public power generation agency

HASTINGS UTILITIES

CCR Temporary Ash Disposal Area

2021 Annual Inspection Report

Gerald T. Whelan Energy Center

Hastings, NE

January, 2022

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Professional Engineer Certification

" I hereby certify that the CCR Temporary Ash Disposal Area at the Whelan Energy Center, operated by Hastings Utilities, was inspected and this report prepared in accordance with the Coal Combustion Residual Rule 40 CFR 257.84(B). I am duly licensed Professional Engineer under the laws of the State of Nebraska".

Print Name: Marty Stange

Signature: Marty Stange

Date: 2/25/2022

License #: E-6129

1. Introduction

On April 17, 2015 the U.S. Environmental Protection Agency (EPA) published the final rule for the regulation and management of coal combustion residuals (CCR) under Subtitle D of the Recourse Conservation and Recovery Act (RCRA). The CCR rule defines a set of requirements for the disposal and handling of CCR within CCR units (defined as either landfills or surface impoundments, or in our case it's CCR Temporary Ash Disposal Area). EPA Regulation Section 40 CFR 257.84(b) specifies that an owner or an operator of a CCR Temporary Ash Disposal Area must have the Temporary Ash Disposal Area inspected on a periodic basis by a qualified professional engineer.

2. Review of available information (40CFR 257.84(B)(1)(i))

- The CCR Landfill weekly inspection records (per Section 257.84(a)) **from January 1,2021 through December 31, 2021**
- CCR Fugitive Dust Control Plan
- NDEE Title 132 Permit , NDEE Permit # NE0204129

Review of the above documents did not uncover any unresolved issues that indicated operation, safety or structural concerns of the Whelan Energy Center Temporary Ash Disposal Area.

3. Visual Site Inspection (40CFR 257.84(B)(1)(ii))

A site inspection of the Whelan Energy Center was performed on **December 9, 2021** by Environmental Director, Marty Stange, PE and Environmental Engineer, Marina Richards.

Weather condition at the time of inspection was **sunny, with 37F temperatures. The site was free of snow cover.**

3.1 Extent of Inspection

The inspection included an extensive site walk of the entire CCR Temporary Ash Disposal Area. As the CCR rule only requires the inspection of the active CCR Temporary Ash Disposal Area itself, this report doesn't address the condition of the groundwater monitoring system, access roads beyond the Temporary Ash Disposal Area perimeter, grades and drainage channels that are not components of the active CCR Temporary Ash Disposal Area.

3.2 Inspection Findings

The following are the findings of the CCR Temporary Ash Disposal Area inspection:

1) Continue to monitor water depth.
2) Continue to use City sweeper to help with dusty conditions off the roads. Continue Dust control.
3) Continue to remove small trees and weeds as needed by the Coal Handlers.
4) Continue to maintain both ponds.

4. Changes in Geometry

The CCR Rule requires that the site geometry changes be identified since the last annual inspection. Survey completed by Kruger Land Surveying in April, 2021. New survey is in the process to be schedule in 2022. Boundary of the lagoon is within the location of bollards. All the CCR activities are within this boundary.

5. Approximate CCR Volume

- Total Pond Ash and Scrubber Ash in storage : **330,181** cyds (259,198 cyds per 2021 survey)

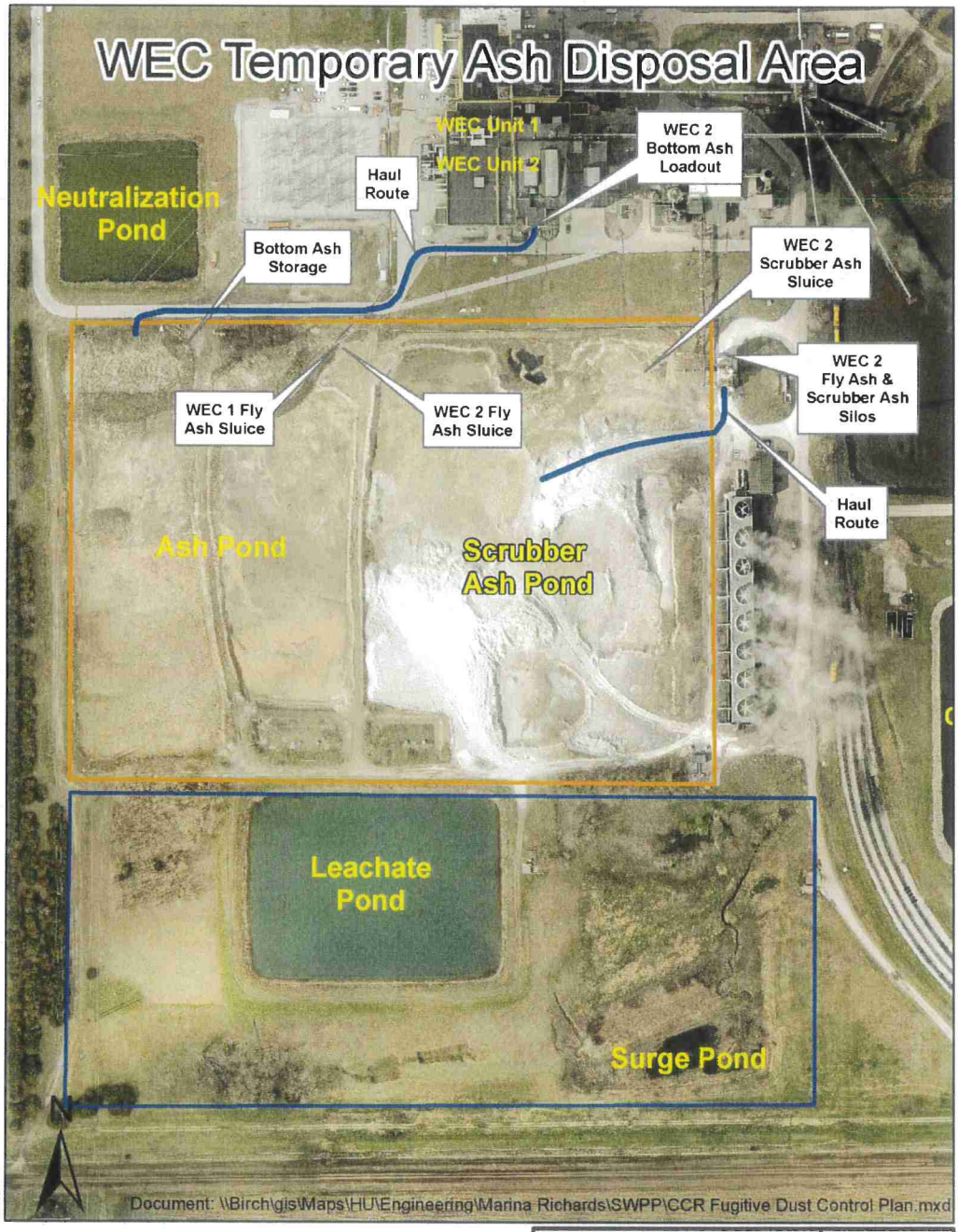
6. Structural Integrity of the CCR

Based on the observation made during the perimeter inspection and physical walk around CCR Temporary Ash Disposal Area there were no apparent or potential structural weaknesses were observed.

7. Changes Affecting Stability or Operation

The CCR rule requires identification of changes that effect site stability or operation of the CCR be identified since the last annual inspection. There were no changes to be made since the last annual inspection.

Facility Site Map



Legend

CCR Boundary

Leachate Pond Boundary

Public Power Generation Agency Hastings Utilities Whelan Energy Center CCR Fugitive Dust Control Plan	June 2019 Figure 1