

**INITIATION OF CLOSURE EXTENSION
JAMES RIVER POWER STATION CCR LANDFILL
CITY UTILITIES OF SPRINGFIELD
JUNE 2019**

In accordance with the requirement of 40 CFR 257.102(e)(2)(ii), City Utilities is providing documentation demonstrating that there is a reasonable likelihood that the James River Power Station (JRPS) Utility Waste Landfill (UWL) will resume receiving coal combustion residuals (CCR) in the foreseeable future. As such, a two-year extension in initiating closure is justified. This demonstration is being placed in the JRPS CCR operating record.

The JRPS landfill last received CCR on or about June 22, 2017. As reported to the Missouri Department of Natural Resources (MDNR) in January 2018, the UWL is now temporarily closed, and it has approximately 274,000 cubic yards of permitted storage capacity remaining. This estimate is based on a December 2017 topographic survey and volume estimate conducted by Anderson Engineering, Inc. In accordance with MDNR regulations, a 12-inch thick vegetated temporary cover consisting of 8-inches of compacted clay and 4-inches of topsoil was placed on the landfill.

Future utilization of the UWL is also addressed in the CCR Closure and Post-Closure Care Plan dated October 11, 2016 and posted on City Utilities' website. Currently the UWL is temporarily closed with no defined timeframe for permanent closure. However, it is reasonable and prudent to anticipate a future need for the remaining capacity. It is anticipated that ash will be mined from JTEC UWL and placed in the JRPS UWL to utilize the remaining capacity. This project will be planned with City Utilities' budgetary and operational availability and constraints.

Owner Certification of Demonstration

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Name/Title Willy Haffecke, Director – Power Generation

Signature/Date

 6/3/19