Closure Plan
Lawrence Energy Center
Industrial Landfill #0847

Prepared for:

Westar Energy

Lawrence Energy Center

Lawrence, Kansas

Prepared by:

Aptim Environmental & Infrastructure, Inc.

March 2018

TABLE OF CONTENTS

APTIM

LIST OF FIGURES AND APPENDICES

FIGURES

APTIM

Plan Review/Amendment Log §257.102(b)(3)

Date of Review	Reviewer Name	Amendment Required (YES/NO)	Sections Amended and Reason
3-20-18	APTIM	Yes	Report amended due to redesign

CCR Regulatory Requirements

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(a) stipulates: *(a) Closure of a CCR landfill, CCR surface impoundment, or any lateral expansion of a CCR unit must be completed either by leaving the CCR in place and installing a final cover system or through removal of the CCR and decontamination of the CCR unit, as described in paragraphs (b) through (j) of this section. Retrofit of a CCR surface impoundment must be completed in accordance with the requirements in paragraph (k) of this section.*	Section 1.0
§257.102(b)(1) stipulates: *(b) Written closure plan—(1) Content of the plan. The owner or operator of a CCR unit must prepare a written closure plan that describes the steps necessary to close the CCR unit at any point during the active life of the CCR unit consistent with recognized and generally accepted good engineering practices. The written closure plan must include, at a minimum, the information specified in paragraphs (b)(1)(i) through (vi) of this section.*	Section 4.0
§257.102(b)(1)(i) stipulates: *(i) A narrative description of how the CCR unit will be closed in accordance with this section.*	Section 4.1

APTIM

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(b)(1)(iii) stipulates: *(iii) If closure of the CCR unit will be accomplished by leaving CCR in place, a description of the final cover system, designed in accordance with paragraph (d) of this section, and the methods and procedures to be used to install the final cover. The closure plan must also discuss how the final cover system will achieve the performance standards specified in paragraph (d) of this section.*	Section 4.2
§257.102(b)(1)(iv) stipulates: *(iv) An estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit.*	Section 3.5
§257.102(b)(1)(v) stipulates: *(v) An estimate of the largest area of the CCR unit ever requiring a final cover as required by paragraph (d) of this section at any time during the CCR unit's active life.*	Section 3.6

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(b)(1)(vi) stipulates: *(vi) A schedule for completing all activities necessary to satisfy the closure criteria in this section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including identification of major milestones such as coordinating with and obtaining necessary approvals and permits from other agencies, the dewatering and stabilization phases of CCR surface impoundment closure, or installation of the final cover system, and the estimated timeframes to complete each step or phase of CCR unit closure. When preparing the written closure plan, if the owner or operator of a CCR unit estimates that the time required to complete closure will exceed the timeframes specified in paragraph (f)(1) of this section, the written closure plan must include the site-specific information, factors and considerations that would support any time extension sought under paragraph (f)(2) of this section.*	Section 8.0
§257.102(b)(2)(i) stipulates: *(2) Timeframes for preparing the initial written closure plan – (i) Existing CCR landfills and existing CCR surface impoundments. No later than October 17, 2016, the owner or operator of the CCR unit must prepare an initial written closure plan consistent with the requirements specified in paragraph (b)(1) of this section.*	Report submitted prior to October 17, 2016

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(b)(2)(iii) stipulates: *(iii) The owner or operator has completed the written closure plan when the plan, including the certification required by paragraph (b)(4) of this section, has been placed in the facility's operating record as required by* §257.105(i)(4).	Section 9.0
§257.102(b)(3) stipulates: *(3) Amendment of a written closure plan. (i) The owner or operator may amend the initial or any subsequent written closure plan developed pursuant to paragraph (b)(1) of this section at any time.* *(ii) The owner or operator must amend the written closure plan whenever:* *(A) There is a change in the operation of the CCR unit that would substantially affect the written closure plan in effect; or* *(B) Before or after closure activities have commenced, unanticipated events necessitate a revision of the written closure plan.* *(iii) The owner or operator must amend the closure plan at least 60 days prior to a planned change in the operation of the facility or CCR unit, or no later than 60 days after an unanticipated event requires the need to revise an existing written closure plan. If a written closure plan is revised after closure activities have commenced for a CCR unit, the owner or operator must amend the current closure plan no later than 30 days following the triggering event.*	Section 9.1

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(b)(4) stipulates: *(4) The owner or operator of the CCR unit must obtain a written certification from a qualified professional engineer that the initial and any amendment of the written closure plan meets the requirements of this section.*	Section 9.2
§257.102(d)(1) stipulates: *(d) Closure performance standard when leaving CCR in place – (1) The owner or operator of a CCR unit must ensure that, at a minimum, the CCR unit is closed in a manner that will:* *(i) Control, minimize or eliminate, to the maximum extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate or contaminated run-off to the ground or surface waters or to the atmosphere;* *(ii) Preclude the probability of future impoundment of water, sediment or slurry;* *(iii) Include measures that provide for major slope stability to prevent the sloughing or movement of the final cover system during the closure and post-closure care period;* *(iv) Minimize the need for further maintenance of the CCR unit; and* *(v) Be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices.*	Section 7.0 – 7.5

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(d)(3)(i) stipulates: *(3) Final cover system. If a CCR unit is closed by leaving CCR in place, the owner or operator must install a final cover system that is designed to minimize infiltration and erosion, and at a minimum, meets the requirements of paragraph (d)(3)(i) of this section, or the requirements of the alternative final cover system specified in paragraph (d)(3)(ii) of this section.(i) The final cover system must be designed and constructed to meet the criteria in paragraphs (d)(3)(i)(A) through (D) of this section. The design of the final cover system must be included in the written closure plan required by paragraph (b) of this section.* *(A) The permeability of the final cover system must be less than or equal to the permeability of any bottom liner system or natural subsoils present, or a permeability no greater than 1 × 10^{-5} cm/sec, whichever is less.* *(B) The infiltration of liquids through the closed CCR unit must be minimized by the use of an infiltration layer that contains a minimum of 18 inches of earthen material.* *(C) The erosion of the final cover system must be minimized by the use of an erosion layer that contains a minimum of six inches of earthen material that is capable of sustaining native plant growth.* *(D) The disruption of the integrity of the final cover system must be minimized through a design that accommodates settling and subsidence.*	Section 4.2 and 5.0

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(d)(3)(ii) stipulates: *(ii) The owner or operator may select an alternative final cover system design, provided the alternative final cover system is designed and constructed to meet the criteria in paragraphs (f)(3)(ii)(A) through (D) of this section. The design of the final cover system must be included in the written closure plan required by paragraph (b) of this section.* *(A) The design of the final cover system must include an infiltration layer that achieves an equivalent reduction in infiltration as the infiltration layer specified in paragraphs (d)(3)(i)(A) and (B) of this section.* *(B) The design of the final cover system must include an erosion layer that provides equivalent protection from wind or water erosion as the erosion layer specified in paragraph (d)(3)(i)(C) of this section.* *(C) The disruption of the integrity of the final cover system must be minimized through a design that accommodates settling and subsidence.*	Section 4.2
§257.102(d)(3)(iii) stipulates: *(iii) The owner or operator of the CCR unit must obtain a written certification from a qualified professional engineer that the design of the final cover system meets the requirements of this section.*	Section 11.0

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(e)(1) stipulates: *(e) Initiation of closure activities. Except as provided for in paragraph (e)(4) of this section and §257.103, the owner or operator of a CCR unit must commence closure of the CCR unit no later than the applicable timeframes specified in either paragraph (e)(1) or (2) of this section. (1) The owner or operator must commence closure of the CCR unit no later than 30 days after the date on which the CCR unit either:* *(i) Receives the known final receipt of waste, either CCR or any non-CCR waste stream; or* *(ii) Removes the known final volume of CCR from the CCR unit for the purpose of beneficial use of CCR.*	Section 8.0
§257.102(e)(3) stipulates: (3*) For purposes of this subpart, closure of the CCR unit has commenced if the owner or operator has ceased placing waste and completes any of the following actions or activities:* *(i) Taken any steps necessary to implement the written closure plan required by paragraph (b) of this section;* *(ii) Submitted a completed application for any required state or agency permit or permit modification; or* *(iii) Taken any steps necessary to comply with any state or other agency standards that are prerequisite, or are otherwise applicable, to initiating or completing the closure of a CCR unit.*	Section 8.0

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(f)(1) stipulates: (f) *Completion of closure activities. (1) Except as provided for in paragraph (f)(2) of this section, the owner or operator must complete closure of the CCR unit:* *(i) For existing and new CCR landfills and any lateral expansion of a CCR landfill, within six months of commencing closure activities.* *(ii) For existing and new CCR surface impoundments and any lateral expansion of a CCR surface impoundment, within five years of commencing closure activities.*	Section 8.0

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(f)(2)(i) stipulates: *(2)(i) Extensions of closure timeframes. The timeframes for completing closure of a CCR unit specified under paragraphs (f)(1) of this section may be extended if the owner or operator can demonstrate that it was not feasible to complete closure of the CCR unit within the required timeframes due to factors beyond the facility's control. If the owner or operator is seeking a time extension beyond the time specified in the written closure plan as required by paragraph (b)(1) of this section, the demonstration must include a narrative discussion providing the basis for additional time beyond that specified in the closure plan. The owner or operator must place each completed demonstration, if more than on time extension is sought, in the facility's operating record as required by §257.105(i)(6) prior to the end of any two-year period. Factors that may support such a demonstration include:* *(A) Complications stemming from the climate and weather, such as unusual amounts of precipitation or a significantly shortened construction season;* *(B) Time required to dewater a surface impoundment due to the volume of CCR contained in the CCR unit or characteristics of the CCR in the unit;* *(C) The geology and terrain surrounding the CCR unit will affect he amount of material needed to close the CCR unit; or* *(D) Time required or delays caused by the need to coordinate with and obtain necessary approvals and permits from a state or other agency.*	Section 8.0

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(f)(2)(ii) stipulates: (2)*(ii) Maximum time extensions.* *(A) CCR surface impoundments of 40 acres or smaller may extend the time to complete closure by no longer than two years* *(B) CCR surface impoundments larger than 40 acres may extend the timeframe to complete closure of the CCR unit multiple times, in two-year increments. For each two-year extension sought, the owner or operator must substantiate the factual circumstances demonstrating the need for the extension. No more than a total of five two-year extensions may be obtained for any CCR surface impoundment.* *(C) CCR landfills may extend the timeframe to complete closure of the CCR unit multiple times, in one-year increments. For each one-year extension sought, the owner or operator must substantiate the factual circumstances demonstrating the need for the extension. No more than a total of two one-year extensions may be obtained for any CCR landfill.*	Section 8.0

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(f)(2)(iii) stipulates: (iii) *In order to obtain additional time extension(s) to complete closure of a CCR unit beyond the times provided by paragraph (f)(1) of this section, the owner or operator of the CCR unit must include with the demonstration required by paragraph (f)(2)(i) of this section the following statement signed by the owner or operator or an authorized representative:* *I certify under penalty of law that I have personally examined and am familiar with the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*	Section 8.0
§257.102(f)(3) stipulates: (3) *Upon completion, the owner or operator of the CCR unit must obtain a certification from a qualified professional engineer verifying that closure was completed in accordance with the closure plan specified in paragraph (b) of this section and the requirements of this section.*	Section 11.0

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(g) stipulates: (g) *No later than the date the owner or operator initiate closure of a CCR unit, the owner or operator must prepare a notification of intent to close a CCR unit. The notification must include the certification by a qualified professional engineer for the design of the final cover system as required by §257.102(d)(3)(iii), if applicable. The owner or operator has completed the notification when it has been placed in the facility's operating record as required by §257.105(i)(7).*	Section 9.1
§257.102(h) stipulates: (h) *Within 30 days of completion of closure of the CCR unit, the owner or operator must prepare a notification of closure of a CCR unit. The notification must include the certification by a qualified professional engineer as required by §257.102(f)(3). The owner or operator has completed the notification when it has been placed in the facility's operating record as required by §257.105(i)(8).*	Section 9.4
§257.102(i) stipulates: *(i) Deed notations. (1) Except as provided by paragraph (i)(4) of this section, following closure of a CCR unit, the owner or operator must record a notation on the deed to the property, or some other instrument that is normally examined during title search. (2) The notation on the deed must in perpetuity notify any potential purchaser of the property that: (i) The land has been used as a CCR unit; and (ii) Its use is restricted under the post-closure care requirements as provided by §257.104(d)(1)(iii).*	Section 9.5

USEPA CCR Criteria 40 CFR 257.102	Lawrence Energy Center (LEC) Closure Plan
§257.102(j) stipulates: *(j) The owner or operator of the CCR nit must comply with the closure recordkeeping requirements specified in §257.105(i), the closure notification requirements specified in §257.106(i), and the closure Internet requirements specified in §257.107(i).*	Section 9.0

1.0 INTRODUCTION

Aptim Environmental & Infrastructure, Inc. formerly named CB&I Environmental and Infrastructure, Inc. (APTIM) has prepared the following Closure Plan (Plan) at the request of Westar Energy (Westar) for the Industrial Landfill No. 0847 (Landfill) located at its coal-fired power plant, Lawrence Energy Center (LEC) in Lawrence, Kansas. The Landfill is used for ash disposal associated with the plants and has been deemed to be a regulated coal combustion residual (CCR) unit by the United States Environmental Protection Agency (USEPA) through the Disposal of Coal Combustion Residuals from Electric Utilities Final Rule (CCR Rule) 40 CFR Parts §257 and §261.

Design modifications for the Landfill were necessary to conform to new design requirements promulgated under the CCR Rule. A report entitled *Lawrence Energy Center Comprehensive Design Modification Report – Industrial Landfill #0847* was submitted to the Kansas Department of Health and Environment (KDHE) Bureau of Waste Management (BWM) at the beginning of 2018. This Plan reflects the design modifications provided in the aforementioned design modification report.

This Plan details the closure requirements outlined in §257.102, for CCR units closed in place. The criteria for conducting the closure or retrofit of CCR units for the Landfill are detailed in Section 2.0. Additionally, the following Plan details the necessary steps to close the Landfill at any point in the active life of the Landfill, based on recognized and good engineering practices. All closure processes have been established to control, minimize, and eliminate infiltration of liquids into waste and the release of leachate.

2.0 REGULATORY OVERVIEW OF CCR CLOSURE PLAN REQUIREMENTS

On April 17, 2015, the USEPA published the CCR Rule under Subtitle D of the Resource Conservation and Recovery Act (RCRA) as 40 CFR Parts §257 and §261. The purpose of the CCR Rule is to regulate the management of CCR material in regulated CCR units for landfill and surface impoundments. The Landfill has been deemed to be a regulated CCR unit at LEC.

Section 257.102(b) of the CCR Rule requires owners or operators of CCR landfills and surface impoundments to prepare a written Plan describing the closure of the unit and schedule for implementation of the Plan. The following citations from the CCR Rule are applicable for the Landfill as discussed in this Plan:

§257.102(b)(1) stipulates:

(b) Written closure plan – (1) Content of the plan. The owner or operator of a CCR unit must prepare a written closure plan that describes the steps necessary to close the CCR unit at any point during the active life of the CCR unit consistent with recognized and generally accepted good engineering practices. The written closure plan must include, at a minimum, the information specified in paragraphs (b)(1)(i) through (vi) of this section

(i) A narrative description that discusses how the CCR unit will be closed in accordance with this section.
(ii) If closure of the CCR unit will be accomplished through removal of CCR from the CCR unit, a description of the procedures to remove the CCR and decontaminate the CCR unit in accordance with paragraph (c) of this section.
(iii) If closure of the CCR unit will be accomplished by leaving CCR in place, a description of the final cover system, designed and methods and procedures to be used to install the final cover will achieve performance standards specified in paragraph (d) of this section, and the methods and procedures to be used to install the final cover. The closure plan must also discuss how the final cover system achieves the performance standards specified in paragraph (d) of this section.
(iv) An estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit.
(v) An estimate of the largest area of the CCR unit ever requiring a final cover as required by paragraph (d) of this section at any time during the CCR unit's active life.
(vi) A schedule for completing all activities necessary to satisfy the closure criteria in this section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including identification of major milestones such as coordinating with and obtaining necessary approvals and permits from other agencies, the dewatering and stabilization phases of CCR surface impoundment closure, or installation of the final cover system, and the estimated timeframes to complete each step or phase of CCR unit closure. When preparing the written closure plan, if the owner or operator of a CCR unit estimates that the time required to complete closure will exceed the timeframes specified in paragraph (f)(1) of this section, the written closure plan must include the site-specific information, factors and considerations that would support any time extension sought under paragraph (f)(2) of this section.

§257.102(b)(iii) outlines closure performance standards for closure of units where CCR material will be left in place. This section requires a description of the final cover system, and the design, methods, and procedures to be used to install the final cover to ensure that it will achieve the performance standards specified in and §257.102(d), which stipulates:

(d) Closure performance standard when leaving CCR in place – (1) The owner or operator of a CCR unit must ensure that, at a minimum, the CCR unit is closed in a manner that will:

- *(i) Control, minimize or eliminate, to the maximum extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate, or contaminated run-off to the ground or surface waters or the atmosphere;*
- *(ii) Preclude the probability of future impoundment of water, sediment or slurry;*
- *(iii) Include measures that provide from major slope stability to prevent the sloughing or movement of the final cover system during closure and post-closure period;*
- *(iv) Minimize the need for further maintenance of the CCR unit; and*
- *(v) Be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices.*

Moreover, the final cover system has been planned in accordance with the following requirements of §257.102(d)(3), which stipulates:

(3) Final cover system. If a CCR unit is closed by leaving CCR in place the owner or operator must install a final cover system that is designed to minimize infiltration and erosion, and at a minimum, meets the requirements of paragraph (d)(3)(i) of this section, or the requirements of the alternative final cover system specified in paragraph (d)(3)(ii) of this section.

- *(i) The final cover system must be designed and constructed to meet the criteria in paragraphs (d)(3)(i)(A) through (D) of this section. The design of the final cover system must be included in the written closure plan required by paragraph (b) of this section.*
  - *(A) The permeability of the final cover system must be less than or equal to the permeability of any bottom liner system or natural subsoils present, or a permeability no greater than $1x10^{-5}$ cm/sec, whichever is less.*
  - *(B) The infiltration of liquids through the CCR unit must be minimized by the use of an infiltration layer that contains a minimum of 18 inches of earthen material.*
  - *(C) The erosion of the final cover system must be minimized by the use of an erosion layer that contains a minimum of six inches of earthen material that is capable of sustaining native plant growth.*
  - *(D) The disruption of the integrity of the final cover system must be minimized through a design that accommodates settling and subsidence.*

In addition to the above, the Plan must ensure compliance with the closure recordkeeping requirements specified in §257.105(i), the closure notification requirements specified in §257.106(i), and the closure intent requirements specified in §257.107(i). A written certification is provided in Section 11.0 from a qualified professional engineer in the State of Kansas, to certify that this Plan meets the requirements of the CCR Rule.

APTIM

3.0 LEC LANDFILL OVERVIEW

3.1 Location, Topography, and Description

Bottom ash, fly ash, and flue gas desulfurization (FGD) by-product are deposited within the Landfill at LEC. The closure of the Landfill will be accomplished by leaving the CCR material in place. The following Plan was developed to satisfy the CCR Rule requirements for in place closure §257.102(b)(1)(iii).

The Landfill is located in Lawrence, Kansas, within Sections 13 and 14, Township 12 South, Range 19 East in Douglass County. The Landfill is located within LEC, on the east side of property. It is surrounded by the Kansas River to the north, the Burlington Northern and Santa Fe Railway along the north and east, industrial buildings to the west, and prairies, industrial buildings, and residential housing to the south, as detailed in **Figure 1**.

The Landfill has eight permitted Cells which are being filled in numerical order. Cell 1 also shares the northwestern border with the closed 333 Landfill at LEC, which is permitted under KDHE-BWM Permit Number 0333. In total, the completed Landfill will cover approximately 58.9 acres. Once CCR material disposal and final cover installation/closure is complete, final cover slopes will be 3.25H:1V in Cells 1 through 3 and 4H:1V in Cells 4 through 8 with transition areas occurring between changes in slope grades. The final cover plateau of the Landfill will have a 5.0% slope with a peak elevation of approximately 992 ft. MSL. Existing and proposed site topography is depicted in **Figure 2** and **Figure 3**, respectively.

3.2 Existing Regulatory Permits and Consents

Westar was granted an Industrial Landfill Permit at LEC by KDHE-BWM for the Landfill through Industrial Landfill Permit No. 0847, in accordance with Kansas Statutes Annotated (KSA) 65-3407. KDHE modified the solid waste permit, per K.A.R. 28-29-6a, in response to the CCR Rule to include all on-site CCR material units as disposal areas under the existing solid waste permit for LEC. The current Industrial Landfill Permit modification was approved on October 15, 2015. This allows CCR material to be generated on-site at LEC and to be properly recycled and/or disposed within the Landfill Permit boundary.

3.3 CCR Material Generation, Recycling, and Disposal

The Landfill began accepting fill, which includes fly ash, bottom ash, and FGD gypsum, in 2009. Bottom ash is the by-product of molten ash being quenched with water in the coal boilers and it falls to the bottom of the boiler where it is collected. Fly ash is typically smaller in particle size and is removed from the combustion gas stream in an electrostatic precipitator. FGD gypsum is generated when the scrubbers remove sulfur from combustion gases with a limestone reagent.

After the CCR materials are generated, they are collected and disposed or recycled. The bottom ash and FGD materials are sluiced to CCR material settling tanks and dewatered. The fly ash is collected from the air quality control system and stored dry in on-site silos. Variable amounts of all CCR material are used as recycled material, due to the changing market demand.

3.4 Landfill Operations

CCR material is deposited at the active waste area of the Landfill by transport trucks. Dozers are used to spread the CCR material into uniform lifts. The CCR material is dried within the Landfill so that it will harden into a solid mass. Periodic grading of the CCR material occurs as needed within the active area to maintain a relatively uniform lift height.

Routine and annual inspections, as well as annual reporting, are undertaken for the CCR units in line with the Landfill inspection requirements in 40 CFR §257.84(b): Inspection Requirements for CCR Landfills. Any operational modifications which require attention are identified as part of the inspection and reporting requirements for the Landfill.

The perimeter berms are constructed ahead of the CCR material placement to prevent stormwater erosion. As landfilling occurs, an adequate freeboard is maintained between the top of waste and the top of the perimeter berm to deter contact water from leaving the Landfill. Stormwater control measures (e.g. dikes or berms) takes place in accordance with the Run-on and Run-off Control Plan for the Landfill.

Contact water is collected by wick drains within each Cell of the Landfill. Wick drains are vertical columns of stone aggregate that collect and transport stormwater to the drainage layer underneath each Landfill Cell. A drainage piping network with the drainage layer transports stormwater to the contact water basin, located in the southeastern corner of the Landfill. The pond is lined with a 60-mil High Density Polyethylene (HDPE) liner to prevent infiltration of contact water into the groundwater system.

3.5 Remaining Landfill Volume and Life (§257.102(b)(1)(iv))

Based on the proposed design modifications submitted to KDHE-BWM, the total disposal capacity of Cells 1 through 8 is approximately 4,944,129 cubic yards (yd^3). This was determined using AutoCAD Civil 3D software to compare the original grades (prior to waste placement) to the proposed top of waste grades. Based on the current rate of fill, the estimated remaining life of the Landfill was determined to be approximately 52 years (year 2070).

3.6 Largest Area Requiring Final Cover (§257.102(b)(1)(v))

The Landfill has been designed, and will be operated so that contemporaneous operation and closure occurs. Therefore, the final cover will be constructed in stages so as to facilitate Landfill operational requirements. The largest area requiring final cover at any time during the CCR units' operating period is estimated to be the current operational area spanning from Cell 1 to Cell 3 of the Landfill, which is approximately 15.8 acres in size.

4.0 CLOSURE PLAN (§257.102(b)(1))

This Plan has been prepared in accordance with requirements of the CCR Rule, which includes a written certification in Section 11.0 from a qualified professional engineer for the State of Kansas.

4.1 Narrative Description (§257.102(b)(1)(i))

The method of closure has been designed to minimize maintenance, leachate generation, control run-on and run-off, and ensure the protection of human health and the environment. Closure of the Landfill will follow construction quality assurance (CQA) procedures to ensure the final cover is designed, constructed, and installed in accordance with recognized standards and accepted good engineering practices as detailed in the following sections.

4.2 Final Cover and Subgrade Overview (§257.102(b)(1)(iii) and §257.102(d)(3)(i))

The final cover has been designed to meet the following objectives:

- Minimize the potential post-closure infiltration of liquids into the waste;
- Minimize the potential for releases of CCR material, leachate, or contaminated run-off to the ground or surface waters or the atmosphere;
- Provide long-term slope stability to prevent the sloughing or movement of the final cover system during closure and post-closure period; and
- Minimize the need for further maintenance of the CCR unit.

The final cover will be installed on top of a minimum of a 12-inch subgrade layer of compacted and graded CCR material. The final cover system of the Landfill will be constructed to ensure permeability no greater than 1 x 10^{-5} cm/sec, the final grades are depicted in **Figure 3**. Positive drainage will minimize the potential for the infiltration of liquids into the CCR material.

The currently permitted final cover system for Cells 1 through 3 includes an 18-inch thick clay cap overlain by a 12-inch protective/vegetative layer, resulting in a 30-inch cap. As Cells 1 through 3 have been operational and accepting CCR material prior to the CCR Rule, this final cover system is designed to meet minimum permeability requirements of 1x10^{-5} cm/sec, in accordance with 40 CFR §257.102(d)(3)(i).

Based on the limited availability of cover soils, an alternative final cover system has been proposed for Cells 4 through 8 and the Landfill plateau area consisting of the following, from top to bottom:

- A 6-inch vegetative cover soil layer;
- An 30-inch protective cover soil layer;
- A double-sided geocomposite with geonet; and
- A textured 40-mil LLDPE geomembrane.

The alternative final cover system has been designed to meet federal requirements set forth in 40 CFR §257.102(d)(3)(i) and requirements provided by KDHE-BWM. All required equivalency demonstrations and material specifications have been submitted to KDHE-BWM and are provided in the report entitled *Lawrence Energy Center Comprehensive Design Modification Report – Industrial Landfill #0847*.

4.2.1 Low Permeability Subgrade Construction

Prior to construction of the final cover system for all Landfill cells, a 12-inch subgrade area comprised of select CCR material will be prepared and used to support the final cover system. The subgrade will be compacted, then graded with a bulldozer, and smoothed to ensure a uniform surface.

After the grading and completion of the subgrade, the area will be inspected to ensure the working surface is smooth and free from sharp objects or abrupt changes in grade, and proper sloping allowed for drainage. Upon inspection, the area will be surveyed on a minimum of a 100-foot grid prior to the commencement of the installation of the final cover.

4.2.2 Infiltration Layer

For Cells 1 through 3, an 18-inch compacted soil layer will be installed at the Landfill to serve as an impermeable barrier. This layer will prevent infiltration of moisture through the final cover into the CCR material. The infiltration layer will be constructed from soil obtained locally or remaining on-site borrow sources and will be free of large particles or debris.

For Cells 4 through 8, a 40-mil LLDPE geomembrane will be used to prevent infiltration of moisture through the final cover, into the CCR material. The geomembrane will be installed on the 12-inch select CCR material subgrade layer that has been selected to ensure that no material is present that may puncture or penetrate the geomembrane liner. The select ash is not considered a component of the final cover system, but is included due to its importance for the final cover performance. Installation of the geomembrane will follow the CQA plan and meet all third-party conformance testing. Third-party conformance testing will be conducted on key parameters for the geomembrane material properties. Testing will be reported as part of the CQA report for the Landfill.

4.2.3 Geocomposite Drainage Layer

A geocomposite drainage layer is included in the final cover system for Cells 4 through 8 and the Landfill plateau area. The geocomposite drainage layer will be installed on top of the 40-mil geomembrane. The geocomposite drainage layer consists of a geonet (drainage net) sandwiched by two non-woven needle-punched geotextiles. The geocomposite drainage layer will discharge at the toe of the Landfill final cover. The end of the geocomposite drainage layer will daylight into the perimeter stormwater channels in Cells 4 through 8.

4.2.4 Protective/Vegetative Soil Layer

The protective/vegetative soil layer for Cells 1 through will consist of a 12-inch soil layer (6-inches of vegetated topsoil and 6-inches of protective cover soils), to protect the underlying clay liner system.

The final protective/vegetative soil layer will be 36-inches thick (6-inches of vegetated topsoil and 30-inches of protective cover soils), to protect the underlying layers from frost,

desiccation, erosion, and penetration by roots or vectors. The protective soil layer exceeds to frost penetration anticipated at LEC and minimizes the potential for water to freeze within the underlying geocomposite. This thickness of cover soil is not necessary in the Cells 1-3 areas where geosynthetics are not used. Cover maintenance will be performed as necessary to maintain the final cover to meet the design objectives.

5.0 CONSTRUCTION CONSIDERATIONS

5.1 Equipment

Westar, or their contractor, is responsible for providing sufficient equipment to carry out Landfill closure operations, as designed, in a satisfactory manner. Equipment for Landfill closure operations may include any or all of the following, as seen in Table 1, and potentially other equipment if deemed appropriate by Westar and their contractors:

TABLE 1: CONSTRUCTION EQUIPMENT

EQUIPMENT	***PURPOSE***
Tracked Dozer	Spreading low permeability soil and protective /vegetative material
Excavators/Backhoes	Slope leveling near geomembrane tie-in at the waste boundary. Excavating soil material into haul trucks and final cover installation
Compactor	Compacting cohesive soil layer to achieve proper density and compacting ash for subgrade layer
Haul Trucks	Haul cohesive soil and CCR material into construction area
Drum Rollers	Preparing the low permeability soil layer top surface for geomembrane placement
Water Trucks	Spraying water on final cover soils during placement and on LEC roads for dust suppression

5.2 Phased Construction

The final cover will be placed progressively as each construction phase is complete. Construction of the cover system, haul road, and fill placement will take place throughout the year as needed. The objective will be to establish the stabilized final surface as efficiently as possible after the filling has been completed.

5.3 Stormwater Run-On and Run-Off Controls

As previously stated, all contact water (leachate) is directed to the Contact Water Pond. The contact water management system has been designed to properly manage stormwater that comes in contact with CCR associated with the 25-year, 24-hour storm event according to Landfill Operations Plan Addendum approved by the KDHE in 2014.

Non-contact stormwater run-off from capped and closed cells will utilize perimeter drainage channels, terrace berms, and letdown structures to convey stormwater to natural drainage swales located at the perimeter outfall locations. Stormwater conveyance structures will convey water to a small stream that is a tributary to the Kansas River or the the Kansas River itself. They will be constructed prior to the placement of CCR material in Landfill cells that drain off-site.

All outfall locations are and will be monitored to ensure they are free of silt and sediment, discoloration, or floating debris and non-aqueous substances in order to meet the standards set by the NPDES Permit No. I-KS31-PO09. See the Run-on and Run-off Control Plan for further information on the stormwater management system.

5.4 Erosion Control

Erosion control measures such as side slope terrace berms, letdown structures, toe slope drainage terraces, and the vegetated erosion control layer will be used to minimize erosion of the Landfill final cover. Other erosion control measures may include a relatively shallow slope of the final cover and the use of the perimeter berms, both of which will control surface run-off rates on and around the Landfill. The vegetated final cover will assist in preventing erosion of the final cover soils. Construction of erosion control measures including dikes, berms, and other features will take place as necessary and will be in accordance with the Run-on and Run-off Control Plan for the Landfill.

5.5 Stability

The final cover system may experience minor settlement over time, due to CCR compression and consolidation. Only minimal waste consolidation is anticipated due to the physical characteristics of CCR. Most of the settlement will have already occurred shortly after CCR placement.

In the event future non-uniform settlement is observed to be impacting the functional design and/or operation of the Landfill and surrounding areas, minor regrading and repair of the soil component may be required. The geomembrane and the final cover soil components are flexible and will retain their integrity under minor differential settlement.

A slope stability analysis for the Landfill was undertaken as part of the design modifications completed by APTIM at the beginning of 2018. It was found that each modeled scenario produced an overall factor of safety that exceeded federal and state requirements.

6.0 OPERATIONS AND MAINTENANCE

Following closure, the final cover will be maintained to prevent erosion and control excessive vegetative growth. Maintenance of the final cover will include periodic mowing of the vegetative cover and reseeding as necessary. The grass will be maintained at such a level as to facilitate inspection. This will help to discourage the inhabitance of burrowing animals. Mowing activities will be conducted on an as-need basis. The protective/vegetative soil layer on the final cover system will be inspected, filled with soil, and regraded if the erosion channels are approximately 6-inches deep. Further details on the operations and maintenance are provided in the Post-Closure Plan for the Landfill.

7.0 CLOSURE PERFORMANCE STANDARDS (§257.102(d)(1))

7.1 Minimization of Liquid Infiltration into CCR Material Mass (§257.102(d)(1)(i))

As detailed above, the final cover system for the Landfill will include an infiltration layer, consisting of either compacted soils and/or a low-permeability geomembrane layer, and an erosion control layer. The compacted soils and/or geomembrane will help to minimize the potential infiltration of water to the CCR material. In addition to minimizing potential infiltration, the purpose of geomembrane is to remove infiltrated water from the final cover system to discharge into the toe of the Landfill, daylighting into the perimeter stormwater channels.

The final cover system will assist in preventing the contact between the surface water and the CCR material. This will minimize the movement of potentially contaminated water to ground or surface water systems. Additionally, it will assist in controlling, minimizing and in some cases eliminating, to the maximum extent feasible, post-closure infiltration of liquids into the waste, and the potential releases of CCR material and leachate, as required by the performance standards.

7.2 Preclusion of Future Impoundment of Water, Sediment, or Slurry (§257.102(d)(1)(ii))

Westar does not intend the need for future impoundment of water, sediment, or slurry within the Landfill once the final cover system is installed. Therefore, the Landfill follows the required performance standards.

7.3 Measures to Maintain Slope Stability (§257.102(d)(1)(iii))

In order to maintain slope stability of the final cover, run-off is collected and controlled in highly erodible areas, such as the side slopes and top slope. The run-off controls and shallow slopes prevent erosion, movement, and sloughing of the final cover system, as required by the performance standard. Established vegetation will also assist in preventing erosion and sloughing. In addition, construction of the Landfill will remain under maximum allowable design slopes that have been demonstrated through modeling to remain stable throughout the operable life of the Landfill cell. Further details on the stormwater management system for the Landfill are provided in the Run-On and Run-Off Control Plan.

7.4 Design to Minimize Ongoing Maintenance (§257.102(d)(1)(iv))

The incorporation of slope stability and erosion control measures will minimize the need for on-going maintenance on the Landfill. Routine inspections will assist in identifying maintenance at the earliest opportunity, so as to prevent larger maintenance requirements in the future.

Both maintenance prevention measures and routine inspections will minimize the requirement for larger maintenance of the Landfill. Therefore the Landfill fulfills the required performance standards.

7.5 Engineering Good Practices (§257.102(d)(1)(v))

The timely, planned completion and phasing of final cover operations will prevent large amounts of contact water from being generated. The use of time efficiency with a high standard for quality is an example of a good engineering practice, and therefore satisfies the required performance standards.

8.0 CLOSURE ACTIVITY SCHEDULE (§257.102(b)(1)(vi))

The closure of the Landfill will be completed according to the following schedule milestones:

- Based on Section 3.5, it can be seen that the estimated closure date of the Landfill will be in 2070. As the Landfill is filled, this date may change depending on the disposal rates of CCR material. Accordingly, this closure date will be updated as required, as part of an amendment to this Plan.

- Notify KDHE in writing at least 60 days before closure.

- The final cover installation will be initiated as soon as possible after regulatory approval, in line with suitable weather for construction.

- Construction and analytical testing will be conducted in a systematic and timely manner. Delays will be avoided in final cover completion. Construction and testing of the soil will generally not exceed 60 working days from beginning to completion.

- Commence closure of the Landfill, by following §257.102(e)(3), no later than 30 days after the date on which the CCR unit receives the final receipt of CCR material, per §257.102(e)(1).

- Completion of closure activities will occur within six months of commencing closure activities as required by §257.102(f)(1). Upon completion a certified Kansas Professional Engineer will provide KDHE with a closure certification. This will verify that Landfill closure was performed and completed in accordance with the closure plan. A request for an extension of the closure timeframe may be submitted following the guidelines in §257.102(f)(2)(i-iii).

- Within 30 days of the completion of closure of the CCR unit, the notification of closure of the CCR unit will be submitted per §257.102(h).

- Post-closure monitoring of the cap and run-on/run-off controls will be conducted on a routine schedule to identify any potential stability issues with the cap and appropriate maintenance to be undertaken. A post-closure monitoring plan for the Landfill has been detailed in the Post-Closure Plan for the Landfill.

9.0 RECORDKEEPING/NOTIFICATION REQUIREMENTS (§257.102(j))

Per §257.102(j), Westar maintains an operating record consisting of the following documents specified in §257.105(i):

- Inspection records that are conducted for the disposal of materials;
- Groundwater sampling and analysis results for the Landfill, records of by-product material recycled, major operational problems, complaints or difficulties, records associated with corrective measures, and employee training records;
- A copy of the SWPPP and the SWPPP Record Forms;
- The Plan, as required by §257.102(b)(2)(iii), the Post-Closure Plan, as well as closure CQA certification and post-closure inspection documentation;
- Proof of financial insurance;
- A copy of the current operating permit and any subsequent addenda; and
- Copies of the permit applications and all supporting documents.

Additionally per §257.104(f), Westar will comply with the notification requirements specified in §257.106(i). This includes submitting the following notification documents and any amendments to these documents to the state director:

- Intent to initiate closure;
- Availability of annual progress reports of closure implementation;
- Closure and Post-Closure Plan and any alternative closure requirements;
- Any required time extensions;
- Completion of closure of a CCR unit; and
- Deed notation.

Internet requirements specified in §257.107(i) will be placed on owner and operators publicly accessible website, per §257.104(f). These documents include any notification on the closure or post-closure intent or completion, annual progress reports, the written Closure and Post-Closure Plans and any amendments, demonstrations for time extensions, and the record of the deed.

All records that are relevant within the past five years will be maintained at LEC and/or by Westar. The records are available to KDHE representatives for review upon request.

9.1 Plan Amendments (§257.102(b)(3))

This Plan will continue to undergo review as the Landfill continues phased construction activities. The amended Plan will be reviewed and recertified by a registered professional

engineer and will be placed in LEC's facility operating record as required per §257.105(i)(4). The amended Plan will supersede and replace any prior versions. Availability of the amended Plan will be noticed to the State Director per §257.106(i) and posted to the publicly accessible internet site per §257.107(i).

A record of Plan reviews/assessments is provided on the first page of this document, immediately following the Table of Contents. Any subsequent amendment of a written Plan will be prepared as required, such as:

- There is a change in the operation of the CCR unit that would substantially affect the written Plan in effect; or
- Before or after closure activities have commenced, unanticipated events necessitate a revision of the written Plan.

The owner or operator will amend the Plan at least 60 days prior to a planned change in the operation of the LEC's facility or CCR unit, or no later than 60 days after an unanticipated event requires the need to revise an existing written Plan. If a written Plan is revised after closure activities have commenced for a CCR unit, the owner or operator will amend the Plan no later than 30 days following the triggering event.

9.2 Amended Plan Certification (§257.102(b)(4))

APTIM reviewed any previously developed closure information/plans which exist for the Landfill. APTIM prepared a Plan for the Landfill to address closure with CCR materials left in place. APTIM has utilized the existing Plans in this report to minimize costs associated with development of these plans.

This Plan will continue to undergo review as the Landfill continues phased construction activities. Any future amendments to the current Plan will be tracked in the log at the beginning of this document and will be certified by a qualified professional engineer that the amended plan meets the requirements of the applicable portions of the CCR Rule. The amended Plan will be placed in LEC's facility operating record as required per §257.105(i)(4), noticed to the State Director per §257.106(i), and posted to the publicly accessible internet site per §257.107(i)

9.3 Notice of Intent to Initiate Closure (§257.102(g))

Westar will file a Notice of Intent of closure activities no later than the date of initiation of closure of the Landfill. The notification will include the certification by a registered professional engineer in the State of Kansas for the design of the final cover system as required by §257.102(d)(3)(iii).

If required, Westar may request an extension of an additional two years to initiate closure of the Landfill, and provide written documentation that the Landfill will continue to accept waste or will start removing CCR material for the purpose of beneficial use. The documentation to extend the closure of an idle CCR unit must be supported by specific information specified in the CCR Rule. The factors that may support such a demonstration are not included in the current Plan at this time. If such an extension is needed in the future, the Plan will be amended to address this issue at a later date.

9.4 Notice of Completion of Closure (§257.102(h))

Westar will complete a Notice of Completion of closure activities within 30 (thirty) days of completion of closure of the Landfill. The notification will include the certification by a registered professional engineer as required by §257.102(f)(3).

9.5 Deed Notation (§257.102(i))

Per §257.102(i), a notation on the deed to the property, or some other instrument, that is normally examined during a title search will be recorded to notify any potential purchaser of the property that the land has been used as a CCR unit and its use is restricted under the post-closure care requirements provided within §257.104(d)(1)(iii). The following information will be recorded in accordance with the CCR Rule:

- The name and address of the person with knowledge of the contents of the Landfill
- The prior land use as a CCR unit
- The restrictions of future land use under the post-closure care requirements

10.0 CLOSURE COST ESTIMATE

The closure cost for the Landfill is estimated to be approximately $692,758.41, as of February 2018. Closure cost estimates were prepared for operations in each Cell of the Landfill. The maximum closure cost estimates when operating in each Cell of the Landfill are provided to KDHE on an annual basis. This information can be obtained through KDHE-BWM by completing the Kansas Open Records Act Request Form.

In providing these cost estimates, it is recognized that Westar does not have control over the costs of labor, equipment, or materials, or over a contractor's method(s) of determining prices or bidding.

11.0 PROFESSIONAL ENGINEER CERTIFICATION (§257.102(d)(3)(iii))

The undersigned registered professional engineer is familiar with the requirements of §257.102 of the CCR Rule and has visited and examined LEC or has supervised examination of LEC by appropriately qualified personnel. The undersigned registered professional engineer attests that this CCR Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and meets the requirements of §257.102, and that this Plan is adequate for LEC's facility. This certification was prepared as required by §257.102(d)(3)(iii).

Name of Professional Engineer: Richard Southorn

Company: APTIM

Signature:

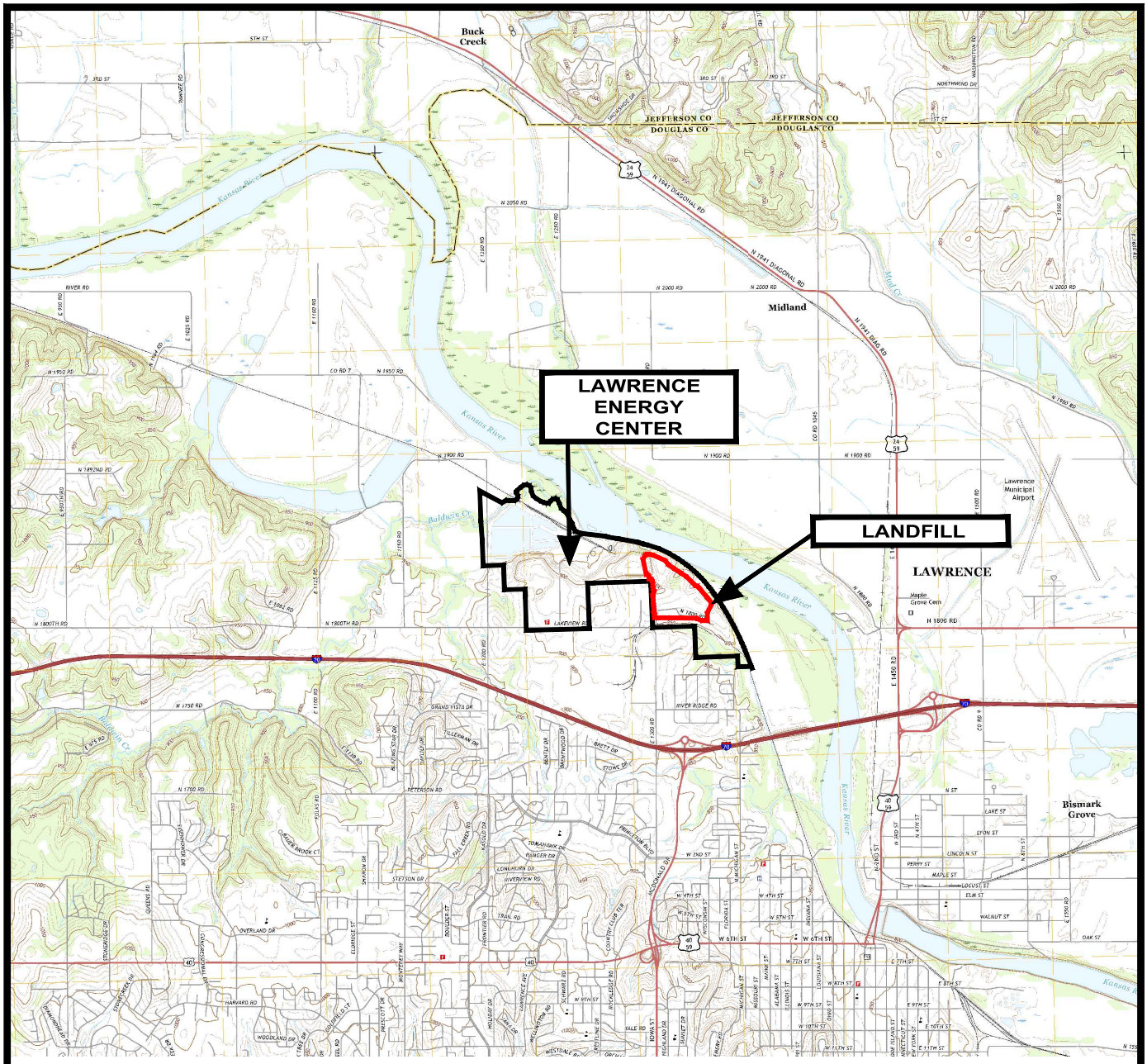
Date: 3/20/18

PE Registration State: Kansas

PE Registration Number: PE25201

Professional Engineer Seal:

FIGURES



LEGEND

LAWRENCE ENERGY CENTER FACILITY BOUNDARY

CCR UNIT BOUNDARY

0 5000'

GRAPHIC SCALE

NOTES

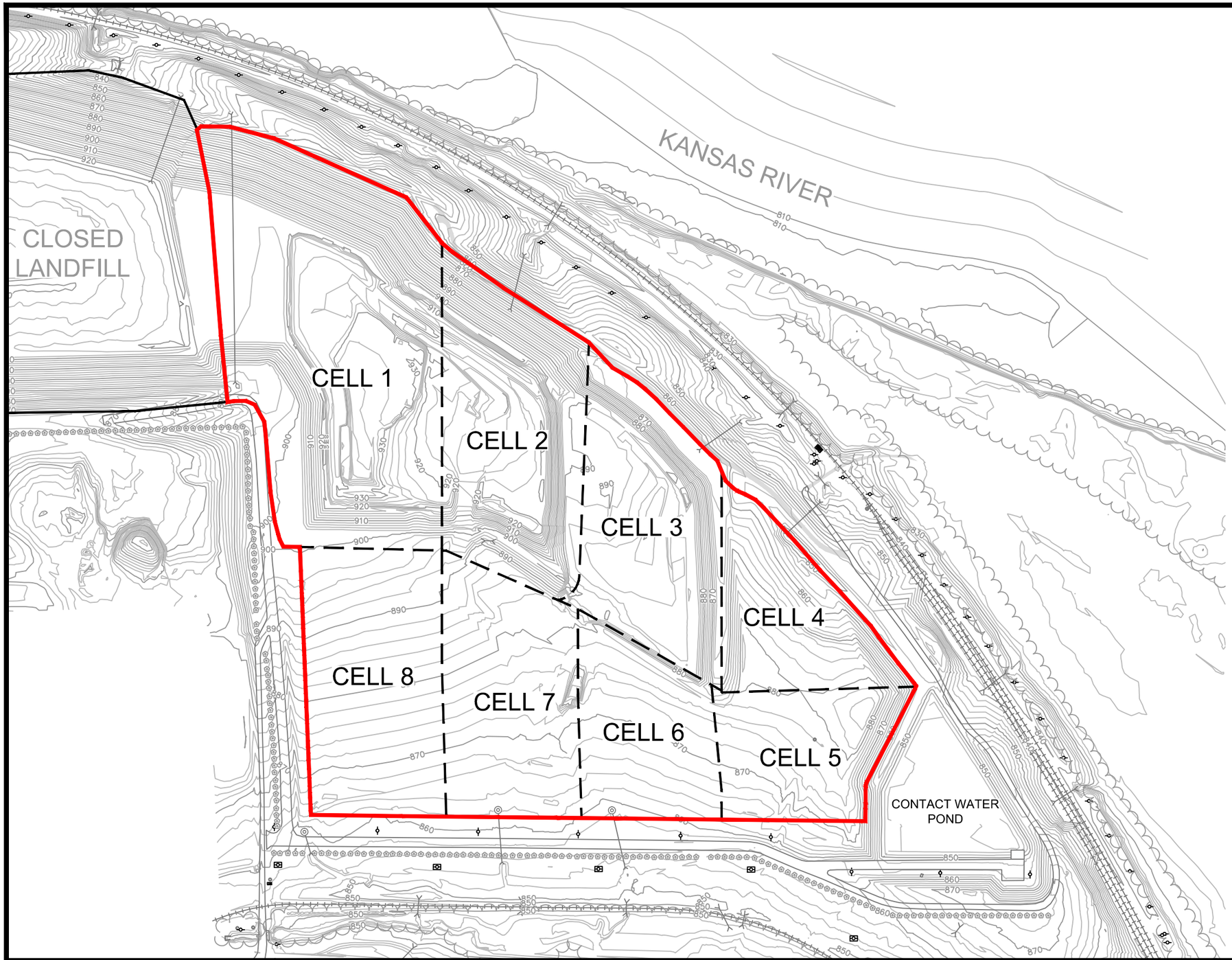
1. AERIAL TOPO OBTAINED FROM USGS 7.5-MINUTE SERIES, LAWRENCE EAST, LAWRENCE WEST, MIDLAND AND WILLIAMSTOWN QUADRANGLE, KANSAS, 2014.
2. ALL BOUNDARIES ARE APPROXIMATE.

APTIM Environmental & Infrastructure, Inc.

LAWRENCE ENERGY CENTER
1250 N. 1800 RD., LAWRENCE, KS.

FIGURE 1
LAWRENCE LANDFILL
SITE LOCATION PLAN

APPROVED BY: RDS	PROJ. NO.: 631214397	DATE: FEBRUARY 2018



N

0 300'

GRAPHIC SCALE

LEGEND

APPROXIMATE CCR UNIT BOUNDARY

APPROXIMATE LANDFILL CELL BOUNDARY

NOTES

1. EXISTING CONTOURS DEVELOPED FROM SITE AERIAL TOPOGRAPHIC SURVEY BY PROFESSIONAL ENGINEERING CONSULTANTS IN JUNE 2016. CONTOURS WERE SUBSEQUENTLY MODIFIED BY APTIM TO REFLECT A RIP-RAP AND SOIL STOCKPILE REMOVAL. EXISTING CONTOURS MAY DIFFER FROM SHOWN.
2. FOR CLARITY, NOT ALL SITE FEATURES MAY BE SHOWN.
3. PROPOSED CCR UNIT BOUNDARY IS APPROX. 53.5 ACRES.
4. ALL BOUNDARIES ARE APPROXIMATE.

REV. NO.	DATE	DESCRIPTION

Westar Energy®

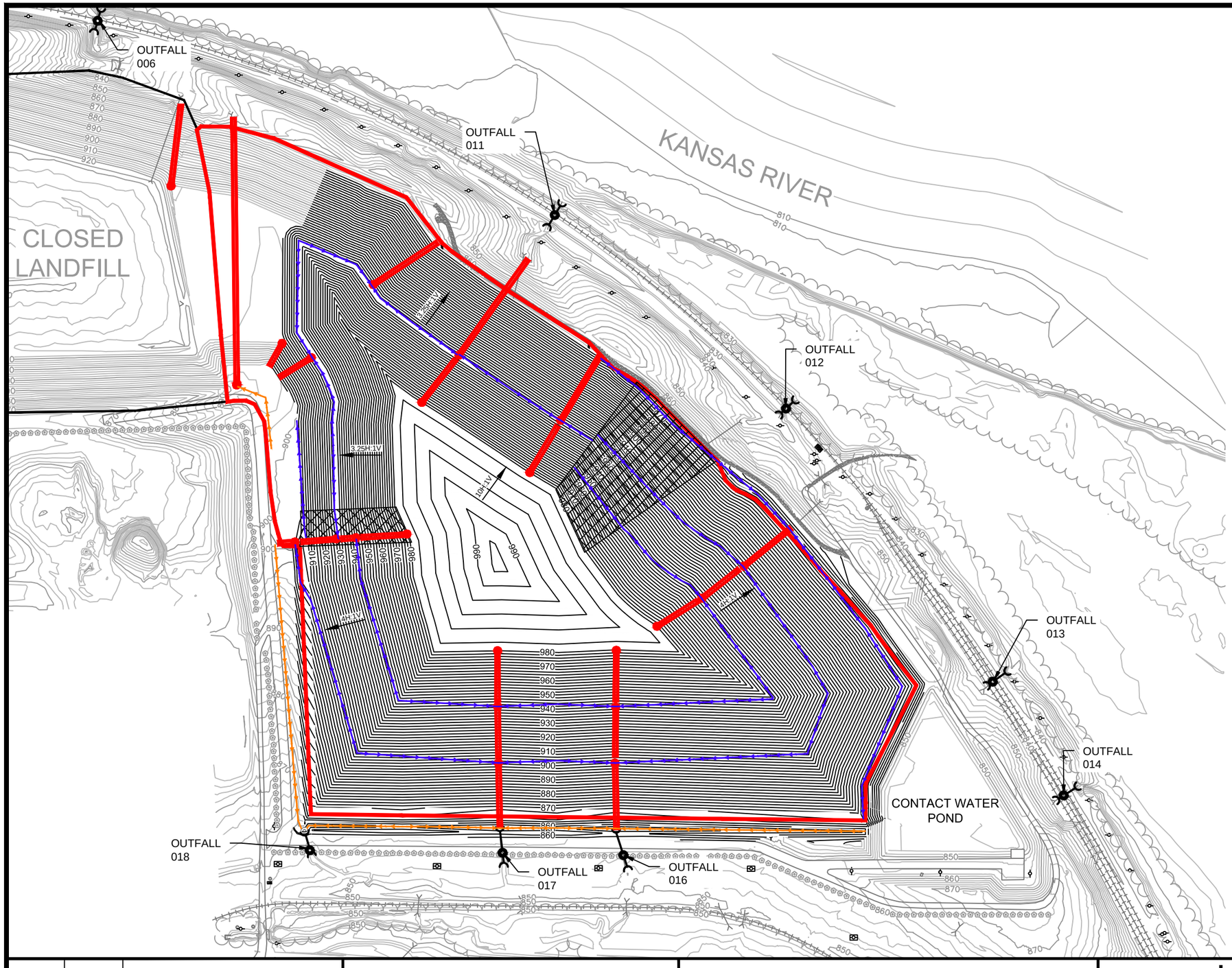
APTIM Environmental & Infrastructure, Inc.

LAWRENCE ENERGY CENTER
1250 N 1800 RD., LAWRENCE, KANSAS

FIGURE 2
LAWRENCE LANDFILL
EXISTING SITE TOPOGRAPHY

DRAWN BY:	ORC	APPROVED BY:	RDS	PROJ. NO.:	631214397	DATE:	MARCH 2018

T:\AutoCAD\Projects\Westar Energy\Lawrence\Compliance Reports\Closure Post-Closure Figures\Figure 2 - Existing Conditions.dwg



N

0 300'

GRAPHIC SCALE

LEGEND

- APPROXIMATE CCR UNIT BOUNDARY
- APPROXIMATE FINAL COVER DESIGN TRANSITION ZONE
- APPROXIMATE TERRACE BERM/BENCH
- APPROXIMATE DRAINAGE DITCH
- APPROXIMATE LETDOWN PIPE
- CULVERT FLOWING TO OUTFALL
- OUTFALL LOCATION

NOTES

1. EXISTING CONTOURS DEVELOPED FROM SITE AERIAL TOPOGRAPHIC SURVEY BY PROFESSIONAL ENGINEERING CONSULTANTS IN JUNE 2016. CONTOURS WERE SUBSEQUENTLY MODIFIED BY APTIM TO REFLECT A RIP-RAP AND SOIL STOCKPILE REMOVAL. EXISTING CONTOURS MAY DIFFER FROM SHOWN.
2. FOR CLARITY, NOT ALL SITE FEATURES MAY BE SHOWN.
3. PROPOSED CCR UNIT BOUNDARY IS APPROX. 53.5 ACRES.
4. ALL BOUNDARIES ARE APPROXIMATE.
5. PERMITTED SLOPE OF FINAL COVER PLATEAU AREA HAS BEEN MODIFIED TO PROVIDE AN INCREASED 20H:1V SLOPE IN ORDER TO PROMOTE DRAINAGE AND ACCOMMODATE DIFFERENTIAL SETTLEMENT.
6. FINAL COVER IN DEVELOPMENT AREAS UTILIZING GEOSYNTHETICS HAVE BEEN MODIFIED TO HAVE A SLOPE OF 4H:1V TO ENSURE LANDFILL STABILITY.

REV. NO.	DATE	DESCRIPTION

Westar Energy®

APTIM

APTIM Environmental & Infrastructure, Inc.

LAWRENCE ENERGY CENTER
1250 N 1800 RD., LAWRENCE, KANSAS

FIGURE 3
LAWRENCE LANDFILL
PROPOSED FINAL LANDFORM

DRAWN BY:	SJL	APPROVED BY:	RDS	PROJ. NO.:	631214397	DATE:	MARCH 2018

T:\AutoCAD\Projects\Westar Energy\Lawrence\Compliance Reports\Closure Post-Closure Figures\Figure 3 - Proposed Conditions.dwg