

SPURLOCK STATION LANDFILL PHASE 3-C CELL CONSTRUCTION

CCR Rule Post-Construction Design Certification



EAST KENTUCKY POWER COOPERATIVE

COAL COMBUSTION RESIDUAL RULE COMPLIANCE

REV. 0 (06/07/2019)

CERTIFICATION

EAST KENTUCKY POWER COOPERATIVE SPURLOCK STATION LANDFILL – PHASE 3-C CELL CONSTRUCTION CCR Rule - Post-Construction Design Certification

CERTIFICATION

I hereby certify, as a Professional Engineer in the Commonwealth of Kentucky, that the composite liner and leachate collection and removal system has been constructed in accordance with the requirements of 40 CFR 257.70. 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: 6/7/19



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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 40 Code of Federal Regulations (CFR) §257.70(f). This document serves as EKPC's post-construction verification that the Phase 3-C lateral expansion was constructed in accordance with the project's design plans and specifications (composite liner system and leachate collection system) at Spurlock Station Landfill. The Phase 3-C lateral expansion was designed by AECOM and the construction quality assurance (CQA) for cell construction was certified by Kenvirons, Inc. Record drawings for the composite liner system and leachate collection system can be found in Attachment 1.

TABLE 1-1 POST-CONSTRUCTION CERTIFICATION SUMMARY

CONSTRUCTION CRITERIA							
Unit: Phase 3-C Cell Construction							
DESCRIPTION	CCR RULE COMPLIANCE						
DESCRIPTION	YES	NO	REPORT REFERENCE				
Composite Liner System ¹			See Section 2.0				
Leachate Collection & Removal System			See Section 3.0				

¹ Certification of the composite liner system is based on the requirements of 40 CFR §257.70(f).

2.0 COMPOSITE LINER SYSTEM

The constructed composite liner system consists of two components: an upper component consisting of a 60-mil HDPE geomembrane and a lower component consisting of at least a two-foot compacted soil layer with a hydraulic conductivity of no more than 1x10-7 centimeters per second (cm/sec) over subgrade construction.

2.1 Subgrade

Rock/soil structural fill was taken from excavation activities within the cell and the borrow area directly to the northeast of the cell. Since the materials contained a large percentage of rock/gravel particles, no laboratory testing was performed. Structural fill

was used primarily for filling the lower elevations of the natural valley to achieve subgrade elevations while excavation was constructed primarily on the valley slopes. Structural fill was placed in 12-inch maximum lifts. All materials were bladed into place with a dozer and compacted with a sheeps foot compactor. Once proper grades were achieved, the cell subgrade was proof rolled utilizing a loaded Volvo A40 articulated dump truck. The proof roll exercise consisted of running the loaded dump truck across the subgrade surface. The ground surface was observed for indication of pumping or rutting. If signs of pumping or rutting were exhibited, the failed areas were reworked and proof roll tested until a passing test was observed. Once complete, the area tested was approved by the certifying Engineer for placement of the two-foot compacted soil layer.

An underdrain system consisting of pipe and gravel was installed beneath final subgrade elevations to intercept discontinuous seeps from underneath of Phase 3-C's composite liner system. The underdrain discharges intercepted flow to the sediment pond located southeast of Phase 3-C waste cell.

2.2 <u>Two-Foot Compacted Soil Layer</u>

The source of the compacted soil material was the soil borrow area west of the construction entrance off South Ripley Road and excavation within the cell. Processed material with particle sizes of two inches or less was used in the compacted soil layer. Samples of the compacted soil layer material were obtained and testing was performed to assure the material can achieve a hydraulic conductivity of no more than 1x10⁻⁷ cm/sec and to determine construction testing parameters. A standard Proctor density and optimum moisture content laboratory testing was performed to determine the construction testing parameters to achieve minimum field compaction of 92% of standard Proctor density and a target moisture content of -4% to +2% of optimum.

The compacted soil layer was placed on top of completed subgrade and is a minimum 24-inches thick throughout the cell. The soil liner material was spread into 6-inch compacted lifts using GPS-guided dozers to achieve proper grading. The lifts were compacted using a vibratory sheeps foot compactor. After compacting, the surface was rolled with a smooth drum vibratory roller. Moisture/density tests were taken on each lift using a nuclear density gauge at a frequency of no less than nine (9) tests per acre per lift.

If tested areas did not meet the minimum project requirements, that area was reworked and retested as necessary until retest results indicated compliance with project requirements. All lifts were scarified by tracking with dozers and water was added, if needed, prior to the next lift being placed. When the final lift was to grade, a smooth-drum, vibratory roller was used to prepare the compacted soil layer for geosynthetic installation. Prior to installation of geosynthetics, the compacted soil layer was inspected and approved by the certifying Engineer.

2.3 60-mil HDPE Geomembrane

Geomembrane deployment was monitored by Kenvirons, Inc. to insure that no damage was done to either the material or the soil liner and to ensure construction of the liner system was performed in accordance to the design and specifications for the project. The geomembrane material was deployed such that the panels and seams were approximately perpendicular to the contours of the slope. The panel alignment was adjusted by the Installer to provide orientation perpendicular to the contours and proper shingled overlap. In all cases, the FML panels were seamed on the day they were placed using a double hot-wedge, fusion welder. Each seam was observed by Kenvirons CQA monitor, with seam defects such as burn-throughs being marked for repair. All patches were heat tacked in place, ground for cleaning and to promote sufficient adhesion and then extrusion welded. Prior to seaming of the FML and again after approximately 4-hours of run time, trial welds were created per welding machine per welder operator each day. The trial seams were tested for peel and shear strength. For 60-mil Textured HDPE, the minimum peel strength for a fusion weld is 91 pounds per inch and 78 pounds per inch for extrusion welds. The minimum sheer strength for both extrusion and fusion welds is 120 pounds per inch. No panels were welded without the welder passing trial seam testing.

Non-destructive testing was performed on all fusion and extrusion welded panel seams and repairs. Air Pressure testing was conducted on fusion welded seams and vacuum box testing was performed on all extrusion welded seams including panel seaming and repair patches. Destructive samples were taken at selected locations for both fusion and extrusion welded seams. These samples were divided for testing on-site by the installation crew and the remaining sample sent out for independent laboratory testing.

3.0 LEACHATE COLLECTION & REMOVAL SYSTEM

The leachate collection system consists of a geocomposite drainage layer material, collection pipes, No. 57 peagravel drainage media and CoalTex geotextile.

3.1 Geocomposite Drainage Layer

The geocomposite was placed to provide sufficient overlap (approximately six inches) to tie the geonet and geotextile components together for each panel. The geonet component was joined via the installation of plastic pull ties placed a maximum of five feet apart on the longitudinal seams and a maximum of one foot apart on the cross seams. The top geotextile component was then fusion welded, sewn or heat bonded together. Additional geotextile material was heat bonded to the geocomposite to seal up all exposed geonet.

3.2 Leachate Collection Pipes

Leachate collection pipes consist of perforated 8-inch and 4-inch diameter HDPE, DR-17 pipes surrounded with No. 57 sized, low calcium carbonate content, washed peagravel and enclosed within a 14-oz/sy CCR compatible geotextile (CoalTex). The 4 inch pipes placed on the benches remain perforated and tie into the 8-inch leachate collection piping near the tie-in with previously constructed Area C Phase 1 and 2. The 8-inch perforated piping located along Phase 1 and 2's tie-in connects to existing Area C, Phases 3-A and 3-B's leachate collection system. Cleanout risers for the collection pipes extend up the side slope of the cell to the north, south and east. Leachate gravity flows into the ditch east of the cell and finally into Pond 1.

3.3 Geotextile

The 14 oz/yd² geotextile (CoalTex) encasing the leachate collection piping and gravel was deployed with enough overlap (at least 6-inches) to connect the textile panels together by heat bonding or with zip ties. Geotextile patches were heat bonded where necessary to repair any cuts or tears in the geotextile.

4.0 REPORT LIMITATIONS

This report is based on data collected and observations made during construction that could be visually seen. Review of design documents and survey information provided by EKPC as well as CQA work performed by Kenvirons based on AECOM's design of Phase 3-C lateral expansion. This post-construction design certification is based on Kenvirons' understanding of AECOM's design plans for the lateral expansion and EKPC's plant operations, maintenance, storm water and CCR handling procedures for the newly constructed lateral expansion. Changes in any of these operations or procedures may result in deviation from the intended design and operation of Phase 3-C.

The post-construction certification 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

RECORD DRAWINGS



RLOCK STATION LAND
MASON COUNTY, KENTUCKY
PERMIT NO. 081-00005
AREA C. PHASE 3-C

SAMUEL T. SAMUEL T. CENSES STARTS

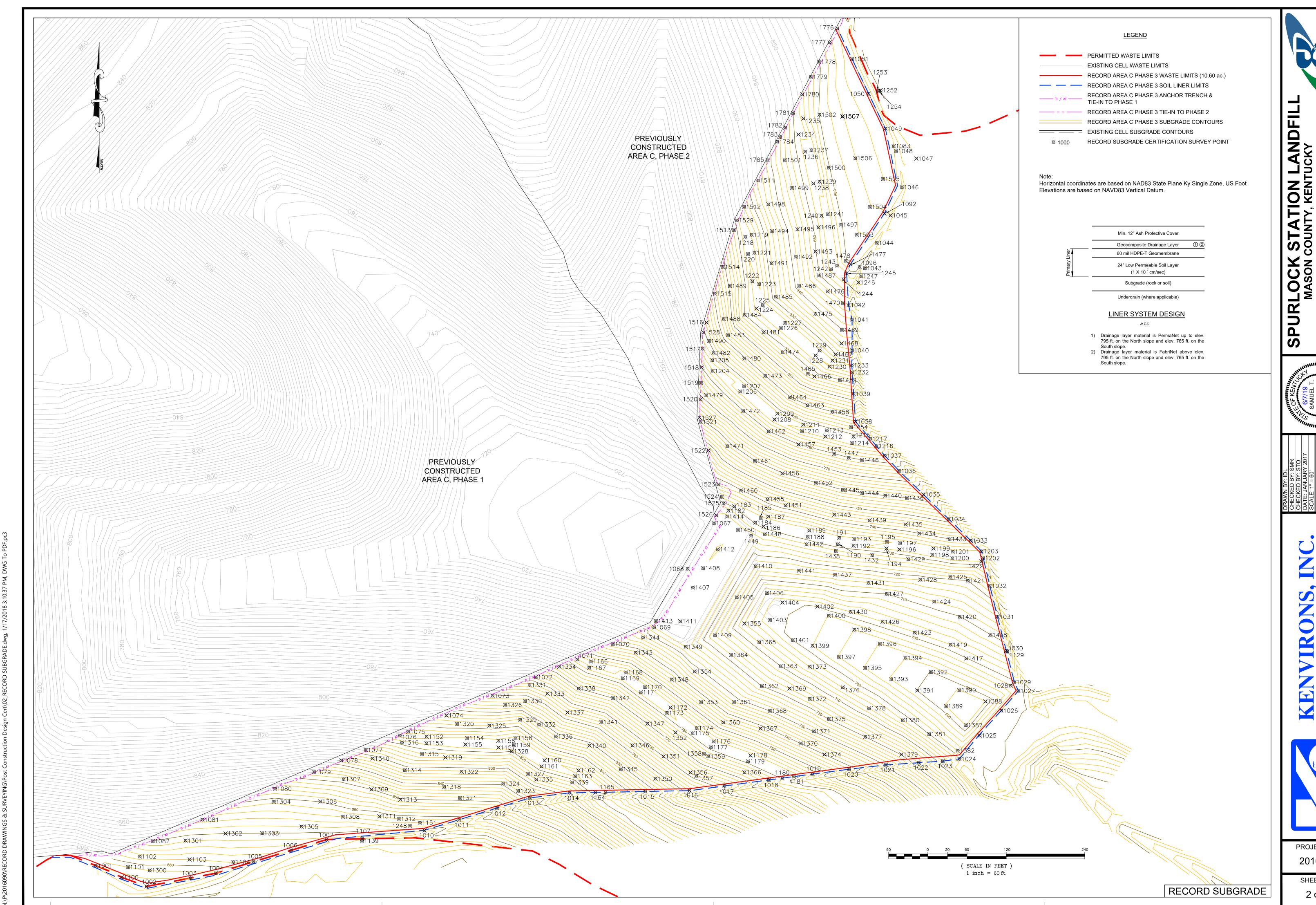
CHECKED BY: SMR
CHECKED BY: STO
DATE: JANUARY 2017
SCALE: 1" = 60'
REVISIONS
REVISIONS

ENVIRONS, IN ANKFORT, KENTUCK



PROJECT NO. 2016090

SHEET NO.

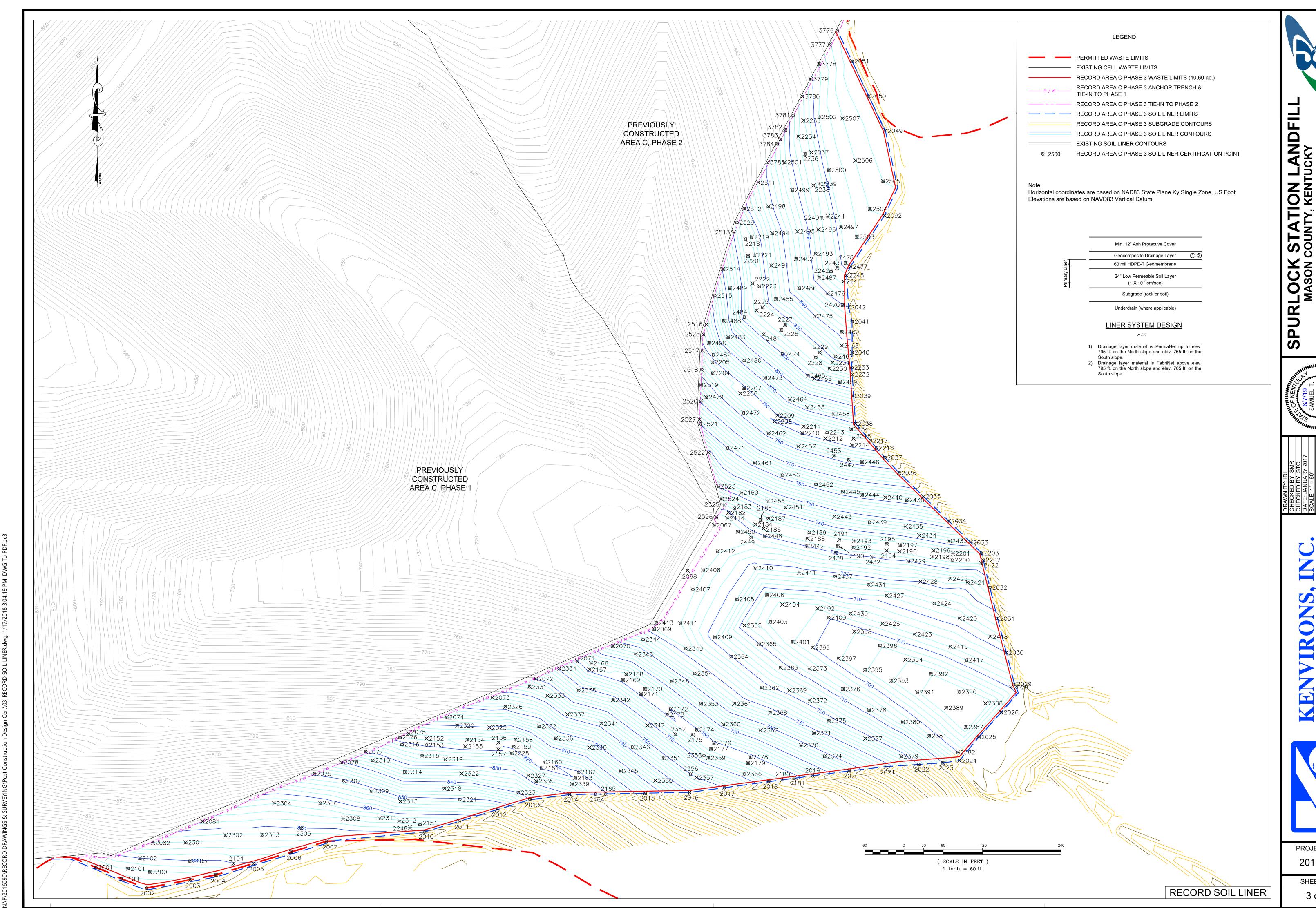






PROJECT NO. 2016090

SHEET NO. 2 of 4







PROJECT NO. 2016090

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