

Progress Report 1/11/18-- Closure Implementation for Inactive Temporary Ash Holding Ponds-JRPS

DESCRIPTION OF ACTIONS TAKEN SINCE THE PREVIOUS PROGRESS REPORT

Construction

- Worked with onsite contractor and onsite CU personnel to ensure excavation and landfilling at JRPS was completed in accordance with the contract, applicable regulations, and the landfill operating manual.
- Coordinated and ensured that sampling was conducted in all areas according to the Clean Closure Verification Plan (April 2016). Samples were tracked per using grid sampling and analysis procedures and the results received were used to confirm clean status in all excavated areas.
- Total materials moved to the existing landfill is estimated at approximately 680,000 cubic yards.
- Clean out of the east temporary ash pond at JRPS was completed. Soil samples were obtained and analyzed on the planned grid pattern to test for ash content and to confirm liner removal and clean status per the clean closure plan.
- Completed removal of remaining west pond berm.
- Completed all closure related activities for the surface impoundments and completed and posted the final Clean Closure Verification Report dated August 8, 2017.

Leachate System Mods

- The leachate system design was modified at JRPS to accommodate removal of the ponds.
- The pump station, including rails, pump, discharge piping, and flow meter was installed in accordance with the plans.
- The new system commenced operation on October 10, 2017.

Regulatory Activities

- Designed and prepared COE 404 permit application for a level spreader at the southwest corner of the west pond. This consisted of a 60 foot x 60 foot area with rip rap and channel side slopes to slow and spread run off water as it leaves the pond area. Engineering work, drawings, a letter report, and 404 permit application were completed to allow construction of the rip rapped pad to control flow leaving the area.
- Completed the initial annual inspection report for the surface impoundment.
- Completed revisions to the fugitive dust control plan to incorporate the temporary ash holding ponds cleaning activities.

ANY PROBLEMS ENCOUNTERED AND ACTIONS TAKEN TO RESOLVE

No major problems have been encountered.

Challenges to date and actions taken to address follow:

- Keeping State regulators informed has been accomplished by communicating and submitting appropriate documents for their files and information should the State take on the CCR regulations. This includes coordinating related work associated with current state permit requirements
- Consistent periodic review of changing CCR rule was performed to ensure timely accomplishment of required CCR work and associated postings.
- Planned work as described above to allow working around electric transmission lines within the project footprint.
- Performed leachate system modification work as described above to allow continual appropriate management of landfill leachate.
- Main construction challenge was managing ash for appropriate dewatering to allow efficient (single handling) removal and placement in the landfill. This was accomplished by pumping as necessary, strategic trenching, maintaining adequate lay down space, sloping to drain to leachate permitted outfalls, and consistent testing of water before any discharge. Perimeter berms or grading were constructed to contain all water that had any contact with ash.

PROJECTED CLOSURE ACTIVITIES FOR THE COMING YEAR

- The ash was removed from the ponds and placed in the landfill. Clean closure samples taken and analyzed in accordance with the Clean Closure Verification Plan demonstrated the ponds have been closed by removal of the ash. No further ash removal is necessary.
- Modifications to leachate collection system are completed and the system is operational/functional. No further work is required.
- Transmission poles were removed or relocated as necessary to accommodate the new grade. No further work is necessary.
- Completed reclamation of disturbed area associated with CCR clean- up project. This activity is substantially complete but potential reseeding or mitigation of any erosion areas may be necessary prior to the upcoming growing season.
- No further closure activities are planned or necessary.

This report is intended to serve as the annual progress report of closure implementation specified under 257.105(i)(1) and as the notification of closure completion specified under 257.105(i)(3).

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