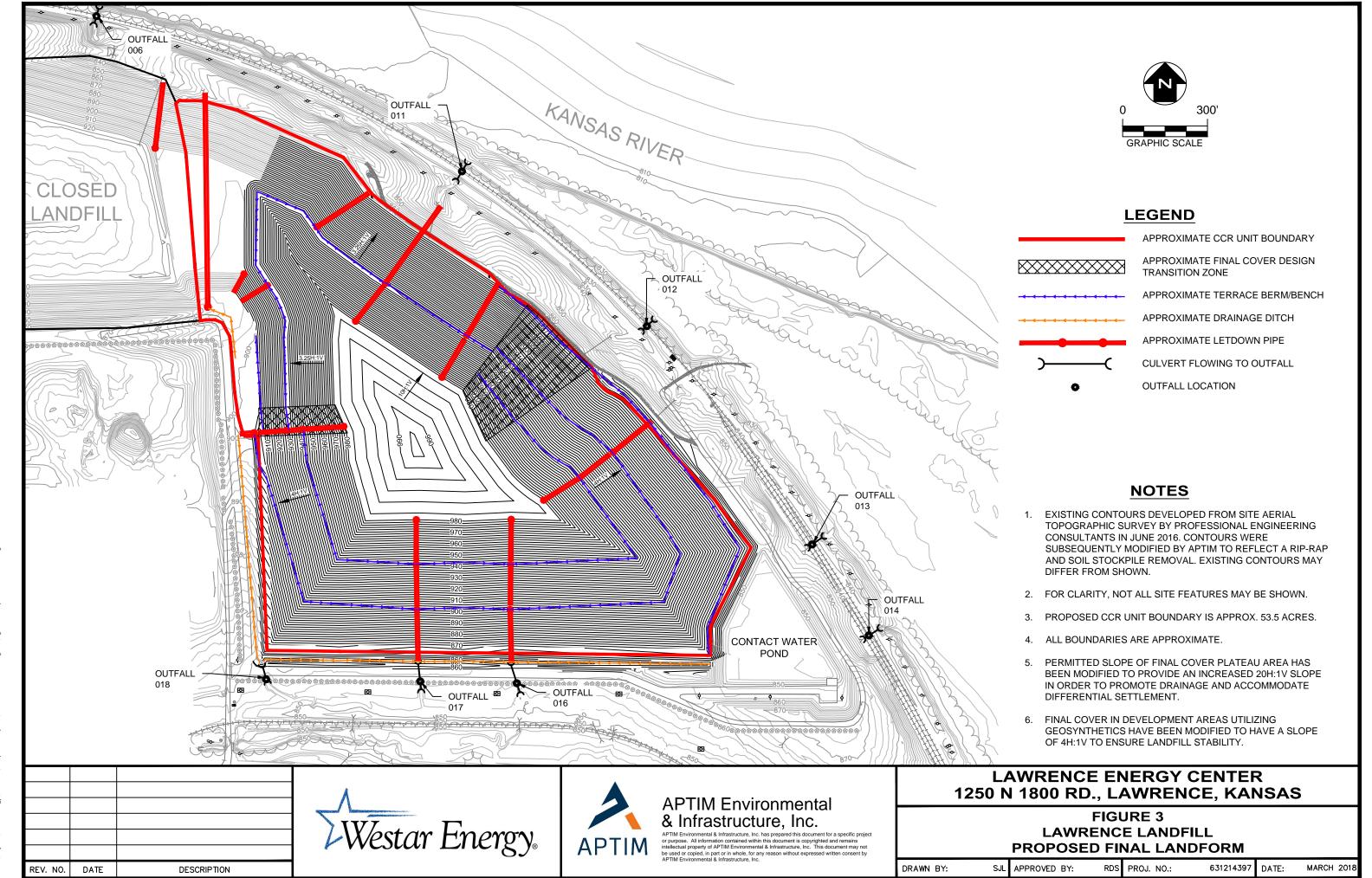
FIGURE 1 **LAWRENCE LANDFILL**

LAWRENCE ENERGY CENTER 1250 N. 1800 RD., LAWRENCE, KS.

SITE LOCATION PLAN

PROJ. NO.: 631214397 APPROVED BY: DATE: FEBRUARY 2018





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