

Annual CCR Landfill Inspection

Inspection Date- 1-15-2016 (Initial Inspection)

Reason for Inspection- Annual inspection to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards.

Inspection Frequency- 1/ Year (Plant personnel inspect the landfill weekly as required in the CCR regulations and these inspections have been placed in the facility's operating record.

Background- Permitted through the State of Indiana FP 63-02. Restricted Waste Site Type III. Permit expires on October 1, 2017. Unit has no liner or leachate collection system. There is a 43 acre expansion approved to the East of the existing landfill unit. The Facility is evaluating their future options based on the new CCR regulations. A permit renewal will need to be filed with IDEM by 6-3-2017 to renew the existing approval. The Facility has only accepted fly ash, bottom ash, filter cake, gypsum, and fixated scrubber sludge (Poz-O-Tec) from IPL Petersburg Generating Station in the landfill. 2010 was the last time that waste was placed in the Unit.

Design Review- At the time of the inspection, the design meets the requirements for a State approved Restricted Waste Site Type III.

Construction Review- Overfill on the North side, and a revised footprint boundary were the only construction variations to the original drawings. Both of these issues have been reported to IDEM and approved as noted in the permit acreage revision of the Renewal permit dated 10-22-12.

Operations review- During the inspection, the only activity was some back dragging of the East slope to repair some rill marks, and the repair of the South rip rap chute. As noted, no CCR material has been placed in the unit since 2010. Semi-annual groundwater monitoring and annual financial assurance documentation is being performed and submitted to IDEM as required. No issues were noted by IDEM. Reviewed the last 4 quarters of IDEM landfill inspections, and no issues or violations were noted.

Maintenance review- During the inspection, the weekly inspections (performed by plant personnel) were reviewed and the maintenance items were listed on the reports with the plan of action to repair and date repaired.

Review files in the operating record- Reviewed the operating record, and all required documents are available for view except there was no inspection done the week of 12-21-2015. Reviewed the IDEM permit dated 10-22-2012 for consistency in design and operation of the landfill with existing practices.

Visual inspection of the CCR unit- On 1-15-2016 myself and Erv Leidolf toured the CCR unit and the facility boundary including the groundwater monitoring wells. Observed slopes, vegetation, closure of

West and North slopes, intermediate cover, erosion, and surface water control structures. All was in order.

Observed changes in geometry of the structure since the previous inspection-Since this is the first annual inspection, no previous information could be used to determine changes. There were no areas observed that appeared to be slumping or failing.

The approximate volume of CCR material contained in the unit at the time of the inspection- Based on information from IPL surveying (Mr. Bill Luecht) at the time of the inspection, there is approximately 7,043,808 yards³ of CCR material placed in the unit.

Any appearances of an actual or potential structural weakness of the CCR unit- During the time of the audit, no actual or potential structural weaknesses were observed.

Conditions that are disruptive or have the potential to disrupt the operation and safety of the CCR Unit- The East slope is scheduled to be covered for NPDES discharge issues. That should not disrupt the piggy back of the expansion.

Changes which may have affected the stability or operation of the CCR unit since the previous inspection- Since this is the initial inspection, no changes can be evaluated. During the time of the inspection no issues were observed that would affect the stability or operation of the CCR unit.

Any deficiencies or releases observed- At the time of the inspection, no deficiencies or releases were observed other than the lack of the weekly inspection for the week of 12-21-2015.

