
Annual CCR Unit Inspection Report

Lon D. Wright Power Plant
Fremont, Nebraska

Prepared for
Fremont Department of Utilities

400 E. Military Road
Fremont, NE 68025

January 19, 2016



TETRA TECH, INC.
6307 Center Street, Suite 210
Omaha, Nebraska


Scott Schmoker, P.E. 3-9-2016
Date



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Executive Summary

On January 5, 2016, Tetra Tech completed the first annual coal combustion residue Unit (CCR Unit) inspection by a qualified professional engineer (P.E.) for the City of Fremont's Lon D. Wright Power Plant (LDW). The primary purpose of the inspection was to assure that the CCR Unit is designed, constructed, operated, and maintained consistent with recognized and generally accepted good engineering standards and protective of human health and the environment. The inspection included review of Fremont's Fossil Fuel Combustion Ash Monofill Permit (Permit Number NE0203777) and monofill permit renewal application (assembled and submitted January 2016 by Tetra Tech), CCR Unit maintenance and compliance evaluation forms, and observation of the CCR Unit and associated activities.

Recommendations developed through the inspection process are listed below:

1. FDU should continue to be diligent about eradicating pests that have caused damage to the upper portion of the leachate collection pond liner and repair the damage to the liner in an expeditious manner.

Damage to the liner was noted during the inspection process as well as observed and discussed with NDEQ representatives at the time of the CCR Unit permit renewal inspection conducted November 16, 2015. Damage to the upper edge of the leachate collection pond apparently by rodents, has resulted in several holes through the liner. Pest control measures are in place and should continue to be implemented to eradicate the pest and allow for repair of the liner. NDEQ representatives supported FDU's effort of using bait boxes to control the pest and to subsequently repair the liner.

2. FDU should continue to monitor animal burrows throughout the CCR Unit footprint and backfill any suspected animal dwellings. Two small animal burrows were observed in the Phase II area. Pest control experts should be consulted as necessary.

3. Ground Water Monitoring Well #2 needs concrete repair work to the pad surround the well riser casing. The concrete pad was cracked and NDEQ noted this during their November 16, 2015 permit renewal inspection.

4. FDU should continue to monitor the position (by conducting field measurements) of the monitoring well casing in Ground Water Monitoring Well #4. FDU staff noticed that over time the top of the well casing might have pushed slightly upward. All indications show that the well is performing as designed.

Section 1: Introduction

1.1 Facility Information

Facility Name:	Lon D. Wright Power Plant (LDWPP)
Facility Street Address:	2701 E. First St. Fremont, NE 68025
Owner Name:	Fremont Department of Utilities (FDU)
Owner Address:	400 E. Military Avenue Fremont, NE 68025

1.2 CCR Unit Information

The Lon D. Wright Power Plant operates an ash monofill (CCR Landfill Unit) for staging and disposal of ash (CCR) resulting from coal combustion related to on-site power generating activities. The design of the CCR Unit incorporates a composite liner, leachate collection system, final cover, and a surface water control system. The liner system includes a 2-foot-thick clay liner compacted to maximum permeability of 1×10^{-7} cm/sec and a 60-mil high density polyethylene (HDPE) liner. The leachate collection system includes a minimum 12-inch granular drainage layer spread over the top of the liner. The drainage layer allows leachate to gravity drain along the bottom of the Monofill to perforated 6-inch-diameter PVC piping embedded in the drainage layer. Geotextile fabric was spread over the entire drainage layer, and a 6-inch protective soil cover was placed over the geotextile fabric. The leachate collection piping discharges leachate into a sump area where the leachate is pumped to the leachate retention pond. Berms, approximate 7-foot-high berms, protect the CCR Unit from storm water run-on and prevent storm water run-off from the active portions of the CCR Unit.

1.3 Purpose

This report has been prepared to document the inspection of the FDU CCR Unit. The inspection was conducted by Tetra Tech on January 5, 2016 and meets the compliance requirements for annual CCR inspections found under 40 CFR 257.84. This report includes inspection checklists, observations, findings and recommendations, and a photographic log of the inspection. No testing or sampling was conducted during the inspection.

Section 2: Annual CCR Unit Inspection

2.1 Objectives

This inspection was conducted to fulfill the requirement for a CCR Unit landfill found at 40 CFR 257.84 to conduct an inspection by a qualified professional engineer at intervals not exceeding 1 year. This initial annual CCR Unit inspection was conducted to ensure that the design, construction, operation, and maintenance of the CCR Unit is consistent with recognized and generally accepted good engineering standards and protective of human health and the environment. This report describes the results of the first annual CCR Unit inspection conducted at LDW.

2.2 CCR Unit Inspection Method

Tetra Tech completed an inspection on January 5, 2016 following the Fremont Department of Utilities Annual CCR Unit Inspection Protocol (December 2015). The inspection was conducted by Tetra Tech's Scott Schmoker, P.E., and Mark Podany, senior project manager. Tony Sedlacek, chemistry supervisor and environmental coordinator for FDU, escorted Messrs. Schmoker and Podany for the duration of the inspection. Mr. Sedlacek provides environmental oversight of the CCR Unit. Records and copies of requested records were provided by Mr. Sedlacek. Weather conditions were windy, partly cloudy, temperature approximately 26 degree Fahrenheit, and snow and ice cover were present from recent precipitation events.

2.3 Review of Operations and Maintenance Data

CCR Unit compliance, operations, and maintenance records were reviewed to assess operating conditions, issues, and maintenance activities occurring during the previous 1-year period. The following records (dated October 19, 2015 to January 5, 2016) and permits were reviewed:

- 1). Work Order History Reports specific to CCR Unit operations from October 19, 2015 to January 5, 2016.
- 2). Unscheduled Maintenance Work Order dated November 25, 2015 to implement more bait traps for rodent control.
- 3). Monofill Storm Water Pollution Prevention Plan – Maintenance and Repairs of Control Measures for the following dates: 23-Nov-15.
- 4). Weekly CCR Unit Compliance Evaluation Forms beginning October 19, 2015 through January 4, 2016. This is a new federal requirement for CCR Unit landfills and FDU is in compliance with this requirement.
- 5). FDU Ash Monofill Leachate System Pumps Monthly Operational Inspection Log Sheet.
- 6). NDEQ Comprehensive Permit Renewal Inspection cover letter and report dated December 3, 2015.

- 7). Fremont Department of Utilities Fossil Fuel Combustion Ash Monofill Permit (Permit Number 0203777), expires July 18, 2016, issue by Nebraska Department of Environmental Quality.
- 8). Fremont Department of Utilities Fossil Fuel Combustion Ash Monofill Permit Renewal Application, submitted by Tetra Tech January 2016 and pending approval by Nebraska Department of Environmental Quality.
- 9). Fremont Department of Utilities Fugitive Dust Control Plan, October 2015.
- 10). Fremont Department of Utilities CCR Unit Annual Inspection Protocol, December 2015.

2.4 Visual Inspection

A visual inspection was conducted of the CCR Unit including the lined disposal area, leachate collection pond and visible portion of the system, pump house, Phase I berms, run-on and run-off system, and ground water monitoring system and well locations.

2.4.1 CCR Unit Lined Disposal Area

The CCR Unit was observed for placement of CCR on the lined area, signs of water accumulation on the liner (ponding), fugitive dust, run-on and run-off control measures, and overall condition of the CCR Unit and associated operations.

A visual inspection of the lined disposal area was conducted by walking the perimeter of the CCR Unit. The south side of the CCR disposal area was demarcated with poles on the east and west sides to show the extent of the liner. The extent of the liner on the north, east, and west sides were identified by the designed proximity to the Phase I berms. No issues were observed and the CCR appeared to be well within the confines of the lined area and no changes were noted in the geometry of the permitted design of the Unit. A review of the December 10, 2015 topographical survey data indicates that Phase I contains approximately 19,098 cubic yards of CCR resulting in approximately 13,472 cubic yards of air space available.

During the inspection, a truck hauling CCR unloaded its contents onto the southwest portion of the lined area and was further managed by a front-end loader (see Photograph #1). Minimal dust was generated and no fugitive dust was observed leaving the property boundary.

Condition and adequacy of the engineered storm water run-on and run-off structures associated with the CCR Unit were evaluated. There was no indication that storm water run-on and run-off measures were failing or inadequate. No sign of erosion, ponding off the lined area, accumulation of CCR off the lined area, washouts, or any abnormal conditions were observed. Although weather conditions somewhat hindered observations, evaluation of site conditions during the November 16, 2015 NDEQ permit renewal inspection support Tetra Tech's position that storm water control measures are constructed and operate appropriately as designed.

Recent snow and ice accumulation resulted in difficult conditions to evaluate ponding on the lined area. However, Mr. Sedlacek stated that any water accumulation was due to recent precipitation and that the Hydrovactor system had not been used to convey

CCR since November 2015 (see Photograph #2). He explained that with recent operational changes, the normal method of handling CCR is in a dry form unloaded by dump trucks and managed with front-end loaders. There was no indication of ponding on or around the CCR Unit lined area.

Recommendations: Observation of CCR Unit operations, design, geometry, ash volume, and maintenance appear to meet the requirements and no adverse conditions were noted. No structural weaknesses or any other conditions were observed that would disrupt operation and safety.

2.4.2 Leachate Collection System

Observation of the leachate collection system was conducted by walking the perimeter of the lined leachate collection pond (see Photograph #3), entering the pump house (building located between the disposal area and leachate collection pond that protects the leachate pumps and associated pipes and valves), and the leachate collection pipes that rise from the bottom of the CCR Unit disposal area liner and extend above the berm and are nested in a concrete weir (see Photograph #8). A high level alarm is in place to notify FDU staff when leachate needs to be pumped to the leachate collection pond. Mr. Sedlacek explained that FDU staff maintain the system to ensure the amount of leachate on the disposal unit liner does not exceed twelve inches above the liner.

Weather conditions inhibited observation of the leachate to visually evaluate for abnormalities such as discoloration or accumulation of CCR solids within the containment. The depth of the leachate was not measured but there was sufficient capacity remaining between the pond level and the top of the liner. Damage by rodents to the upper portion of the liner was observed and resulted in about five to six quarter-sized holes through the fabric (see Photographs #4, 5, and 6). The holes were located along the top of the liner where the exposed liner meet the ground surface. At each location there were orange safety cones sitting on top of plastic rodent bait traps. Mr. Sedlacek explained that he keeps a close watch on the rodent activity and that they recently added more bait traps to eliminate the pests. Once the rodents are controlled, the liner will be repaired. This issue was discussed with NDEQ staff at the time of the November 16, 2015 permit renewal inspection. NDEQ staff supported FDU's effort to control the rodents and subsequently repair the liner as soon as possible.

The pump house is located between the leachate collection pond and the disposal area. It provides protection for the pumps, piping and valves. There were three pump systems observed. Mr. Sedlacek explained they consisted of a leachate transfer pump, Hydrovactor pump, and leachate sump pump. This system is designed to allow for pumping leachate back and forth as required under certain operating conditions. The pump house floor was dry and no issues were identified with any of the system components. Mr. Sedlacek provided the FDU Ash Monofill Leachate System Pumps Monthly Operational Inspection Log Sheet that is kept in the pump house and completed after each monthly inspection (see Photograph #7). The log had entries for November and December 2015. January's inspection was still pending. No issues were identified in the log.

A visual inspection of the leachate piping risers, concrete weir, and high level alarm was conducted. The risers provide access to the lateral pvc collection pipes installed along

the bottom of the disposal area but above the liner. According to Mr. Sedlacek, the annual camera inspection of the collection pipes occurs at this access port. A camera inspection of the leachate collection system was not conducted as part of this annual inspection. No issues were identified and the exposed collection pipe risers, concrete weir and high level alarm appeared to be in good operating condition. Although the alarm was not tested at the time of the inspection, Mr. Sedlacek stated that the alarm was operable.

Recommendations: FDU should continue to be diligent about eradicating pests that have caused damage to the upper portion of the leachate collection pond liner and repair the damage to the liner in an expeditious manner. NDEQ has requested notification to the department subsequent to completing the repair to the liner. FDU should continue to consult with a pest specialist to ensure control measures are appropriate. No other conditions were observed that indicated any structural weakness, change in geometrical design, or a disruption in operation and safety of the leachate collection system.

2.4.3 Phase I Berms and Phase II Area

Condition of the Phase I berms were evaluated for erosion, vegetative cover, signs of structural failure, animal burrows, and any abnormalities (see Photographs #9 through 15). Due to weather conditions and personal safety, observations were made by walking the perimeter of the Phase I area from the top of the berm. This deviates from the established method described in the Annual CCR Unit Inspection Protocol, however, safety was determined to be a factor in light of the snow and ice cover. Tetra Tech did not observe any abnormal conditions or issues that warrant corrective action. This position is supported by the results of the November 16, 2015 NDEQ permit renewal inspection. However, during the November 16, 2015 inspection, NDEQ staff identified two suspected animal burrows in the Phase II area. The slope and condition of the berms were observed by Tetra Tech to be in good condition no obvious indication of additional animal burrows or signs of erosion. Due to seasonal and current weather conditions, evaluation of vegetative cover could not be conducted.

Recommendations: Although Phase II construction has not been initiated, FDU should continue to monitor animal burrows throughout the CCR Unit footprint and backfill any suspected animal dwellings. Tetra Tech supports FDU's action of expanding rodent control bait stations into the Phase II area (see Photograph # 16). No other conditions were observed that indicated any structural weakness, change in geometrical design, or a disruption in operation and safety of the Phase I berms and Phase II area.

2.4.4 Ground Water Monitoring Wells

Five ground water monitoring wells encompass the CCR Unit including the disposal area and leachate collection pond. This system is designed to provide access to ground water for the purpose of monitoring and testing certain parameters and constituents used to detect release of CCR material to the environment. Due to weather and safety concerns, monitoring wells were observed from a distance to ensure the lids were closed on the risers. The physical condition of each well was observed during the November 16, 2015 NDEQ permit renewal inspection. Tetra Tech assumes the condition of the wells did not change since that inspection. No additional issues were noted during the January 5, 2016 inspection.

Ground Water Monitoring Well #2 needs concrete repair work to the pad surround the well riser casing. The concrete pad was cracked and NDEQ noted this during their November 16, 2015 permit renewal inspection.

FDU should continue to monitor the position of the well casing in Ground Water Monitoring Well #4. Although the well appears to perform as designed, FDU staff noticed that over time the top of the well casing appears to have pushed slightly upward.

Recommendations: As soon as weather permits, FDU should repair and document the repair of the concrete pad that secures Monitoring Well #2. As part of FDU's monitoring well inspections, staff should continue to observe the condition of the concrete pads at each well for signs of cracking or deterioration. No other conditions were observed that indicated any structural weakness, change in geometrical design, or a disruption in operation and safety of the groundwater monitoring system.

However, FDU should continue to monitor the position of the well casing in Ground Water Monitoring Well #4. It is recommended that field measurements be taken of the well casing at the time groundwater samples are taken or other routine schedule as dictated by FDU staff.

Under the new CCR Rule, groundwater monitoring and corrective action requirements are codified under 40 CFR 257.90 through 257.98, and owners and operators are required to be in compliance with these requirements on or before October 17, 2017. The stated groundwater requirements are, in summary:

- 1. Install a groundwater monitoring system (40 CFR 257.91);*
- 2. Develop a groundwater sampling and analysis program, including statistical procedures for evaluating groundwater monitoring data (40 CFR 257.93);*
- 3. Initiate detection monitoring to obtain at least eight (8) independent samples for each background and downgradient well for constituents listed in Appendix III to part 257 (40 CFR 257.94(b));*
- 4. Begin evaluating the groundwater monitoring data for statistically significant indications of groundwater impacts (40 CFR 257.94).*

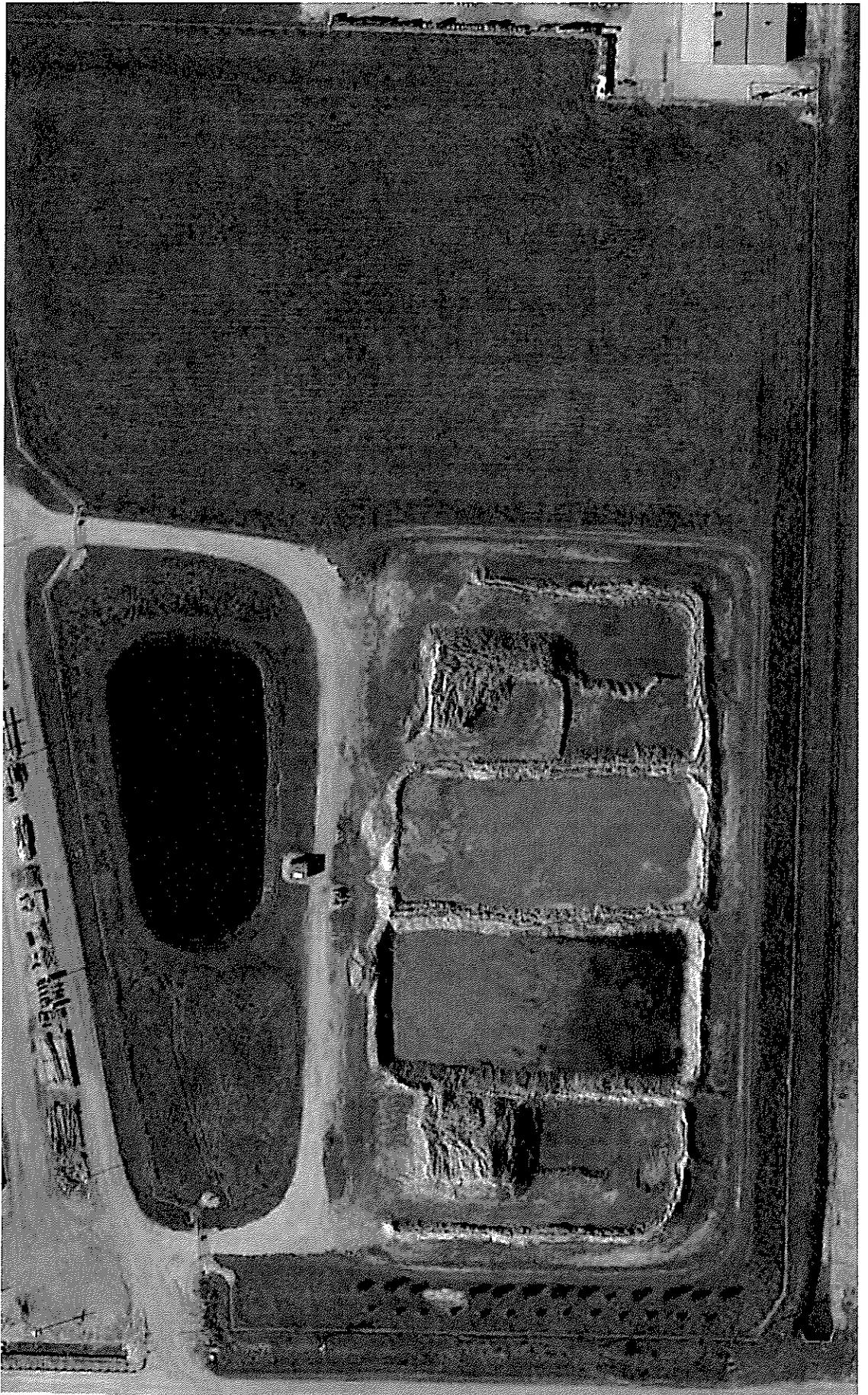
FDU contracted Tetra Tech to assess the existing groundwater monitoring program to determine sufficiency or deficiency relative to the new CCR Rule. A draft memo titled, "Groundwater Monitoring System Assessment," dated January 28, 2016, was provided to FDU for review and comments. Subsequent to final approval by FDU, recommendations described in the assessment by Tetra Tech, should be considered and implemented to comply with the requirements of the CCR Rule.

Summary

On January 5, 2016, Tetra Tech conducted the initial CCR Unit inspection required to be conducted annually by a qualified professional engineer. This report should be used as a baseline for gauging future annual inspections. Based on observations, it is the opinion of Tetra Tech that FDU has designed, constructed, operated, and maintained the CCR unit with recognized and generally accepted good engineering standards that are protective of human health and the environment. However, FDU should consider and

implement the recommendations provided in this report to ensure meeting the conditions of both state (permit) and federal CCR Landfill Unit requirements.

Figure 1



APPENDIX A

Annual CCR Unit Inspection Checklist

1/5/16

Scott Schumaker, P.E.
Mark Podany
FDU CCR Landfill
Unit

Annual CCR Unit Inspection Checklist

Lon D. Wright Power Plant

Circle either "YES" or "NO" to each question in the tables below:

OUTSIDE PERIMETER:

1. Is visible evidence of CCR (i.e., ash) present around the outside perimeter of the CCR Unit?	YES	<input checked="" type="radio"/> NO
2. Is visible evidence of storm water runoff issues such as pooling or significant erosion present outside the perimeter of the CCR Unit?	YES	<input checked="" type="radio"/> NO
Provide a detailed description of any "YES" answers and mark location data on the map provided as Figure 1 of the Annual CCR Unit Inspection Protocol:		
Photograph Numbers: <u>16</u>		

BERM:

1. Is visible evidence of CCR (i.e., ash) present on the crest and outside slope of the CCR Unit berm?	YES	<input checked="" type="radio"/> NO
2. Is visible evidence of burrowing animals present on the slopes or crest of the berm?	YES	<input checked="" type="radio"/> NO
3. Is visible evidence of erosion, cracks, or irregularities present on the berm?	YES	<input checked="" type="radio"/> NO
4. Is the vegetative cover on the berm sufficient to prevent erosion? <i>unable to determine</i>	YES	NO
Provide a detailed description of any "YES" answers and mark location data on the map provided as Figure 1 of the Annual CCR Unit Inspection Protocol:		
<i>Time of year and weather conditions made it difficult to observe vegetative cover. No issues suspected.</i>		
Photograph Numbers: <u>1, 2, 10, 11, 12</u>		

1/5/16

Scott Schmofer, P.E.
Mark Podany
DCA CCR Landfill Unit

LINED AREA:

1. Is visible evidence of improper placement of CCR (i.e., ash) present?	YES	<input checked="" type="radio"/> NO
2. Is visible evidence of burrowing animals present in the lined area?	YES	<input checked="" type="radio"/> NO
3. Is visible evidence of liquid accumulation in the lined area present within the lined area?	YES	<input checked="" type="radio"/> NO
4. Is visible evidence of liner failure or compromise present?	YES	<input checked="" type="radio"/> NO

Provide a detailed description of any "YES" answers and mark location data on the map provided as Figure 1 of the Annual CCR Unit Inspection Protocol:

Photograph Numbers: 1, 2, 9, 13, 14, 15

LEACHATE SYSTEM:

1. Is visible evidence of leaks from the piping, valves, or pumps present?	YES	<input checked="" type="radio"/> NO
2. Is visible evidence of excessive corrosion on metal parts of the system?	YES	<input checked="" type="radio"/> NO
3. Is the leachate in the leachate pond cloudy or muddy? <i>Unable to determine</i>	YES	NO

Provide a detailed description of any "YES" answers and mark location data on the map provided as Figure 1 of the Annual CCR Unit Inspection Protocol:

Ice and snow cover made it difficult to observe the color of leachate.
Control of rodents with bait traps was evident. Upper edge of leachate liner must be ^{MBP} repaired subsequent to rodent control.

Photograph Numbers: 3, 4, 5, 6, 7, 8

APPENDIX B

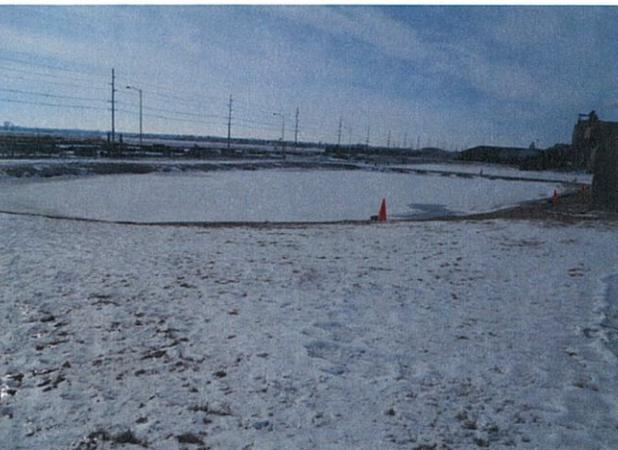
Photographs



Photograph #1 1/5/16
Photograph taken facing northwest on access road between south end of monofill lined area and the leachate collection pond. The concrete object in the lower center of the photo is the leachate riser. The CCR in the background is staged on the liner for potential beneficial use or disposal.



Photograph #2 1/5/16
Photograph taken from same location as previous photo but in a northerly direction. The object in the foreground is part of the Hydrovactor system. The active disposal area is shown towards the right of the photo.



Photograph #3 1/5/16
Photograph taken facing southwest showing the leachate collection pond. Ice had formed and snow collected on the surface. The orange cones are placed next to rodent bait traps.



Photograph #4 1/5/16
Close-up view showing an orange cone and associated bait trap for rodents. The leachate pond liner can be seen to the far right of the photo.



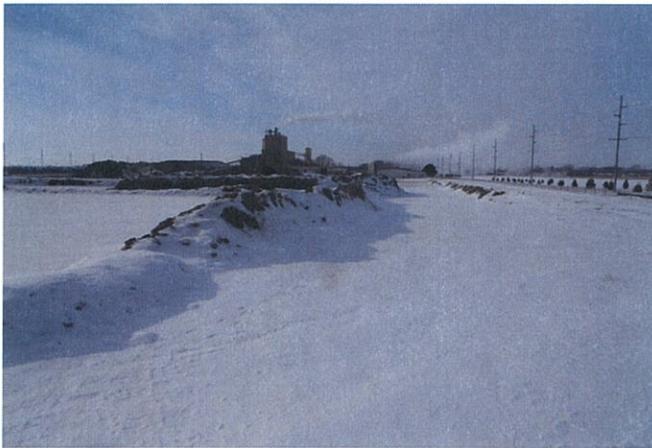
Photograph #5 1/5/16
Photograph taken facing east showing the northern edge of the exposed leachate collection pond liner. Ice and snow covered the surface of the leachate pond. Orange cones with rodent bait traps can be seen along the lip of the liner.



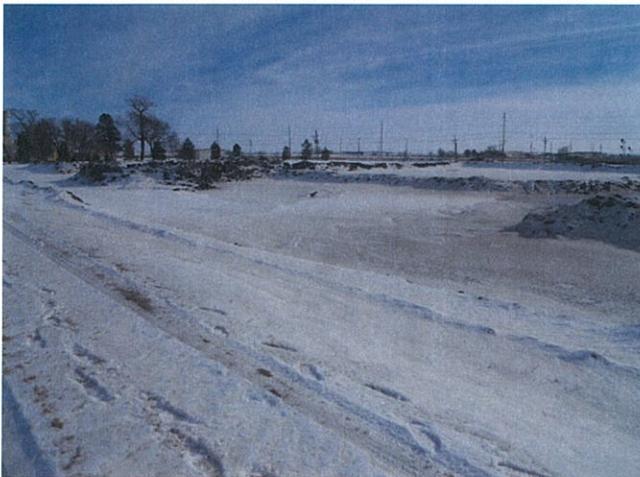
Photograph #6 1/5/16
Close-up view showing damage caused by rodents to the upper edge of the leachate collection pond liner.



Photograph #10 1/5/16
Photograph taken facing north from the same location as the previous photo. The snow covered berm can be seen in the center of the photo and the lined disposal area is shown to the left of the photo.



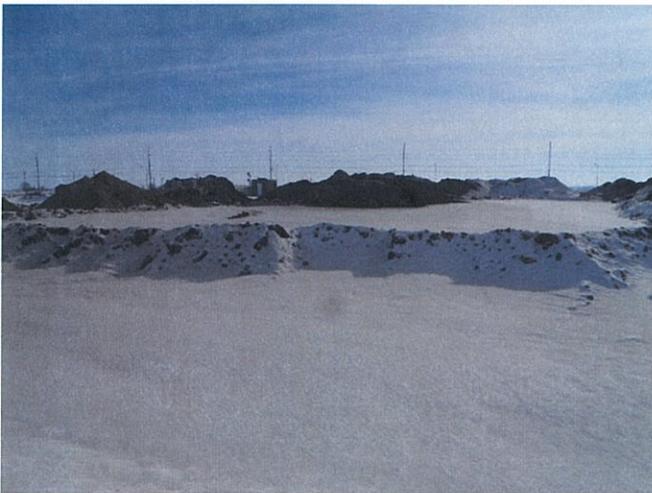
Photograph #11 1/5/16
Photograph taken facing west from the northeast corner of the monofill. The berm and monofill are shown to the left of the photo.



Photograph #12 1/5/16
Photograph taken facing southeast from the north side of the monofill. The lined disposal area is shown in the center of the photo.



Photograph #13 1/5/16
Photograph taken facing south from the same location as the previous photo. CCR staged on the liner can be seen in the top half of the photo. This material is staged for potential beneficial use purposes.



Photograph #14 1/5/16
Photograph taken facing south from the northeast corner of the monofill. The CCR material shown was placed within the lined area.



Photograph #15 1/5/16
Photograph taken slightly west of the location in the previous photo and facing south. The CCR material was placed on the liner. The access road to the right of the photo is the west boundary of Phase I. The Phase II area can be seen to the far right.



Photograph #16 1/5/16
Close-up view of the Phase II area shown in the previous photo. The berm (access road) is shown to the far left. The orange cones are used to locate rodent bait traps in place to eliminate future damage to the top of the leachate liner.

APPENDIX C

Work Order History Reports

Work Order History Report

Dates: From 10/19/2015 To 1/05/2016. Equipment: From MONOFILL To MONOFILL.

Query: None.

EQUIPMENT:MONOFILL		MONOFILL							
WO	TASK	SCHEDULED	DONE		ACT	EST	BREAK	EMP	TYPE
3,335	1	11/09/15	11/09/15	MOW MONOFILL USED LITTLE KUBOTA MOWER (FRONT DECK) AND BATWING MOWER	3.00	3.00	0.00	TT	SC
3,426	1	11/29/15	11/25/15	INSPECT LECHATE PUMPS MONTHLY	1.00	1.00	0.00	TT	PM
3,415	1	11/23/15	12/01/15	MONOFILL LECHATE POND SUMP PUMP NO POWER TO PANEL ON 20 NOVEMBER TV RAN LEACHATE SUMP PUMP MANUALLY UNTIL PUMP BROKE SUCTION. PLEASE CHARGE THIS 1/2 HR TO TV W/ COMMENTS. BADDERS 11/20 1.5 - CONTROLLER IS ON ORDER PER GARY	8.00	8.00	0.00	MM	BK
3,522	1		12/07/15	ASH MONOFILL INSTALL LEACHATE POND LEVEL INDICATOR WE DETERMINED FROM PRINTS THAT BOTTOM OF VAULT IN MONOFILL PUMPHOUSE AND BOTTOM OF LECHATE POND ARE THE SAME. SO WE DECIDED TO MEASURE POND LEVEL FROM VAULT. DRILLED 1 1/2" HOLE IN FLOOR OF PUMPHOUSE (SEOUTHEAST CORNER). MODIFIED OLD FUEL TANK DIP STICK TO INSERT IN HOLE TO MEASURE ELVEL IN VAULT. HIGH LEVEL WILL BE 3'6". LOW LEVEL WILL BE 2'0"	6.00	0.00	0.00	TV	SC
3,527	1	12/15/15	12/10/15	INSPECT LECHATE PUMPS MONTHLY	1.00	1.00	0.00	TT	PM
3,528	1	12/08/15	12/10/15	PUMP STORM / PROCESS WATER @ MONOFILL. TO RENTION POND (EAST CENTRAL CELL) HARTUNG/TAYLOR PUMP WATER FROM MONOFILL CELL TO LEACHATE POND WITH HYDRAULIC PUMP	16.00	0.00	0.00	DH	SC
Equipment Total:					35.00	13.00	0.00		
Grand Total:					35.00	13.00	0.00		

APPENDIX D

Unscheduled Maintenance Work Orders

Unscheduled Maintenance Work Order

WORK ORDER NO... 3,432

ASSIGNED TO.....TS SEDLACEK

EQUIPMENT..... MONOFILL MONOFILL

LOCATION..... REQUESTED BY.SEDLACEK

MODEL..... SERIAL.....

MANUFACTURER.. LINE.....

WORK ORDER HEADER: ADDITIONAL RODENT BURROWS

SCHEDULED.....

PRIORITY.....

WO REQUEST #..... 0000001904

SUPERVISOR..... ESUPV

ENTERED 11/25/2015 8:32 AM

STARTED / /

DEPT

SHIFT D

STATUS:

REQUESTER INFORMATION: SEDLACEK

TONY.SEDLACEK@FREMONTNE.GOV

SEQ#	DESCRIPTION	DATE	DO TIME	INITIALS
------	-------------	------	---------	----------

1 ADDITIONAL SMALL RODENT BURROWS AND CHUTES AND TWO LARGE RODENT BURROWS WERE OBSERVED DURING THE SITE INSPECTION WALK AROUND WITH THE NDEQ. PEST PROS WAS CONTACTED TO ADD ADDITIONAL BAIT TRAPS AND DETERMINE WHAT RODENT CAUSED THE LARGE BURROWS.

11/23 PEST PROS ADDED ADDITIONAL BAIT TRAPS AND ASSESSED WHAT RODENT CAUSED THE LARGE BURROWS.

Total Estimated: 0.00 Total Time: _____

Time	Date	Initials	ADDITIONAL LABOR	Time	Date	Initials
------	------	----------	------------------	------	------	----------

Part Number	Description	ADDITIONAL PARTS	Location	QTY	Used
-------------	-------------	------------------	----------	-----	------

Comments

Approved By: _____ Inspected By: _____

APPENDIX E

Monofill SWPPP Maintenance and Repairs of Control Measures

Ash Monofill Site SWPPP Maintenance and Repairs of Control Measures

Instructions:

- Include in your records documentation of maintenance and repairs of control measures and industrial equipment, including:
 - the control measure/equipment maintained,
 - date(s) of regular maintenance,
 - date(s) of discovery of areas in need of repair/replacement, and for repairs,
 - date(s) that the control measure/equipment was returned to full function, and
 - justification for any extended maintenance/repair schedules.

- Provide information, as shown below, to document your maintenance activities for each control measure and industrial equipment. Repeat as necessary by copying and pasting the information below for additional control measures.

Control Measure Maintenance Records (copy information below for each control measure)

Control Measure: *Leachate Collection Pond (Detention Pond) Liner and Phase II*

Regular Maintenance Activities: *N/A*

Regular Maintenance Schedule: *N/A*

Date of Action: *11/23/15*

Reason for Action: Regular Maintenance Discovery of Problem

If Problem,

- **Description of Action Required:** *Additional signs of rodent activity is widespread in phase I, mainly around the Leachate Pond liner. Two large burrows were also discovered along with smaller burrows and chutes in phase II, Pest Pros was on-site on November 23 to assess the burrows and add additional bait traps.*
- **Date Control Measure Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Ash Monofill Site SWPPP

Maintenance and Repairs of Control Measures

Instructions:

- Include in your records documentation of maintenance and repairs of control measures and industrial equipment, including:
 - the control measure/equipment maintained,
 - date(s) of regular maintenance,
 - date(s) of discovery of areas in need of repair/replacement, and for repairs,
 - date(s) that the control measure/equipment was returned to full function, and
 - justification for any extended maintenance/repair schedules.
- Provide information, as shown below, to document your maintenance activities for each control measure and industrial equipment. Repeat as necessary by copying and pasting the information below for additional control measures.

Control Measure Maintenance Records (copy information below for each control measure)

Control Measure: Monofill Ash Cell (second ^{east central} from the east)

Regular Maintenance Activities:

Ponded stormwater pumped from cell to leachate retention pond.

Regular Maintenance Schedule:

As needed

Date of Action: 12/10/15

Reason for Action: Regular Maintenance Discovery of Problem

If Problem,

- **Description of Action Required:**

- **Date Control Measure Returned to Full Function:** 12/10/15

- **Justification for Extended Schedule, if applicable:**

Notes:

APPENDIX F

Weekly CCR Unit Compliance Evaluation Form

Fremont Department of Utilities
Lon D. Wright Power Plant

Coal Combustion Residue (CCR) Unit
Weekly CCR Unit Compliance Evaluation

Date: October 19, 2015

Time: 14:30

Inspector: Tony Sedlaczek

Weather Conditions: Clear, Sunny, 81°F, S 14mph

This inspection checklist must be completely filled out, signed and dated. Circle the appropriate answer for observations conducted of the following:

Is airborne fugitive CCR dust with the potential to cross the property boundary observed in the CCR Unit area? YES NO

If YES, describe the cause and control measure(s) taken.

Does fugitive dust warrant the application of water or other means to control on-site conditions? YES NO

If YES, describe the cause and control measure(s) taken.

Are conditions observed around the outside and inside perimeters of the secured area of the CCR Unit that require actions to be taken? YES NO

If YES, describe action(s) needed:

Are CCR Unit stormwater drainage areas in good condition and is stormwater draining as designed? YES NO

If NO, describe action(s) needed:

Are the inside and outside slopes of the CCR Unit in good condition with no signs of sloughing, erosion, or other condition that requires repair or other action to return the unit to its design specification? YES NO

If NO, describe action(s) needed: _____

Observe all five groundwater monitoring wells.

Are the riser covers closed and locked? YES NO

If NO, state when the locks were secured:

Anything unusual observed (e.g., flowing water, staining, damaged equipment, etc.)?

YES NO If yes, describe: _____

Is there water (ponding) on the surface of the lined area of the CCR Unit? YES NO

If YES, describe: _____

If YES, what action must be taken to reduce the amount of water on the lined area of the CCR Unit?

Is there evidence of CCR outside of the lined area of the CCR Unit? YES NO

If YES, describe: _____

Describe action(s) needed: _____

Is there woody vegetation on or near the liner or the slopes of the CCR Unit? YES NO

If YES, describe action(s) needed: _____

Is sufficient capacity available in the leachate collection pond?

YES NO

If NO, describe action(s) needed: _____

Other observations of concern: None observed

List any findings from the inspection that must be communicated to applicable plant staff and/or require corrective action(s):

None

Describe who was contacted and what action(s) were/will be taken and when: N/A

Have all issues of concern been resolved? YES NO

If NO, describe what, when and where action will be taken: N/A

Signature of Inspector: Tony Sedlack

Date: October 19, 2015

Fremont Department of Utilities
Lon D. Wright Power Plant

Coal Combustion Residue (CCR) Unit
Weekly CCR Unit Compliance Evaluation

Date: October 26, 2015

Time: 14:30

Inspector: Tony Sedlacek

Weather Conditions: Cloudy, 62°F, 5.56 mph

This inspection checklist must be completely filled out, signed and dated. Circle the appropriate answer for observations conducted of the following:

Is airborne fugitive CCR dust with the potential to cross the property boundary observed in the CCR Unit area? YES NO

If YES, describe the cause and control measure(s) taken.

Does fugitive dust warrant the application of water or other means to control on-site conditions? YES NO

If YES, describe the cause and control measure(s) taken.

Are conditions observed around the outside and inside perimeters of the secured area of the CCR Unit that require actions to be taken? YES NO

If YES, describe action(s) needed:

Are CCR Unit stormwater drainage areas in good condition and is stormwater draining as designed? YES NO

If NO, describe action(s) needed:

Are the inside and outside slopes of the CCR Unit in good condition with no signs of sloughing, erosion, or other condition that requires repair or other action to return the unit to its design specification? YES NO

If NO, describe action(s) needed: _____

Observe all five groundwater monitoring wells.

Are the riser covers closed and locked? YES NO

If NO, state when the locks were secured:

Anything unusual observed (e.g., flowing water, staining, damaged equipment, etc.)?

YES NO If yes, describe: _____

Is there water (ponding) on the surface of the lined area of the CCR Unit? YES

NO

If YES, describe: _____

If YES, what action must be taken to reduce the amount of water on the lined area of the CCR Unit?

Is there evidence of CCR outside of the lined area of the CCR Unit? YES

NO

If YES, describe:

Describe action(s) needed:

Is there woody vegetation on or near the liner or the slopes of the CCR Unit? YES

NO

If YES, describe action(s) needed: _____

Is sufficient capacity available in the leachate collection pond?

YES NO

If NO, describe action(s) needed: _____

Other observations of concern: None observed

List any findings from the inspection that must be communicated to applicable plant staff and/or require corrective action(s):

None

Describe who was contacted and what action(s) were/will be taken and when: N/A

Have all issues of concern been resolved? YES NO

If NO, describe what, when and where action will be taken: N/A

Signature of Inspector: Tommy Sedlacek

Date: October 26, 2015

Fremont Department of Utilities
Lon D. Wright Power Plant

Coal Combustion Residue (CCR) Unit
Weekly CCR Unit Compliance Evaluation

Date: November 2, 2015

Time: 1421

Inspector: Tony Sedlaren

Weather Conditions: Clear, Sunny, 79°F SSE 5mph

This inspection checklist must be completely filled out, signed and dated. Circle the appropriate answer for observations conducted of the following:

Is airborne fugitive CCR dust with the potential to cross the property boundary observed in the CCR Unit area? YES NO

If YES, describe the cause and control measure(s) taken.

Does fugitive dust warrant the application of water or other means to control on-site conditions? YES NO

If YES, describe the cause and control measure(s) taken.

Are conditions observed around the outside and inside perimeters of the secured area of the CCR Unit that require actions to be taken? YES NO

If YES, describe action(s) needed:

Are CCR Unit stormwater drainage areas in good condition and is stormwater draining as designed? YES NO

If NO, describe action(s) needed:

Are the inside and outside slopes of the CCR Unit in good condition with no signs of sloughing, erosion, or other condition that requires repair or other action to return the unit to its design specification? YES NO

If NO, describe action(s) needed: _____

Observe all five groundwater monitoring wells.

Are the riser covers closed and locked? YES NO

If NO, state when the locks were secured:

Anything unusual observed (e.g., flowing water, staining, damaged equipment, etc.)?

YES NO If yes, describe: _____

Is there water (ponding) on the surface of the lined area of the CCR Unit? YES

NO

If YES, describe: _____

If YES, what action must be taken to reduce the amount of water on the lined area of the CCR Unit?

Is there evidence of CCR outside of the lined area of the CCR Unit? YES

NO

If YES, describe: _____

Describe action(s) needed: _____

Is there woody vegetation on or near the liner or the slopes of the CCR Unit? YES

NO

If YES, describe action(s) needed: _____

Is sufficient capacity available in the leachate collection pond?

YES NO

If NO, describe action(s) needed: _____

Other observations of concern: None observed

List any findings from the inspection that must be communicated to applicable plant staff and/or require corrective action(s):

None

Describe who was contacted and what action(s) were/will be taken and when: N/A

Have all issues of concern been resolved? YES NO

If NO, describe what, when and where action will be taken: N/A

Signature of Inspector: Jonny Sedorech

Date: November 2, 2015

Fremont Department of Utilities
Lon D. Wright Power Plant

Coal Combustion Residue (CCR) Unit
Weekly CCR Unit Compliance Evaluation

Date: November 9, 2015
Time: 1415
Inspector: Tom Sedlacek
Weather Conditions: Sunny, 64°F, South @ 5mph

This inspection checklist must be completely filled out, signed and dated. Circle the appropriate answer for observations conducted of the following:

Is airborne fugitive CCR dust with the potential to cross the property boundary observed in the CCR Unit area? YES NO
If YES, describe the cause and control measure(s) taken.

Does fugitive dust warrant the application of water or other means to control on-site conditions? YES NO
If YES, describe the cause and control measure(s) taken.

Are conditions observed around the outside and inside perimeters of the secured area of the CCR Unit that require actions to be taken? YES NO
If YES, describe action(s) needed:

Are CCR Unit stormwater drainage areas in good condition and is stormwater draining as designed? YES NO
If NO, describe action(s) needed:

Are the inside and outside slopes of the CCR Unit in good condition with no signs of sloughing, erosion, or other condition that requires repair or other action to return the unit to its design specification? YES NO
If NO, describe action(s) needed: _____

Observe all five groundwater monitoring wells.
Are the riser covers closed and locked? YES NO
If NO, state when the locks were secured:
Anything unusual observed (e.g., flowing water, staining, damaged equipment, etc.)?
YES NO If yes, describe: _____

Is there water (ponding) on the surface of the lined area of the CCR Unit? YES NO

If YES, describe: _____

If YES, what action must be taken to reduce the amount of water on the lined area of the CCR Unit?

Is there evidence of CCR outside of the lined area of the CCR Unit? YES NO

If YES, describe: _____

Describe action(s) needed: _____

Is there woody vegetation on or near the liner or the slopes of the CCR Unit? YES NO

If YES, describe action(s) needed: _____

Is sufficient capacity available in the leachate collection pond?

YES NO

If NO, describe action(s) needed: _____

Other observations of concern: None observed

List any findings from the inspection that must be communicated to applicable plant staff and/or require corrective action(s):

None

Describe who was contacted and what action(s) were/will be taken and when: N/A

Have all issues of concern been resolved? YES NO

If NO, describe what, when and where action will be taken: N/A

Signature of Inspector: Tony Sedlock

Date: November 9, 2015

Fremont Department of Utilities
Lon D. Wright Power Plant

Coal Combustion Residue (CCR) Unit
Weekly CCR Unit Compliance Evaluation

Date: November 16, 2015
Time: 1115
Inspector: Tony Sedlaczek
Weather Conditions: Cloudy, 51°F SE @ 10 mph

This inspection checklist must be completely filled out, signed and dated. Circle the appropriate answer for observations conducted of the following:

Is airborne fugitive CCR dust with the potential to cross the property boundary observed in the CCR Unit area? YES NO

If YES, describe the cause and control measure(s) taken.

The fugitive dust observed was from the dumping of pelletized scrubber by-product from a dump truck. An observation was completed along the property boundary and fugitive dust

Does fugitive dust warrant the application of water or other means to control on-site conditions? YES NO did not cross the property boundary, no corrective action was needed.

If YES, describe the cause and control measure(s) taken.

Are conditions observed around the outside and inside perimeters of the secured area of the CCR Unit that require actions to be taken? YES NO

If YES, describe action(s) needed:

Are CCR Unit stormwater drainage areas in good condition and is stormwater draining as designed? YES NO

If NO, describe action(s) needed:

Are the inside and outside slopes of the CCR Unit in good condition with no signs of sloughing, erosion, or other condition that requires repair or other action to return the unit to its design specification? YES NO

If NO, describe action(s) needed: Rodent burrows and chutes were observed

south of the lined area and east of the leachate pond, west bowl slope. Additional rodent bait traps will be added.

Observe all five groundwater monitoring wells.

Are the riser covers closed and locked? YES NO

If NO, state when the locks were secured:

All areas around the lined area looked good.

Anything unusual observed (e.g., flowing water, staining, damaged equipment, etc.)?

YES NO If yes, describe: Monitoring Well #2 concrete pad is cracked in several places and needs to be replaced per NDEQ.

Is there water (ponding) on the surface of the lined area of the CCR Unit? YES NO

If YES, describe: Ash was being hydrated and deposited into the second cell from the east.

If YES, what action must be taken to reduce the amount of water on the lined area of the CCR Unit?

No action was needed, the hydrating of ash is the current approved practice in the current Ash monofill permit, the water will infiltrate the ash within 1 day.

Is there evidence of CCR outside of the lined area of the CCR Unit? YES NO

If YES, describe:

Describe action(s) needed:

Is there woody vegetation on or near the liner or the slopes of the CCR Unit? YES NO

If YES, describe action(s) needed:

Is sufficient capacity available in the leachate collection pond?

YES NO

If NO, describe action(s) needed:

Other observations of concern: None

List any findings from the inspection that must be communicated to applicable plant staff and/or require corrective action(s):

Additional rodent burrows were observed in the active site and two large burrows and small burrows and chutes were observed in the phase II site (not-active)

Describe who was contacted and what action(s) were/will be taken and when: Gary Odger was present during the inspection, Gary would be the individual contacted,

Have all issues of concern been resolved? YES NO

If NO, describe what, when and where action will be taken: Additional rodent bait traps will be scheduled to be added to the active areas.

Signature of Inspector: Tony Sedlacek

Date: November 16, 2015

Fremont Department of Utilities
Lon D. Wright Power Plant

Coal Combustion Residue (CCR) Unit
Weekly CCR Unit Compliance Evaluation

Date: November 23, 2015

Time: 1054

Inspector: Tony Sedlacek

Weather Conditions: Sunny, 42°F N/A mph

This inspection checklist must be completely filled out, signed and dated. Circle the appropriate answer for observations conducted of the following:

Is airborne fugitive CCR dust with the potential to cross the property boundary observed in the CCR Unit area? YES NO

If YES, describe the cause and control measure(s) taken.

Does fugitive dust warrant the application of water or other means to control on-site conditions? YES NO

If YES, describe the cause and control measure(s) taken.

Are conditions observed around the outside and inside perimeters of the secured area of the CCR Unit that require actions to be taken? YES NO

If YES, describe action(s) needed:

Are CCR Unit stormwater drainage areas in good condition and is stormwater draining as designed? YES NO

If NO, describe action(s) needed:

Are the inside and outside slopes of the CCR Unit in good condition with no signs of sloughing, erosion, or other condition that requires repair or other action to return the unit to its design specification? YES NO

If NO, describe action(s) needed: As recorded on the November 16, 2015 inspection report, no activity was observed.

Observe all five groundwater monitoring wells.

Are the riser covers closed and locked? YES NO

If NO, state when the locks were secured:

Anything unusual observed (e.g., flowing water, staining, damaged equipment, etc.)?

YES NO If yes, describe: _____

Is there water (ponding) on the surface of the lined area of the CCR Unit? YES NO

If YES, describe: Water is present in the second cell from the east

If YES, what action must be taken to reduce the amount of water on the lined area of the CCR Unit?

The cell is active, and has and will continue to receive hydroxide ash until full. If the water is present once the cell is full of ash and inactive, the water will be pumped to the leachate collection pond.

Is there evidence of CCR outside of the lined area of the CCR Unit? YES NO

If YES, describe:

Describe action(s) needed:

Is there woody vegetation on or near the liner or the slopes of the CCR Unit? YES NO

If YES, describe action(s) needed: _____

Is sufficient capacity available in the leachate collection pond?

YES NO

If NO, describe action(s) needed: _____

Other observations of concern: None

List any findings from the inspection that must be communicated to applicable plant staff and/or require corrective action(s):

None, however additional bait traps were placed around areas of activity as recorded in the November 16, 2015 inspection report.

Describe who was contacted and what action(s) were/will be taken and when: _____

Have all issues of concern been resolved? YES NO

If NO, describe what, when and where action will be taken: A work order to have the stormwater pumped out of the active cell will be created, if the cell becomes inactive and if weather does not cause a safety issue.

Signature of Inspector: Jerry Adlman

Date: November 23, 2015

Fremont Department of Utilities
Lon D. Wright Power Plant

Coal Combustion Residue (CCR) Unit
Weekly CCR Unit Compliance Evaluation

Date: November 30, 2015
Time: 10:50 am
Inspector: Tony Sedlacek
Weather Conditions: light to moderate snow, 33°F, NE 1 mph

This inspection checklist must be completely filled out, signed and dated. Circle the appropriate answer for observations conducted of the following:

Is airborne fugitive CCR dust with the potential to cross the property boundary observed in the CCR Unit area? YES NO
If YES, describe the cause and control measure(s) taken.

Does fugitive dust warrant the application of water or other means to control on-site conditions? YES NO
If YES, describe the cause and control measure(s) taken.

Are conditions observed around the outside and inside perimeters of the secured area of the CCR Unit that require actions to be taken? YES NO
If YES, describe action(s) needed:

Are CCR Unit stormwater drainage areas in good condition and is stormwater draining as designed? YES NO
If NO, describe action(s) needed:

Are the inside and outside slopes of the CCR Unit in good condition with no signs of sloughing, erosion, or other condition that requires repair or other action to return the unit to its design specification? YES NO
If NO, describe action(s) needed: _____

Observe all five groundwater monitoring wells.
Are the riser covers closed and locked? YES NO
If NO, state when the locks were secured:
Anything unusual observed (e.g., flowing water, staining, damaged equipment, etc.)?
YES NO If yes, describe: _____

Is there water (ponding) on the surface of the lined area of the CCR Unit? YES NO

If YES, describe: See entry on November 23, 2015 inspection report

If YES, what action must be taken to reduce the amount of water on the lined area of the CCR Unit?

See entry on November 23, 2015 inspection report.

Is there evidence of CCR outside of the lined area of the CCR Unit? YES NO

If YES, describe:

Describe action(s) needed:

Is there woody vegetation on or near the liner or the slopes of the CCR Unit? YES NO

If YES, describe action(s) needed:

Is sufficient capacity available in the leachate collection pond?

YES NO

If NO, describe action(s) needed:

Other observations of concern: None observed.

List any findings from the inspection that must be communicated to applicable plant staff and/or require corrective action(s):

None

Describe who was contacted and what action(s) were/will be taken and when:

Have all issues of concern been resolved? YES NO

If NO, describe what, when and where action will be taken:

Signature of Inspector: Tommy Sedlitz

Date: November 30, 2015

Fremont Department of Utilities
Lon D. Wright Power Plant

Coal Combustion Residue (CCR) Unit
Weekly CCR Unit Compliance Evaluation

Date: December 7, 2015
Time: 9:52 am
Inspector: Tony Sedlack
Weather Conditions: Sunny, 42°F SSW @ 11 mph

This inspection checklist must be completely filled out, signed and dated. Circle the appropriate answer for observations conducted of the following:

Is airborne fugitive CCR dust with the potential to cross the property boundary observed in the CCR Unit area? YES NO
If YES, describe the cause and control measure(s) taken.

Does fugitive dust warrant the application of water or other means to control on-site conditions? YES NO
If YES, describe the cause and control measure(s) taken.

Are conditions observed around the outside and inside perimeters of the secured area of the CCR Unit that require actions to be taken? YES NO
If YES, describe action(s) needed:

Are CCR Unit stormwater drainage areas in good condition and is stormwater draining as designed? YES NO
If NO, describe action(s) needed:

Are the inside and outside slopes of the CCR Unit in good condition with no signs of sloughing, erosion, or other condition that requires repair or other action to return the unit to its design specification? YES NO
If NO, describe action(s) needed:

Observe all five groundwater monitoring wells.
Are the riser covers closed and locked? YES NO
If NO, state when the locks were secured:
Anything unusual observed (e.g., flowing water, staining, damaged equipment, etc.)?
YES NO If yes, describe:

Is there water (ponding) on the surface of the lined area of the CCR Unit? YES NO

If YES, describe: See entry on November 23, 2015 inspection report

If YES, what action must be taken to reduce the amount of water on the lined area of the CCR Unit?

See entry on November 23, 2015 inspection report

Is there evidence of CCR outside of the lined area of the CCR Unit? YES NO

If YES, describe:

Describe action(s) needed:

Is there woody vegetation on or near the liner or the slopes of the CCR Unit? YES NO

If YES, describe action(s) needed: _____

Is sufficient capacity available in the leachate collection pond?

YES NO

If NO, describe action(s) needed: _____

Other observations of concern: None observed

List any findings from the inspection that must be communicated to applicable plant staff and/or require corrective action(s):

None

Describe who was contacted and what action(s) were/will be taken and when: _____

Have all issues of concern been resolved? YES NO

If NO, describe what, when and where action will be taken: _____

Signature of Inspector: Tony Sedlach

Date: December 7, 2015

Fremont Department of Utilities
Lon D. Wright Power Plant

Coal Combustion Residue (CCR) Unit
Weekly CCR Unit Compliance Evaluation

Date: December 14, 2015

Time: 9:55am

Inspector: Tony Sedlacker

Weather Conditions: Cloudy, 34°F, NNW @ 10 mph

This inspection checklist must be completely filled out, signed and dated. Circle the appropriate answer for observations conducted of the following:

Is airborne fugitive CCR dust with the potential to cross the property boundary observed in the CCR Unit area? YES NO

If YES, describe the cause and control measure(s) taken.

Does fugitive dust warrant the application of water or other means to control on-site conditions? YES NO

If YES, describe the cause and control measure(s) taken.

Are conditions observed around the outside and inside perimeters of the secured area of the CCR Unit that require actions to be taken? YES NO

If YES, describe action(s) needed:

Are CCR Unit stormwater drainage areas in good condition and is stormwater draining as designed? YES NO

If NO, describe action(s) needed:

Are the inside and outside slopes of the CCR Unit in good condition with no signs of sloughing, erosion, or other condition that requires repair or other action to return the unit to its design specification? YES NO

If NO, describe action(s) needed: _____

Observe all five groundwater monitoring wells.

Are the riser covers closed and locked? YES NO

If NO, state when the locks were secured:

Anything unusual observed (e.g., flowing water, staining, damaged equipment, etc.)?

YES NO If yes, describe: _____

Is there water (ponding) on the surface of the lined area of the CCR Unit? YES NO

If YES, describe: Water was pumped out on 12/8 & 12/9. However, due to a recent storm event, stormwater is present again.

If YES, what action must be taken to reduce the amount of water on the lined area of the CCR Unit?

The water will be pumped out when it is safe to do so. The ground is very soft and the needed equipment cannot be used to pump the water out due to the soft ground and equipment sinking.

Is there evidence of CCR outside of the lined area of the CCR Unit? YES NO

If YES, describe:

Describe action(s) needed:

Is there woody vegetation on or near the liner or the slopes of the CCR Unit? YES NO

If YES, describe action(s) needed: _____

Is sufficient capacity available in the leachate collection pond?

YES NO

If NO, describe action(s) needed: _____

Other observations of concern: None observed

List any findings from the inspection that must be communicated to applicable plant staff and/or require corrective action(s):

None

Describe who was contacted and what action(s) were/will be taken and when: _____

Have all issues of concern been resolved? YES NO

If NO, describe what, when and where action will be taken: The water will be pumped out when it is safe to do so.

Signature of Inspector: Jony Hedrick

Date: December 14, 2015

Fremont Department of Utilities
Lon D. Wright Power Plant

Coal Combustion Residue (CCR) Unit
Weekly CCR Unit Compliance Evaluation

Date: December 21, 2015

Time: 14:55 pm

Inspector: Tony Sedlaczek

Weather Conditions: Cloudy, 30°F, W @ 7mph

This inspection checklist must be completely filled out, signed and dated. Circle the appropriate answer for observations conducted of the following:

Is airborne fugitive CCR dust with the potential to cross the property boundary observed in the CCR Unit area? YES NO

If YES, describe the cause and control measure(s) taken.

Does fugitive dust warrant the application of water or other means to control on-site conditions? YES NO

If YES, describe the cause and control measure(s) taken.

Are conditions observed around the outside and inside perimeters of the secured area of the CCR Unit that require actions to be taken? YES NO

If YES, describe action(s) needed:

Are CCR Unit stormwater drainage areas in good condition and is stormwater draining as designed? YES NO

If NO, describe action(s) needed:

Are the inside and outside slopes of the CCR Unit in good condition with no signs of sloughing, erosion, or other condition that requires repair or other action to return the unit to its design specification? YES NO

If NO, describe action(s) needed: _____

Observe all five groundwater monitoring wells.

Are the riser covers closed and locked? YES NO

If NO, state when the locks were secured:

Anything unusual observed (e.g., flowing water, staining, damaged equipment, etc.)?

YES NO If yes, describe: _____

Is there water (ponding) on the surface of the lined area of the CCR Unit? YES NO

If YES, describe: Due to the current temperature there is a surface layer of ice on the ponded water. The

If YES, what action must be taken to reduce the amount of water on the lined area of the CCR Unit? leachate sump pump is still pumping water from the liner.

If temperatures increase enough to melt the ice and conditions are safe the water will be pumped out and into the leachate collection ponds.

Is there evidence of CCR outside of the lined area of the CCR Unit? YES NO

If YES, describe:

Describe action(s) needed:

Is there woody vegetation on or near the liner or the slopes of the CCR Unit? YES NO

If YES, describe action(s) needed: _____

Is sufficient capacity available in the leachate collection pond?

YES NO

If NO, describe action(s) needed: _____

Other observations of concern: None observed

List any findings from the inspection that must be communicated to applicable plant staff and/or require corrective action(s):

None

Describe who was contacted and what action(s) were/will be taken and when: _____

Have all issues of concern been resolved? YES NO

If NO, describe what, when and where action will be taken: The water if remaining will be pumped out when it is safe to do so.

Signature of Inspector: Jimmy Sedwick

Date: December 21, 2015

Fremont Department of Utilities
Lon D. Wright Power Plant

Coal Combustion Residue (CCR) Unit
Weekly CCR Unit Compliance Evaluation

Date: December 28, 2015

Time: 9:30 am

Inspector: Tony Sedlacker

Weather Conditions: Blowing Snow, 16°F, N@ 9 mph

This inspection checklist must be completely filled out, signed and dated. Circle the appropriate answer for observations conducted of the following:

Is airborne fugitive CCR dust with the potential to cross the property boundary observed in the CCR Unit area? YES NO

If YES, describe the cause and control measure(s) taken.

Does fugitive dust warrant the application of water or other means to control on-site conditions? YES NO

If YES, describe the cause and control measure(s) taken.

Are conditions observed around the outside and inside perimeters of the secured area of the CCR Unit that require actions to be taken? YES NO

If YES, describe action(s) needed:

Are CCR Unit stormwater drainage areas in good condition and is stormwater draining as designed? YES NO

If NO, describe action(s) needed:

Are the inside and outside slopes of the CCR Unit in good condition with no signs of sloughing, erosion, or other condition that requires repair or other action to return the unit to its design specification? YES NO

If NO, describe action(s) needed: _____

Observe all five groundwater monitoring wells.

Are the riser covers closed and locked? YES NO

If NO, state when the locks were secured:

Anything unusual observed (e.g., flowing water, staining, damaged equipment, etc.)?

YES NO If yes, describe: _____

Is there water (ponding) on the surface of the lined area of the CCR Unit? YES NO

If YES, describe: The water has frozen, and due to current weather conditions it is not safe to pump the

If YES, what action must be taken to reduce the amount of water on the lined area of the CCR Unit? water out of the cell.

The leachate sump pump is in auto and is actively pumping water out of the lined area. No further action is required at this time until conditions are safe to manually

Is there evidence of CCR outside of the lined area of the CCR Unit? YES NO pump the water out of the lined area.

If YES, describe:

Describe action(s) needed:

Is there woody vegetation on or near the liner or the slopes of the CCR Unit? YES NO

If YES, describe action(s) needed: _____

Is sufficient capacity available in the leachate collection pond?

YES NO

If NO, describe action(s) needed: _____

Other observations of concern: None observed

List any findings from the inspection that must be communicated to applicable plant staff and/or require corrective action(s):

None

Describe who was contacted and what action(s) were/will be taken and when: _____

Have all issues of concern been resolved? YES NO

If NO, describe what, when and where action will be taken: The water if remaining will be pumped out when it is safe to do so.

Signature of Inspector: Tony Adlacilo

Date: December 28, 2015

Fremont Department of Utilities
Lon D. Wright Power Plant

Coal Combustion Residue (CCR) Unit
Weekly CCR Unit Compliance Evaluation

Date: January 4, 2016

Time: 10:35 am

Inspector: Tony Sedlacek

Weather Conditions: Cloudy w/fog, 19°F, S @ 3 mph

This inspection checklist must be completely filled out, signed and dated. Circle the appropriate answer for observations conducted of the following:

Is airborne fugitive CCR dust with the potential to cross the property boundary observed in the CCR Unit area? YES NO

If YES, describe the cause and control measure(s) taken.

Does fugitive dust warrant the application of water or other means to control on-site conditions? YES NO

If YES, describe the cause and control measure(s) taken.

Are conditions observed around the outside and inside perimeters of the secured area of the CCR Unit that require actions to be taken? YES NO

If YES, describe action(s) needed:

Are CCR Unit stormwater drainage areas in good condition and is stormwater draining as designed? YES NO

If NO, describe action(s) needed:

Are the inside and outside slopes of the CCR Unit in good condition with no signs of sloughing, erosion, or other condition that requires repair or other action to return the unit to its design specification? YES NO

If NO, describe action(s) needed: _____

Observe all five groundwater monitoring wells.

Are the riser covers closed and locked? YES NO

If NO, state when the locks were secured:

Anything unusual observed (e.g., flowing water, staining, damaged equipment, etc.)?

YES NO If yes, describe: _____

Is there water (ponding) on the surface of the lined area of the CCR Unit? YES NO
If YES, describe: The water is frozen and will be pumped out when conditions are safe

If YES, what action must be taken to reduce the amount of water on the lined area of the CCR Unit?
The leachate sump pump is working and pumping water from the liner to the leachate collection ponds

Is there evidence of CCR outside of the lined area of the CCR Unit? YES NO
If YES, describe:
Describe action(s) needed:

Is there woody vegetation on or near the liner or the slopes of the CCR Unit? YES NO
If YES, describe action(s) needed:

Is sufficient capacity available in the leachate collection pond? YES NO
If NO, describe action(s) needed:

Other observations of concern: None observed

List any findings from the inspection that must be communicated to applicable plant staff and/or require corrective action(s):
None

Describe who was contacted and what action(s) were/will be taken and when:

Have all issues of concern been resolved? YES NO
If NO, describe what, when and where action will be taken: The water if remaining will be pumped out when conditions are safe

Signature of Inspector: Tony Deloche
Date: January 4, 2016