



Closure Plan

WEC Temporary Ash Disposal Area



Public Power Generation Agency/
Hastings Utilities/City of Hastings, Nebraska

Gerald T. Whelan Energy Center

Hastings, Nebraska

Revised: August 6, 2021



**CLOSURE PLAN
WEC TEMPORARY ASH DISPOSAL AREA**

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PROFESSIONAL ENGINEER CERTIFICATION

“I hereby certify that this Closure Plan for the Whelan Energy Center (WEC) Temporary Ash Disposal Area at the WEC, operated by Hastings Utilities/City of Hastings, Nebraska, meets the requirements of the Coal Combustion Residual (CCR) Rule Title 40 of the Code of Federal Regulations (CFR) §257.102(b) and that I am a duly licensed Professional Engineer under the laws of the State of Nebraska.”

Print Name: Lori J. Calub

Signature: _____

Date: _____

License #: E-9881

My license renewal date is December 31, 2021.

SECTION 1.0 SITE IDENTIFICATION

1.1 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 the Resource Conservation and Recovery Act (RCRA). The rule – effective on October 19, 2015 – applies to electric utilities and independent power producers that fall within North American Industry Classification System (NAICS) code 221112, and the facility produces or stores CCR materials in impoundments or landfills. This regulation applies to the Whelan Energy Center (WEC).

The WEC Temporary Ash Disposal Area serves the two (2) fossil fuel combustion units of the WEC. City of Hastings owns Unit No. 1 (WEC1) and Hastings Utilities, the utilities department for the City of Hastings, operates WEC1; Public Power Generation Agency (PPGA) owns Unit No. 2 (WEC2) while Hastings Utilities/City of Hastings (Hastings) is the operating agent for PPGA. The WEC Temporary Ash Disposal Area is classified as an existing CCR surface impoundment of approximately 23.2 acres in size that has historically received CCR for disposal/storage and is permitted with the State of Nebraska. WEC Temporary Ash Disposal Area received CCR for disposal/storage both before and after October 19, 2015.

Over the next couple years, the existing CCR surface impoundment will complete a phase clean closure for a portion of the WEC Temporary Ash Disposal Area to be retrofitted to a CCR landfill. The retrofitted CCR landfill will provide CCR storage for continued WEC2 operations during seasonal markets as beneficial use. The retrofitted CCR landfill will be approximately six (6) acres in size and located in the northeast corner of the existing WEC Temporary Ash Disposal Area footprint.

This Closure Plan has been prepared in accordance with Nebraska Department of Environment and Energy (NDEE) Title 132, Chapter 4 requirements and updated to comply with the federal CCR rule requirements. It provides a description of activities, schedules, and features incorporated into the closure of the WEC Temporary Ash Disposal Area. This plan was developed based on removal of the CCR and clean closure of the existing WEC Temporary Ash Disposal Area as a CCR surface impoundment and the clean closure of the proposed retrofitted CCR landfill. This Closure Plan must be amended whenever there is a change in the operation of a CCR unit that would substantially affect the written closure plan, or if before or after closure activities have commenced, unanticipated events necessitate a revision of the written closure plan. PPGA and Hastings will not implement modifications to the design or operations of the WEC Temporary Ash Disposal Area, as existing CCR surface impoundment or retrofitted CCR landfill, that result in further changes to this Closure Plan without prior approval from NDEE.

1.2 Facility Identification

Facility: WEC Temporary Ash Disposal Area

Location: A parcel of land located in the north half of Section 14, Township 7 North, Range 9 West of Adams County, Nebraska, as more specifically described in the Permit Renewal Application, containing approximately 320 acres. The current WEC Temporary Ash Disposal Area disposal footprint as a CCR surface impoundment is approximately 23.2 acres on the WEC site. The CCR landfill and leachate pond liner footprint within the retrofitted portion of the WEC Temporary Ash Disposal Area will be approximately six (6) acres. This site is approximately two (2) miles east of Hastings, Nebraska, immediately south of U.S. Highway 6.

Owner/Operator Contact Address: Hastings Utilities
1228 North Denver Avenue
Hastings, NE 68901

or

P.O. Box 289
Hastings, NE 68902-0289

NDEE Permit No.: NE0204129

NDEE Facility ID: 58048

1.3 Maximum Inventory of CCR

The WEC Temporary Ash Disposal Area is planned to be closed with removal of all CCR and decontaminated as described in this Closure Plan. There will be no disposed CCR in the WEC Temporary Ash Disposal Area after completion of final closure.

The current WEC Temporary Ash Disposal Area defined as a CCR surface impoundment is approximately 23.2 acres, with available capacity to store approximately 820,000 cubic yards of CCR to an approximate elevation of 1,912 feet above mean sea level (AMSL). This volume is equivalent to five (5) years of pond ash generation and five (5) years of scrubber ash with both WEC1 and WEC2 operating at full capacity. With reduced water volumes entering the CCR surface impoundment, CCR is managed and stockpiled at elevations higher than elevation 1,898 feet AMSL of the perimeter roadway/surrounding area. Volume available to elevation 1,896 feet AMSL is approximately 293,000 cubic yards, of which 143,000 cubic yards in Pond Ash (West) Area and 150,000 cubic yard in Scrubber Ash (East) Area. Total volume available to the top of berm elevation 1,898 feet AMSL is approximately 366,000 cubic yards.

The planned retrofitted CCR landfill for the WEC Temporary Ash Disposal Area will consist of a composite liner with area for stockpiling and loadout of scrubber ash, bottom ash, and periodic fly ash, along with leachate/run-off collection. The CCR landfill was sized to provide storage capacity for at least one (1) year of volume for scrubber ash and bottom ash from WEC2 operating at half capacity. Maximum storage capacity with CCR stockpiles up to elevation 1,912 feet AMSL and approximate 3:1 side slopes provides a temporary seasonal storage of approximately 35,000 cubic yards scrubber ash and 8,000 cubic yards bottom ash.

Through beneficial reuse of CCR over the operational lifetime and retrofit of the WEC Temporary Ash Disposal Area, ultimately no CCR is expected to remain in the CCR unit. Upon closure of the retrofitted landfill all CCR will be removed from the landfill limits. Hastings will monitor the utilization rate of the CCR over the operational lifetime and if necessary, modify this Closure Plan.

1.4 Site Life

Clean closure of the existing CCR surface impoundment will begin in phases over the next couple years in preparation for retrofit to a CCR landfill. Final closure of the existing CCR surface impoundment will be initiated within 30 days of the last receipt of sluiced CCR from WEC1 or October 2023, whichever is sooner.

CCR is anticipated to be regularly removed from the WEC Temporary Ash Disposal Area retrofitted CCR landfill for beneficial use over its lifetime. The operation of the CCR landfill will continue for the life of the WEC as a coal combustion facility and will be under the operational control of Hastings.

1.5 Notifications

The facility will be used solely for the storage of CCR from the WEC. There will be no other users of the facility to be notified at the time of final closure.

Hastings will provide NDEE with formal written notice of its intent to close the WEC Temporary Ash Disposal Area and CCR Landfill at least 180 days prior to date of final receipt of CCR in accordance with NDEE Title 132 Chapter 4, Section 005.03. Hastings will provide NDEE with notice of phased or temporary clean closure construction activities at least 30 days prior to start of construction, including the following:

- Projected date of the last receipt of CCR (for final closure)
- Projected date of initiation of clean closure activities
- Projected date of removal of known final volume of CCR for the purpose of beneficial use of CCR (257.102(e)(1))
- Proposed construction schedule, if required

The NDEE also requires notification of the actual date of initiation of final closure and the actual date of completion of clean closure activities.

In accordance with the CCR rule requirements and Title 132, the following closure-related notifications will be provided to the Director of NDEE:

- Notification that the Closure Plan is available and posted to the CCR website, and any amendment thereof
- Notification of intent to close (final closure as CCR surface impoundment and final closure as CCR landfill)
- Notification of completion of closure, including certification by qualified professional engineer (both as CCR surface impoundment and CCR landfill)
- Notification that deed notation has been recorded (after last final closure as CCR landfill)

1.6 Schedule of Activities

The WEC Temporary Ash Disposal Area CCR surface impoundment is scheduled to cease placing CCR and non-CCR waste by October 15, 2023 in accordance with the CCR rule Title 40 of the Code of Federal Regulations (CFR) §257.103(f)(1)(vi)(A). Initiation of closure activities for the CCR surface impoundment portion must commence either:

- within 30 days after the last receipt of CCR or removal of the known final volume of CCR for purpose of beneficial use, or
- within two (2) years of the last receipt of CCR or last removal of CCR material for purpose of beneficial use.

Pursuant to 40 CFR §257.102(f)(1)(ii), closure activities for an existing CCR surface impoundment will be completed in accordance with the closure plan within five (5) years of commencing closure activities. The maximum time extension is two (2) years for a CCR surface impoundment of 40 acres or smaller (40 CFR §257.102(f)(2)(ii)(A)).

The WEC Temporary Ash Disposal Area retrofitted CCR landfill will be constructed after the phased clean closure of an area of the existing CCR surface impoundment with construction completed and approval from NDEE to place CCR in the newly constructed landfill by the October 2023 deadline. The schedule for completing all activities necessary to satisfy the closure criteria in the CCR rule 40 CFR §257.102 and NDEE Title 132 includes the following anticipated key activities and milestones, along with estimated timeframes to complete each step. For CCR landfills, Hastings must complete closure within six (6) months of commencing closure activities, unless a time extension is sought. The maximum time extension for completing closure is two (2) one (1) year increment extensions for a CCR landfill ((40 CFR §257.102(f)(2)(ii)(C)).

- 1) Notification of intent to close (NDEE Title 132) – 180 days prior to final receipt of CCR
- 2) Notice of initiation of closure (NDEE Title 132) – at least 30 days prior to start
- 3) Notification of intent to close (CCR rule) – no later than date of initiating closure (both as CCR surface impoundment and CCR landfill)
- 4) CCR surface impoundment
 - Dewatering of CCR surface impoundment – initial and throughout CCR removal
 - Continue removal of CCR for beneficial use – up to four (4) years
 - Excavation of remaining CCR for beneficial use or disposal at local permitted disposal landfill, if required – up to six (6) months
 - Final dewatering of CCR surface impoundment and leachate retention pond – estimate two (2) months
 - Final excavation of CCR and soils (decontamination) as required for decontamination – estimate two (2) months
 - Testing of soils of closed CCR surface impoundment and leachate retention pond – estimate 1-3 months overlapping with final excavation activity
- 5) CCR landfill
 - Continue removal of CCR for beneficial use – up to four (4) years
 - Excavation of protective cover – up to one (1) year
 - Final dewatering of leachate pond and removal of CCR sediment and geomembrane – estimate two (2) months

- 6) Groundwater monitoring for Appendix IV constituents – two (2) sampling events at least 30 days apart
- 7) Complete closure – within five (5) years of commencing clean closure activities (CCR rule)
- 8) Notification of completion of closure (CCR rule) – within 30 days of completion (both as CCR surface impoundment and CCR landfill)
- 9) Submit CQA Construction Documentation Report – concurrent with Notification of Completion of Closure (both as CCR surface impoundment and CCR landfill)
- 10) Deed notation – following final closure completion (CCR landfill)
- 11) Notification that deed notation has been recorded (CCR rule) – within 30 days of recording
- 12) Notification and copy of deed notation (NDEE Title 132) – following deed notation

The post-closure plan, as required by NDEE, will be implemented immediately after closure is complete.

1.7 Final Closure Certifications and Reports

Hastings will prepare, directly or through a contract, the documentation of closure in accordance with NDEE Title 132, Chapter 4. Documentation of closure of both the existing CCR surface impoundment and future CCR landfill retrofit will each include certification by an independent professional engineer, registered in the State of Nebraska, verifying that closure has been completed in accordance with this or any subsequently updated Closure Plan. This certification will be placed in the operating record. Documentation of closure and certification will include records of dewatering, CCR removal and decontamination, and testing to confirm removal.

Certifications required by the federal CCR rule are included with the notifications described under Section 1.5 above.

When the WEC Temporary Ash Disposal Area surface impoundment completes final closure, a topographical survey and plat (prepared by a licensed surveyor in the State of Nebraska and meeting the minimum standards of property boundary surveys) will be submitted to NDEE. The survey plat will include the name of the property owner as it appears on the property deed, a legal description of the site, a description of the CCR accepted, the historic location of the CCR and the approximate depth of CCR fill (if CCR remains in place), and the location and description of groundwater management systems that are to be maintained throughout the post-closure period.

1.8 Deed Notation

Pursuant to NDEE, within 90 days following the final clean closure completion of the WEC Temporary Ash Disposal Area, or installation of the final cover system if required, a notation will be recorded on the deed to the City of Hastings WEC property or other instrument that is normally examined during a title search with the Adams County Registrar of Deeds. A final plat will be filed with the Adams County Registrar prepared by a registered land surveyor licensed in the State of Nebraska. Hastings will provide documentation of the deed notation to NDEE to show that such notation has been recorded, and a copy of this record and documentation will be placed in the operating record.

The notation on the deed will in perpetuity notify any potential purchaser of the property that:

- 1) A fossil fuel combustion ash disposal area previously existed on the property (the land has been used as a CCR surface impoundment or CCR landfill and all CCR has been removed for closure);
- 2) The type, depth, and location of CCR (if any) disposed on the property is identified as well as the existence of any monitoring systems; and
- 3) Its use may be restricted under NDEE Title 132, Chapter 4 to protect the monitoring system or any other components of the containment system.

SECTION 2.0

CLOSURE PLAN – EXISTING CCR SURFACE IMPOUNDMENT

Hastings plans to close the WEC Temporary Ash Disposal Area surface impoundment in phases by removal of the CCR and decontamination of the CCR surface impoundment as allowed by the federal CCR rule 40 CFR 257.102(a) and (c). This Closure Plan describes the steps necessary to close the CCR surface impoundment at any point during the active life of the CCR surface impoundment.

Clean closure activities at the WEC Temporary Ash Disposal Area CCR surface impoundment are anticipated to include the following components:

- CCR removal
- Dewatering – leachate management
- Decontamination – sampling and miscellaneous CCR/soil removal (WEC Temporary Ash Disposal Area and leachate retention pond)
- Decontamination – groundwater monitoring
- Stormwater and erosion controls
- Access controls
- On-site structures and roadways

With removal of CCR, a final cover system is not anticipated to be required and therefore is not included in this plan. The CCR removal and sampling activities are applicable to permanent partial clean closure, temporary clean closure, construction clean closure, and final clean closure.

2.1 CCR Removal

Final closure of the WEC Temporary Ash Disposal Area CCR surface impoundment will begin after WEC1 ceases sluicing CCR by October 2023. At this time, the amount of pond ash, scrubber ash and bottom ash in the unlined portion of the WEC Temporary Ash Disposal Area is anticipated to be less than the most recent volumes obtained from the topographic survey. All remaining CCR will be excavated and removed from the CCR surface impoundment by the local ash contractor, City, or other contractor to be transported to various projects. Markets for CCR have been well established prior to final closure. CCR removal at final closure will also include removal of the internal ash separation berm within the WEC Temporary Ash Disposal Area.

For closure cost calculations, CCR volumes from the January 2021 survey are used. Volumes are determined from the topographic survey to original ash pond base elevation of 1,888 feet above mean sea level. These include:

- Pond ash, approximately 165,000 cubic yards
- Pond ash separation berms, approximately 15,000 cubic yards
- Scrubber ash and non-spec scrubber ash (i.e. includes fly ash/pond ash), approximately 94,000 cubic yards
- Bottom ash, estimated at 7,000 cubic yards

2.2 Dewatering-Leachate Management

Leachate management facilities for the CCR surface impoundment consist of surface pumps, risers, culverts/spillways, leachate retention pond and pump station. These are anticipated to remain in place at final closure of the CCR surface impoundment.

Throughout the CCR removal activities during various closure stages, stormwater will be regularly removed from the CCR surface impoundment and placed in the existing leachate retention pond. Water in the leachate retention pond is periodically pumped to a stationary sprayer and used for CCR fugitive dust control. Upon final removal of all CCR, the CCR surface impoundment and leachate retention pond will be completely dewatered with water used as dust control on the retrofitted CCR landfill.

Upon completion of CCR removal and decontamination, the existing leachate management system serving the CCR surface impoundment will no longer be necessary. The pipe spillways with riser inlets, leachate retention pond, and pump station can remain to act as discharge controls for stormwater containment or serve other non-CCR needs of the WEC.

2.3 Decontamination

In compliance with 40 CFR 257.102(c), decontamination of the CCR unit is considered complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to 40 CFR 257.95(h) for constituents listed in Appendix IV of the CCR rule.

2.3.1 Decontamination-Clean Closure Soil Sampling and Analysis

At clean closure (partial, temporary, construction, or final) and after removal of CCR, the surface soils at the base of the WEC Temporary Ash Disposal Area surface impoundment or partial clean area of the WEC Temporary Ash Disposal Area surface impoundment will be sampled for parameter(s) distinctive in concentration between the fossil fuel combustion ash and native clay soils (barium and chromium for pond ash and bottom ash; and barium, chromium and mercury for scrubber ash). Clean closure sampling parameters, frequency, and procedures are outlined in the Clean Closure Soil Sampling and Analysis Plan located in Attachment 1.

At final closure of the surface impoundment after removal of all CCR, the surface soils at the base of the existing leachate retention pond will also be sampled as described in the Clean Closure Soil Sampling and Analysis Plan (Attachment 1). Areas not passing will receive further material removal and re-sampling to confirm miscellaneous CCR removal from the leachate retention pond. This pond will then be renamed as a stormwater pond.

2.3.2 Decontamination-Groundwater Monitoring

All installed monitoring wells at the time of CCR surface impoundment closure are anticipated to remain in use for the groundwater level measurements, detection monitoring program, and/or assessment monitoring as required to comply with NDEE Title 132. Hastings has installed markers to identify the location of all existing monitoring wells and bollards, as needed, to

protect wells from inadvertent damage. The groundwater monitoring system is described in the Groundwater Sampling and Analysis Plan (Permit – Appendix D).

After removal of the final amount of CCR and contaminated soils from the unlined CCR surface impoundment, the groundwater monitoring wells in the CCR monitoring well network will be sampled for the CCR rule Appendix IV constituents listed in Attachment 2. A total of two (2) groundwater monitoring events of Appendix IV constituents, a minimum of 30 days apart, will be completed. Decontamination will be deemed completed when the groundwater monitoring concentrations do not exceed the groundwater protection standards established for the Appendix IV constituents.

2.4 Stormwater and Erosion Controls

The drainage ditches, culverts, and leachate retention pond for the CCR surface impoundment already exist on the WEC site. The leachate retention pond will be managed as described in Section 2.2. During final closure activities, all drainage structures and ditches will be maintained as designed to accommodate a 25-year, 24-hour frequency storm event, as shown in the Site Drainage Calculations (Permit – Appendix M).

Further erosion controls are not anticipated at the WEC site. However, if necessary, erosion controls may be installed and will consist of silt fence, staked hay bales, wattles or similar erosion control devices. These may be used during closure activities of the WEC Temporary Ash Disposal Area surface impoundment or where stormwater is likely to discharge from the WEC site. All discharges from the WEC site will be in accordance with the site's National Pollutant Discharge Elimination System (NPDES) permit.

2.5 Access Control

The WEC site access is controlled by perimeter chain-link security fencing with a lockable gate at the entrance, call box with mechanical traffic boom and secondary chain-link fence and operable sliding gate, and barbed-wire fencing in other areas. The gate(s) are locked at all times and entrance is by permission only. The site security system includes cameras that monitor the site. The power plant is staffed at all times. The fencing and cameras discourage unauthorized site access. Unauthorized personnel will not be allowed on-site. Site access controls will remain with continued operation of the power plant.

2.6 On-Site Structures and Roadways

There are no buildings required for the operation of the WEC Temporary Ash Disposal Area. A temporary office by the fly ash marketer/CCR removal entity may be used but will be mobile and removed at the end of any contractual agreement held with PPGA and Hastings. Any buildings that are deemed unnecessary following closure of the CCR surface impoundment may be demolished and removed from the WEC site for disposal in a permitted off-site facility.

With continued operation of WEC2 as a coal-combustion power plant and future WEC1 power generation (i.e. not from coal), the structures for the WEC will remain.

Site configuration will incorporate the existing roadways to access the groundwater monitoring wells, surface water facilities, retrofitted CCR landfill, and other appropriate areas.

SECTION 3.0

CLOSURE PLAN – RETROFITTED CCR LANDFILL

Hastings plans to close the WEC Temporary Ash Disposal Area retrofitted CCR landfill by clean closure to the leachate drainage layer. This Closure Plan describes the steps necessary to close the CCR landfill at any point during the active life of the CCR landfill. CCR stockpiled in the retrofitted CCR landfill will be regularly removed for beneficial reuse and recycling. Periodic accumulation of CCR volumes stockpiled in the WEC Temporary Ash Disposal Area may require additional management at final closure.

Clean closure activities at the WEC Temporary Ash Disposal Area retrofitted CCR landfill are anticipated to include the following components:

- CCR removal
- Protective cover removal
- Decontamination – material removal and groundwater monitoring
- Stormwater and erosion controls
- Access controls
- On-site structures and roadways

With removal of CCR, a final cover system is not anticipated to be required and therefore is not included in this plan. The CCR removal and decontamination activities are applicable to partial clean closure and final clean closure.

3.1 CCR Removal

With regular marketing of the CCR, less than one (1) year of CCR generation is anticipated to be stored in the WEC Temporary Ash Disposal Area landfill. All remaining CCR will be excavated and removed by the local ash contractor, City of Hastings, or other contractor to be transported to various projects. Markets for CCR from the WEC have been well established. For financial assurance purposes, one (1) year of scrubber ash and bottom ash from WEC2 projected operations is estimated at approximately 17,000 cubic yards and 6,000 cubic yards, respectively.

3.2 Protective Cover Removal

The protective cover over the drainage layer and liner provides the working surface for the CCR stockpiling and loadout activities. Protective cover may consist of pond ash, soil and/or gravel surfacing. Volume of protective cover is estimated at approximately 24,200 cubic yards based on average three (3) feet depth over five (5) acres (no protective cover within the leachate pond). Material will be excavated and transported to various projects for beneficial use. Sampling may be required prior to the beneficial use.

3.3 Decontamination

In compliance with 40 CFR 257.102(c), decontamination of the retrofitted CCR landfill is considered complete when constituent concentrations throughout the CCR landfill and any areas affected by releases from the CCR landfill have been removed and groundwater monitoring

concentrations do not exceed the groundwater protection standard established pursuant to 40 CFR §257.95(h) for constituents listed in Appendix IV of the CCR rule.

3.3.1 Decontamination-Material Removal

This Closure Plan includes removal of CCR and the protective cover (working surface) of the CCR landfill as the decontamination measure for areas potentially affected by releases from the retrofitted CCR landfill. Sections 3.1 and 3.2 of this plan describe the CCR removal and protective cover removal.

Decontamination will also include pumping out the leachate and stormwater from the leachate pond and removal of any miscellaneous CCR sediment.

3.3.2 Decontamination-Groundwater Monitoring

The CCR monitoring well network at the time of final closure is anticipated to remain in use for the groundwater level measurements, detection monitoring program, and/or assessment monitoring as required to comply with NDEE Title 132. Hastings has installed markers to identify the location of all existing monitoring wells and bollards, as needed, to protect wells from inadvertent damage. The groundwater monitoring system is described in the Groundwater Sampling and Analysis Plan (Permit – Appendix D).

After removal of the final amount of CCR and materials for decontamination, the groundwater monitoring wells in the CCR monitoring well network will be sampled for the CCR rule Appendix IV constituents listed in Attachment 2. A total of two (2) groundwater monitoring events of Appendix IV constituents, a minimum of 30 days apart, will be completed. Decontamination will be deemed completed when the groundwater monitoring concentrations do not exceed the groundwater protection standards established for the Appendix IV constituents.

3.4 Stormwater and Erosion Controls

After clean closure of the CCR landfill, stormwater and erosion controls will no longer be necessary. Run-on control diversion berms may remain in place.

Further erosion controls are not anticipated at the WEC site. However, if necessary, during material removal and decontamination, erosion controls may be installed consisting of silt fence, staked hay bales, wattles or similar erosion control devices. These will only be used at the CCR landfill where stormwater is likely to discharge onto the site and impact closure activities. All discharges from the WEC site will be in accordance with the WEC NPDES permit.

3.5 Access Control

WEC site access controls are expected to remain after final clean closure of the CCR landfill. Future use(s) of the site will dictate changes, if any, to the access controls.

3.6 On-Site Structures and Roadways

There are no buildings required for the operation of the CCR landfill. A temporary office by the fly ash marketer/CCR removal entity may be used but will be mobile and removed at the end of any contractual agreement held with PPGA and Hastings. Any buildings that are constructed and deemed unnecessary following closure may be demolished and removed from the WEC site for disposal in a permitted off-site facility. Buildings not removed will be securely locked to prevent unauthorized access. Maintenance equipment required during the post-closure period may remain on-site.

The final site configuration will incorporate the roadways to access the groundwater monitoring wells, surface water facilities, and other appropriate areas.

**Attachment 1
Clean Closure Soil Sampling and
Analysis Plan**

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Attachment 2
CCR Rule Appendix IV Constituents

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Appendix IV to 40 CFR Part 257

Appendix IV Constituents for Assessment Monitoring
• Antimony • Arsenic • Barium • Beryllium • Cadmium • Chromium • Cobalt • Fluoride • Lead • Lithium • Mercury • Molybdenum • Selenium • Thallium • Radium 226 and 228 combined

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