




**SUNFLOWER ELECTRIC
POWER CORPORATION**

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ANNUAL LANDFILL INSPECTION REPORT

**Sunflower Electric Power Corporation
Holcomb Station Unit #1
2440 Holcomb Lane / P.O. Box 430
Holcomb, KS 67851**

January 5, 2023

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LIST OF ACRONYMS

- CCR Coal Combustion Residuals
- CFR Code of Federal Regulations
- EPRI Electric Power Research Institute
- FGD Flue Gas Desulfurization

1.0 INSPECTION

The annual inspection of the Sunflower Electric CCR landfill was performed on January 5, 2023 by Emily Vsetecka, Manager, Environmental and Laboratory Services. The purpose of this inspection is to comply with the CCR rule.

2.0 DESCRIPTION AND HISTORY OF LANDFILL

2.1 General Overview

FGD materials, fly ash, and bottom ash produced by the plant are disposed of in the Holcomb Landfill. These materials are delivered to the landfill by truck.

2.2 Location

The Landfill is located approximately 1.0 mile north of Holcomb Station. The plant is located five miles south of Holcomb, KS in the north Half of Section 29, Township 24S, Range 33W.

2.3 Landfill Description

Holcomb Station operates (1) CCR industrial landfill called Holcomb Common Facilities, LLC. Holcomb has the only industrial landfill in the western part of the state. The Landfill accepts CCR material along with basin sludge, baghouse bags, and concrete. The landfill consists of multiple phases with Phase 3A as the current, active phase.

The Landfill includes an area of approximately 292 acres with a landfill footprint of 190 acres.

2.4 Performance History

There are no reported incidences of slope failure on Phase 3A.

2.5 Construction History

The plant has disposed of CCR in Phase 3A of the landfill since May, 2013.

2.6 Review of Operational Records

Design, construction and the results of weekly inspection reports were reviewed for the annual inspection.

2.6.1 Design and Construction Information

The landfill area is approximately 292 acres with a landfill footprint of 190 acres and a volume of 18,169,000 cubic yards. Phases 1, 2A and 2B of the landfill no longer accept waste, Phase 3A is the current, active phase for disposal.

2.6.2 Results of Weekly Inspection by a Qualified Person

The landfill is subject to periodic inspections by the Sunflower Electric environmental staff. The 2022 inspection reports were reviewed. The inspector observed any maintenance required on the landfill, any erosion on the slopes and vegetation on the inactive phases. The repairs made to the inactive phase slope continue to be monitored with no additional erosion. Seeding was also completed on Phase 1 cap, Phase 2 cap and the borrow area with additional vegetation growth in areas in 2022. These inspections are documented and retained by Sunflower Electric. The weekly inspections by the environmental staff are appropriate for compliance with the CCR rule. A sample of Sunflower's Inspection Form can be found in Appendix B.

2.6.3 Results of Previous Annual Inspections

The previous annual inspection conducted under the CCR rule for Holcomb Landfill did not indicate any concerns. This report and other pertinent reports and data will be available at the following website:

<http://sunflownet.azurewebsites.net/sunflower-electric-documents/>.

3.0 FIELD INSPECTION OF HOLCOMB LANDFILL

A field inspection was conducted on January 5, 2023 by Emily Vsetecka, Manager, Environmental & Laboratory Services of Sunflower Electric.

A photograph log documenting the landfill at the time of the inspection is presented in Appendix A. The Annual Inspection checklist is presented in Appendix C.

3.1 General

The field inspection was performed by Emily Vsetecka. The inspection took place by driving around the active landfill to identify any areas of concern and to provide a baseline for future inspections.

3.2 Volume of CCR

Sunflower estimates the amount of CCR in storage at the time of the inspection to be 512,165 tons and approximately 445,593 cubic yards.

3.3 Actual or Potential Structural Weaknesses

There were no appearances of actual or potential structural weakness or existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit.

3.4 Observed Changes

This is the eighth annual inspection conducted under the CCR rule for the Holcomb Landfill. Normal disposal activities were taking place on the landfill at the time of the inspection along with additional work at the landfill reshaping the active phase side slopes along with ditch repairs by a contractor. The landfill has had 61,630 tons of CCR placed in the landfill since the last inspection. Seeding was completed on the Phase 1 cap, Phase 2 cap and the borrow area in the spring with some additional vegetation growth this year and no additional erosion issues on the inactive phase side slopes.

4.0 ENGINEERING CERTIFICATION

Pursuant to 40 CFR 257.84 and by means of this certification, I attest that:

- (i) I am familiar with the requirements of the CCR Rule (40 CFR 257);
- (ii) I, or my agent, have visited and examined the Holcomb Station;
- (iii) the Annual Inspection Report has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the CCR Rule.

Emily D. Vsetecka

Printed Name of Qualified Professional Engineer



Emily Vsetecka

Signature of Qualified Professional Engineer

Registration/License No. 20380 State: Kansas

Appendix A

Inspection Photographs



Photo 1: Entrance Road to Phase 3A



Photo 2: Phase 3A looking east. On top of waste pit.



Photo 3: Contact water ditch for Landfill looking west



Photo 4: East end of contact water ditch to evaporation basin



Photo 5: On access road around Phase 3A

Appendix B
Weekly Inspection Form

Sunflower Electric
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CCR Landfill
Weekly Inspection Report

Name of CCR Landfill: Holcomb Common Facilities, LLC Qualified Inspector: _____
 Landfill ID Number: Kansas Permit No. 420 Date: _____ Time: _____
 Owner: Sunflower Electric Power Corporation Weather: _____
 Operator: Sunflower Electric Power Corporation Precipitation (since last inspection): _____ in.
 Site Conditions: _____

I. Perimeter Slope

- 1. Is there an access road around the perimeter slope? Yes No
 If 'Yes', describe (good condition, numerous cracks, newly paved, stone uniformly distributed, etc.) _____
- 2. Are there any depressions, ruts, or holes on the access road? Yes No
 If 'Yes', describe (size, location, etc.) _____

II. Landfill Conditions

- 1. Describe operations in the landfill (disposal, reclamation, general operational activities): _____

- 2. Are any stormwater controls obstructed? Yes No
 If 'Yes', describe (type of debris, reason for obstruction, etc.) _____
- 3. Are there indications of erosion on the landfill slopes? Yes No
 If 'Yes', describe what type and its condition (rill, gully, dimensions, etc.) _____
- 4. Other observations around the landfill (changes since last inspection, etc.): _____

III. Repairs, Maintenance, Action Items

- 1. Has any routine maintenance been conducted since the last inspection? Yes No
 If 'Yes', describe. _____
- 2. Have any repairs been made since the last inspection? Yes No
 If 'Yes', describe. _____

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CCR Landfill
Weekly Inspection Report

3. Are there any areas of potential concern? Yes No
 If 'Yes', describe. _____

4. Has this inspection identified any need for repair or maintenance? Yes No
 If 'Yes', describe and state the urgency of maintenance. "Urgent" for maintenance that should be conducted as soon as possible, "Moderate" for maintenance that should be conducted within three months, and "Not Urgent" for maintenance that can be conducted in a year. _____

IV. Photographs

Photographs can be taken of notable features. List of photographs:

	Location	Direction of Photo	Description
i.	_____	_____	_____
ii.	_____	_____	_____
iii.	_____	_____	_____
iv.	_____	_____	_____
v.	_____	_____	_____
vi.	_____	_____	_____
vii.	_____	_____	_____
viii.	_____	_____	_____
ix.	_____	_____	_____
x.	_____	_____	_____

V. General Notes

Appendix C
Annual Inspection Checklist

Checklist for Annual Inspections of CCR Landfills

Annual structural stability assessments shall be conducted to document whether the CCR unit has been designed, constructed, operated, and maintained in accordance with Federal Register Vol. 80, No. 74, Rule §257.84(b). The assessment must identify any structural stability deficiencies associated with the CCR unit in addition to recommending corrective measures with respect to items one (1) through three (3) listed below. If a deficiency or a release is identified during the assessment, the owner or operator of the unit must remedy the deficiency or release as soon as feasible and prepare documentation detailing the corrective measures taken.

The checklist is intended to provide general guidance to comply with the minimum requirements for the annual structural stability assessment of CCR Landfills. The annual inspection should be completed and certified by a qualified professional engineer (i.e., an individual who is licensed by the state where the CCR Unit is located as a professional engineer to practice one or more disciplines of engineering and who is qualified by education, technical knowledge and experience to make the specific technical certifications required under this subpart). The following checklist items should be addressed:

1. Review of Operational Records (as applicable) including:

- Design and Construction Information
- Results of Weekly Inspection by A Qualified Person
- Results of Previous Annual Inspections
- Other Documents: _____

Comments: _____

2. Conducted a visual inspection of the CCR unit to identify signs of distress or malfunction of the unit and appurtenant structures.

Note: the Weekly Inspection form(s) may be used to facilitate the visual inspection augmented for site specific conditions.

- Yes No Comments: _____
- N/A _____

3. Compiled an inspection report addressing items one (1) and two (2), above, in addition to:

- Changes in geometry of the CCR Landfill since the previous annual inspection.
- Approximate volume of CCR contained in the CCR Landfill. Storage capacity of the CCR Landfill structure at the time of the inspection.
- Any appearances of actual or potential structural weakness of the CCR Landfill.
- Any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR Landfill and appurtenant structures.

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Any other changes which may have affected the stability or operation of the CCR Landfill since the previous annual inspection.

Comments: _____

Name of Qualified Professional Engineer: _____

License Number: _____

Date of Inspection: _____

Signature: _____