

# Spurlock Station Landfill Area C, Phase 4 Cell Construction

# LOCATION RESTRICTIONS COMPLIANCE DEMONSTRATION



#### **EAST KENTUCKY POWER COOPERATIVE**

#### COAL COMBUSTION RESIDUAL RULE COMPLIANCE

REV. 0 (10/15/2019)

#### CERTIFICATION

EAST KENTUCKY POWER COOPERATIVE
SPURLOCK STATION – AREA C, PHASE 4
LOCATION RESTRICTIONS COMPLIANCE DEMONSTRATION

#### CERTIFICATION

I hereby certify, as a Professional Engineer in the Commonwealth of Kentucky, that the Spurlock Station CCR Landfill, Area C, Phase 4 at East Kentucky Power Cooperative's Spurlock Station has been sited and constructed to meet the requirements of the following provisions of the CCR Rule: 40 CFR §§ 257.60 (placement above the uppermost aquifer); 257.61 (wetlands); 257.62 (fault areas); 257.63 (seismic impact zones) and 257.64 (unstable areas).

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: 11/4/19



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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, codified at 40 CFR §257.50 through §257.107, 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 must demonstrate compliance with location restrictions per 40 Code of Federal Regulations (CFR) §257.60 through §257.64. This document serves as EKPC's location restriction demonstration for Spurlock Station CCR Landfill Area C Phase 4. This unit is a lateral expansion of the existing Landfill as defined in 40 CFR §257.53. The site plans can be found in Attachment 2.

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

**TABLE 1-1 LOCATION RESTRICTIONS SUMMARY** 

	L	OCATI	ON RESTRICTIONS			
Unit: Spurlock Station Landfill Lateral Expansion (Area C, Phase 4)						
DESCRIPTION	CCR RULE COMPLIANCE					
DESCRIPTION	YES	NO	REPORT REFERENCE			
Placement Above Uppermost Aquifer			See Section 2.1			
Wetlands			See Section 2.2			
Fault Areas			See Section 2.3			
Seismic Impact Zones			See Section 2.4			
Unstable Areas <sup>1</sup>	$\boxtimes$		See Section 2.5			

<sup>&</sup>lt;sup>1</sup> Certification based on incorporation of recognized and generally accepted engineering practices to ensure integrity of the structural components of the CCR unit per 40 CFR §257.64(a).

#### 2.0 LOCATION RESTRICTIONS

#### 2.1 Placement Above the Uppermost Aquifer

40 CFR §257.60(a) states that CCR landfills "must be constructed with a base that is located no less than 1.52 meters (five feet) above the upper limit of the uppermost aquifer, or must demonstrate that there will not be an intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table)."

A hydrogeological field investigation was conducted by Tetra Tech, Inc. (Tetra Tech) in October 2017 for Spurlock Station Landfill. Based on this investigation and published regional geological information, each hollow in the area represents a separate groundwater regime, with the recharge area bounded by the top of the ridges that define the watershed. Although the centers of the ridges may be saturated, flow between the hollows is constrained due to the absence of fracture porosity. The uppermost aquifer at the site is considered to be within the weathered and fractured bedrock zone in the valley floors (natural drainage courses) underlain by shale bedrock strata. The weathered/fractured zone extends 15 to 45 feet below the bedrock surface.

The landfill subgrade (base) is designed to be no less than five feet above the seasonal high saturated zone that is situated along the weathered/fractured bedrock zone in the valley bottoms. However, 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.

The seasonal high saturated zone (potentiometric surface) for the landfill was determined by Tetra-Tech in 2015 as part of their hydrogeological investigation referenced previously in this section. Comparing design subgrade to Tetra-Tech's potentiometric surface, the distance from the seasonal high saturated zone to the lowest elevations of the landfill subgrade (cell floor) range from 22 to 36 feet, well above the 5 feet requirement stated in 40 CFR §257.60(a). See Attachment 1 for the landfill subgrade (base grades) versus the seasonal high saturated zone map.

#### 2.2 Wetlands

40 CFR §257.61(a) states that CCR landfills "must not be located in wetlands, as defined in §232.2 of this chapter, unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that the CCR unit meets the requirements of paragraph (a)(1) through (5) of this section." Based on jurisdictional determinations performed by Redwing Ecological Services, Inc. on behalf of EKPC, the Spurlock Station Landfill Area C Phase 4 waste boundary is not located in wetlands, as defined under the CCR Rule.

#### 2.3 Fault Areas

40 CFR §257.62(a) states that CCR landfills "must not be located within 60 meters (200 feet) of the outermost damage zone of a fault that has had displacement in Holocene time unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that an alternative setback distance of less than 60 meters (200 feet) will prevent damage to the structural integrity of the CCR unit."

Based on mapping data obtained from the Kentucky Geologic Survey (KGS) and United States Geologic Survey (USGS), the facility will not be located within 60 meters (200 feet) of the outermost damage zone of a fault that has displaced in Holocene time. See Attachment 4 for fault mapping.

#### 2.4 Seismic Impact Zones

40 CFR §257.63(a) states that CCR landfills "must not be located in seismic impact zones unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that all structural components including liners, leachate collection and removal systems, and surface water control systems, are designed to resist the maximum horizontal acceleration in lithified earth material for the site."

Based on the 2008 USGS seismic mapping, the site is located in an area with a peak ground acceleration (PGA) of 0.0867 g. The definition of a seismic impact zone is as follows: "A seismic impact zone means an area having a 2% or greater probability that the maximum expected horizontal acceleration, expressed as a percentage of the earth's gravitational pull (g), will exceed 0.10 g in 50 years." 40 CFR §257.53. Based on the definition, the facility is not located within a seismic impact zone. A copy of the USGS Unified Hazard Tool with the site specific PGA value is provided in Attachment 3.

#### 2.5 Unstable Areas

40 CFR §257.64(a) states that CCR landfills "must not be located in an unstable area unless the owner or operator demonstrates by the dates specified in paragraph (d) of this section that recognized and generally accepted good engineering practices have been incorporated into the design of the CCR unit to ensure that the integrity of the structural components of the CCR unit will not be disrupted."

Based on a review of KGS mapping and available regional geologic information (see Attachment 4), a portion of the facility is underlain by geologic formations that are susceptible to karst topography which the CCR Rule defines as unstable areas. Site studies performed at the existing CCR landfill by S&ME – Report of Geotechnical Services, EKPC CCR Siting Exploration – Spurlock Station Ash Landfill, dated March 2, 2016 and geotechnical and hydrogeological investigations performed for Spurlock

Station Landfill by Tetra Tech in October 2017, show no evidence of karst topography at the site.

Despite the lack of evidence of karst topography and thus the lack of evidence of unstable areas, Kenvirons, Inc. has nevertheless prepared the landfill design using generally accepted good engineering practices to ensure that the integrity of the structural components of the CCR unit will not be disrupted. These practices include industry and regulatory standards specified for the design of an EPA CCR Landfill, Kentucky Division of Waste Management (KDWM) CCR Landfill, EPA Subtitle D Landfill and KDWM Contained Landfill facility.

Construction of the landfill liner system will be performed to meet generally accepted good engineering/construction standards through the use of a Construction Quality Assurance (CQA) Plan. The plan will be utilized to ensure, to the utmost extent possible, that the landfill is constructed to maintain its structural integrity and any unstable materials encountered during construction activities are mitigated.

Once operations begin for the landfill, periodic inspections will be conducted to monitor the landfill for the appearance of actual or potential structural weakness.

With the combined components of design, construction quality control/assurance, and periodic operations inspections, the Spurlock Station CCR Landfill will meet the alternative location restriction demonstration for unstable areas pursuant to the CCR Rule.

See Attachment 2 for the liner system design plans.

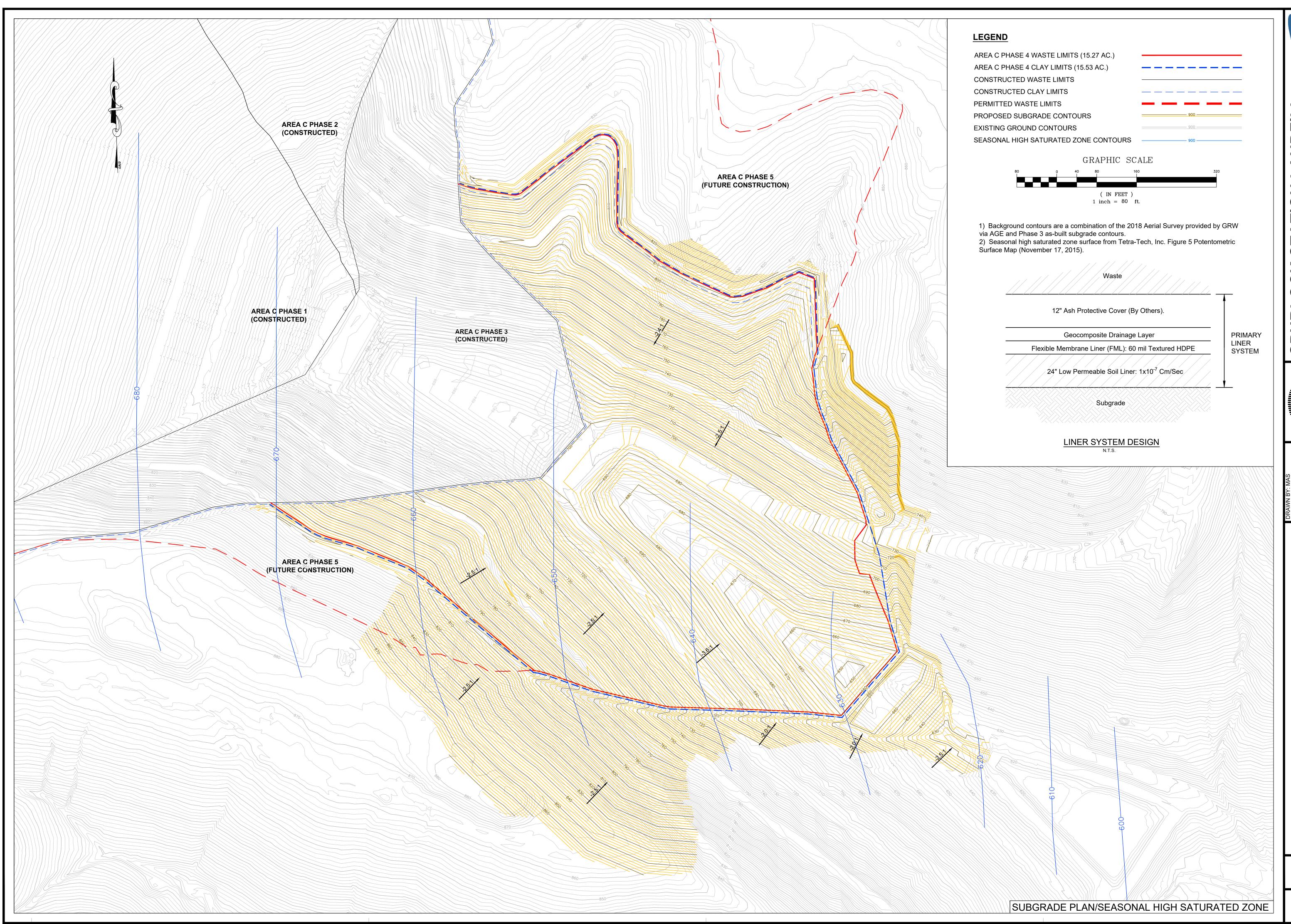
#### 3.0 REPORT LIMITATIONS

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**

# LINER SYSTEM SUBGRADE SEASONAL HIGH SATURATED ZONE MAP



LOCK STATION LANDF MASON COUNTY, KENTUCKY PERMIT NO. 081-00005

SAMUEL T.
OAKES

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CORES

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CHECKED BY: STO
DATE: OCT 2019
SCALE: AS NOTED
REVISIONS

INVIRONS, INCK



PROJECT NO.

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SHEET NO.

SHEET NO.

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# ATTACHMENT 2 LINER SYSTEM DESIGN PLANS

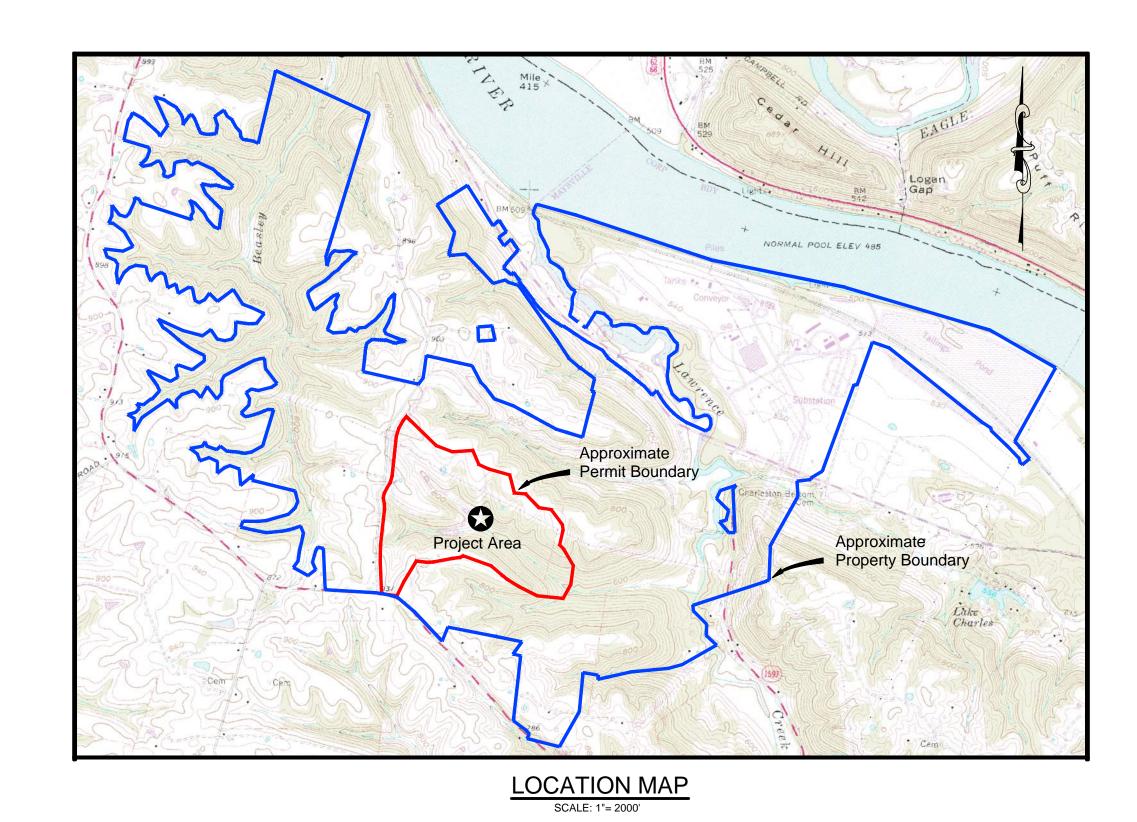
# EAST KENTUCKY POWER COOPERATIVE, INC. SPURLOCK STATION LANDFILL

MASON COUNTY, KENTUCKY PERMIT NO. 081-0005

# AREA C, PHASE 4 CONSTRUCTION DRAWINGS FEBRUARY 2018

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UNDERDRAIN PLAN	4
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SUBGRADE ISOPACH	6
SOIL LINER STAKING PLAN	7
LEACHATE COLLECTION SYSTEM & GEOSYNTHETICS PLAN	8
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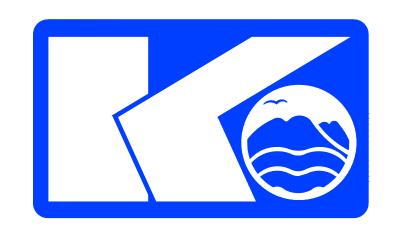


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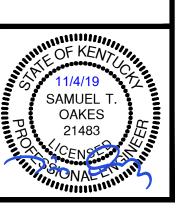
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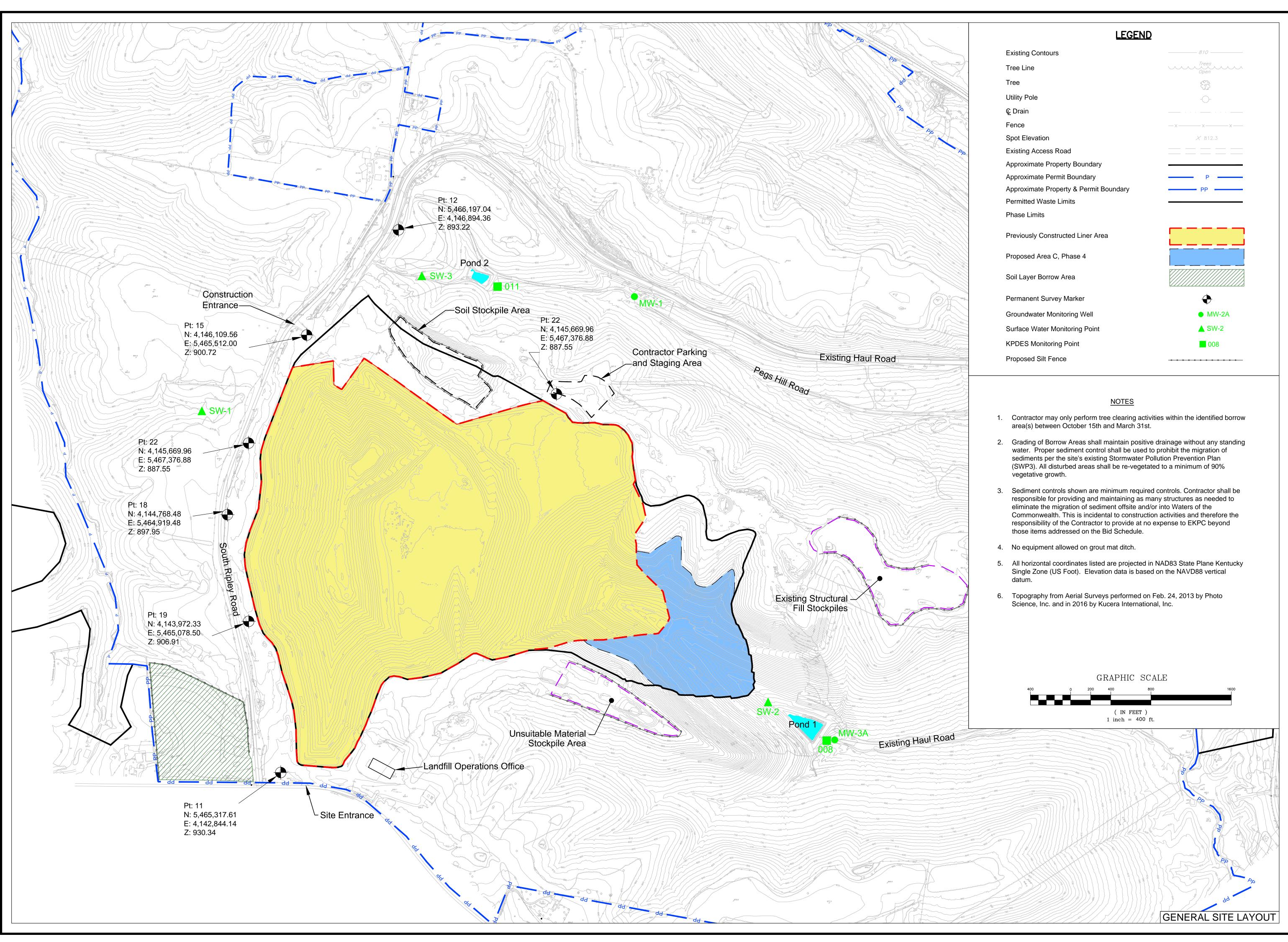


East Kentucky Power Cooperative 4775 Lexington Road P.O. Box 707 Winchester, Kentucky 40392-0707



KENVIRONS, INC.
452 Versailles Road - Frankfort, Kentucky 40601
502 695-4357
502 695-4363 Fax





FAST KENTUCKY

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MASON COUNTY, KENTUCK PERMIT NO. 081-00005 AREA C, PHASE 4

SAMUEL T. OAKES 21483 FE

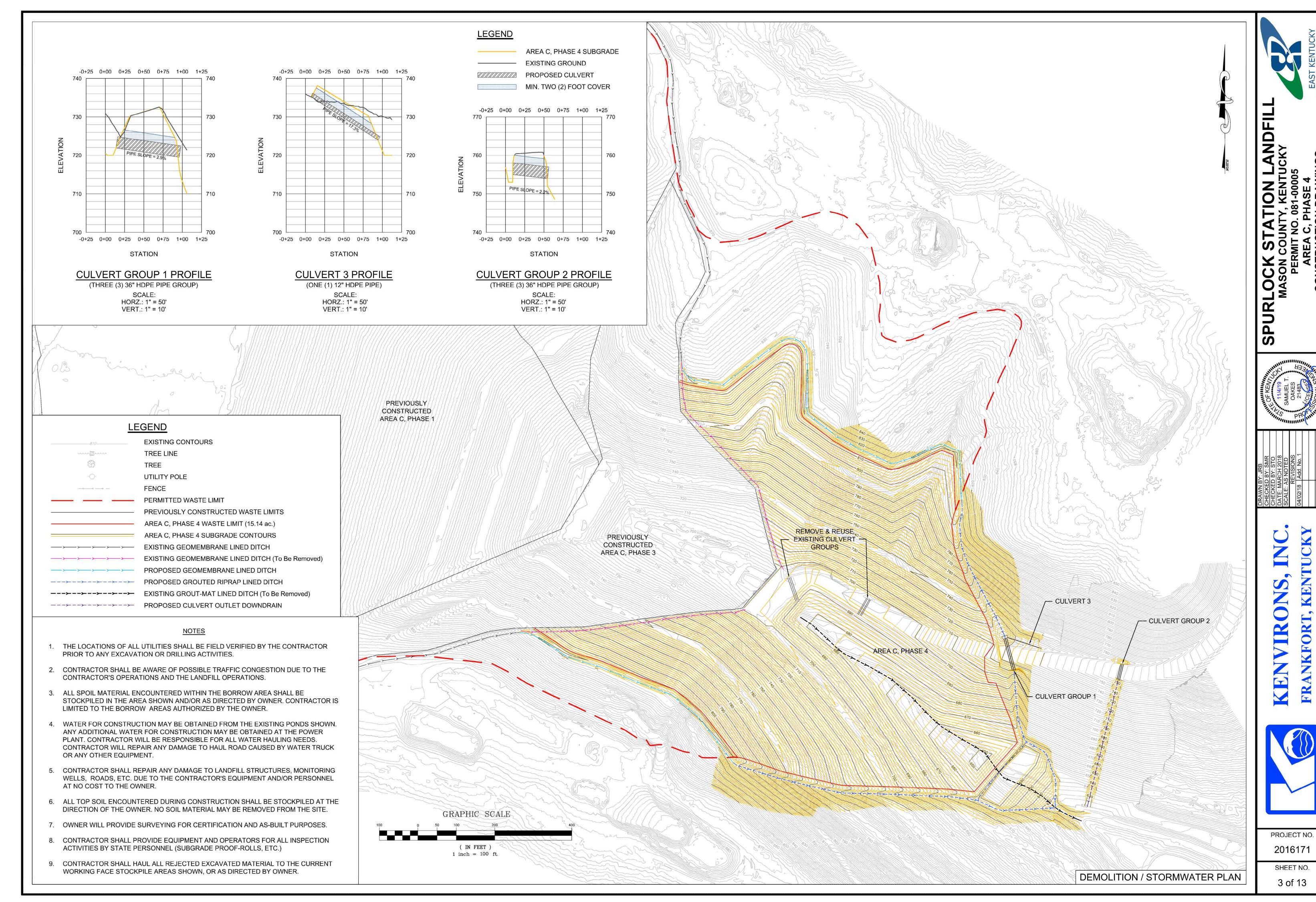
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CHECKED BY: STO
DATE: MARCH 2018
SCALE: 1"= 400'
REVISIONS

VIRONS, INC KFORT, KENTUCK

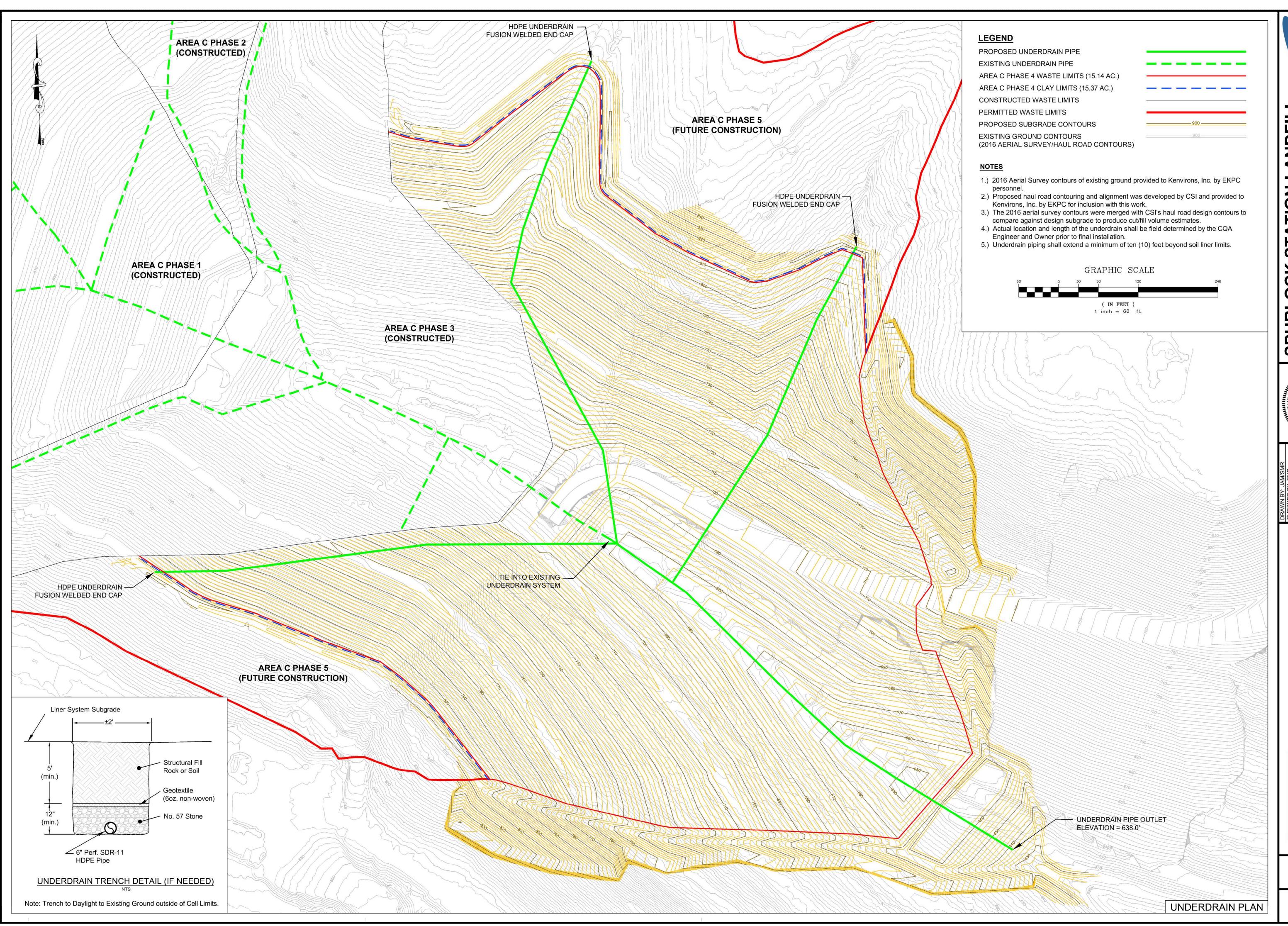
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SHEET NO. 2 of 13



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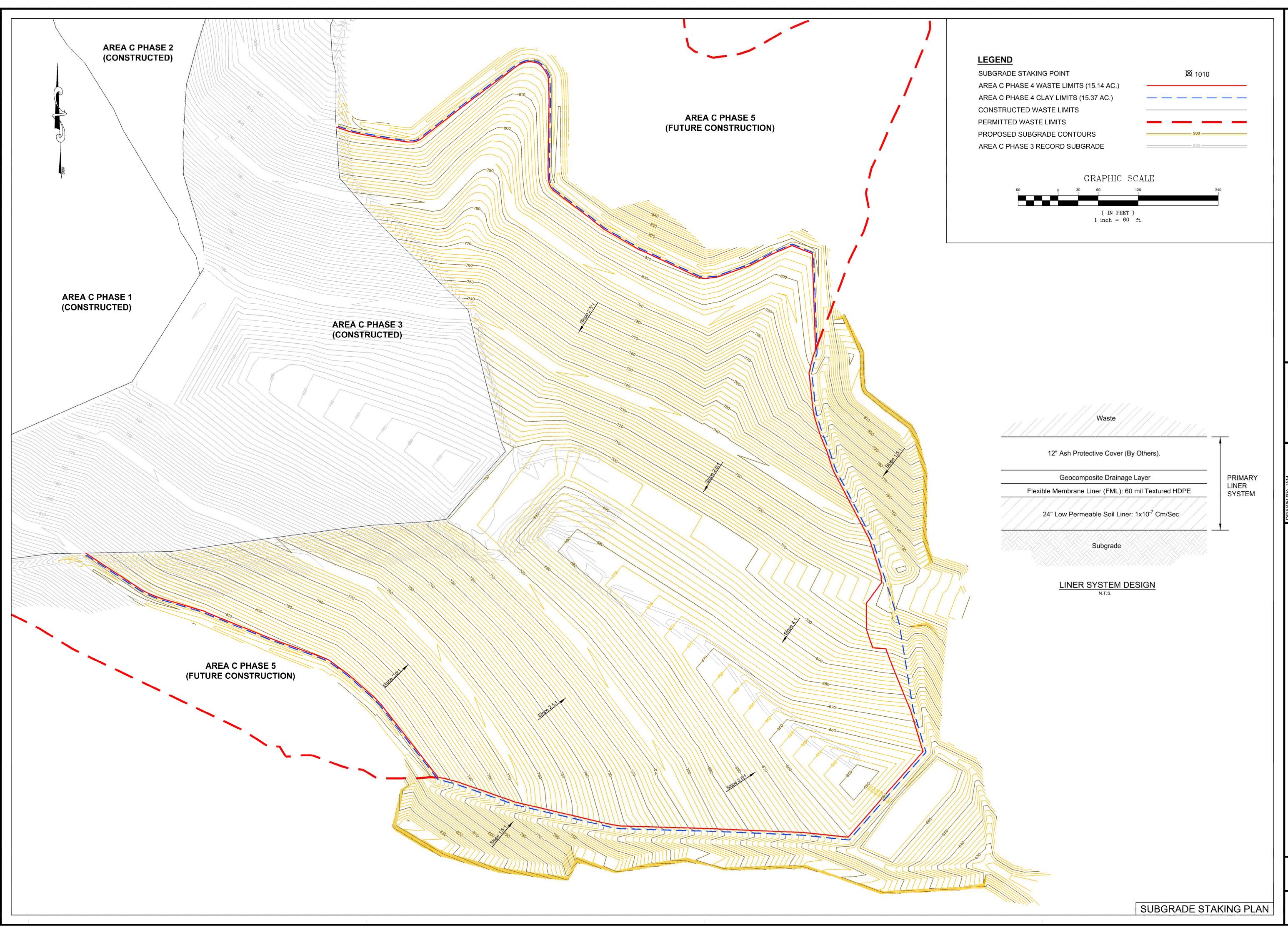


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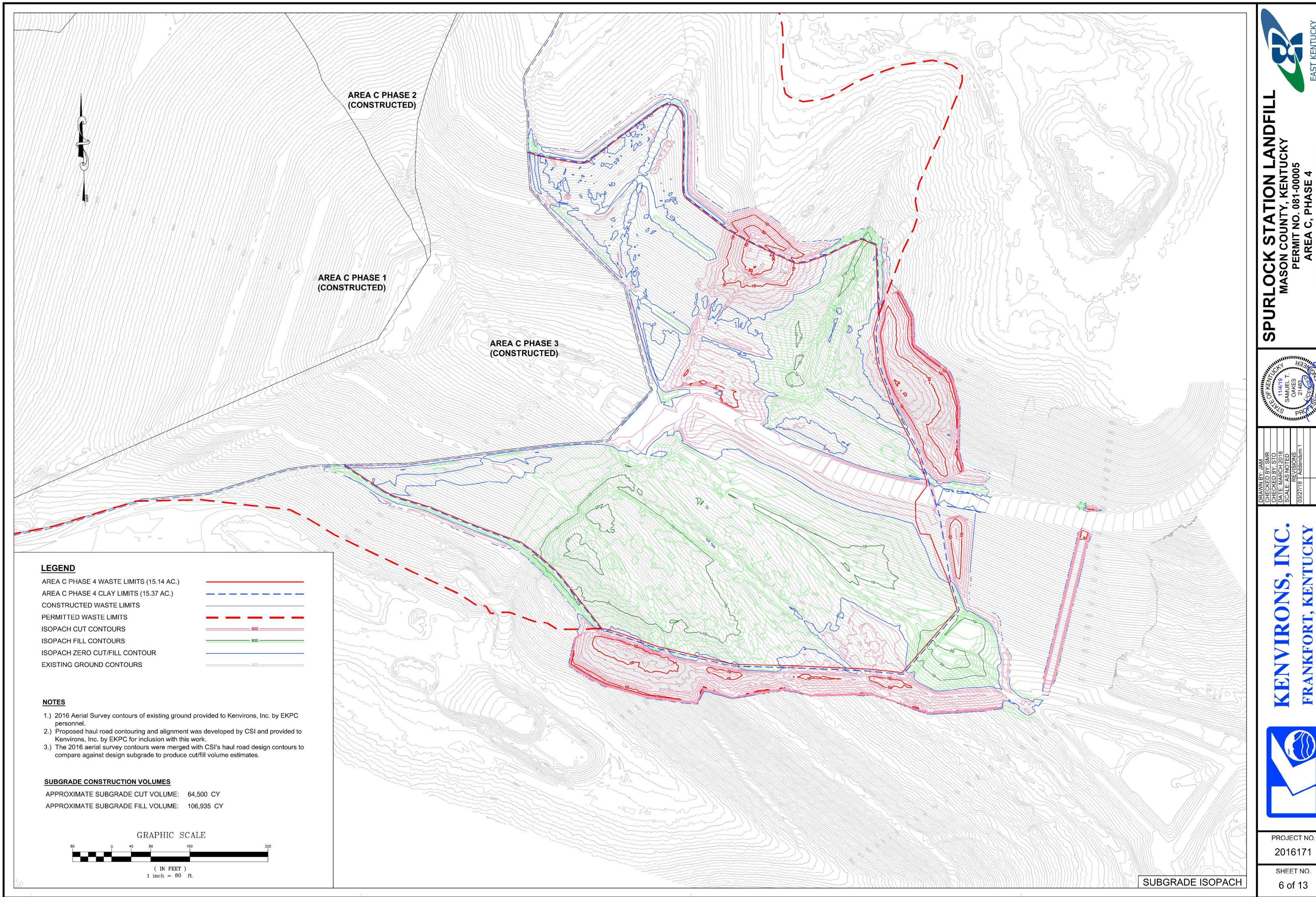
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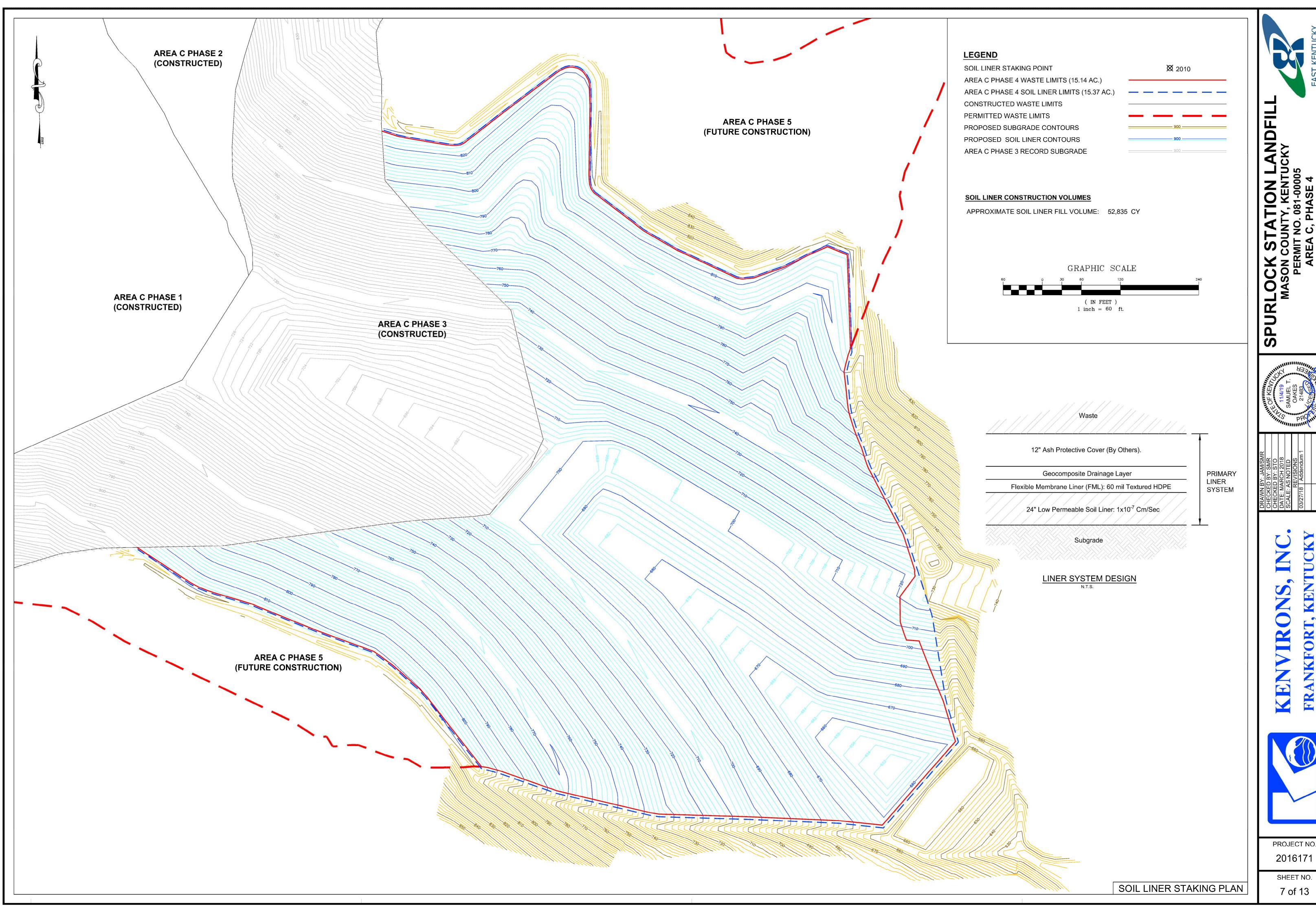
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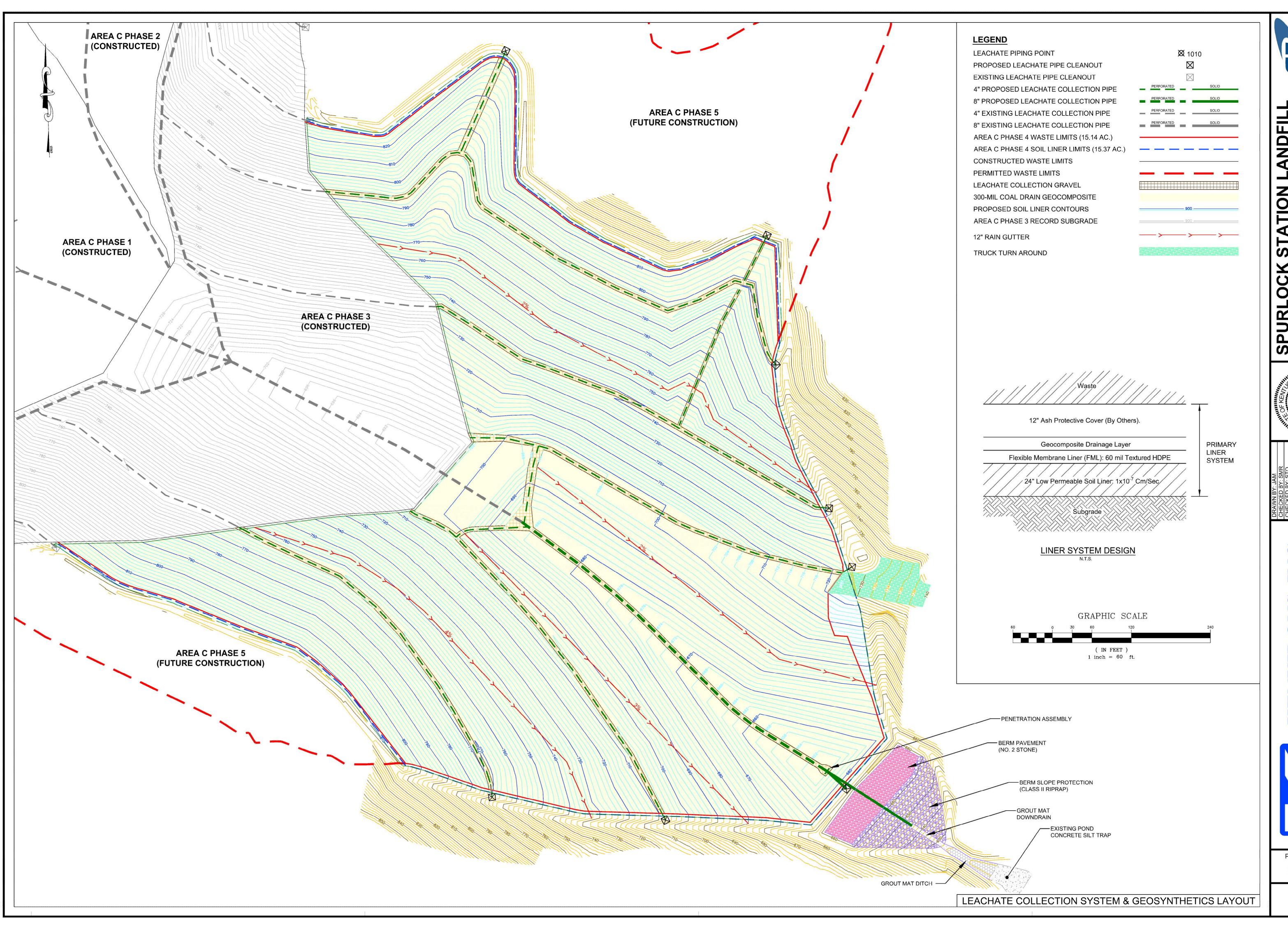
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SHEET NO.



FATION LANDFILL
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NO. 081-00005
C, PHASE 4

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CHECKED BY: SMR
CHECKED BY: STO
DATE: MARCH 2018
SCALE: AS NOTED
REVISIONS
03/27/18 Addendum 1

CONS, INC. SOLUTION S

KENVIRONS, II

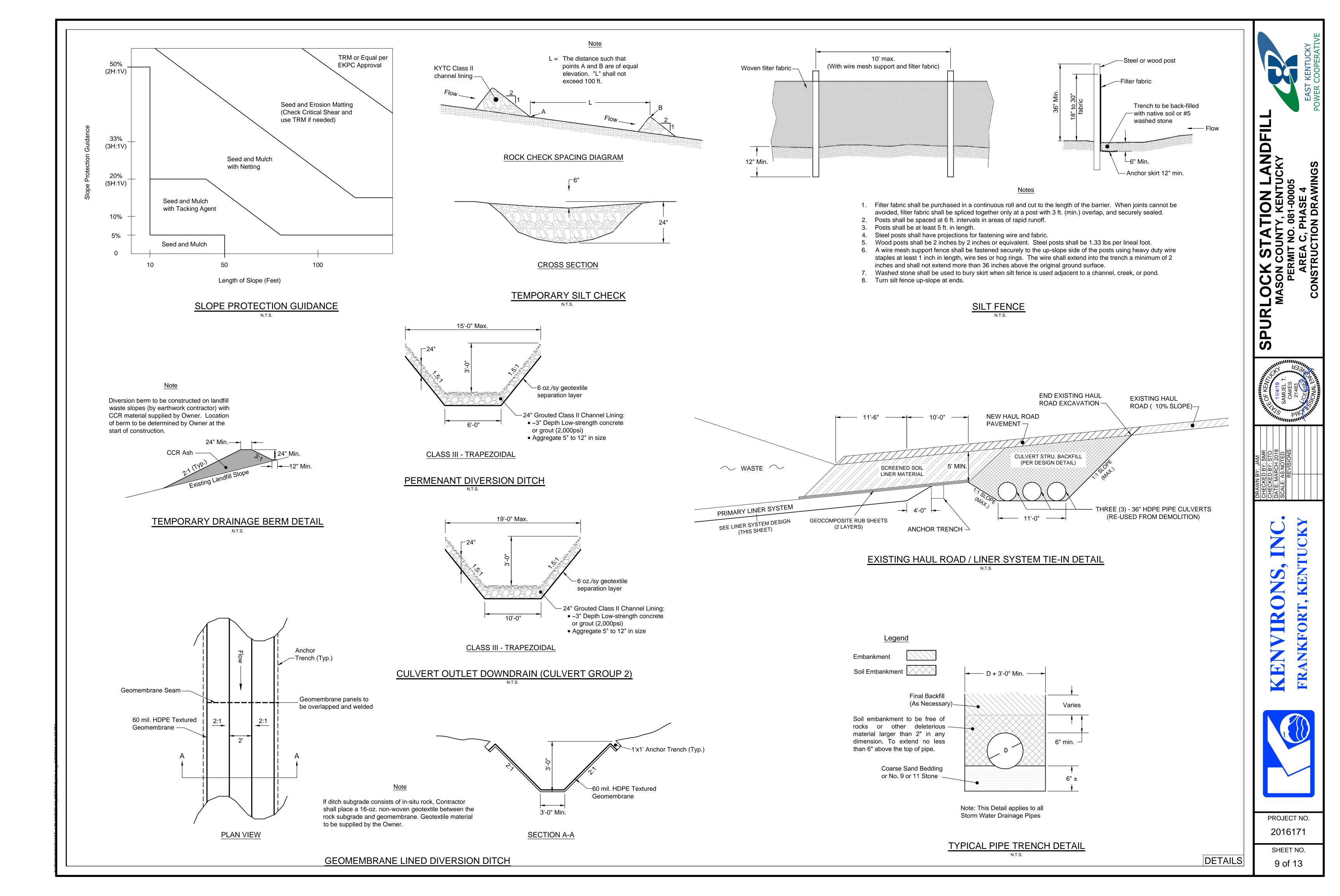


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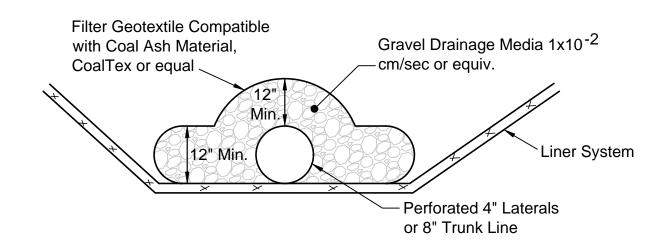
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SHEET NO.

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#### TRIANGULAR SHAPED AND BENCH DRAINAGE PATHWAY

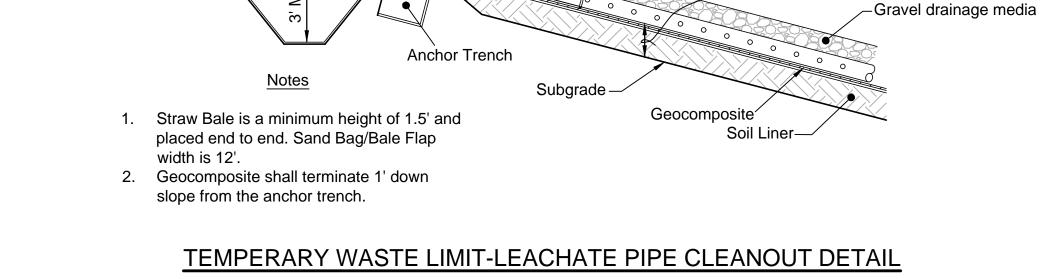


#### TRAPEZOIDAL SHAPED DRAINAGE PATHWAY

#### <u>Notes</u>

- 1. All Gravel shall be placed with equipment that will not exceed ground pressure of 5 psi and must be approved prior to use by the Owner and Engineer.
- 2. Minimum width of gravel drainage media in trapezoidal pattern shall be 10 feet. 3. Drainage media shall be completely encased inside the geotextile. The geotextile seam shall be sewn or fusion welded. CoalTex geotextle (or equal) shall be placed so the non-woven side will be in contact with the CCR waste.

## LEACHATE COLLECTION PIPE DETAIL



— Waste Limit

Extrusion welded FML boot (Typ.)

Primary Liner

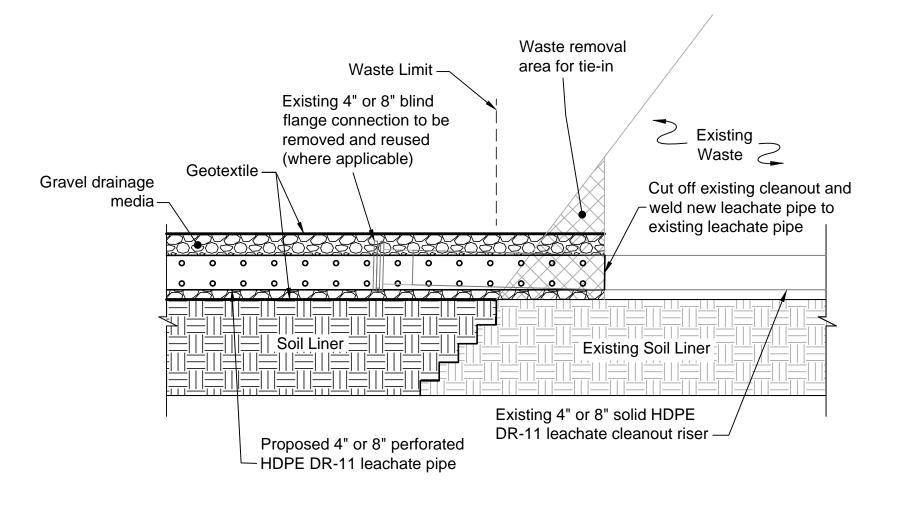
(See General Design Detail)

4" or 8" bolted blind

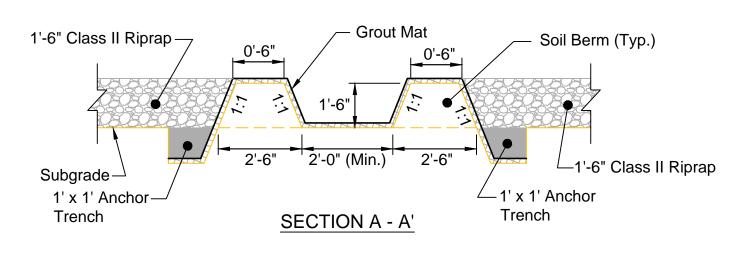
15' Min.

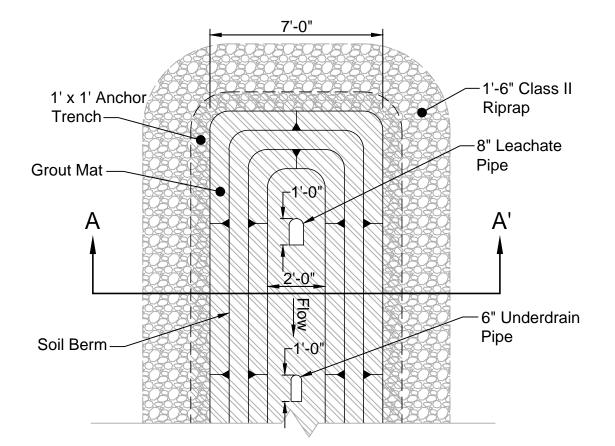
1'x1' Anchor Trench (Typ.)

flange w/SS hardware



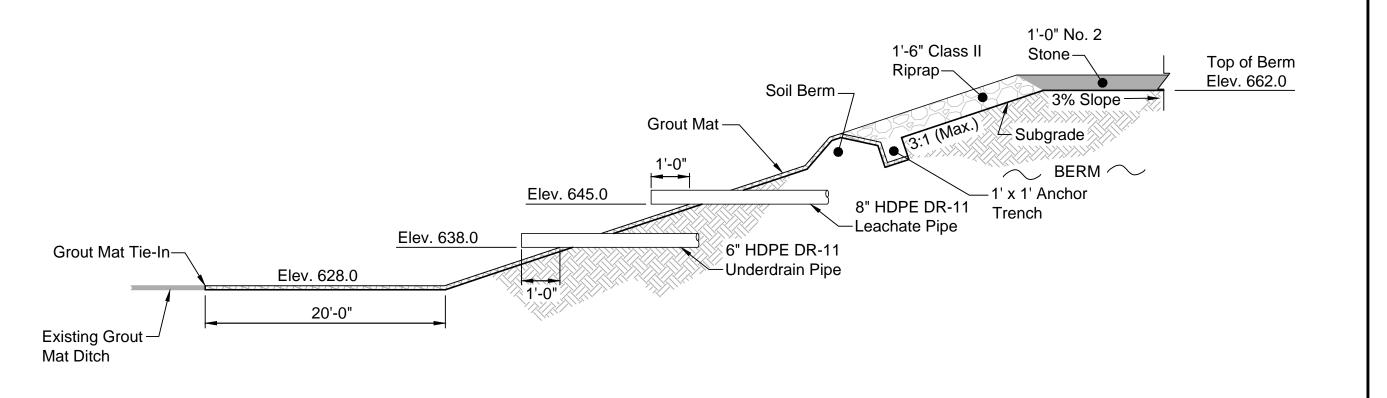
## LEACHATE PIPE TIE-IN DETAIL





#### <u>PLAN</u>

# GROUTMAT DOWNDRAIN DETAIL



## **UNDERDRAIN & LEACHATE PIPE TERMINATION DETIAL**

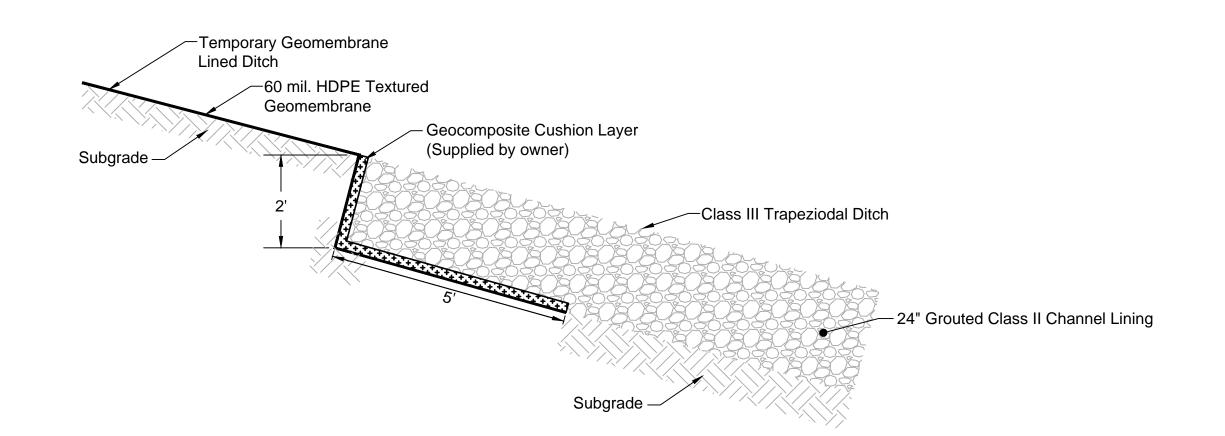


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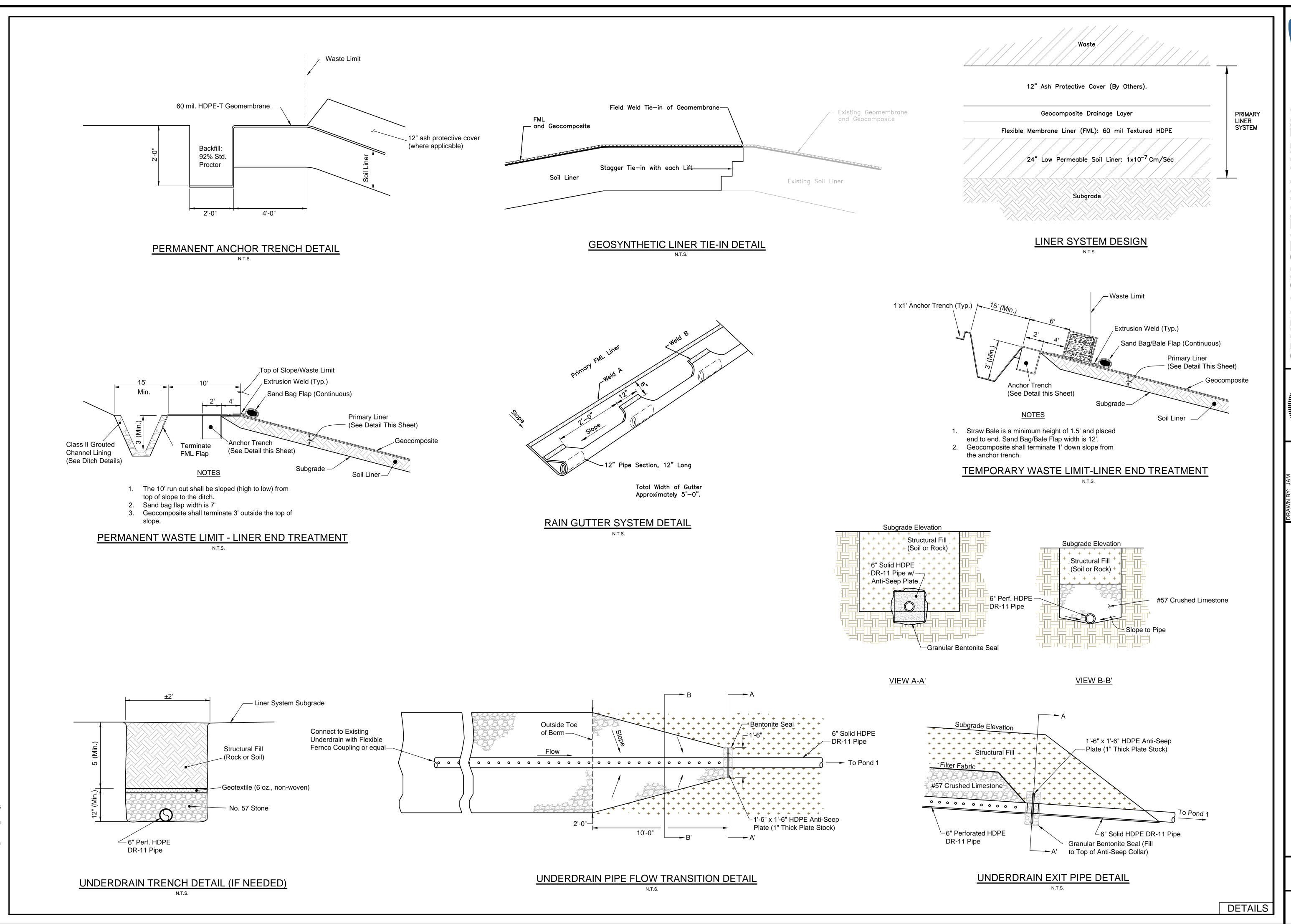
DETAILS

8" Leachate Trunk and 4" Lateral Lines O 6" o.c. (Typ.)  $\sqrt{\frac{3}{8}}$ " Ø Hole (Typ.) COLLECTION PIPE PERFORATION DETAIL



#### GEOMEMBRANE LINED DITCH TO CLASS III TRAPEZOIDAL DITCH TRANSITION

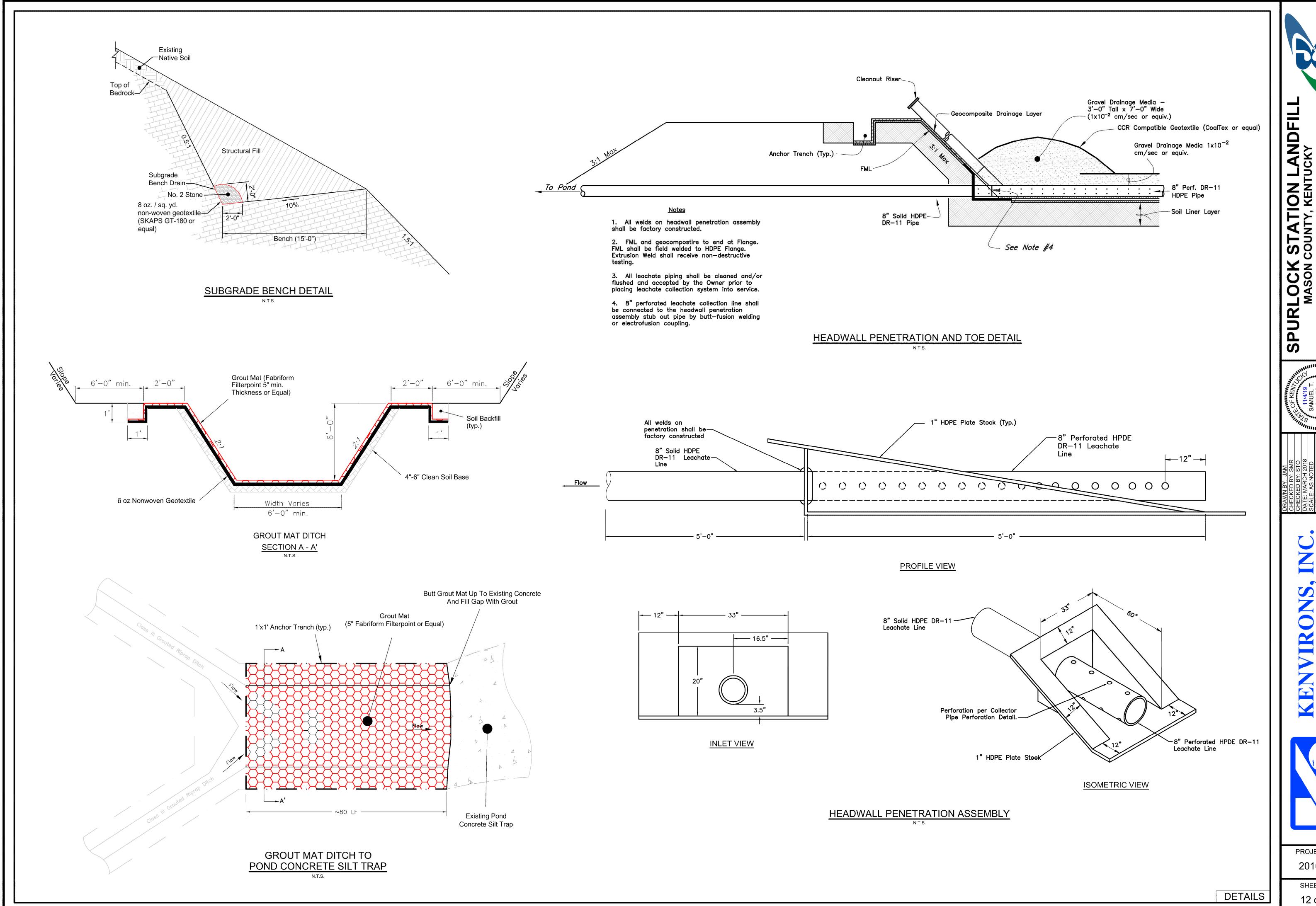
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KENTUCK A X

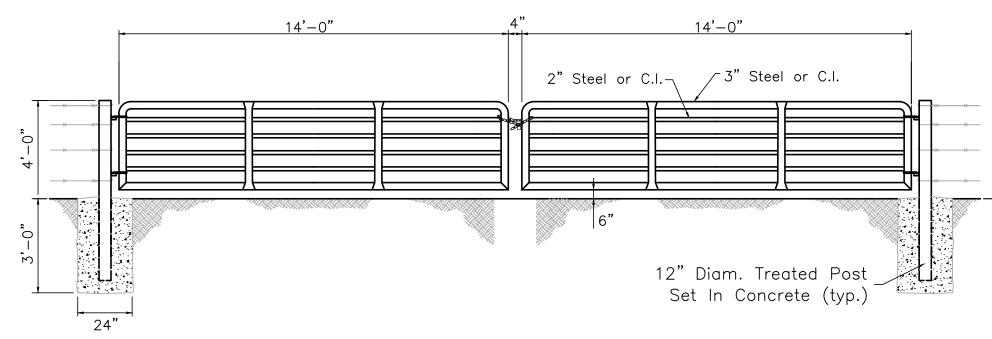
PROJECT NO. 2016171

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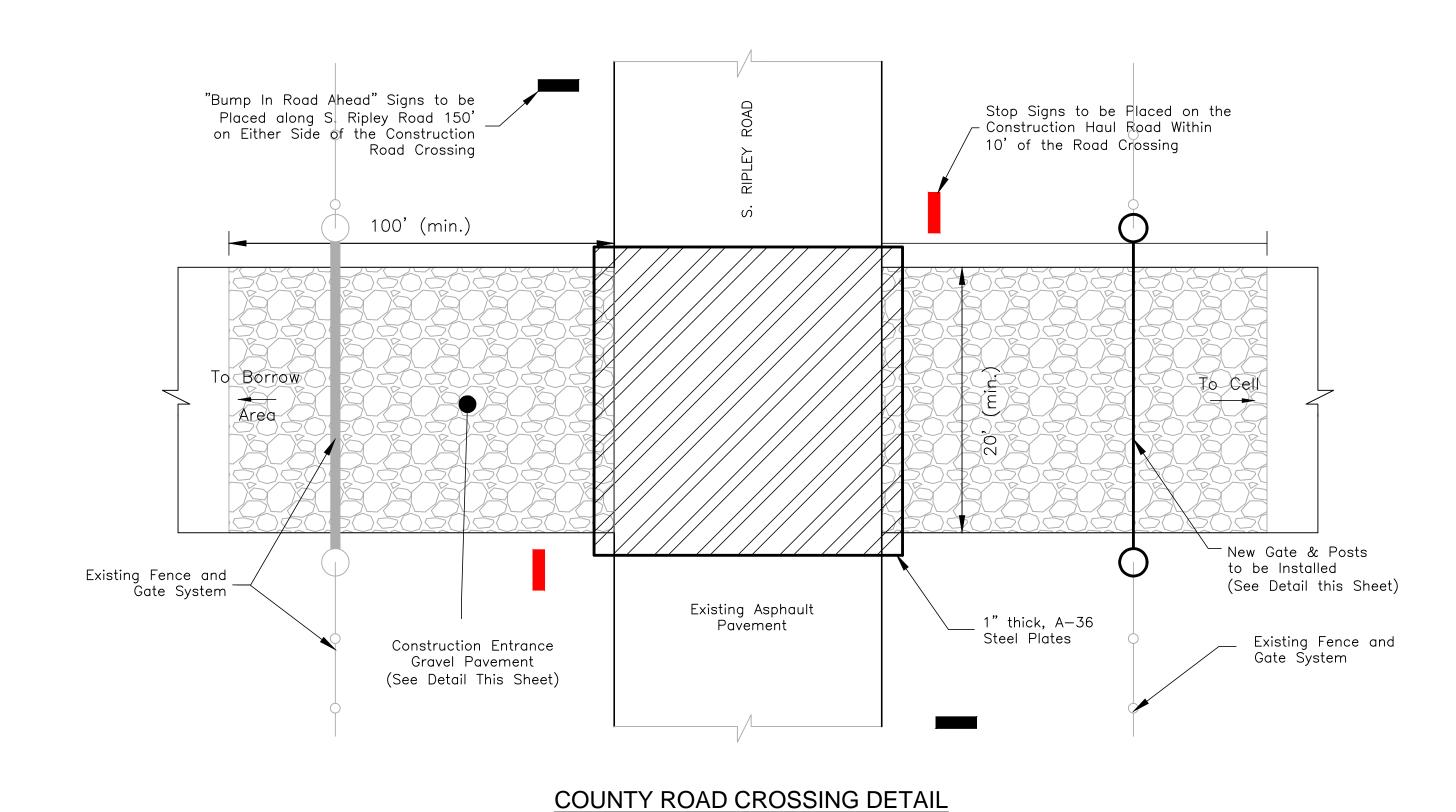


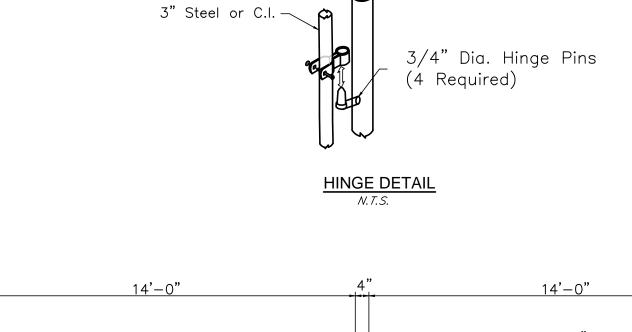


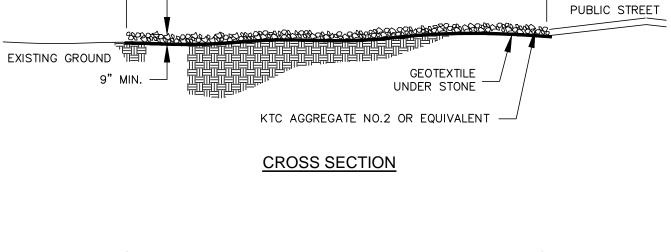
SHEET NO. 12 of 13

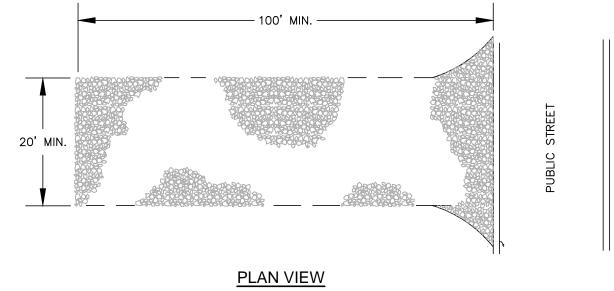


## **CONSTRUCTION ENTRANCE GATE DETAIL**





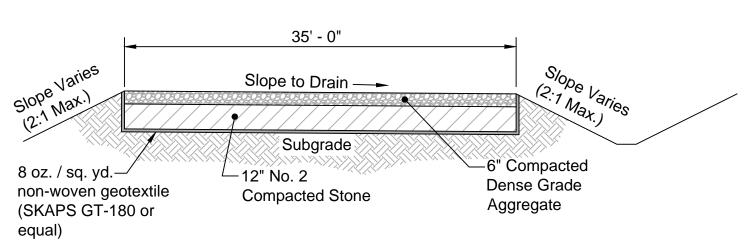




#### <u>NOTES</u>

- A STABILIZED ENTRANCE PAD OF CRUSHED STONE SHALL BE LOCATED WHERE TRAFFIC WILL ENTER OR LEAVE THE CONSTRUCTION SITE ONTO A PUBLIC STREET.
- 2. SOIL STABILIZATION FABRIC SHALL BE USED AS A BASE FOR THE CONSTRUCTION ENTRANCE.
- 3. THE ENTRANCE SHALL BE MAINTAINED IN A CONDITION WHICH WILL PREVENT TRACKING OR FLOWING OF SEDIMENT ONTO PUBLIC STREETS OR EXISTING PAVEMENT. THIS MAY REQUIRE PERIODIC TOP DRESSING WITH ADDITIONAL STONE AS CONDITIONS WARRANT AND REPAIR OR CLEAN OUT OF ANY MEASURES USED TO TRAP SEDIMENT.
- 4. ANY SEDIMENT SPILLED, DROPPED, WASHED, OR TRACKED ONTO PUBLIC STREETS OR INTO STORM DRAINS MUST BE REMOVED IMMEDIATELY.
- 5. WHEN APPROPRIATE, WHEELS MUST BE CLEANED TO REMOVE SEDIMENT PRIOR TO ENTERING A PUBLIC STREET. WHEN WASHING IS REQUIRED, IT SHALL BE DONE IN AN AREA STABILIZED WITH CRUSHED STONE WHICH DRAINS INTO AN APPROVED SEDIMENT BASIN.

### **CONSTRUCTION ENTRANCE - GRAVEL PAVEMENT**



HAUL ROAD DETAIL

N.T.S.

DETAILS

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PROJECT NO. 2016171 SHEET NO.

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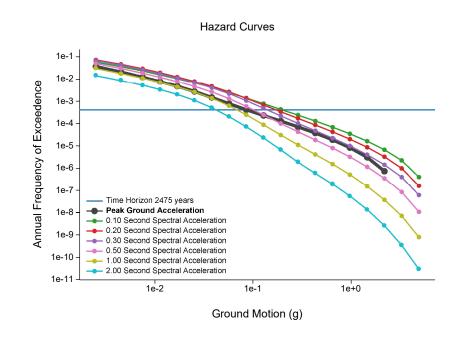
# ATTACHMENT 3 USGS UNIFIED HAZARD TOOL RESULTS

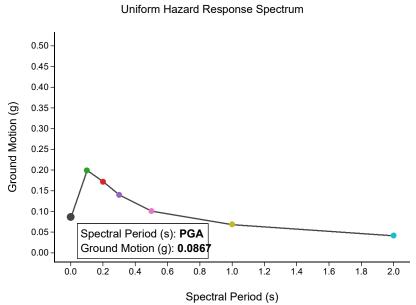
#### **Unified Hazard Tool**

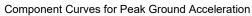
Please do not use this tool to obtain ground motion parameter values for the design code reference documents covered by the <u>U.S. Seismic Design Maps web tools</u> (e.g., the International Building Code and the ASCE 7 or 41 Standard). The values returned by the two applications are not identical.

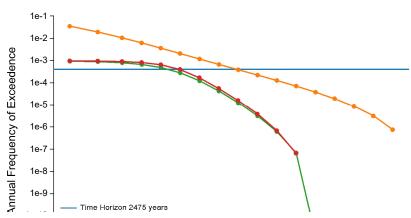
Edition	Spectral Period	
Dynamic: Conterminous U.S. 2008 (v3.3.3)	Peak Ground Acceleration	
Latitude	Time Horizon	
Decimal degrees	Return period in years	
38.686	2475	
Longitude		
Decimal degrees, negative values for western longitudes		
-83.827		
Site Class		
Site Class 760 m/s (B/C boundary)		

#### ^ Hazard Curve





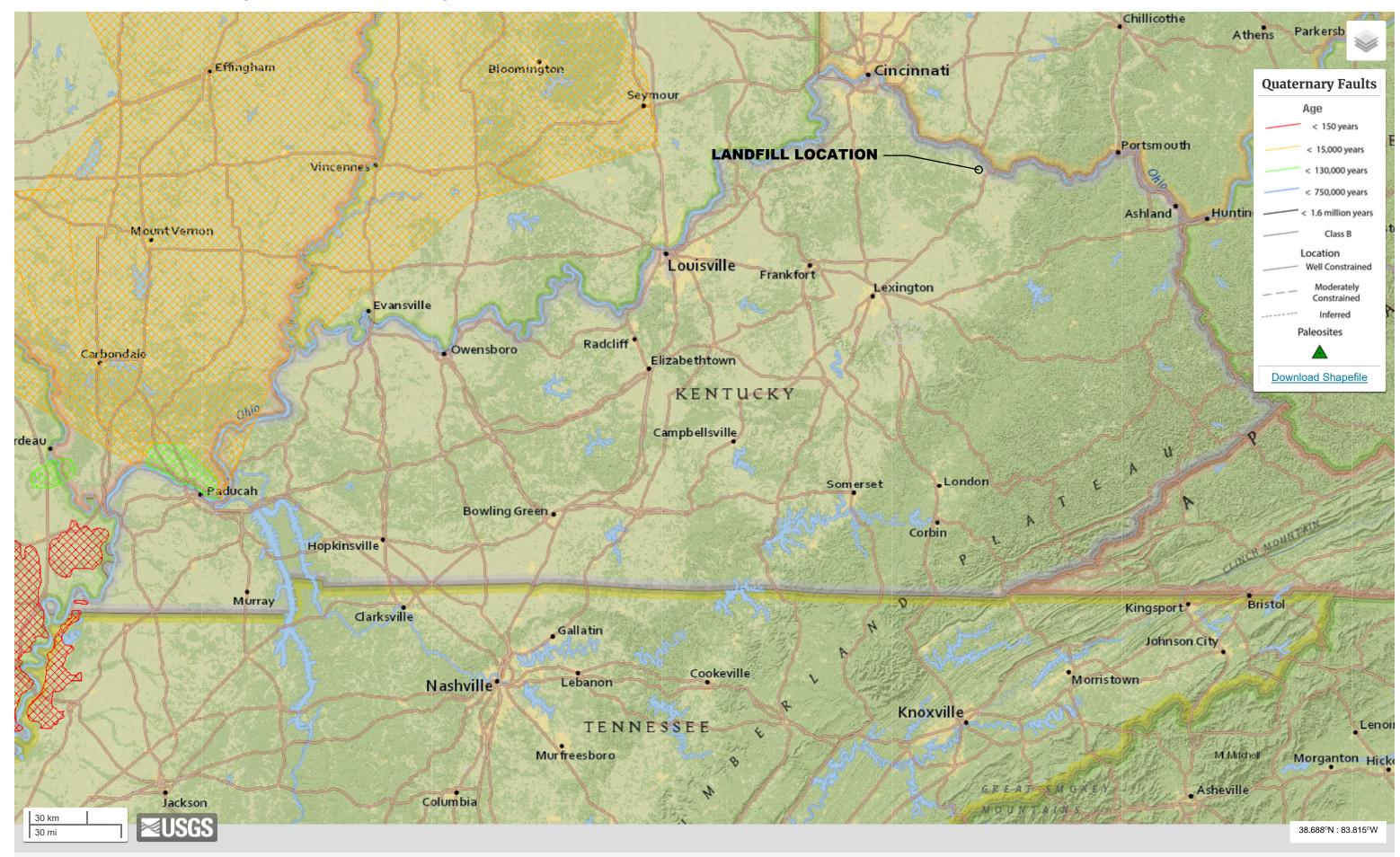




#### **ATTACHMENT 4**

#### **USGS FAULT AND KGS KARST POTENTIAL MAPPING**

#### **FAULTS MAPPING (HOLOCINE TIME)**



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