

## 2020 ANNUAL CCR INSPECTION

Facility Name: Lawrence Energy Center (LEC)  
 Owner/Operator Name: Evergy Kansas Central, Inc. (f/k/a Westar Energy)  
 CCR Unit: Area 2 Pond, Area 3 Pond, and Area 4 Pond (inactive)  
 Inspection Date: June 9, 2020

USEPA CCR Rule Criteria 40 CFR §257.83	Area 2 Pond, Area 3 Pond, and Area 4 Pond (inactive) Annual Inspection Results
<p>§257.83(b)(2)(i) stipulates:  <i>“(2) Inspection report. The qualified professional engineer must prepare a report following each inspection that addresses the following:</i>  <i>(i) Any changes in geometry of the impounding structure since the previous annual inspection;”</i></p>	<p>A visual inspection of the LEC inactive Area 2 Pond, Area 3 Pond, and the Area 4 Pond and associated hydraulic structures was conducted on June 9, 2020 by Mr. Richard Southorn, a qualified professional engineer (QPE). The Area 2, 3, and 4 Ponds underwent closure by removal construction which was completed in July 2018. Certification of closure has not yet been completed. Changes in geometry since the previous annual inspection include the temporary removal of a portion of the impounding structure (perimeter dike) at the western end of the Area 2 Pond where a box culvert is being constructed.</p>
<p>§257.83(b)(2)(ii) stipulates:  <i>“(ii) The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection;”</i></p>	<p>No instrumentation devices associated with the hydraulic structures, impoundment embankments, perimeter dike, or slope performance are installed at, or near, the Area 2, 3, and 4 Ponds.</p>
<p>§257.83(b)(2)(iii) stipulates:  <i>“(iii) The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection;”</i></p>	<p>The present depth of water in the Area 2 and Area 3 Ponds frequently changes depending on plant operations and rainfall events. Based on the closure design, the minimum and maximum water depth in the Area 2, and 3 Ponds is 0 ft to approximately 19 ft (843 ft MSL within the Area 3 Pond). At the time of inspection, the water depth was approximately 0 - 11 ft in the Area 2 Pond (approximately 830 ft MSL to 837 ft MSL) and approximately 2 ft in the Area 3 Pond (approximately 825 ft MSL to 829 ft MSL). There is no impounded water in the Area 4 Pond and it has been removed from service.             There are no minimum, maximum, or present CCR depths/elevations in the Area 2, 3, or 4 Ponds due to the removal of CCR from the unit for the closure by removal project.</p>
<p>§257.83(b)(2)(iv) stipulates:  <i>“(iv) The storage capacity of the impounding structure at the time of the inspection;”</i></p>	<p>The storage capacity of the Area 2, 3, and 4 Ponds was reported to be 273 acre-ft, 185 acre-ft, and 70.5 acre-ft in the 2018 Annual Inspection Report. Due to pending closure, the Area 2, 3, and 4 Ponds no longer store CCR material.</p>

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<p>§257.83(b)(2)(v) stipulates: <i>“(v) The approximate volume of the impounded water and CCR at the time of the inspection;”</i></p>	<p>There is no impounded water in the Area 4 Pond. Water in the Area 2 Pond and the Area 3 Ponds follows NPDES regulations and the volume varies greatly depending on plant operations, stormwater conditions and associated NPDES permitted discharges. At the time of inspection there was approximately 31,000 cubic feet of impounded water in the Area 2 Pond and 15,200 cubic feet of impounded water in the Area 3 Pond.</p> <p>There is no CCR in the Area 2, 3, or 4 Ponds due to the removal of CCR from the unit for the closure by removal project.</p>
<p>§257.83(b)(2)(vi) stipulates: <i>“(vi) 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 and appurtenant structures;”</i></p>	<p>At the time of this inspection, there were no signs of distress or malfunction that would indicate actual or potential structural weakness of the perimeter dike. There was no indication that existing conditions or closure activities at the Area 2, 3, and 4 Ponds have disrupted or have the potential to disrupt safety or operations.</p>
<p>§257.83(b)(2)(vii) stipulates: <i>“(vii) Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.”</i></p>	<p>A portion of the perimeter dike was temporarily removed at the time of inspection in order to complete the construction of an engineered stormwater diversion structure in the Area 2 Pond. This temporary change to the geometry does not pose a threat of concern to the stability of the perimeter dike. No other changes were made to the Area 2, 3, and 4 Ponds that would pose a threat or concern to the stability of the perimeter dike or operations at LEC.</p>

## PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of the CCR Rule and has visited and examined LEC or has supervised examination of LEC by appropriately qualified personnel. I hereby certify based on a review of available information within LEC's operating records and observations from my personal on-site inspection, that the Area 2, 3, and 4 Ponds do not exhibit any appearances of actual/potential structural weakness that would be disruptive to the normal operations of the LEC CCR Units. The units are 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 §257.83.

Name of Professional Engineer: \_\_\_\_\_ Richard Southorn \_\_\_\_\_

Company: \_\_\_\_\_ APTIM \_\_\_\_\_

Professional Engineer Seal:

