

Initial Annual Inspection Report

Intermountain Power Combustion By-Products CCR Landfill

January 18, 2016

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1.0 Introduction

On April 17, 2015 the EPA published its final rule in the Federal Register to regulate disposal of coal combustion residuals (CCR) as a solid waste under subtitle D of the Resource Conservation and Recovery Act (RCRA). The effective date of this final rule was October 19, 2015. This final rule established several requirements for existing and new CCR landfills and existing and new CCR surface impoundments. Among them was the requirement to have a qualified professional engineer conduct annual inspections and prepare annual reports on each of the CCR units, with the initial annual inspection and report due no later than January 18, 2016. The requirements for the annual inspections and reports for CCR landfill(s) are outlined in §257.84(b).

The Intermountain Power Project (IPP) is located in Millard County Utah. The IPP is owned by Intermountain Power Agency (IPA) and operated locally by Intermountain Power Service Corporation (IPSC). IPP has one CCR landfill. This landfill's name is "Intermountain Power Combustion By-Products Landfill".

The purpose of this report is to document the annual inspection and annual report on the IPP's CCR landfill. This is the first or initial annual report done on this CCR landfill since the rule went into effect on October 19, 2015. This report covers the period of time from October 19, 2015 until the date of this report.

2.0 Annual Inspection

2.1 Requirements for the Annual Inspection

In accordance with §257.84(b)(1), the annual inspection must include a review of available information regarding the status and condition of the CCR unit, including but not limited to, files available in the operating record such as the results or findings of inspections by a qualified person and the results or findings of previous annual inspections; and a visual inspection of the CCR unit and appurtenant structures to identify signs of distress or malfunction.

2.2 Findings of Initial Annual Inspection

The initial annual inspection on the CCR landfill was performed by Hyrum Blaine Ipson who is a licensed professional engineer in the State of Utah. A copy of the inspection checklist used for the inspection is included in this annual inspection report. The annual inspection included a review of the weekly inspections, a review of previous annual inspections, and a visual inspection of the CCR unit.

2.2.1 Review of Operating Record

The rule requires that inspections be done on CCR units by a “qualified person” at intervals not to exceed seven days, and that the results of these inspections be put into the operating record. For the purposes of this annual inspection report, these inspections will be called “weekly inspections”. These weekly inspections should look for any appearances of actual or potential structural weakness and other conditions which are disrupting or have the potential to disrupt the operation or safety of the CCR unit. This would include inspecting for (1) proper placement of the waste; (2) slope stability and erosion control; (3) surface water percolation minimized (i.e. reduce ponding); (4) liner systems and leachate collection system properly operated and maintained where applicable; water quality monitoring systems are maintained and operating; (6) dust is controlled; and (7) a plan is in place to promptly address and correct problems and deficiencies discovered during the inspection.

A review of the operating record was done as part of this annual inspection. This review showed that the required weekly inspections as outlined above were done at least once every seven days as required since the rule went into effect on October 17, 2015. The first weekly inspection on this CCR unit was conducted on October 21, 2015.

Subsequent weekly inspections have since been done on this CCR unit at intervals not exceeding seven days to the present. Each of the weekly inspections was done by a “qualified person” and addressed the seven things outlined in the paragraph above. No items or issues of concern were identified or noted in any of these weekly inspections. These weekly inspections did not show any appearances of actual or potential structural weakness and other conditions which are disrupting or have the potential to disrupt the operation or safety of this CCR unit.

2.2.2 Review of Previous Annual Inspections

Since this rule has only been in place since October 19, 2015, this is the first annual inspection and there are no previous annual inspections to review. Accordingly, no review of previous annual inspections was able to be conducted as part of this first annual inspection.

2.2.3 Visual Inspection

A visual inspection of this CCR landfill was conducted on January 7, 2015. This visual inspection looked for signs of actual or potential structural weakness and other conditions which are disrupting or have the potential to disrupt the operation or safety of the CCR unit. The visual inspection did not find any conditions that are disrupting or have the potential to disrupt the operation or safety of this CCR unit.

3.0 Annual Inspection Report

3.1 Requirements for Annual Inspection Report

In accordance with §257.84(b)(2), the annual inspection report must address each of the following (in addition to the findings of the annual inspection discussed above):

- (i) Any changes in the geometry of the structure since the previous annual inspection;
- (ii) The approximate volume of CCR contained in the unit at the time of the inspection;
- (iii) Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit; and
- (iv) Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection.

3.2 Annual Inspection Report

3.2.1 Changes in Geometry of Structure since Previous Annual Inspection

This is the initial annual inspection.

3.2.2 Approximate Volume of CCR Contained in CCR Unit at Time of Inspection

The approximate volume of CCR contained in the CCR unit at time of inspection was 11,075,673 cubic yards.

3.2.3 Appearances of Structural Weakness with Potential to Disrupt Operation/Safety

During the visual inspection and review of available information as discussed above in Section 2.2 above, no appearances of an actual or potential structural weakness of this CCR unit or any existing conditions were found that are disrupting or have the potential to disrupt the operation and safety of this CCR unit.

3.2.4 Changes which may have affected CCR Unit since Previous Annual Inspection

This is the initial annual inspection.

4.0 Qualified Professional Engineer

The rule requires that an annual inspection be done the corresponding annual inspection report be prepared by a qualified professional engineer. This annual inspection and corresponding annual inspection report were done by Hyrum Blaine Ipson who is a qualified professional engineer. He is a registered professional engineer and has been conducting inspections on surface water storage impoundment embankments for more than 32 years and inspections on landfills for more than 26 years.

I certify that I conducted this annual inspection and prepared the corresponding annual inspection report. The information contained herein is accurate to the best of my knowledge.

Hyrum Blaine Ipson
Hyrum Blaine Ipson

January 18, 2016
Date



Intermountain Power Combustion By-Products CCR Landfill

Checklist for Annual Inspections of CCR Landfills

Annual inspections shall be conducted to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards. This checklist is intended to provide general guidance to comply with the minimum requirements for the annual inspection and report of CCR Landfills as outlined in §257.84(b) for the CCR rule. The annual inspection and report must be completed and certified by a qualified professional engineer (i.e., an individual who is licensed by the state where the CCR Unit is located as a professional engineer to practice one or more disciplines of engineering and who is qualified by education, technical knowledge and experience to make the specific technical certifications required under this subpart). The following checklist items for the inspection and report should be addressed:

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

- ☒ Results of Inspections by A Qualified Person;
- ☐ Results of Previous Annual Inspections; Initial - No Previous
- ☐ Other Documents: _____

Comments: All inspections done as required, no problems identified in records.

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

☒ Yes ☐ No Comments: No apparent signs of distress or malfunction.

3. After the inspection, an inspection report addressing items one (1) and two (2) above must be compiled. This report must also include:

- ☐ Changes in geometry of the CCR Landfill since the previous annual inspection. Initial - no previous
- ☒ Approximate volume of CCR contained in the CCR Landfill. Storage capacity of the CCR Landfill structure at the time of the inspection. 11,075,673 cubic yards - surveyed
- ☒ Any appearances of actual or potential structural weakness of the CCR Landfill. None found.
- ☒ Any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR Landfill and appurtenant structures. None found
- ☐ Any other changes which may have affected the stability or operation of the CCR Landfill since the previous annual inspection. Initial - no previous

Comments: The approximate volume of CCR contained in landfill was surveyed by licensed surveyor Doug Grimshaw.

Name of Qualified Professional Engineer: Hiram Blaine Ipson

License Number: Utah 168299-2202

Date of Inspection/Report: Inspection: 01/07/16 Report: 01/18/16

Signature: Hiram Blaine Ipson