

Progress Report 1/11/17-- Closure Implementation for Inactive Temporary Ash Holding Ponds

Description of actions completed to date

- Selected a team led by Jacobs Engineering Group and assembled data for review and field work on CCR regulations as applied to City Utilities temporary ash holding ponds.
- Coordinated the notification and posting of the intent to close the inactive ash holding ponds (i.e., CCR units) and the landfill fugitive dust control plan by the dates required under the CCR rule.
- Investigative drilling was performed to establish material characteristics of the embankment between the east and west ash pond cells.
- Prepared specifications and construction drawings for clean closure of the temporary ash holding ponds at James River Power Station (JRPS), which included development of clean closure procedures for verifying and certifying CCR compliance.
- Project bid documents for the CCR clean-up were released in May 2016 and subsequently awarded to Emery Sapp and Sons (ESS) in July 2016.
- Worked with multiple departments to get the SWPPP for the clean closure of the ash holding ponds approved by the City of Springfield. BMPS have been installed and remain functioning.
- Clean out of the west temporary ash pond cell at JRPS was completed in September, 2016. 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. This pond closure was certified on December 29, 2016.
- Worked with internal electric line distribution personnel to plan removal of electric poles to allow for excavation of temporary holding pond berms.
- Leachate from the landfill historically was pumped to the temporary holding ponds. Since these are closed or in the process of being closed, a new repository is needed. CUS worked with the City of Springfield to obtain approval to pump these waters to into the sanitary sewer.
- Prepared specifications and construction drawings to modify leachate collection system and received approval of Missouri DNR for a permit modification to install the new leachate system. A contractor has been selected to complete this work.
- Storage, offices, security badges, and other administrative needs were put in place to support and allow work to proceed.
- A Quality Assurance Procedure Plan (QAPP) for clean closure verification and certification was developed by the consultant and approved by CU staff.
- Drafted a detailed plan for removal of the JRPS west pond west berm for review. Submitted to DNR Water Pollution Staff for review. At the time of this posting, removal of the west berm is approximately 75% complete.

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
- Where historical data were lacking or incomplete on site investigation (i.e. test pits or borings) were performed to establish needed information to proceed with appropriate work.
- Consistent periodic review of changing CCR rule was performed to insure 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 design work as described above to allow continued appropriate management of landfill leachate.
- Main construction challenge has been managing ash for appropriate dewatering to allow efficient (single handling) removal and placement in the landfill. This has been 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 has also been constructed to contain all water that has had any contact with ash.

Projected closure activities for the coming year

- Continue ash removal and placement in on site landfill, incorporating appropriate management and support activities as described above.
- Complete removal of west pond cell west berm and confirm berm footprint is clean.
- Complete removal of ash and liner materials from east pond cell.
- Confirm and certify removal of CCR materials from site per the closure plan.
- Complete modifications to leachate collection system.
- Complete removal and or relocation of necessary transmission poles.
- Complete reclamation of disturbed area associated with CCR clean- up project.
- Place temporary protective landfill cap.

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