

2019 ANNUAL CCR INSPECTION

Facility Name: Lawrence Energy Center (LEC)
 Owner/Operator Name: Westar Energy
 CCR Unit: Area 2 Pond, Area 3 Pond, and Area 4 Pond (inactive)
 Inspection Date: April 29, 2019

USEPA CCR Rule Criteria 40 CFR §257.83	Area 2 Pond, Area 3 Pond, and Area 4 Pond (inactive) Annual Inspection Results
<p>§257.83(b)(2)(i) stipulates: <i>“(2) Inspection report. The qualified professional engineer must prepare a report following each inspection that addresses the following: (i) Any changes in geometry of the impounding structure since the previous annual inspection;”</i></p>	<p>A visual inspection of the LEC inactive Area 2 Pond, Area 3 Pond, and the Area 4 Pond and associated hydraulic structures was conducted on April 29, 2019 by Mr. Richard Southorn, a qualified professional engineer (QPE). The Area 2, 3, and 4 Ponds underwent closure by removal construction in July 2018. Certification of closure has not yet been completed. Changes in geometry since the previous annual inspection include completion of closure construction of the Storm Water Settling Pond and Ditch to Storm Water Settling Pond, which included moderate excavation, fill placement, and and installation of a clay liner.</p>
<p>§257.83(b)(2)(ii) stipulates: <i>“(ii) The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection;”</i></p>	<p>No instrumentation devices associated with the hydraulic structures, impoundment embankments, perimeter dike, or slope performance are installed at, or near, the Area 2, 3, and 4 Ponds.</p>
<p>§257.83(b)(2)(iii) stipulates: <i>“(iii) The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection;”</i></p>	<p>The present depth of water in the Area 2 and 3 Ponds frequently changes depending on plant operations and rainfall events. There is no impounded water in the Area 4 Pond. Based on the closure design, the minimum and maximum water depth in the Area 2, 3, and 4 Ponds is 0 ft (all CCR was removed from the Area 4 Pond and it has been removed from service) to approximately 19 ft (Pond 404 in the Area 3 Pond). There are no minimum, maximum, or present CCR depths/elevations in the Area 2, 3, or 4 Ponds due to the removal of CCR from the unit for the closure by removal project.</p>
<p>§257.83(b)(2)(iv) stipulates: <i>“(iv) The storage capacity of the impounding structure at the time of the inspection;”</i></p>	<p>The storage capacity of the Area 2, 3, and 4 Ponds was reported to be 273 acre-ft, 185 acre-ft, and 70.5 acre-ft in the 2018 Annual Inspection Report. Due to pending closure, the Area 2, 3, and 4 Ponds no longer store CCR material.</p>
<p>§257.83(b)(2)(v) stipulates: <i>“(v) The approximate volume of the impounded water and CCR at the time of the inspection;”</i></p>	<p>There is no impounded water in the Area 4 Pond. Water in the Area 2 Pond and Area 3 Pond follows NPDES regulations and the volume varies greatly depending on plant operations, stormwater conditions and associated NPDES permitted discharges. There is no CCR in the Area 2, 3, or 4 Ponds due to the removal of CCR from the unit for the closure by removal project.</p>

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§257.83(b)(2)(vi) stipulates: <i>"(vi) Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit and appurtenant structures;"</i>	At the time of this inspection, there were no signs of distress or malfunction that would indicate actual or potential structural weakness of the perimeter impoundment dike. There was no indication that existing conditions or closure activities at the Area 2, 3, and 4 Ponds have disrupted or have the potential to disrupt safety or operations.
§257.83(b)(2)(vii) stipulates: <i>"(vii) Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection."</i>	There have been no changes to the perimeter dike since the previous annual inspection. Any changes to the Area 2, 3, and 4 Ponds from the previous site inspections will not pose a threat or concern to the stability of the perimeter dike or operations at LEC.

PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of the CCR Rule and has visited and examined LEC or has supervised examination of LEC by appropriately qualified personnel. I hereby certify based on a review of available information within LEC's operating records and observations from my personal on-site inspection, that the Area 2, 3, and 4 Ponds do not exhibit any appearances of actual/potential structural weakness that would be disruptive to the normal operations of the LEC CCR Units. The units are being operated and maintained consistent with recognized and generally accepted good engineering standards and practices. This certification was prepared as required by 40 CFR Part §257.83.

Name of Professional Engineer: Richard Southorn

Company: APTIM

Professional Engineer Seal:

