## 2018 ANNUAL INSPECTION REPORT OF CCR LANDFILL BY QUALIFIED PROFESSIONAL ENGINEER 40 CFR 257.84

| FACILITY INFORMATION   |                                                                         |  |
|------------------------|-------------------------------------------------------------------------|--|
| Facility Name/ Address | Montrose Generating Station / 400 SW Highway P, Clinton, Missouri 64735 |  |
| Owner Name             | Kansas City Power & Light Company                                       |  |
| CCR Unit               | CCR Landfill                                                            |  |
| Inspection Date        | November 20, 2018                                                       |  |

| ANNUAL CCR UNIT INSPECTION REPORT                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                              |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Rule                                                                                                                                                                                                                                               | Inspection Results                                                                                                                                                                                                                                                                                           |  |
| §257.84(b)(2)(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 structure since the previous annual inspections;" | A visual inspection of the CCR Landfill was completed on November 20, 2018 by Mr. Patrick Goeke, a qualified professional engineer (QPE), and/or his designated representative. No changes in the geometry of the landfill exterior berms were noted since the 2017 site inspection. Approximately 0 to 3.5. |  |
| previous unitida inspections,                                                                                                                                                                                                                      | since the 2017 site inspection. Approximately 0 to 3.5 feet of CCR material was added to the upper areas of the northeastern third of the landfill since the previous annual inspection.                                                                                                                     |  |
| §257.84(b)(2)(ii):  "(ii) The approximate volume of CCR contained in the unit at the time of the inspection;"                                                                                                                                      | The approximate volume of CCR contained in the unit at the time of inspection was 1.9 million cubic yards <sup>1</sup> .                                                                                                                                                                                     |  |
| §257.84(b)(2)(iii):  "(iii) 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;"  | At the time of this inspection, there were no signs of actual or potential structural weakness or existing conditions that would disrupt or have the potential to disrupt the operation and/or safety of the CCR landfill. No signs of distress or malfunction were observed.                                |  |
| §257.84(b)(2)(iv):  "(iv) Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection.                                                                                             | There have been no changes to the landfill that have affected the stability or operation of the CCR unit since the previous annual inspection.                                                                                                                                                               |  |

- 1. The 2018 volume calculations were completed by SCS Engineers using AutoCAD and the client supplied surface data from the November 29, 2017 and December 13, 2018 topographic surveys prepared by Whitehead Consultants.
- 2. The QPE reviewed §257.84(a)(1) 7-day reports as part of the annual inspection.

## PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of the CCR Rule and has visited and examined the CCR unit or has supervised examination of the CCR unit by appropriately qualified personnel. I hereby certify based on a review of available information within the Montrose Generating Station's operating records and observations from my and/or my designated representative's personal on-site inspection, that this CCR unit does not exhibit any appearances of actual/potential structural weakness that would be disruptive to the safety or normal operations of the CCR unit. The unit is 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 §257.84.

Name of Professional Engineer: \_ Patrick M. Goeke, P.E.

PATRIC.
MICHAEL
GOEKE
NUMBER
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Professional Engineer Seal: