



# Post-Closure Plan Jeffrey Energy Center Fly Ash Landfill

Prepared for:

Westar Energy

Jeffrey Energy Center

St. Marys , Kansas

Prepared by:

CB&I Environmental & Infrastructure, Inc.

October 2016



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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



## CCR Regulatory Requirements

USEPA CCR Criteria 40 CFR §257.104	Jeffrey Energy Center Post-Closure Plan
<p>§257.104(a)(1) stipulates:</p> <p><i>(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.</i></p>	<p>Section 1.0, Page 1</p>
<p>§257.104(b)(1) stipulates:</p> <p><i>(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;</i></p>	<p>Section 7.1, Page 7</p>
<p>§257.104(b)(2) stipulates:</p> <p><i>(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</i></p>	<p>Section 7.2, Page 8</p>



USEPA CCR Criteria 40 CFR §257.104	Jeffrey Energy Center Post-Closure Plan
<p>§257.104(b)(3) stipulates:</p> <p><i>(3) Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of §257.90 through §257.98.</i></p>	<p>Section 7.3, Page 8</p>
<p>§257.104(c)(1) stipulates:</p> <p><i>(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.</i></p>	<p>Section 4.0, Page 4</p>
<p>§257.104(d)(1)(i) stipulates:</p> <p><i>(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;</i></p>	<p>Section 7.0, Page 7</p>
<p>§257.104(d)(1)(ii) stipulates:</p> <p><i>(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.</i></p>	<p>Section 10.0, Page 11</p>



USEPA CCR Criteria 40 CFR §257.104	Jeffrey Energy Center Post-Closure Plan
<p>§257.104(d)(1)(iii) stipulates:</p> <p><i>(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.</i></p>	<p>Section 4.0, Page 4</p>
<p>§257.104(d)(2)(i) stipulates:</p> <p><i>(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.</i></p>	<p>Report submitted prior to October 17, 2016.</p>
<p>§257.104(d)(2)(ii) stipulates:</p> <p><i>(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).</i></p>	<p>Will be completed after approval</p>



USEPA CCR Criteria 40 CFR §257.104	Jeffrey Energy Center Post-Closure Plan
<p>§257.104(d)(3) stipulates:</p> <p><i>(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.</i></p> <p><i>(ii) The owner or operator must amend the written closure plan whenever:</i></p> <p><i>(A) There is a change in the operation of the CCR unit that would substantially affect the written post-closure plan in effect; or</i></p> <p><i>(B) After post-closure activities have commenced, unanticipated events necessitate a revision of the written post-closure plan.</i></p> <p><i>(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.</i></p>	<p>Section 11.0, Page 12</p>
<p>§257.104(d)(4) stipulates:</p> <p><i>(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.</i></p>	<p>Section 12.0, Page 13</p>





USEPA CCR Criteria 40 CFR §257.104	Jeffrey Energy Center Post-Closure Plan
<p>§257.104(e) stipulates:</p> <p><i>(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).</i></p>	<p>Section 8.0, Page 9</p>
<p>§257.104(f) stipulates:</p> <p><i>(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).</i></p>	<p>Section 9.0, Page 10</p>



## 1.0 INTRODUCTION

CB&I Environmental and Infrastructure, Inc. (CB&I) has prepared the following Post-Closure Plan (Plan) at the request of Westar Energy (Westar) for the Fly Ash Landfill located at its Jeffrey Energy Center (JEC) in St. Marys, Kansas. JEC is a coal-fired and natural gas-fired power plant that has been in operation since 1980. Fly ash is permitted for disposal within the Fly Ash Landfill at JEC. The Fly Ash Landfill includes the existing Fly Ash Area 1, which is operational, and the proposed Fly Ash Area 2. Both Fly Ash Area 1 and Area 2 have been deemed to be regulated coal combustion residual (CCR) units 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.

Following the closure of the Fly Ash Area 1 (Fly Ash Area) Landfill, per §257.102 for closure of CCR material in place, Westar intends to conduct the post-closure care of the Fly Ash Area Landfill in line with the requirements outlined in §257.104 *Post-Closure Care Requirements*. The criteria for conducting the post-closure care of the Fly Ash Area 1 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 release of leachate.



## 2.0 REGULATORY OVERVIEW OF CCR PLAN REQUIREMENTS

On April 17, 2015, The United States Environmental Protection Agency (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 Fly Ash Area Landfill at JEC has been deemed to be a regulated CCR unit.

Section 257.104(d) of the CCR Rule requires owners or operators of CCR Landfills 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 post-closure, and the schedule for implementation of the Plan. The following citations from the CCR Rule are applicable for the Fly Ash Area 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 FLY ASH AREA LANDFILL OVERVIEW

#### 3.1 Location, Topography, and Description

Fly ash is deposited within JEC's Fly Ash Area Landfill. The closure of the Fly Ash Area Landfill will be accomplished by leaving the CCR material in place and covering the CCR material with an engineered cap.

The Fly Ash Area Landfill is located in St. Marys, Kansas, approximately 4.5 miles west of Highway 63. The Fly Ash Area Landfill is located within JEC's facility, north of the Tower Hill Lake and west of Fly Ash Area 2, as detailed in **Figure 1**.

The Fly Ash Area Landfill totals at 98.8 acres, and consists of large berms and deep ravines in the northern and southern portions, which are being filled with fly ash, and is more flat in the central portion of the area. The topography varies across the Fly Ash Area Landfill, ranging in approximate elevations from 1,190 to 1,247 feet mean sea level (ft MSL). The existing site topography for the Fly Ash Area Landfill is depicted in **Figure 2**.

JEC has been designated as a critical habitat by the Kansas Department of Wildlife, Parks, and Tourism for the endangered avian species, Least Tern. The Least Terns currently nest in various locations on the Fly Ash Area Landfill. The current Least Tern habitat boundary fence is depicted in **Figure 3**. The area set aside for the Least Tern habitat is approximately 34.5 acres in size. Fly ash infilling is not undertaken within these designated nesting areas during the breeding season, which is from May through August. The Fly Ash Area Landfill is graded prior to the start of the nesting season and is blocked off to prohibit disturbance from vehicles once the nesting season has started. Westar works closely with the U.S. Fish & Wildlife Service and the Kansas Department of Wildlife, Parks and Tourism, Ecological Services Section on protection of the Least Tern at JEC.

#### 3.2 Existing Regulatory Permits and Consents

Westar was granted an Industrial Landfill Permit at JEC by the Kansas Department of Health and Environment – Bureau of Waste Management (KDHE-BWM) for the Fly Ash Area Landfill through Industrial Landfill Permit No. 0359 (Industrial Landfill Permit), in accordance with Kansas Statutes Annotated (KSA) 65-3407. KDHE modified the permit, per K.A.R 28-29-6a, in response to the CCR Rule to include all on-site CCR units as disposal areas under the existing solid waste permit for the facility. The current Industrial Landfill Permit modification was approved on October 15, 2015. This allows CCR generated on-site to be properly treated and/or disposed within the Industrial Landfill Permit boundary, including the Fly Ash Area Landfill. As part of this permit, the Fly Ash Area Landfill has previously approved final grades, as depicted in **Figure 4**.



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

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

During post-closure, the Fly Ash Area Landfill will continue to act and be maintained as an environment and habitat for the endangered avian species, Least Terns. The Least Terns prefer the Fly Ash Area Landfill location due to its flatter topography in the central portion of the area. Least Terns also prefer the composition of the fly ash, which is a similar condition to their preferred nesting habitat on the Kansas River gravel bars. During the May through August nesting season, the fly ash disposal area is to be completely isolated and fencing will be installed. The current boundary of the fencing for the Least Tern habitat is illustrated in **Figure 3**.

The post-closure planned use of the Fly Ash Area Landfill will remain a protected Least Tern habitat until otherwise assessed. The Least Tern habitat will not disturb the integrity of the final cover system or any of the monitoring systems. Mitigation measures will be observed to ensure that the post-closure activities will not disturb the Least Tern Habitat during nesting and breeding season.

Westar has not proposed any additional uses for the area outside the Least Tern habitat boundary at this time. Entrance to the Fly Ash Area Landfill is only granted through the secured entrance to JEC's generation facility. The Fly Ash Area Landfill will be closed to the public. Documentation of suitability, methodology and criteria for selecting the final cover, cover soils, erosion control layer, and any other recommended materials or structures to be constructed, covered in the Fly Ash Area Landfill Closure Plan.



## 5.0 INSPECTION ACTIVITIES

Weekly (7-day) inspections and annual reporting are currently undertaken in accordance with §257.84(b). These activities will continue to be performed during the operational life of the Fly Ash Area Landfill. Current inspections and reporting will identify any stability, stormwater, erosion controls, or vegetation which requires attention, in addition to any operation changes.

As part of the post-closure care phase for JEC, it is anticipated that the current weekly (7-day) 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 future inspections and monitoring which will be undertaken as part of the post-closure care phase for JEC.

The inspection of the closed Fly Ash Area Landfill will be conducted by JEC 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 Fly Ash Area Landfill final cover, cover soils, vegetation, stormwater management systems, and the Least Tern Habitat fencing, for the Fly Ash Area 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 sampling points for JEC. 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 Fly Ash Area Landfill. JEC's groundwater network will be sampled semi-annually and 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 JEC's NPDES Permit No. I-KS67-PO06.



## **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 fly ash, the fly ash is compacted during placement, and most of the settlement will have already occurred shortly after landfilling. Minor regrading and repair of the erosion control layer soil component may be required in the event that future non-uniform settlement is observed to be impacting the functional design and/or operation of the Fly Ash Area Landfill and surrounding areas. The proposed synthetic 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 inhabitation of burrowing animals. Mowing activities will be conducted on an as-need basis. The erosion control layer on the final cover system will be inspected, filled with appropriate material, regraded, and seeded if the erosion channels are approximately 6-inches deep.

The Least Tern habitat will be maintained when damage or distress to the final cover, cover soils, or fencing system are noted during the weekly inspections. Any detection will be repaired to maintain the erosion control measures and prevent a breach of the containment structures.

Routine maintenance of run-on and run-off control structures include cleaning sediment from structures such as ditches, culverts, sedimentation ponds, down chute pipes, and pond outlets. Repair of these structures will typically be performed by outside contractors who will bring 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))**

Due to the Fly Ash Area Landfill being an existing and operational waste management unit prior to the commencement of the Rules, there is no leachate collection and removal system in Fly Ash Area Landfill. Therefore, no maintenance will need to be performed.

## **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 JEC 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 Fly Ash Area Landfill Roads**

Routine maintenance will be performed on Fly Ash Area Landfill roads if settlement, subsidence, erosion, 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 Fly Ash Area 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 will maintain an operating record which will include the required documents specified in §257.105(i), in addition to the following documents:

- Inspection records that are conducted for the disposal of materials;
- Groundwater sampling and analysis results for the Fly Ash Area 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 Plan, Closure Plan, and closure CQA certification and post-closure 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 implementation;
- Plan, Closure Plan, 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 JEC 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: Jared Morrison  
Director, Environmental Water and Waste Programs

Address: Westar Energy  
818 South Kansas Avenue  
Topeka, Kansas 66601

E-mail Address: [westarccr@westarenergy.com](mailto: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 Fly Ash Area 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 JEC's facility or the Fly Ash Area 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 in the state of Kansas and will be placed in JEC'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 JEC or has supervised examination of JEC 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 JEC's facility. This certification was prepared as required by §257.104(d)(4).

Name of Professional Engineer: Richard Southorn

Company: CB&I

Signature: 

Date: 10/4/16

PE Registration State: Kansas

PE Registration Number: PE25201

Professional Engineer Seal:



# FIGURES

Figure 1 – Fly Ash Area, Site Location Plan

Figure 2 – Fly Ash Area 1, Existing Site Topography

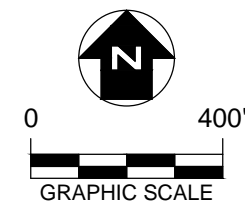
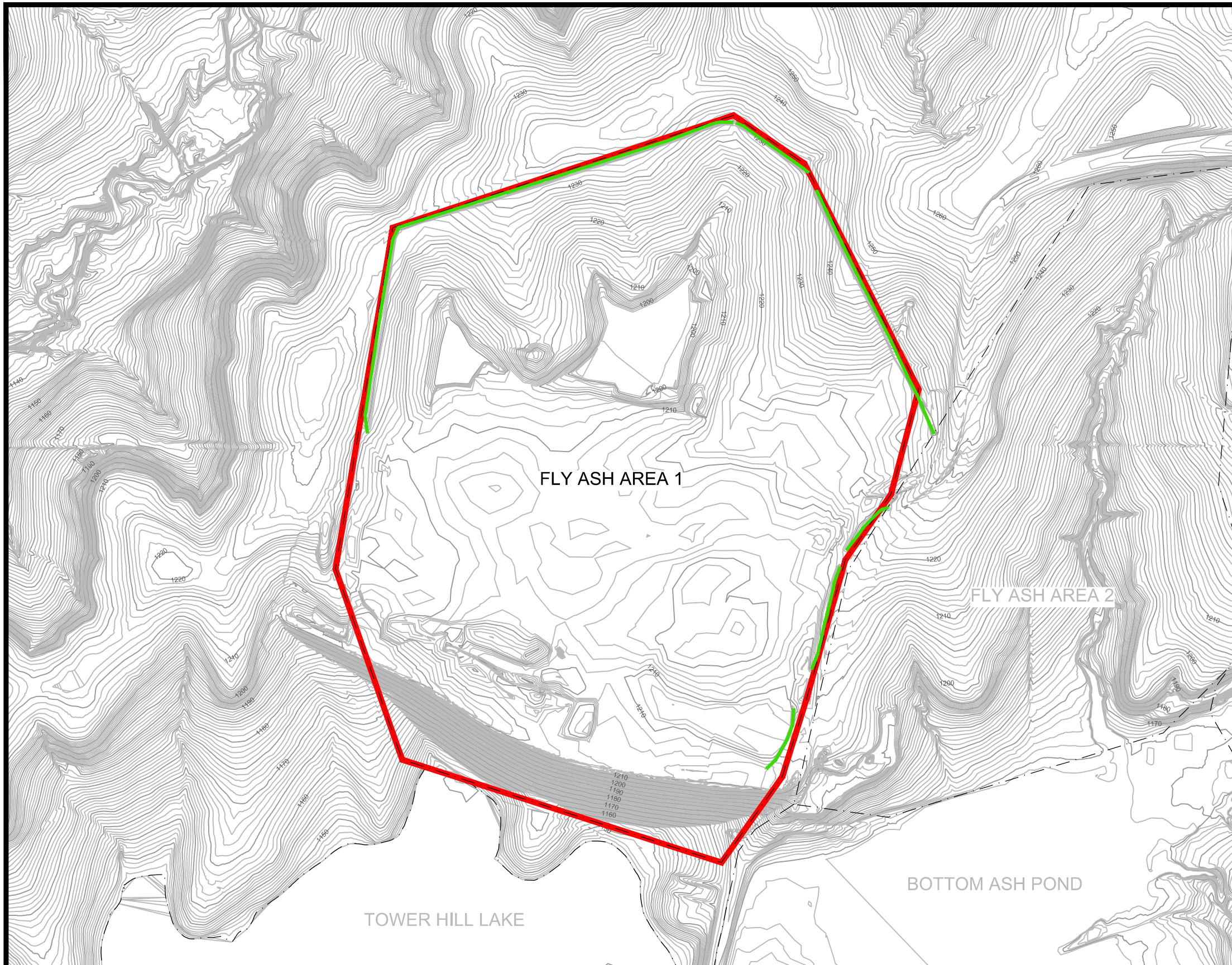
Figure 3 – Fly Ash Area 1, Current Least Tern Boundary Location

Figure 4 – Fly Ash Area 1, Permitted Final Landform










**LEGEND**

- CCR UNIT BOUNDARY
- EXISTING PERIMETER BERM

**NOTES**

1. EXISTING CONTOURS DEVELOPED BY PEC IN APRIL 2016.
2. FOR CLARITY, NOT ALL SITE FEATURES MAY BE SHOWN.
3. FLY ASH AREA 1 BOUNDARY IS APPROX. 98.8 ACRES.
4. ALL BOUNDARIES ARE APPROXIMATE.

REV. NO.	DATE	DESCRIPTION



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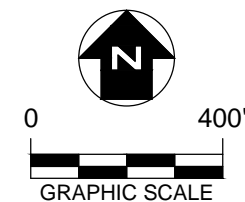
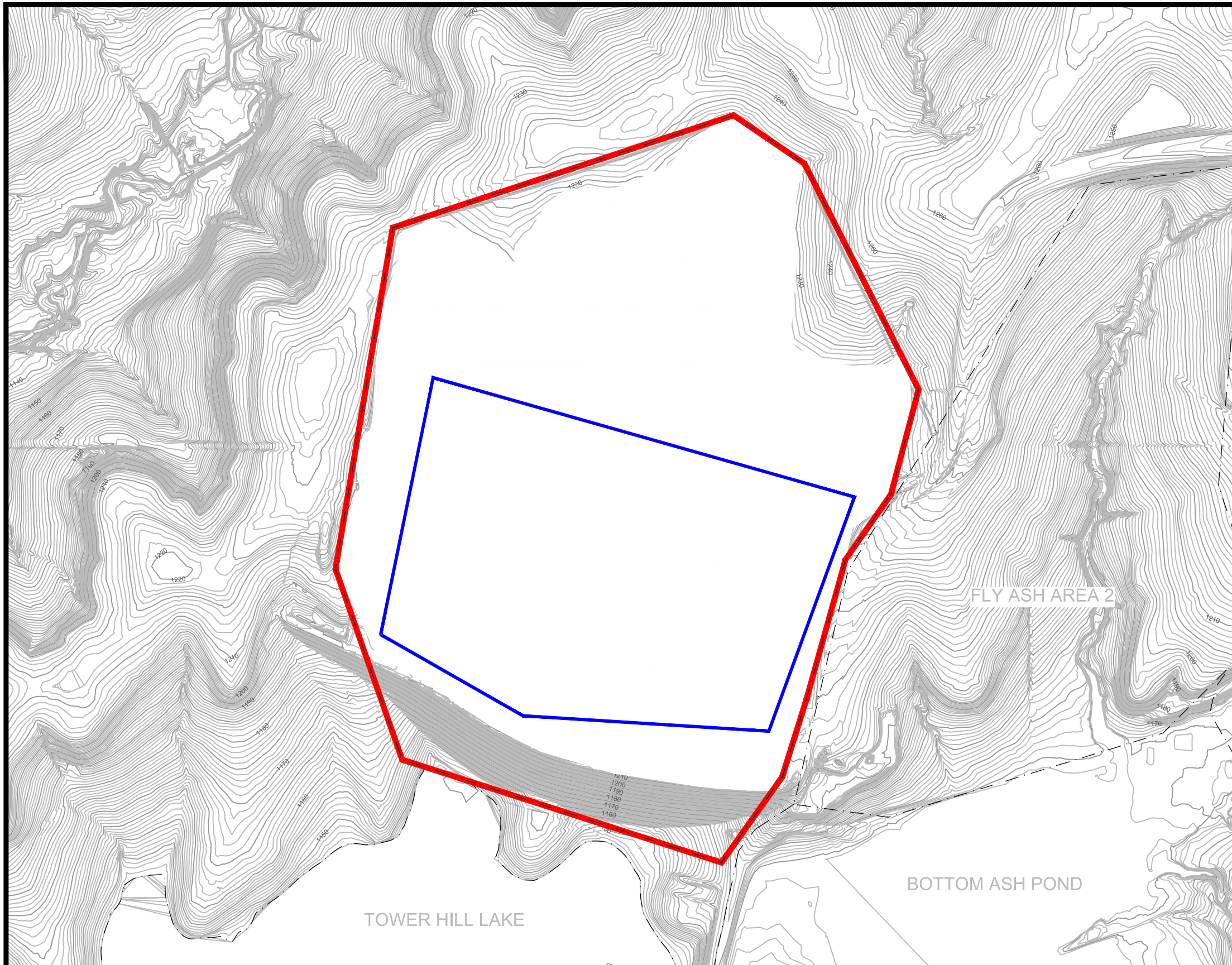
**WESTAR ENERGY**  
**25905 JEFFREY RD., ST. MARYS, KS**

**FIGURE 2**  
**FLY ASH AREA 1**  
**EXISTING SITE TOPOGRAPHY**

DRAWN BY: NV	APPROVED BY: MMS	PROJ. NO.: 631214397	DATE: OCTOBER 2016
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T:\AutoCAD\Projects\Westar Energy\Jeffrey\Final Grades and Current Grades.dwg, 9/28/2016 12:52:12 PM, DWG To PDF.pc3






**LEGEND**

- FLY ASH AREA 1 BOUNDARY
- LEAST TERN HABITAT FENCING (BASED ON CURRENT BREEDING LOCATIONS)

**NOTES**

1. EXISTING CONTOURS DEVELOPED BY PEC IN APRIL 2016.
2. FOR CLARITY, NOT ALL SITE FEATURES MAY BE SHOWN.
3. FENCE BOUNDARY BASED ON 2015 INTERIOR LEAST TERN NESTS MAP FOR JEFFREY ENERGY CENTER, U.S. FISH AND WILDLIFE SERVICES, 2015.
4. FLY ASH AREA 1 BOUNDARY IS APPROX. 98.8 ACRES.
5. LEAST TERN HABITAT IS APPROX. 34.5 ACRES.
6. ALL BOUNDARIES ARE APPROXIMATE.

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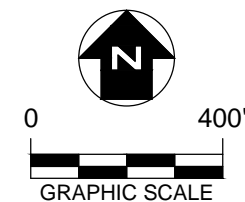
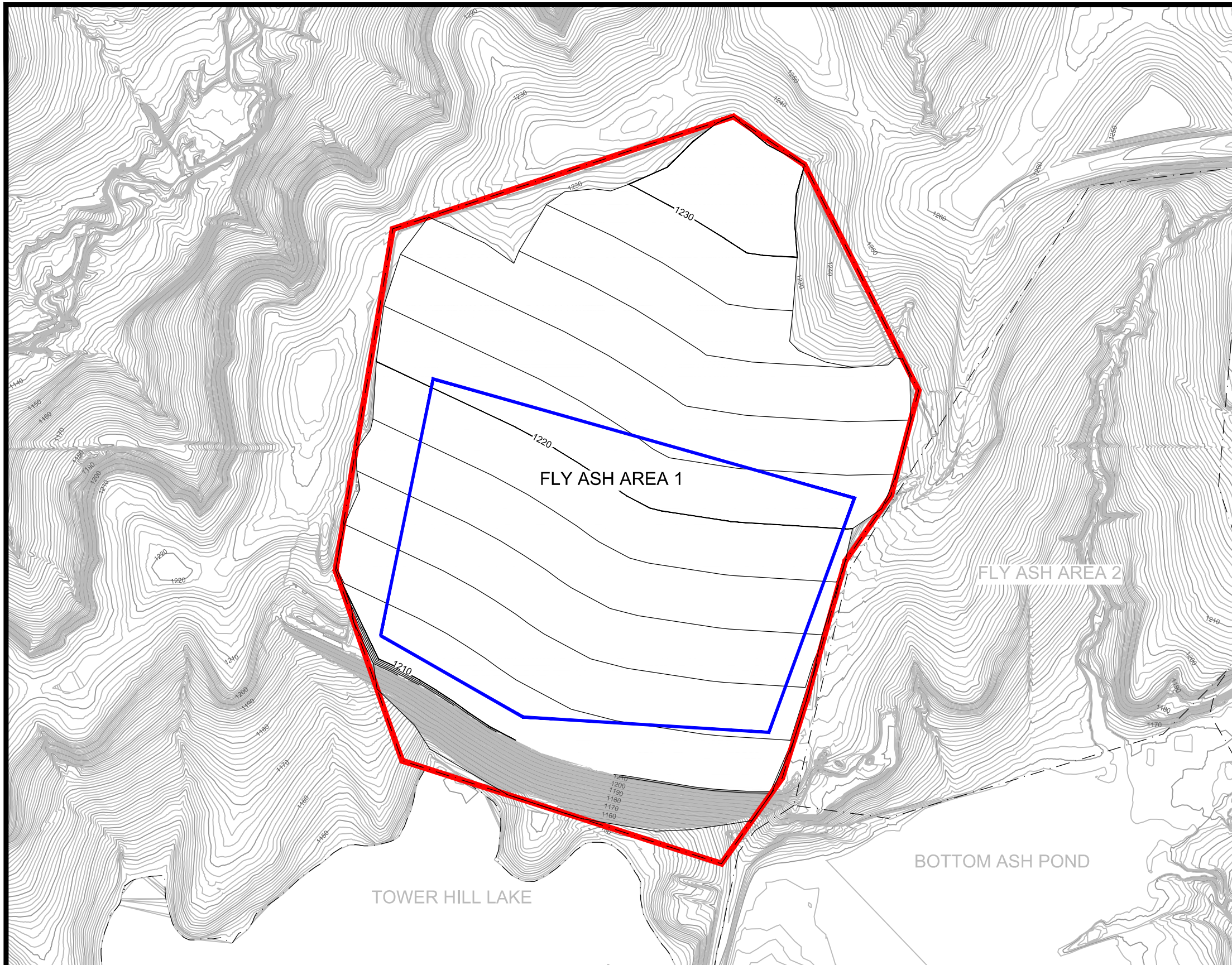
**WESTAR ENERGY**  
**25905 JEFFREY RD., ST. MARYS, KS**

**FIGURE 3**  
**FLY ASH AREA 1**  
**CURRENT LEAST TERN BOUNDARY FENCE LOCATION**

DRAWN BY:	ORC	APPROVED BY:	MMS	PROJ. NO.:	631214397	DATE:	OCTOBER 2016
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**LEGEND**

- CCR UNIT BOUNDARY
- EXISTING SITE CONTOUR
- PERMITTED SITE CONTOUR
- LEAST TERN HABITAT FENCING (BASED ON CURRENT BREEDING LOCATIONS)

**NOTES**

1. EXISTING CONTOURS DEVELOPED BY PEC IN APRIL 2016.
2. FINAL GRADES WERE TAKEN FROM KDHE-BWM INDUSTRIAL LANDFILL PERMIT NO. 0359.
3. FENCE BOUNDARY BASED ON 2015 INTERIOR LEAST TERN NESTS MAP FOR JEFFREY ENERGY CENTER, U.S. FISH AND WILDLIFE SERVICES, 2015.
4. FLY ASH AREA 1 BOUNDARY IS APPROX. 98.8 ACRES.
5. LEAST TERN HABITAT IS APPROX. 34.5 ACRES.
6. ALL BOUNDARIES ARE APPROXIMATE.

REV. NO.	DATE	DESCRIPTION

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**WESTAR ENERGY**  
**25905 JEFFREY RD., ST. MARYS, KS**

**FIGURE 4**  
**FLY ASH AREA 1**  
**PERMITTED FINAL LANDFORM**

DRAWN BY:	NV	APPROVED BY:	MMS	PROJ. NO.:	631214397	DATE:	OCTOBER 2016
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# APPENDICES

# APPENDIX A

## Post-Closure Cost Estimate

# Landfill Post-Closure Care - 2016 Annual Cost Estimate Worksheet - Kansas Department of Health & Environment

OWNER: <u>Westar Energy, Inc.</u>	PERMIT No.: <u>359</u>	
OPERATOR: <u>Westar Energy, Inc.</u>	ESTIMATOR: <u>CB&amp;I Environmental &amp; Infrastructure</u>	DATE: <u>October 2016</u>
TOTAL PERMITTED WASTE DISPOSAL: <u>299.3</u> ACRES	Post-Closure Plan Title: <u>Jeffrey Energy Center Post Closure</u>	Last Revision Date: _____
TOTAL PERMITTED AREA CERTIFIED CLOSED: <u>151.1</u> ACRES		
TOTAL PERMITTED VOLUME: _____ CU. YD.	PERMITTED VOLUME FILLED: _____ CU. YD.	PERMITTED VOLUME AVAILABLE: _____ CU. YD.
LANDFILL TYPE: _____ SUBTITLE D MUNICIPAL SOLID WASTE _____ SMALL ARID MUNICIPAL SOLID WASTE <input checked="" type="checkbox"/> INDUSTRIAL WASTE _____ CONSTRUCTION & DEMOLITION WASTE _____ WASTE TIRE MONOFILL		

## LANDFILL POST-CLOSURE CARE - ANNUAL COST ESTIMATE WORKSHEET Permit No.: \_\_\_\_\_

ITEM No.	ITEM	QUANTITY	UNITS	UNIT COST	COST	SUBTOTALS	SOURCE OF UNIT COST INFO or NA
<b>1.0.0</b>	<b>FINAL COVER ROUTINE MAINTENANCE</b>						
1.0.1	Inspect soil cover, vents, flares, drainage letdowns and outfalls, etc...	2	Event	\$640.00	\$1,280.00		16 man hours per year at \$80/ hour
1.0.2	Mowing/Trimming total acres twice per year	151.1	ACRE	\$132.00	\$19,945.20		
1.0.3	Clean Drain/Vent Openings	2	Event		\$0.00		
1.0.4	<b>Final Cover Routine Maintenance Annual Subtotal</b>					\$21,225.20	
<b>2.0.0</b>	<b>FINAL COVER REPAIRS</b>						
2.0.1	Remove/incorporate unacceptable materials (e.g., dead vegetation, solid waste)		ACRE		\$0.00		
2.0.2	Scarify and prepare surface	7.6	ACRE	\$1,297.00	\$9,857.20		Cost includes material removal and site prep for 5% of total closure area
2.0.3	Soil, On-Site (excavate, transport, place, compact)	12261	CU. YD.	\$4.75	\$58,239.75		1' of material for 5% of acreage to be repaired annually
2.0.4	Soil, Off-site (purchase, transport, place, compact)		CU. YD.		\$0.00		
2.0.5	Seeding and mulching	7.6	ACRE	\$2,104.00	\$15,990.40		Assume seed and mulch for 5% of area annually
2.0.6	Fertilizer	7.6	ACRE	\$330.00	\$2,508.00		Fertilize reseeded area
2.0.7	<b>Final Cover Repairs Annual Subtotal</b>					\$86,595.35	
<b>3.0.0</b>	<b>ACCESS ROAD REPAIRS</b>						
3.0.1	Reshape/regrade subgrade		SQ. YD.		\$0.00		
3.0.2	Gravel (purchase, transport, place)	10	TON	\$34.14	\$341.40		Assuming 300 tons of rock to be used for road repair during 30 year post-closure plan
3.0.3	Drainage Structures (e.g., culverts)		Lin. FT.		\$0.00		
3.0.4	Riprap ditching/channels		Lin. FT.		\$0.00		
3.0.5	<b>Access Roads Repair Annual Subtotal</b>					\$341.40	
<b>4.0.0</b>	<b>SURFACE WATER MANAGEMENT OPERATION AND MAINTENANCE (O&amp;M)</b>						
4.0.1	Collection system operation and maintenance (ditches, piping conveyances, outfalls, sampling points repair/replace)	11067	Linear FT	\$0.19	\$2,102.73		2016 RS Means clearing and cleaning drainage channels (\$0.19/ L.F.)
4.0.2	Stormwater storage (sediment pond) operation/repairs	1	Lump Sum		\$0.00		
4.0.3	Sample collection ( _52_ events per year)	0	Event	\$0.00	\$0.00		
4.0.4	Sample analysis and reporting ( _12_ events per year)	0	Event	\$0.00	\$0.00		
4.0.5	<b>Surface Water Management O&amp;M Annual Subtotal</b>					\$2,102.73	
<b>5.0.0</b>	<b>LEACHATE COLLECTION SYSTEM O&amp;M</b>						
5.0.1	Generation Rate = _____ gal./ac./yr.						
5.0.2	Clean Leachate Line	1	Annual		\$0.00		
5.0.3	Collection operation/maintenance (pump, piping, storage...operation/repair/replace)	12	Months		\$0.00		NA
5.0.4	Leachate loading, off-loading and off-site transportation		Event		\$0.00		NA
5.0.5	Leachate Treatment/Disposal		Gal.		\$0.00		NA
5.0.6	Additional/upgrades for piping, pumps and storage		Lump Sum		\$0.00		NA
5.0.7	Leachate sample collection		EACH		\$0.00		NA
5.0.8	Leachate sample analysis and reporting		EACH		\$0.00		NA
5.0.9	<b>Leachate Collection System O&amp;M Annual Subtotal</b>					\$0.00	
<b>6.0.0</b>	<b>GROUNDWATER MONITORING SYSTEM O&amp;M</b>						



6.0.1	Number of Wells in Approved System = <u>8</u>						
6.0.2	Well maintenance (e.g., protective casing (lock & hinges) repair/replacement, well pad repair/replace, etc...)	0.8	EACH	\$503.00	\$402.40		Pro-rated maintenance cost for maintenance on 8 wells every ten years.
6.0.3	Abandon & plug existing wells	0.4	EACH	\$1,328.00	\$531.20		Pro-rated cost to abandon and plug 12 wells over 30 years. Eight wells currently existing plus four replacement wells as required by KDHE for replacement of 50% of groundwater wells.
6.0.4	Rehabilitate/redevelop existing wells	0.8	EACH	\$452.00	\$361.60		Pro-rated maintenance cost to rehabilitate 8 wells every ten years.
6.0.5	Well Replacement	0.133	EACH	\$6,500.00	\$864.50		Pro-rated cost for 4 new wells over 30 year post-closure period.
6.0.6	Sample collection (2 events per year)	2	Event	\$2,150.00	\$4,300.00		Sampling cost from Blackstone Environmental invoicing
6.0.7	Sample analysis and reporting (2 events per year)	2	Event	\$14,100.00	\$28,200.00		Analysis and report cost from Blackstone Environmental invoicing
6.0.8	<b>Groundwater Monitoring System O&amp;M Annual Subtotal</b>					\$34,659.70	

**Landfill Post-Closure Care - 2016 Annual Cost Estimate Worksheet** Permit No.:

ITEM No.	ITEM	QUANTITY	UNITS	UNIT COST	COST	SUBTOTALS	SOURCE OF UNIT COST INFO or NA
7.0.0	<b>GAS MONITORING SYSTEM O&amp;M</b>						
7.0.1	Number of Gas Monitoring Probes/Wells = _____						
7.0.2	Methane monitoring of probes/wells (4 per year)	0	Event		\$0.00		NA
7.0.3	Methane monitoring at site boundary and structures (4 per year)	0	Event		\$0.00		NA
7.0.4	Sample analysis and reporting	0	Event		\$0.00		NA
7.0.5	<b>Gas Monitoring System O&amp;M Annual Subtotal</b>					\$0.00	
8.0.0	<b>GAS EXTRACTION SYSTEM O&amp;M</b>						
8.0.1	Gas vents, _____ # of vents, _____ average depth						
8.0.2	<b>Passive System</b>						
8.0.3	Passive well head turbine maintenance		EACH		\$0.00		NA
8.0.4	<b>Active System</b>						
8.0.5	Flare, _____ BTU/hour		EACH		\$0.00		NA
8.0.6	Additional Well Installation/Upgrades		EACH		\$0.00		NA
8.0.7	Ancillary gas equipment repair/replacement (piping, blowers, condensate collection)	1	Lump Sum		\$0.00		NA
8.0.8	<b>Gas Extraction System O&amp;M Annual Subtotal</b>					\$0.00	
9.0.0	<b>CORRECTIVE ACTION EVALUATION AND IMPLEMENTATION</b>						
9.0.1	Resurvey monitoring well reference points and site benchmarks (prorate for annual expenses)		EACH		\$0.00		
9.0.2	Remove sediments from stormwater basin(s) (prorate for annual expenses)		EACH		\$0.00		NA
9.0.3	Groundwater exceedances statistical evaluation (		EACH		\$0.00		
9.0.4	Groundwater alternate source determination) (prorate for annual expenses)		EACH		\$0.00		
9.0.5	Other: _____	1	Lump Sum		\$0.00		
9.0.6	<b>Corrective Action Evaluation and Implementation Annual Subtotal</b>					\$0.00	
10.0.0	<b>POST-CLOSURE CARE ANNUAL COST SUBTOTAL</b>					\$144,924.38	
11.0.0	Administrative Services (Post-Closure Cost Subtotal [10.0.0] x 6%)				\$8,695.46		
12.0.0	Contingency (Post-Closure Cost Subtotal [10.0.0] x 10%)				\$14,492.44		
13.0.0	<b>PROFESSIONAL SERVICES</b> (Post-Closure Cost Subtotal [10.0.0] x 7%) <b>OR</b> Enter costs provided by third party with sources listed in line items below				\$10,144.71		
13.0.1	Engineering (annual inspection and reporting, corrective action design and bid, contract management)	1	Lump Sum		\$0.00		
13.0.2	Topographic and Boundary Survey	1	Lump Sum		\$0.00		
13.0.3	Corrective Action Engineering Services (construction oversight, testing, reporting, certification)	1	Lump Sum		\$0.00		
14.0.0	<b>Subtotal of Line Items 11.0.0 through 13.3.0</b>					\$43,477.31	
	<b>TOTAL ESTIMATED ANNUAL POST-CLOSURE CARE COST</b>					\$188,401.69	
<b>(2016) ESTIMATED 30 YEAR POST-CLOSURE CARE COST</b>			"Total Estimated Annual Post Closure Care Cost" x 30 years		<b>\$5,652,050.82</b>	For all operational sites	

<b>(2017) ESTIMATED 30 YEAR POST-CLOSURE CARE COST</b>		\$5,821,612.34	2016 Post-Closure Cost plus 3% per KDHE guidance
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Estimator: \_Michelle Spruth on behalf of CB&I for Westar Energy\_\_\_\_\_

(Printed Name)

\_\_\_\_\_

Signature

Date: \_\_\_\_\_