



Memorandum

To: Jay Martin, PE (Evergy)
From: Richard Southorn, PE, PG
Date: May 7, 2020
Re: Engineer's Certification of CCR Compliance
Lawrence Energy Center Landfill Cell 4 Construction

The purpose of this memorandum is to provide the Professional Engineer certification, as required by 40 CFR 257.70 (f)(2), that Cell 4 of the Lawrence Energy Center Landfill (Kansas Solid Waste Permit #0847) was constructed in compliance with 40 CFR 257(70).

On November 30, 2017, Aptim Environmental and Infrastructure, Inc. (APTIM, now Aptim Environmental and Infrastructure, LLC) completed a report titled "Lawrence Energy Center Comprehensive Design Modification Report, Industrial Landfill #0847" (Comprehensive Design Modification Report) The Comprehensive Design Modification Report presents updated design and construction protocols for Landfill 0847 at the Lawrence Energy Center, which is permitted under Permit No. 0847 by the Bureau of Waste Management, Solid Waste Permit Section, Kansas Department of Health and Environment. The purpose of the Comprehensive Design Modification Report is to define design and construction modifications for Cells 4-8 (lateral expansion areas of the 2017 landfill footprint) in order to comply with requirements specified in the Disposal of Coal Combustion Residuals from Electric Utilities Final Rule (CCR Rule) 40 CFR §257 and §261. This landfill had been permitted prior to the implementation of the CCR Rule. The design specified in the Comprehensive Design Modification Report now serves as the permitted landfill design under Permit No. 0847.

Within this report, certification was provided by the undersigning Kansas Professional Engineer Richard David Southorn (License No. PE25201), certified that the design and construction protocols for the modified Landfill in the lateral expansion areas were prepared in accordance with good engineering practice, the applicable industry standards, and met the requirements of 40 CFR §257.70, §257.81, §257.102 and K.A.R. 28-29-104, 28-29-108, 28-29-121. This certification was prepared as required by §257.70(e).

On July 13, 2018, APTIM completed a report titled "Lawrence Energy Center Cell 4 Bottom Liner System Construction Quality Assurance Acceptance Report" (CQA Report). The CQA Report documented all construction activities that took place during the construction of the bottom liner system for Cell 4 of Landfill 0847. The report specifies that the Cell 4 Bottom Liner system was constructed in general accordance with the engineering design and specifications identified in the Comprehensive Design Modification Report. In accordance with KDHE Bureau of Waste Management Policy 00-04, Kansas Professional Engineer Richard David Southorn certified within the CQA Report that the construction of the Cell 4 Bottom Liner was completed under his direction and in general accordance with the engineering design and specifications approved by KDHE Permit No. 0847.

This engineering certification is provided to attest to the above provided information and to provide clarification that the design of the composite liner (alternative composite liner) and the leachate collection and removal system that were constructed in Cell 4 of Landfill 0847 are in accordance with §257.70 of the CCR Rule.



Richard D. Southorn, P.E., P.G.
Professional Engineer Registration No. 25201
APTIM Environmental & Infrastructure, LLC
1607 E. Main Street, Suite E
St. Charles, IL 60174