

SPURLOCK STATION LANDFILL AREA C, PHASE 4 CELL CONSTRUCTION

DESIGN CRITERIA COMPLIANCE DEMONSTRATION



EAST KENTUCKY POWER COOPERATIVE

COAL COMBUSTION RESIDUAL RULE COMPLIANCE

REV. 0 (7/12/2018)

Kenvirons, Inc.

CERTIFICATION

EAST KENTUCKY POWER COOPERATIVE, INC. SPURLOCK STATION LANDFILL AREA C, PHASE 4 CELL CONSTRUCTION DESIGN CRITERIA COMPLIANCE DEMONSTRATION

CERTIFICATION

I hereby certify, as a Professional Engineer in the Commonwealth of Kentucky, that East Kentucky Power Cooperative's Spurlock Station Landfill, Area C, Phase 4 Cell Construction has been designed to meet the requirements of the following provisions of the CCR Rule: 40 CFR § 257.70.

I further certify that the information in this document was assembled under my direct supervisory control. This report is not intended or represented to be suitable for reuse by East Kentucky Power Cooperative or others without specific verification or adaptation by the Engineer.

S. Tim Oakes, P.E. [21,483] – Kenvirons, Inc.

Date: 7/12/18



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1.0 INTRODUCTION

On April 17, 2015, the Environmental Protection Agency (EPA) issued the final version of the federal Coal Combustion Residual Rule (CCR Rule) to regulate the disposal of coal combustion residual (CCR) materials generated at coal-fired units. The rule will be administered as part of the Resource Conservation and Recovery Act [RCRA, 42 United States Code (U.S.C.) §6901 et seq.], under Subtitle D.

East Kentucky Power Cooperative (EKPC) is subject to the CCR Rule and as such will demonstrate compliance with design criteria per 40 CFR §257.70. This document serves as EKPC's design criteria certification for Area C, Phase 4 Cell Construction at Spurlock Station Landfill. Phase 4 cell construction is defined as a lateral expansion of the existing CCR landfill per 40 CFR §257.53. Phase 4 Cell Construction Plans can be found in Attachment 1.

A compliance summary of the CCR Rule design criteria requirements addressed in this document are provided in Table 1-1 below.

DESIGN CRITERIA								
Unit: Spurlock Station Landfill Lateral Expansion (Area C, Phase 4 Cell Construction)								
DESCRIPTION	CCR RULE COMPLIANCE							
DESCRIPTION	YES	NO	REPORT REFERENCE					
Composite Liner ¹	\boxtimes		See Sections 2.1 through 2.5					
Leachate Collection & Removal System			See Section 2.6 (2.6.1 – 2.6.3)					

TABLE 1-1 DESIGN CRITERIA SUMMARY

¹ Certification applicable to Composite Liner of 40 CFR §257.70(b).

2.0 **DESIGN CRITERIA**

40 CFR §257.70(a)(1) states that new CCR landfills "must be designed, constructed, operated, and maintained with either a composite liner that meets the requirements of paragraph (b) of this section or an alternative composite liner that meets the requirements in paragraph (c) of this section, and a leachate collection and removal system that meets the requirements of paragraph (d) of this section."

2.1 Composite Liner

40 CFR §257.70(b) states "A composite liner must consist of two components; the upper component consisting of, at a minimum, a 30-mil geomembrane liner (GM), and the lower component consisting of at least a two-foot layer of compacted soil with a hydraulic conductivity of no more than 1×10^{-7} centimeters per second (cm/sec). GM

components consisting of high density polyethylene (HDPE) must be at least 60-mil thick. The GM or upper liner component must be installed in direct and uniform contact with the compacted soil or lower liner component."

Phase 4 Lateral Expansion incorporates components specified by 40 CFR §257.70(b) which are an upper component consisting of a textured 60-mil HDPE geomembrane and a lower component consisting of two feet of compacted soil with a hydraulic conductivity of no more than $1x10^{-7}$ cm/sec.

2.2 Chemical Properties, Strength and Thickness of Materials

40 CFR §257.70 (b)(1) states that the composite liner must be: "Constructed of materials that have appropriate chemical properties and sufficient strength and thickness to prevent failure due to pressure gradients (including static head and external hydrogeologic forces), physical contact with the CCR or leachate to which they are exposed, climatic conditions, the stress of installation, and the stress of daily operation;"

The list below describes how the composite liner system design meets the requirements of 40 CFR §257.70 (b)(1) referenced above.

- 1. The 60-mil HDPE geomembrane materials are chemically compatible with CCR waste per manufacturer historic laboratory analysis.
- 2. A deformation and post-earthquake analysis performed by Stantec in June 2018 determined a maximum permanent deformation to be approximately 0.04 inches for the critical liner interface, well below the allowable range of 6 to 12 inches.
- 3. As discussed in Section 2.1, if isolated saturated zones (seeps) are encountered within the vadose zone during construction of the liner system, an underdrain will be installed to capture and convey groundwater seeps outside the landfill to control external hydrogeologic forces.
- 4. The subgrade (base) will be constructed following a CQA Plan to promote a stable support for the composite liner materials and resist static head forces.
- 5. All geosynthetic liner materials will be installed per manufacturer and CQA Plan guidelines to minimize installation stresses including stresses applied by construction equipment.
- 6. The initial lifts of CCR, next to the liner system, will be placed during filling operations at specified thicknesses and with equipment that will apply no more than 5 psi on the geomembrane component of the liner system.
- 7. The climatic conditions at the facility are relatively humid with abundant rainfall. The normal monthly mean temperature ranges from 30° F in January to 76° F in July. Average daily relative humidity ranges from 45% to 95% with the average annual precipitation around 47.3 inches. The CQA Plan and industry standards

(ex: Geosynthetic Research Institute – GRI) provide guidelines for material endurance impacted by climatic conditions such as ultra violet radiation (UV) and weather exposure. These guidelines are incorporated into the design to provide a composite liner that is compatible with the site's climatic conditions.

2.3 Shear Resistance

40 CFR §257.70(b)(2) states that the composite liner must be: "Constructed of materials that provide appropriate shear resistance of the upper and lower component interface to prevent sliding of the upper component including on slopes;"

The slope stability of the landfill is predominately controlled by the frictional resistance at the anticipated critical interface of the composite liner system and also by the shear strength parameters of the waste, drainage layer, compacted soil layer and subgrade (base). A global slope stability analysis was conducted by Stantec (dated December 2016) as part of the landfill design process to determine acceptable friction angles for the composite liner. The analysis determined that the minimum friction angle for components of the composite liner remain stable at 12.4 degrees using a factor of safety of 1.25.

2.4 Composite Liner Foundation or Base

40 CFR §257.70(b)(3) states that the composite liner must be: "Placed upon a foundation or base capable of providing support to the liner and resistance to pressure gradients above and below the liner to prevent failure of the liner due to settlement, compression, or uplift;"

Site specific geotechnical and hydrogeological investigations were performed for the landfill site to determine suitability. Likewise, a structural integrity analysis was conducted, which included the designed base or foundation (subgrade) of the landfill. The base of the landfill will be mainly constructed of bedrock and/or engineered structural fill. The structural fill will be placed in areas to meet grade requirements. The structural fill layer was modeled with shear strength parameters of 28 degrees and zero cohesion, along with a unit weight of 120 pounds per cubic foot (pcf). The computer analysis was performed with the composite liner components and subgrade (base) under saturated conditions with the following results: A minimum static factor of safety of 2.0 was determined from the stability models compared to a target factor of safety of 2.0. Construction methodologies based on the design and CQA Plan will ensure a competent base is prepared to resist pressure gradients per 40 CFR §257.70 (b)(3).

2.5 Composite Liner Limits

40 CFR §257.70(b)(4) states that the composite liner must be: "Installed to cover all surrounding earth likely to be in contact with the CCR or leachate."

The design limits of the composite liner system specified in the design documents cover all surrounding earth likely to be in contact with CCR or leachate.

2.6 Leachate Collection and Removal System

40 CFR §257.70(d) states "The leachate collection and removal system must be designed, constructed, operated, and maintained to collect and remove leachate from the landfill during the active life and post-closure care period. The leachate collection and removal system must be: (1) Designed and operated to maintain less than a 30-centimeter depth of leachate over the composite liner or alternative composite liner; (2) Constructed of materials that are chemically resistant to the CCR and any non-CCR waste managed in the CCR unit and the leachate expected to be generated, and of sufficient strength and thickness to prevent collapse under the pressures exerted by overlying waste, waste cover materials, and equipment used at the CCR unit; and (3) Designed and operated to minimize clogging during the active life and post-closure care period."

2.6.1 Maximum Depth of Leachate

The leachate collection system designed for the landfill was designed to maintain less than 30 centimeters depth of leachate over the composite liner system. The HELP model (Hydrogeologic Evaluation of Landfill Performance) was used to predict leachate production under operational and closed conditions. The model was performed for all composite liner system options included in the design documents.

2.6.2 Chemical Properties, Strength and Thickness of Materials

The leachate collection system design consist of polypropylene, HDPE and naturally occurring durable gravel materials. The man-made materials are chemically stable, do not rot and are resistant to oxidation and microorganisms. Gravel materials incorporated into the design are durable materials resistant to deterioration in a CCR leachate environment. All materials have the appropriate thickness and strength to resist collapse under the pressures of the waste, cover, and equipment.

2.6.3 Minimize Clogging

Materials specified in the design documents are selected to minimize clogging during the active life and 30 year post closure care period. Materials selected to provide filtering of the leachate collection system components have been designed and tested by the manufacturers to minimize clogging when subjected to CCR waste. Representative hydraulic conductivity ratio (HCR) testing has been performed with acceptable results per GRI guidelines for minimal clogging.

3.0 **REPORT LIMITATIONS**

This report is based on observations made of features that could be visually seen at the time of site reconnaissance, review of previous engineering investigations and design documents, permits and survey information provided by EKPC as well as work performed by Kenvirons for the design of Area C, Phase 4 Cell Construction. The design basis and documents are based on Kenvirons' understanding of current plant operations, maintenance, storm water handling and CCR handling procedures for the landfill, as provided by EKPC. Changes in any of these operations or procedures may result in deviation from the intended design and operation of the landfill.

The design is based on established engineering principles and provided in a manner consistent with the level of care and skill ordinarily exercised by the engineering consultants under similar circumstances. No other representation is intended.

ATTACHMENT 1

AREA C, PHASE 4 CELL CONSTRUCTION PLANS

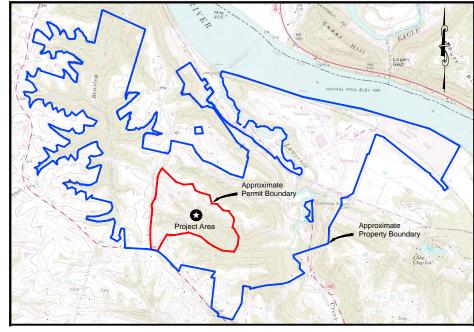
EAST KENTUCKY POWER COOPERATIVE, INC. **SPURLOCK STATION LANDFILL**

MASON COUNTY, KENTUCKY **PERMIT NO. 081-00005**

AREA C, PHASE 4 CONSTRUCTION DRAWINGS FEBRUARY 2018

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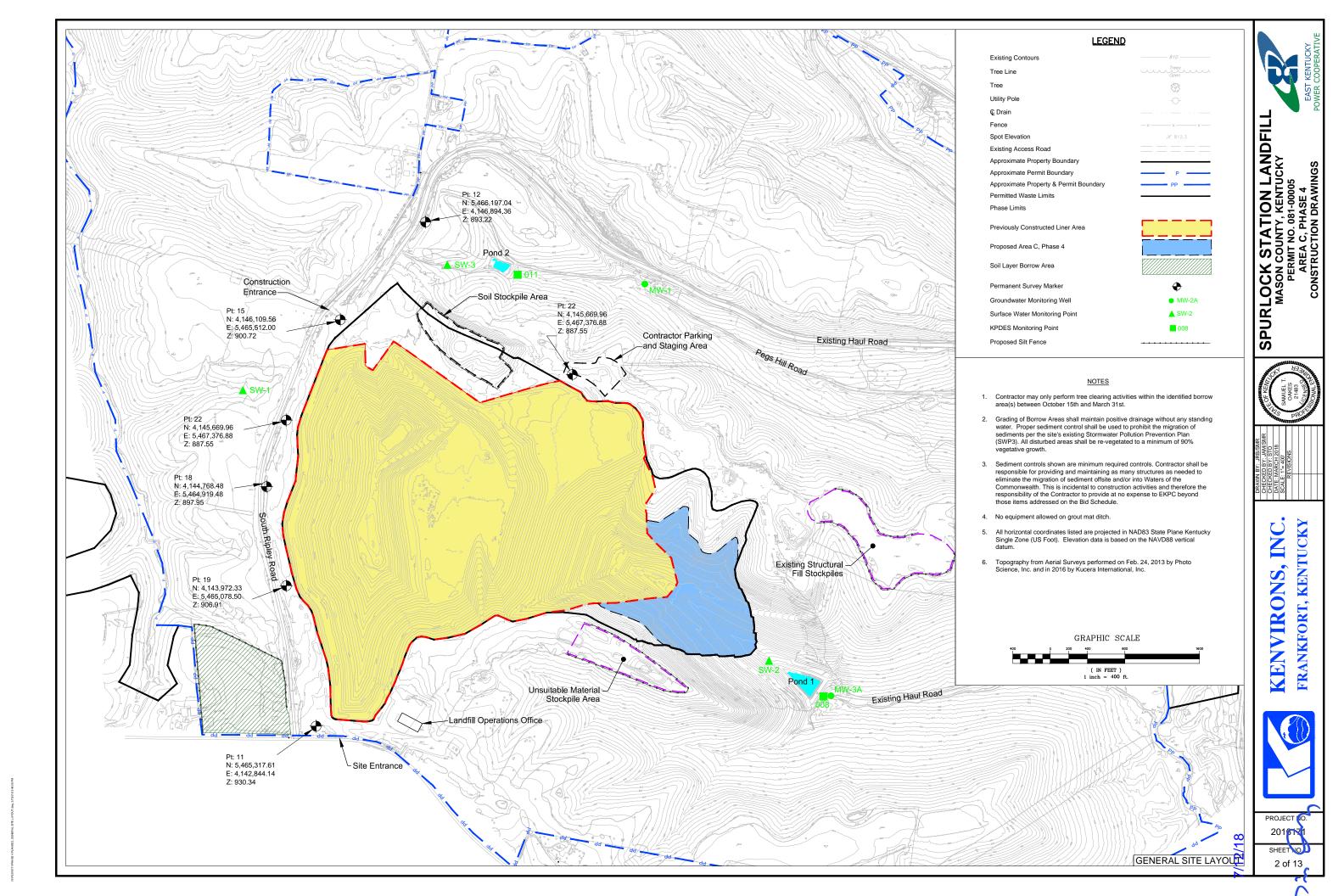


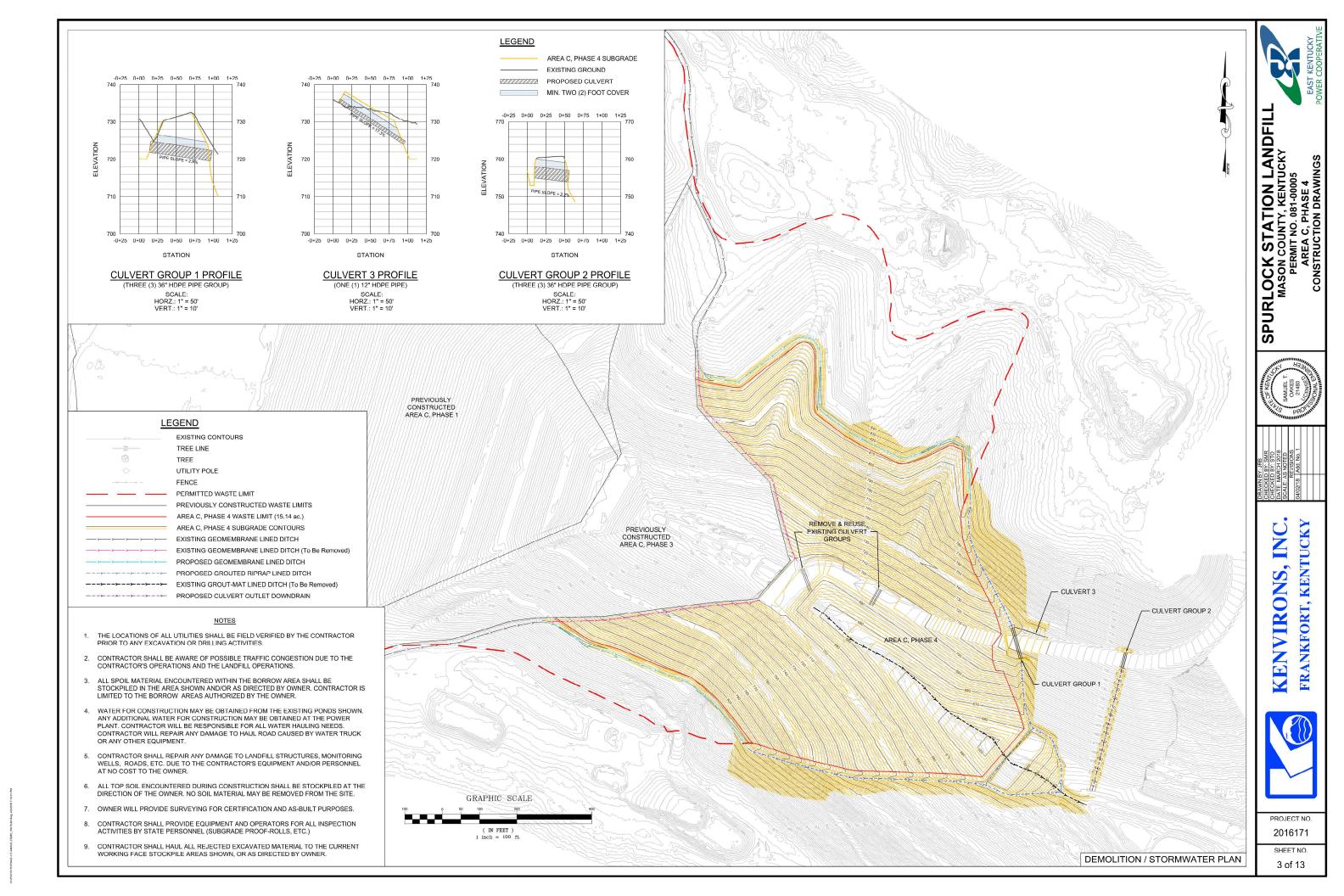
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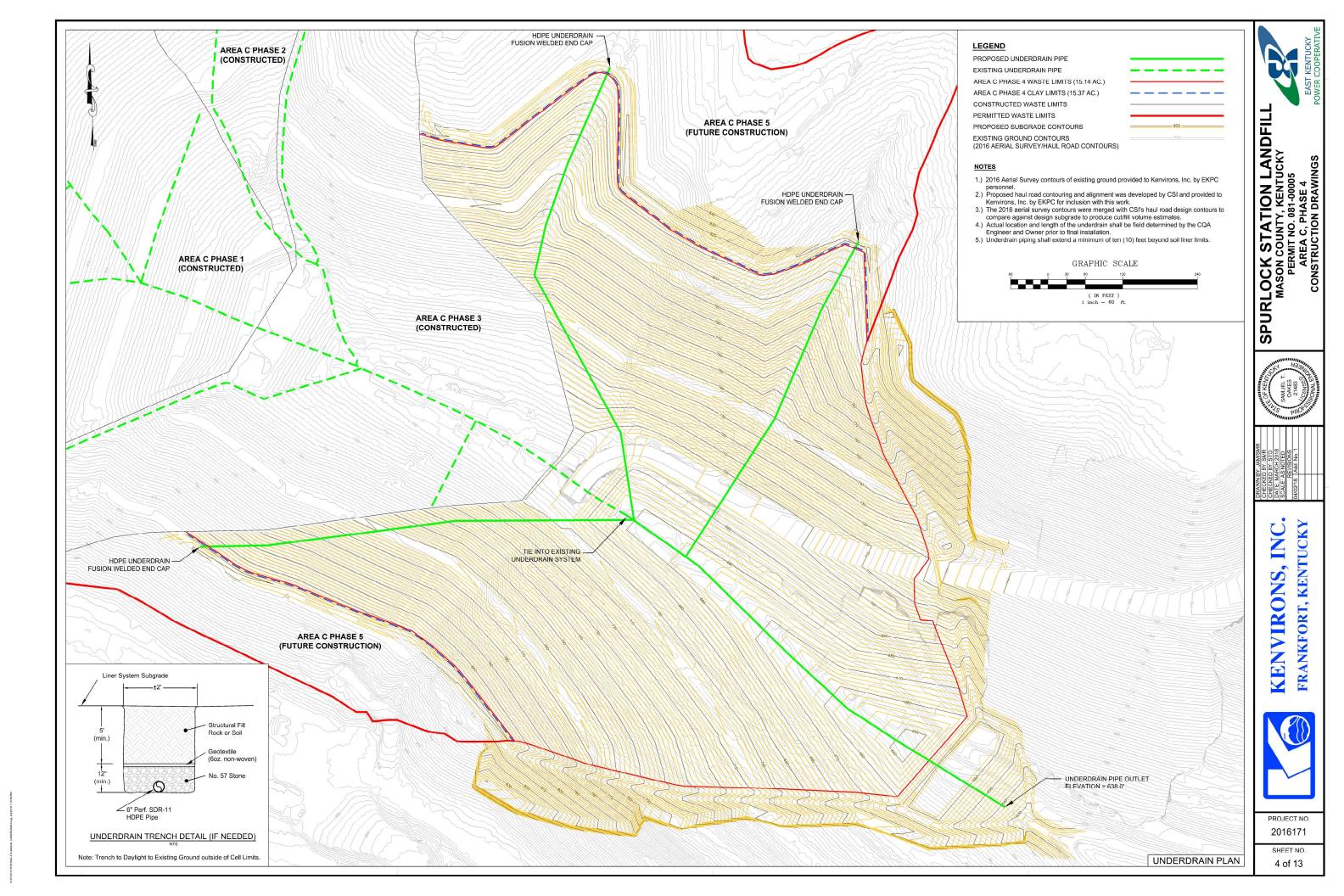


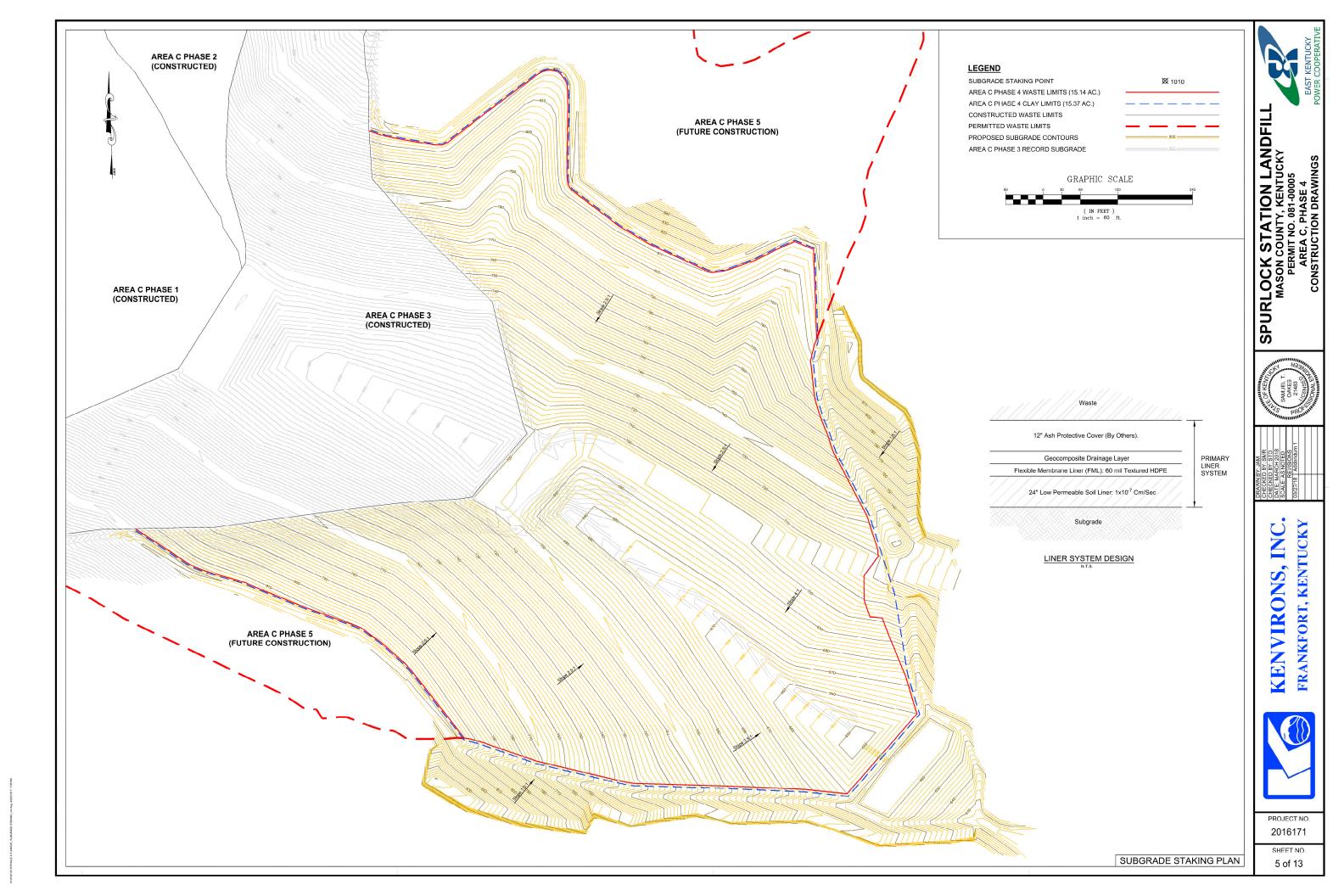
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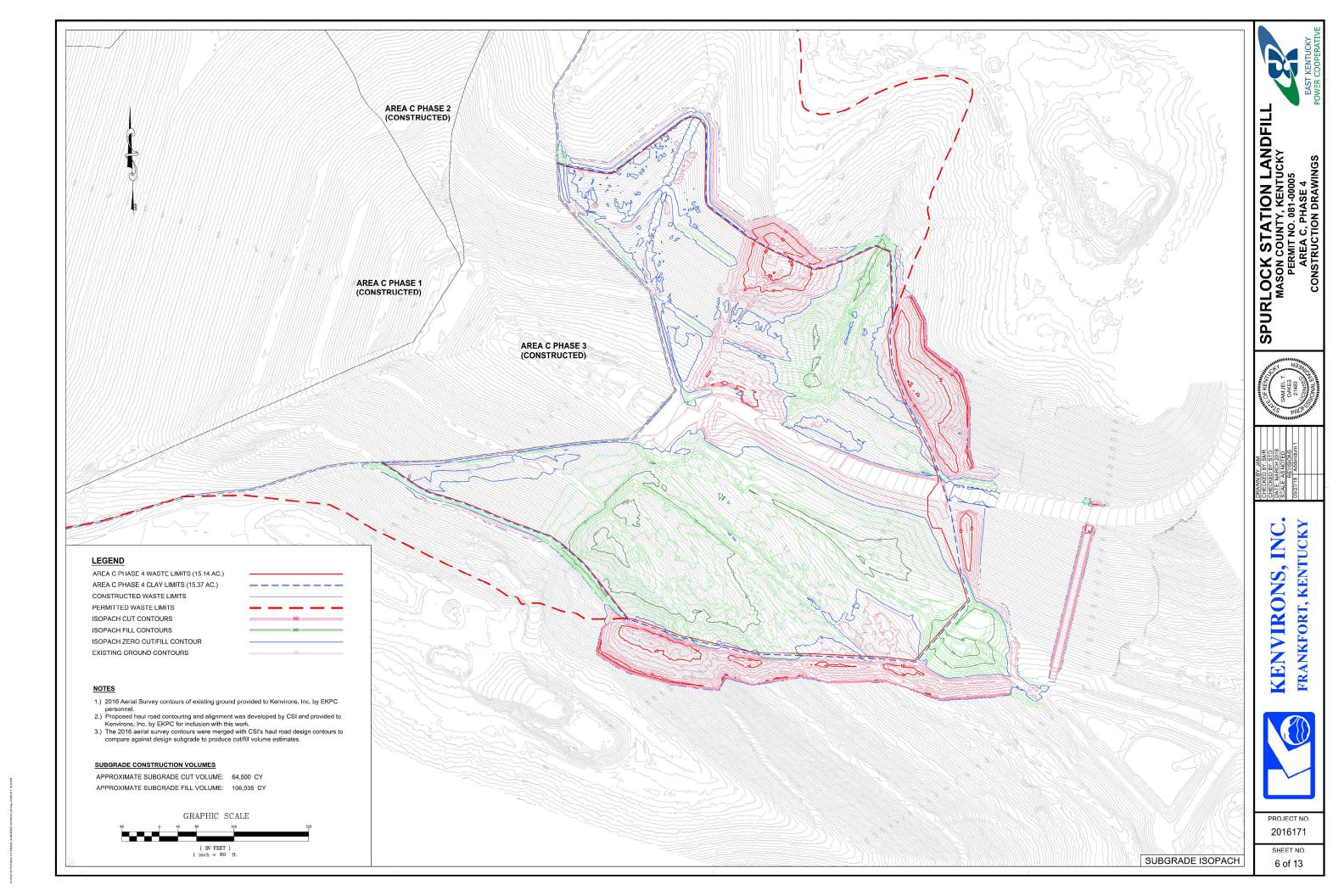


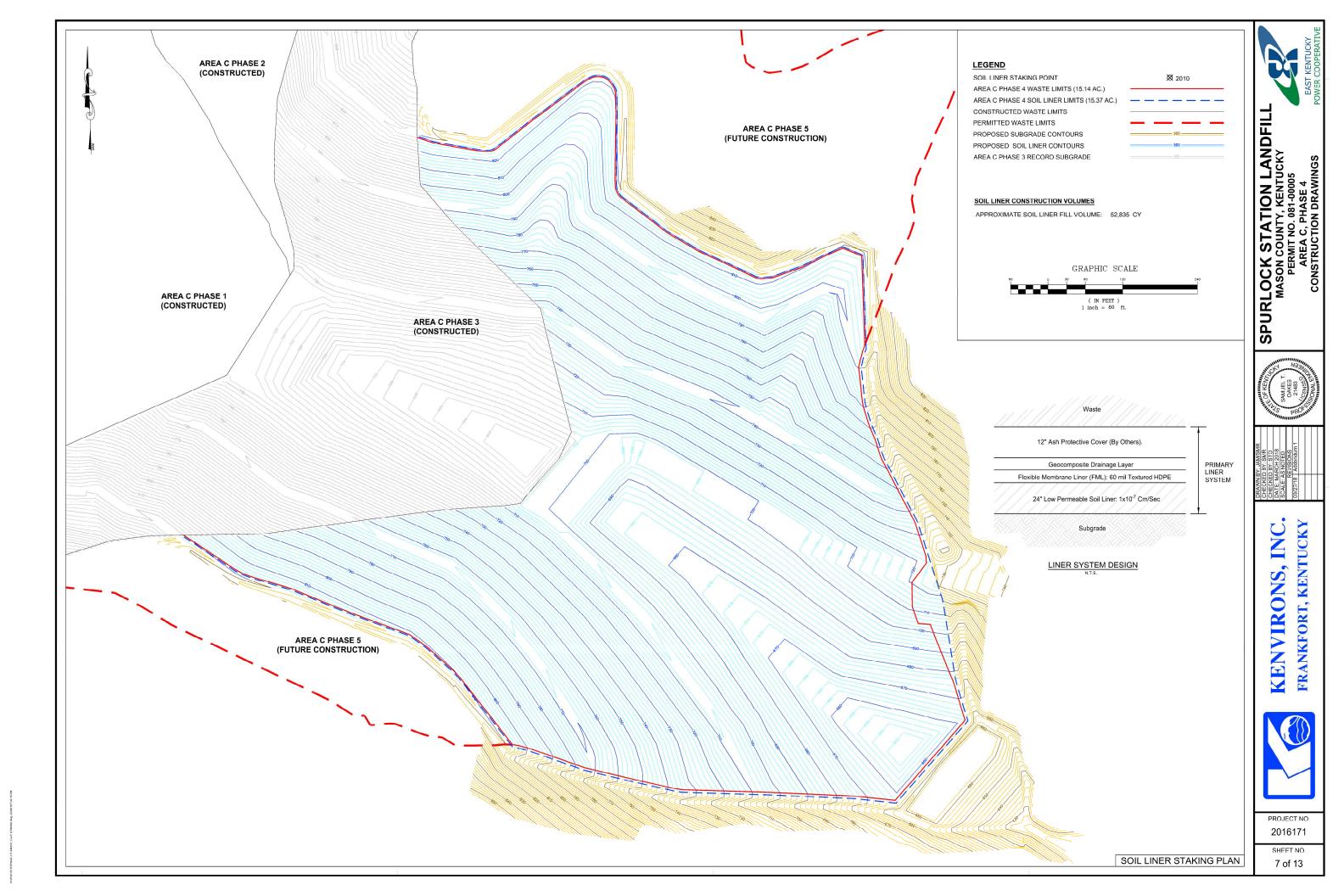


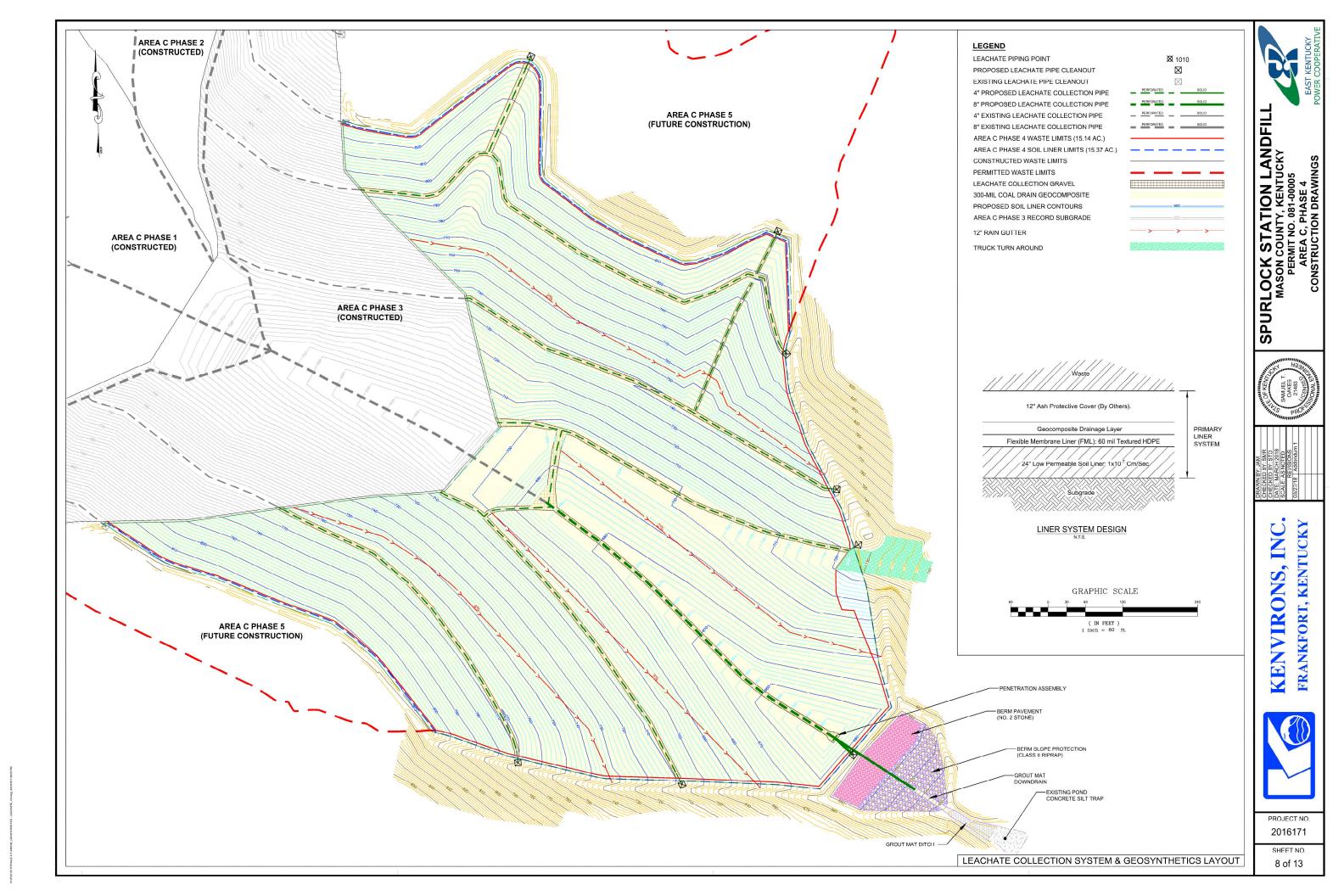


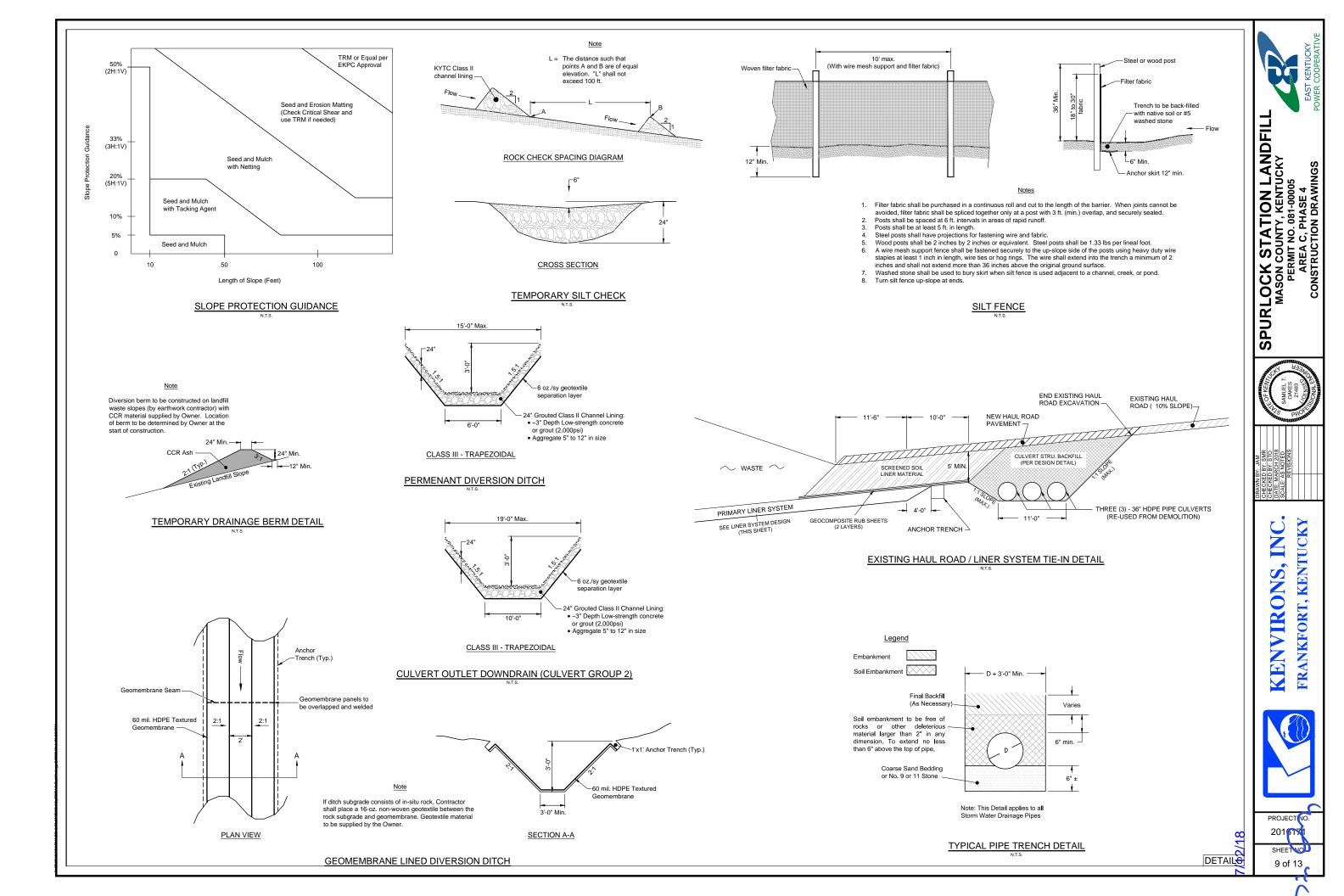


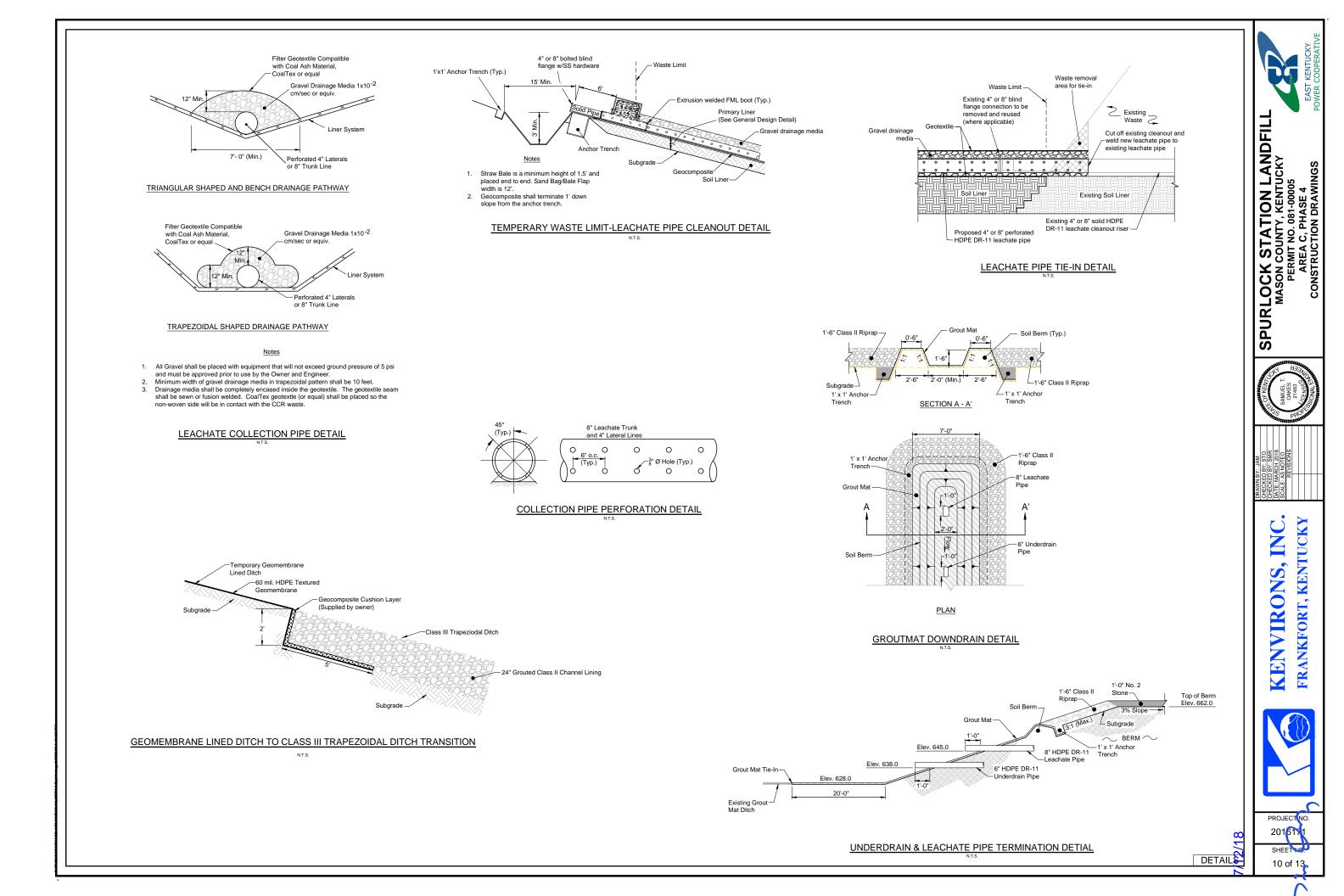


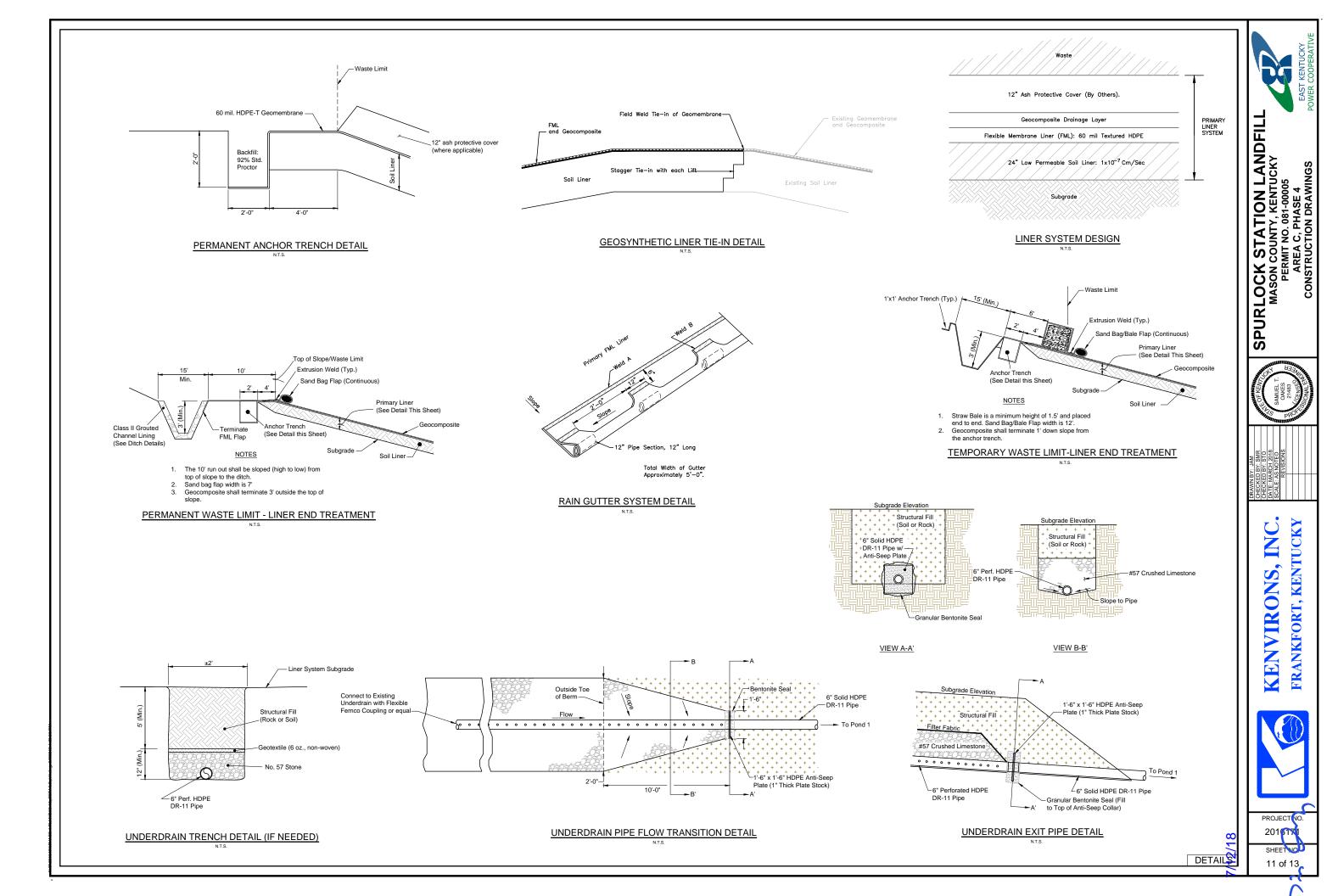


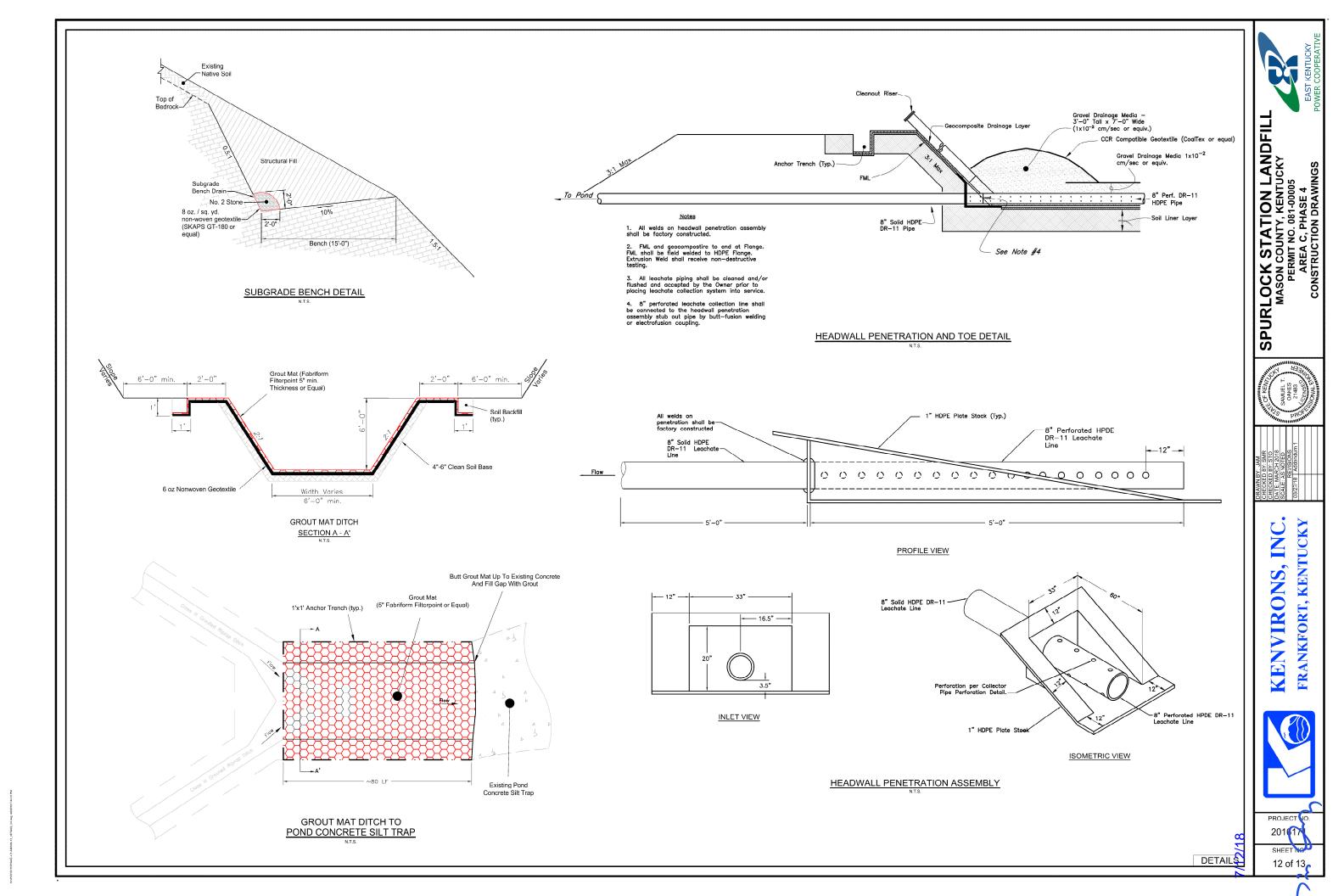


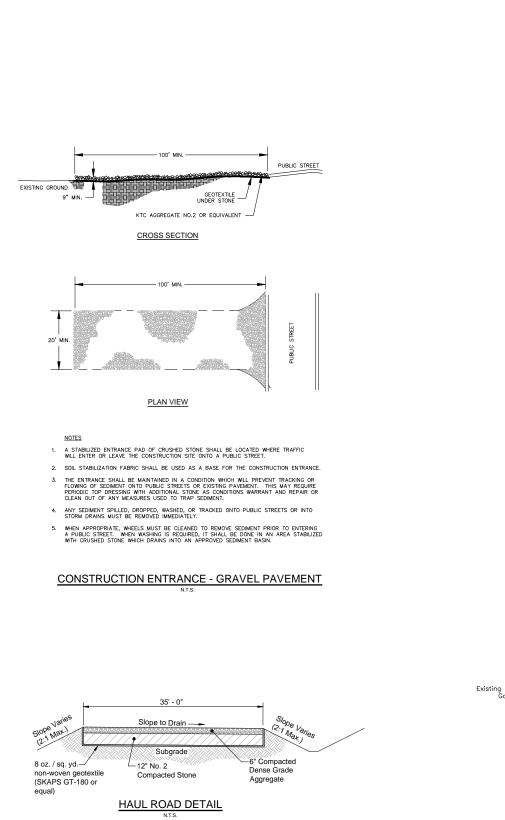


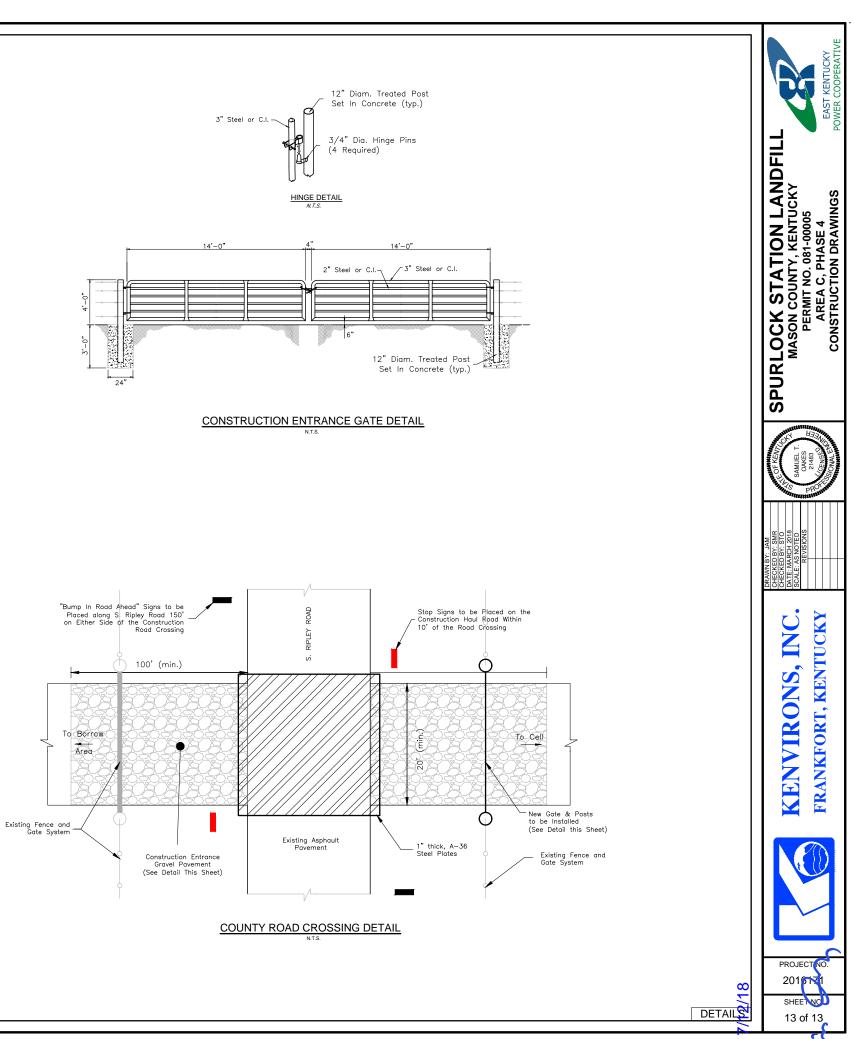


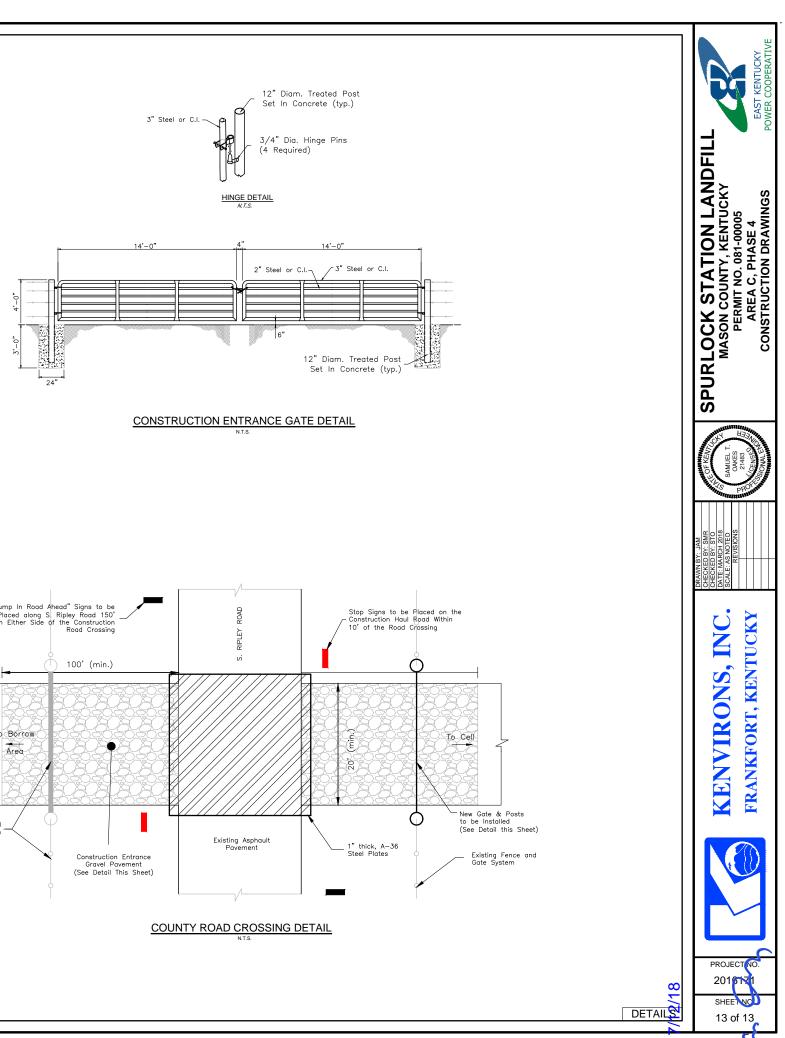












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