POST CLOSURE PLAN

CFR 257.104(d)

CCR Landfill

Turk Plant Fulton, Arkansas

September, 2016

Prepared for: Southwestern Electric Power Company

Prepared by: American Electric Power Service Corporation

1 Riverside Plaza

Columbus, OH 43215



GERS-16-094

POST CLOSURE PLAN CFR 257.104(d) TURK PLANT CCR LANDFILL

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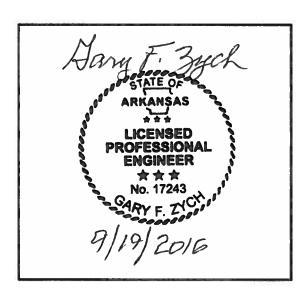
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APPROVED BY

Hary F. Zych

DATE <u>9/19/2016</u>

Manager - AEP Geotechnical Engineering



I certify to the best of my knowledge, information, and belief that the information contained in this post closure plan meets the requirements of 40 CFR § 257.104

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Attachment A: Post Closure Care Plan from approved landfill permit

1.0 OBJECTIVE

This report was prepared by AEP- Geotechnical Engineering Services (GES) section to fulfill requirements of CFR 257.104(d) for Post Closure Plans of CCR units.

2.0 DESCRIPTION OF THE CCR UNIT

The Turk Power Plant is located near the City of Fulton, Hempstead County, Arkansas. It is owned and operated by Southwestern Electric Power Company (SWEPCO). The facility operates one landfill for storing CCRs.

The landfill is permitted by the Arkansas Department of Environmental Quality, Class 3N Landfill permit 0311-S3N.

3.0 DESCRIPTION OF POST CLOSURE PLAN 257.104(d)(1)

[A description of the monitoring and maintenance activities required in paragraph (b) of this section for the CCR unit, and the frequency at which these activities will be performed.]

The Turk landfill will be closed at either the life of plant or the life capacity of the facility. The post closure care plan is further discussed in the ADEQ approved Plan in Attachment A, with the exception that the post closure care period will be 30 years.

3.1 SECTION 257.104(b)(1)

[Maintaining the integrity and effectiveness of the final cover system including making repairs to the final cover as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover.]

Inspections are performed for the items noted below. The inspection frequencies are scheduled to properly detect any issues so that repairs can be performed before significant harm occurs.

- <u>Embankment</u>: The entire waste embankment, including top surface and side-slopes, will be inspected for slides, settlement, subsidence, displacement, and cover condition (see below).
- <u>Soil Dike</u>: The soil dike will be inspected for slides, displacement, and erosion.
- <u>Cover</u>: The final cover will be inspected for erosion and for the condition of the vegetated cover, i.e., gaps in vegetation or presence of undesirable trees or brush. The integrity of the cover drainage system will also be inspected.
- <u>Final Cover Surface</u>: The Final Cover surface will be inspected for any ponding of water or flat areas.
- <u>Surface Drainage System</u>: The surface drainage system, including channels, culverts, slope
 drains, etc., will be inspected for erosion, integrity of channel lining, ponding, and accumulated
 sediment.
- <u>Leachate Collection Piping</u>: The discharge pipes of the Leachate Collection System at the Leachate Collection Pond will be inspected for clogging or damage. Other exposed portions of the Leachate Collection System including cleanouts will be inspected for damage. Similarly, the

Leachate Collection Pond will be inspected for general damage to the pond and perimeter berms, and for accumulation of sediment in the pond.

Maintenance during the post-closure care period will be performed as discussed below, based upon the facility inspections described above.

- <u>Security Control Devices</u>: Any portions of the roadway barricades which might be damaged will be repaired or replaced as necessary.
- <u>Erosion Damage Repair</u>: Any areas exhibiting erosion will be repaired by replacing and compacting the material in-kind to design grade/specifications, and reseeding the area to the specifications. Applications of additional fertilizer, selective herbicides, rodent control measures, etc. will be implemented as necessary. In the selection of fertilizers and herbicides, ensure their use will not impact the groundwater negatively. Follow-up monitoring of the repaired area will be conducted to ascertain the integrity of the repair.
- <u>Settlement, Subsidence, Displacement</u>: Any areas at the closed site exhibiting evidence of settlement, subsidence, or displacement will be examined to determine the cause of the movement. If backfilling or placing additional fill material is needed to maintain the integrity of the closed structure, it will be performed in accordance with the site/closure specifications, including seeding. If the condition reoccurs or persists, or if the severity of the condition initially is judged to warrant it, a detailed investigation of the cause will be performed and remedial action will be performed. Similarly, any areas of the soil dike exhibiting sliding, displacement, or seepage will be investigated. Repairs will be made as necessary. Follow-up monitoring of the area will be performed to ascertain that the problem has been corrected.
- <u>Closure Cap Surface</u>: Any areas that show signs of ponding water or flat contours will be examined and rectified.
- <u>Surface Water Drainage System</u>: The channel linings are designed to withstand the design
 velocities. Maintenance of the surface water drainage system will consist of removing sediment
 and/or undesirable vegetation from the surface water runoff control system (channels and
 culverts) as required. Eroded areas will be repaired by back-filling and reseeding according to
 the specifications. Damage to culverts will be repaired; structure replacement will be performed
 if needed.
- <u>Leachate Collection System</u>: Maintenance of the leachate collection system, collection sump, and leachate pumps will consist of repairing and/or replacing in-kind any damaged or eroded portions of the system and pond, cleaning pipes, and removing leachate and sediment from the collection sump and the Leachate Collection Pond, as needed.

3.1 SECTION 257.104(b)(3)

[Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of §§257.90 through 257.98.]

The groundwater monitoring system will be inspected for the general integrity of the wells, well casings and well protective casings. Any damaged portions of the monitoring wells and/or their protective casings will be replaced in-kind.

Monitoring the groundwater will be in accordance with the groundwater monitoring plan for this facility and in accordance with the requirements of §§257.90 through 257.98.

4.0 POST-CLOSURE CONTACT 257.104 (d)(1)(ii)

[The name, address, telephone number and email address of the person or office to contact about the facility during the post-closure care period.]

The name, address, and telephone number of the person to contact about the Facility during the post-closure period shall be provided upon notice of closure.

5.0 POST-CLOSURE PLANNED USE 257.104 (d)(1)(iii)

[A description of the planned uses of the property during the post-closure period. Post-closure use of the property shall not disturb the integrity of the final cover, liner(s), or any other component of the conatainment system, or the function of the monitoring systems unless necessary to comply with the requirements in this subpart...]

The post-closure use of the property will be undisturbed vacant land space. The only activities occurring on the closed CCR unit will be related to the Post-Closure care activities.

ATTACHMENT A

Post Closure Care Plan from approved landfill permit

CLOSURE AND POST-CLOSURE PLAN

SOUTHWESTERN ELECTRIC POWER COMPANY JOHN W. TURK, JR. POWER PLANT CLASS 3N LANDFILL HEMPSTEAD COUNTY Permit No. 0311-S3N AFIN: 29-00506

Terracon Project No. 35107007 January 2011

Prepared For:

SOUTHWESTERN ELECTRIC POWER COMPANY 3711 HIGHWAY 3555 FULTON, AR 71838

Prepared By:

Terracon Consultants, Inc. 25809 Interstate 30 South Bryant, AR 72022

Volume 2, Appendix H



SWEPCO - John W. Turk, Jr. Power Plant Class 3N Landfill Appendix H – Closure and Post-Closure Plan Project No. 35107007 January 2011



ENGINEER'S CERTIFICATION

"I certify to the best of my professional judgment that this document and all attachments properly adhere to established, sound engineering practices. This certification is contingent on the fact that all information supplied to the signatory authority, up to the date of this certification, is unquestionably accurate and was provided in good faith."

REGIS PROFES

David C. McCormick, Arkansas Professional Engineer No. 9199

Date of Certification

1/10/11

SWEPCO - John W. Turk, Jr. Power Plant Class 3N Landfill Appendix H – Closure and Post-Closure Plan Project No. 35107007 January 2011



3.0 POST-CLOSURE PLAN

The post closure period shall be two years following the date of written confirmation by the ADEQ that the Facility has been closed in accordance with the approved closure plan, unless the period is decreased or increased by the Director of the ADEQ (Reg.22.1302(c)(4)). The period may be decreased if the Facility demonstrates that the reduced period is sufficient to protect human health and the environment and this demonstration is approved by the Director of the ADEQ (ADEQ Reg.22.1302(c)(4)(i)). The period may be increased if the Director determines that the lengthened period is necessary to protect human health and the environment (ADEQ Reg.22.1302(c)(4)(ii)). During the post-closure care period, the closure cover shall be maintained and monitoring activities will be performed as described in the following subsections.

3.1 Post Closure Monitoring and Maintenance

Access to the site after closure will be controlled through maintenance of existing fencing and signs, and all access gates will be locked to discourage unauthorized entry.

The integrity of the final cover shall be maintained, including the repair of the cover, as necessary to correct the effects of settlement, subsidence, and erosion, and prevent runoff and run-on from damaging the cover. Vegetation shall be mowed at least annually to control the growth of unwanted vegetation that may interfere with integrity of the final cover. All cracked, eroded and uneven areas must be filled and reseeded and ditches maintained (Reg.22.1302(b)(1)).

The Facility will continue to monitor the ground water in accordance with the requirements of Chapter 12 and maintain the groundwater monitoring system (*Reg.22.1302(b)(3)*).

The surface water control systems will be operated and maintained in accordance with **Reg.22.419** and **Reg.22.1302(b)(1)** or until such time as a permanent erosion control measures have been established at the site.

3.2 Contact Persons

In accordance with Reg.22.1302)(d)(2) the name, address, and telephone number of the person to contact about the Facility during the post-closure period will be provided upon notice of closure.

SWEPCO - John W. Turk, Jr. Power Plant Class 3N Landfill Appendix H – Closure and Post-Closure Plan Project No. 35107007 January 2011



3.3 Post-Closure Cost Estimate

To comply with **Reg.22.1402** an estimate of the cost of performing post-closure activities is based on the estimated cost of hiring a third party to conduct the activities. The cost estimate is based on the most expensive costs of post closure care during the post-closure care period. **ATTACHMENT A** of this document presents the estimated post-closure cost for the Facility. The post-closure cost estimate will be revised annually during the life of the Facility to account for inflation.

3.4 Certification of Completion

Following the completion of the post-closure care period for the Facility, the Director of the ADEQ will be notified that a certification has been placed in the POR. The certification, signed by an independent registered engineer and approved by the Director of the ADEQ, will verify that post-closure care has been completed in accordance with the post-closure plan and **Reg.22.1302(f)**.

3.5 Site Management and Use

It is anticipated that upon completion of post-closure care, that this site will become open grassland. The actual long-term use of the land will be determined upon notice of closure. The final Facility cover will not be disturbed without prior approval from the Director of the ADEQ in accordance with *Reg.22.1302(h)*.