

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)	
COMPANY FOR A CERTIFICATE OF PUBLIC)	CASE NO: 2017-00483
CONVENIENCE AND NECESSITY AND)	
APPROVAL OF AMENDMENT TO ITS 2016)	
COMPLIANCE PLAN FOR RECOVERY BY)	
ENVIRONMENTAL SURCHARGE)	

APPLICATION

Kentucky Utilities Company (“KU”), pursuant to KRS 278.020(1), KRS 278.183, and 807 KAR 5:001 Sections 14 and 15, hereby petitions the Kentucky Public Service Commission (“Commission”) to issue an order approving the recovery of the cost through its Environmental Cost Recovery (“ECR”) Surcharge tariff of KU’s amendment to Project 36 of its 2016 Environmental Compliance Plan (“2016 ECR Plan”) and granting KU a Certificate of Public Convenience and Necessity (“CPCN”) for the (1) construction of an amended Phase II of the landfill at the E.W. Brown Generating Station (“Brown” or “Brown Station”) and (2) capping and closing of any remaining surface area of the Brown Main Ash Pond. The Amendment to 2016 Environmental Compliance Plan is attached as Application Exhibit 1. In support of this Application, KU states as follows:

1. The full name and mailing address of KU are: Kentucky Utilities Company, Post Office Box 32010, 220 West Main Street, Louisville, Kentucky 40202. KU may be reached by electronic mail at the electronic mail addresses of its counsel set forth below.

2. KU is a utility engaged in the electric business. KU generates and purchases electricity, and distributes and sells electricity at retail in the following counties in Central, Northern, Southeastern, and Western Kentucky:

Adair	Edmonson	Jessamine	Ohio
Anderson	Estill	Knox	Oldham
Ballard	Fayette	Larue	Owen
Barren	Fleming	Laurel	Pendleton
Bath	Franklin	Lee	Pulaski
Bell	Fulton	Lincoln	Robertson
Bourbon	Gallatin	Livingston	Rockcastle
Boyle	Garrard	Lyon	Rowan
Bracken	Grant	Madison	Russell
Bullitt	Grayson	Marion	Scott
Caldwell	Green	Mason	Shelby
Campbell	Hardin	McCracken	Spencer
Carlisle	Harlan	McCreary	Taylor
Carroll	Harrison	McLean	Trimble
Casey	Hart	Mercer	Union
Christian	Henderson	Montgomery	Washington
Clark	Henry	Muhlenberg	Webster
Clay	Hickman	Nelson	Whitley
Crittenden	Hopkins	Nicholas	Woodford
Daviess			

3. KU was incorporated in Kentucky on August 17, 1912, and in Virginia on November 26, 1991 (and effective as of December 1, 1991), and is in good standing in both Kentucky and Virginia. Copies of KU's good standing certificates from the Kentucky Secretary of State and the Virginia State Corporation Commission are attached as Application Exhibit 2.

4. Pursuant to KRS 278.380, KU waives any right to service of Commission orders by mail for purposes of this proceeding only. Copies of all orders, pleadings and other communications related to this proceeding should be directed to:

Robert M. Conroy
Vice President, State Regulation and Rates
LG&E and KU Services Company
220 West Main Street
Louisville, KY 40202
robert.conroy@lge-ku.com

Rick Lovekamp
Manager, Regulatory Strategy/Policy
LG&E and KU Services Company
220 West Main Street
Louisville, KY 40202
rick.lovekamp@lge-ku.com

Allyson K. Sturgeon
Senior Corporate Attorney
Sara Judd
Senior Corporate Attorney
LG&E and KU Services Company
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allyson.sturgeon@lge-ku.com
sara.judd@lge-ku.com

Kendrick R. Riggs
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828
kendrick.riggs@skofirm.com

Monica Braun
Mary Ellen Wimberly
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801
monica.braun@skofirm.com
maryellen.wimberly@skofirm.com

Request for Certificate of Public Convenience and Necessity

5. KU proposes to amend Project 36 of its 2016 ECR Plan to construct an amended Phase II of the Coal Combustion Residuals (“CCR”) landfill at Brown and cap and close any remaining surface area of the Brown Main Ash Pond. Based on KU’s current projected needs for CCR disposal at Brown, Amended Project 36 involves the construction of a smaller Phase II Landfill than was originally proposed in Project 36 and the cap and closure of any remaining surface area of the Brown Main Ash Pond. The amendment to Project 36 will allow KU to continue to comply with the U.S. Environmental Protection Agency’s (“EPA’s”) federal

Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities (“Federal CCR Rule”).¹

6. The Commission originally approved construction of Phase II of the landfill at Brown (“Brown CCR Landfill”) in KU’s 2016 ECR Plan proceeding.² Construction of Phase II was delayed because decreased CCR production from the Brown generating units delayed the need for Phase II. KU allowed the 2016 CPCN for Project 36 to expire in August 2017 before construction of Phase II began. KU reported the expiration of the 2016 CPCN for Project 36 in two ECR reports.³

7. Based upon these evaluations, including the retirement of Brown Units 1 and 2 and forecasted reductions in CCR, KU now proposes to amend Project 36 and construct a smaller Phase II Landfill than was originally approved and cap and close any remaining surface area of the Brown Main Ash Pond.

8. Statement of Need (807 KAR 5:001 § 15(2)(a)): In support of KU’s position that the public convenience and necessity requires the proposed construction of an amended Phase II of the Brown CCR Landfill and the cap and closure of any remaining surface area of the Brown Main Ash Pond, R. Scott Straight explains in his testimony that the revised scope of Project 36 reflects KU’s forecasted reductions in CCR and thus Project 36 remains a necessary facility for KU’s compliance with the Federal CCR Rule.⁴ When the Kentucky Division of Waste Management issued the permit for the Special Waste Landfill at Brown, it set forth a 10 foot

¹ The Federal CCR Rule defines CCR as “fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers.” 40 CFR 257.53. This definition includes what is commonly referred to as gypsum.

² *In the Matter of: The Application of Kentucky Utilities Company for Certificates of Public Convenience and Necessity and Approval of its 2016 Compliance Plan for Recovery by Environmental Surcharge*, Case No. 2016-00026, Order at 33 (Ky. PSC Aug. 8, 2016).

³ *2016 ECR Plan Status Update Report Quarterly Report – Update #5* at 4 (Oct. 30, 2017); *2016 ECR Plan Status Update Report Quarterly Report – Update #4* at 3 (July 28, 2017). All quarterly reports are filed in the “Post-Case Filing” of Case No. 2016-00026.

⁴ Direct Testimony of R. Scott Straight at 1.

differential height limit for each successive phase of lateral expansion such that the volume of CCR disposed in each phase can be no more than 10 feet higher than adjoining phase(s). Because of this permit condition, the initial capacity of Phase I is limited to a height of 10 feet. As shown in Exhibit SAW-1 Table 5 to the testimony of Stuart A. Wilson, based on the revised projected CCR production at Brown, Phase I storage capacity will likely not be depleted until 2020 or later, well before coal fired generation will cease at Brown Unit 3. And, as a result of the revised projected CCR storage needs at Brown, Phase III of the current landfill is not necessary to support the expected operation of Brown Unit 3 for the remaining life of the generation unit. Instead, KU is proposing to construct a smaller portion of Phase II than originally proposed, and cap and close any remaining surface area of the Brown Main Ash Pond to comply with Kentucky environmental regulations. As Mr. Wilson describes in his testimony, constructing an amended Phase II of the Brown CRR Landfill, and capping and closing any remaining surface area of the Brown Main Ash Pond is the most cost-effective means of ensuring continued operation of Brown and compliance with the Federal CCR Rule and state environmental regulations.

9. Description of Proposed Construction (807 KAR 5:001 § 15(2)(c)): KU is requesting a CPCN to construct Amended Project 36, including the costs to design and construct an amended Phase II of the Brown CRR Landfill, as well as the costs to cap and close any remaining surface area of the Brown Main Ash Pond. Originally, the Brown CCR Landfill was planned to serve as the entire cap for the Brown Main Ash Pond once Phase III was constructed. As Phase III is no longer needed, KU must cap and close any remaining surface area of the Brown Main Ash Pond. Details of the construction of amended Phase II of the Brown CCR Landfill and the cap and closure of the Brown Main Ash Pond are further described in detail in

the testimony of Mr. Straight. Construction is expected to begin in August 2018. The amended Phase II of the Brown CCR Landfill is expected to be available for commercial operation before the end of 2019.

10. There are no utilities, corporations, or persons with whom the proposed new construction is likely to compete.

11. Permits or Franchises (807 KAR 5:001 § 15(2)(b)): KU will submit to the Kentucky Division of Waste Management a request to modify existing operating permits to reflect the construction of the amended Phase II of the Brown CCR Landfill, and will file a copy of the application with the Commission when it is available. KU will also seek any applicable construction permits. Once the amended Phase II is constructed, the Brown Main Ash Pond will still be required to be closed per the requirements of the 2014 Special Waste Permit. A copy of the 2014 Special Waste Permit is attached as Application Exhibit 3. The requirements of the 2014 Special Waste Permit are explained in the testimony of Gary H. Revlett.

12. Maps and Drawings of Proposed Construction (807 KAR 5:001 § 15(2)(d)(1) and (2)): The required maps and drawings for KU's proposed construction of the amended Phase II of the Brown CCR Landfill and the capping and closing of the remaining surface area of the Brown Main Ash Pond are attached in Application Exhibit 4.

13. Financing Plans (807 KAR 5:001 § 15(2)(e)): The total projected capital cost of this facility at Brown is \$14.7 million which KU seeks to recover through the ECR mechanism as part of its 2016 ECR Plan Amended Project 36. KU expects to finance the cost of the facility with a combination of new debt and equity. The mix of debt and equity used to finance the project will be determined so as to allow KU to maintain its strong investment-grade credit

rating. KU's proposed financing of such costs is identical to the proposed financing of its 2016 ECR Plan.

14. Estimated Cost of Operation (807 KAR 5:001 § 15(2)(f)): The proposed construction is not anticipated to create incremental operating and maintenance costs, and the Company is not seeking ECR recovery of such costs in this proceeding, as reflected on tab 2 of Application Exhibit 1. O&M costs related to amended Phase II will be similar to costs incurred in Phase I and are not distinguishable. KU plans to continue to recover its Brown CCR Landfill O&M costs through its environmental surcharge as part of Project 29 in KU's 2011 ECR Plan.

**Request for Authority for Recovery by Environmental Surcharge
of KU's Amended Project 36 in the 2016 ECR Plan**

15. KU received approval to recover the costs of projects in its 2016 ECR Plan, including Project 36, in Case No. 2016-00026.⁵ The scope of Project 36 in KU's 2016 ECR Plan has changed; and the CPCN associated with the construction of Project 36 has lapsed. With this Application, KU requests authority to recover the costs of Amended Project 36 through its ECR Surcharge tariff.

16. This Application and supporting testimony and exhibits are available for public inspection at the KU office located at 100 Quality Street, Lexington, Kentucky. The Company is giving notice to the public of the proposal to recover the costs of Amended Project 36 through its existing environmental surcharge tariff by newspaper publication, through a bill insert in monthly billings to its customers, and through posting the published notice at the offices and places of business of the Company where bills are paid. The Company is also posting this Application on its website (<http://www.lge-ku.com>). An initial Certificate of Notice and

⁵ *In the Matter of: The Application of Kentucky Utilities Company for Certificates of Public Convenience and Necessity and Approval of its 2016 Compliance Plan for Recovery by Environmental Surcharge*, Case No. 2016-00026, Order at 33 (Ky. PSC Aug. 8, 2016).

Publication is filed with this Application. A Certification of Completed Notice and Publication will be filed with the Commission upon the completion of this notice.

17. Pursuant to KRS 278.183(1), KU is “entitled to the current recovery of its costs of complying with the Federal Clean Air Act as amended and those federal, state, or local environmental requirements which apply to coal combustion wastes and byproducts from facilities utilized for production of energy from coal in accordance with the utility’s compliance plan.”

18. KU is amending one project from its approved 2016 ECR Plan. Amended Project 36 will enable Brown Station to continue to comply with the Federal CCR Rule and state environmental regulations by constructing additional landfill capacity that better meets KU’s projected CCR storage needs and completing the closure of the Brown Main Ash Pond. The environmental regulations creating the need for Amended Project 36 are detailed in the testimony of Mr. Revlett. The testimony of Mr. Straight describes the design and construction for amended Project 36 and the cost of the project. The testimony of Mr. Wilson demonstrates how Amended Project 36 will enable KU to cost effectively satisfy those regulatory requirements. The total capital cost of Amended Project 36 is estimated to be \$14.7 million, which KU seeks to recover through the ECR mechanism as part of its 2016 ECR Plan.

19. A detailed summary of the facts and compliance requirements supporting this Application is set forth in the direct testimony and exhibits of the Company’s witnesses:

- The testimony of Robert M. Conroy, Vice President, State Regulation and Rates, presents an overview of KU’s requested amendment to Project 36 and supporting testimony, and requests the continued use of a 9.70%

return on common equity for purposes of calculating the overall return component of the environmental surcharge until KU's next base rate case.

- R. Scott Straight, Vice President, Project Engineering, presents testimony that describes the engineering and construction aspects of Amended Project 36 and explains how it differs from the project that was approved as part of KU's 2016 ECR Plan in Case No. 2016-00026. Mr. Straight also discusses how Amended Project 36 continues to comply with the Federal CCR Rule.
- Gary H. Revlett, Director, Environmental Affairs, presents testimony discussing the environmental requirements that necessitate Amended Project 36 and discusses how KU's proposed amendment to Project 36 allows KU to continue to comply with the requirements.
- Stuart A. Wilson, Director, Energy Planning, Analysis, and Forecasting, presents testimony on the analysis and cost-effectiveness of Amended Project 36.

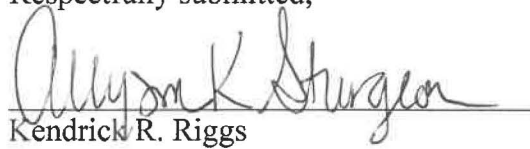
20. KU is proposing no changes to its Environmental Cost Recovery Surcharge tariff sheets, P.S.C. No. 18, Original Sheet No. 87 and Original Sheet No. 87.1 *Adjustment Clause ECR*, other than to change their issue and effective dates. KU is filing its Environmental Cost Recovery Surcharge tariff sheets, attached as Application Exhibit 5, for the purpose of obtaining the Commission's approval of the recovery of the costs of Amended Project 36 in 2016 Environmental Compliance Plan by the proposed assessment through this tariff provision. In accordance with KRS 278.183(2), the ECR tariff has an issue date of January 26, 2018, and is proposed to be effective on July 31, 2018. Therefore, bills issued on and after August 30, 2018,

will reflect the revised environmental surcharge beginning with the expense month of July 2018 (i.e., beginning with the expense month six months after the filing of this Application).

WHEREFORE, Kentucky Utilities Company respectfully asks the Commission to enter an order on or before July 25, 2018: (1) granting KU a Certificate of Public Convenience and Necessity to construct Amended Project 36; (2) approving the amendment to Project 36 in KU's 2016 ECR Plan for purposes of recovering the costs of this project through the environmental surcharge mechanism; (3) approving the proposed environmental surcharge tariff for recovery of the costs of Amended Project 36 in KU's 2016 ECR Plan effective for bills rendered on and after August 30, 2018 (i.e., beginning with the expense month of July 2018); (4) approving the recovery of the overall rate of return requested herein; (5) approving the modification of ES Form 2.01; and (6) granting such other relief as KU may be entitled under law.

Dated: January 26, 2018

Respectfully submitted,



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Stoll Keenon Ogden PLLC
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Louisville, Kentucky 40202
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LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088
Fax: (502) 627-3367
allyson.sturgeon@lge-ku.com

Counsel for Kentucky Utilities Company

CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001 Section 8(7), this is to certify that Kentucky Utilities Company's January 26, 2018 electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing was transmitted to the Commission on January 26, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; that an original and one copy of the filing is being hand-delivered to the Commission on January 26, 2018; and that on January 26, 2018, electronic mail notification of the electronic filing will be provided to the following:

Rebecca Goodman
Lawrence W. Cook
Office of the Attorney General
Office of Rate Intervention
700 Capitol Avenue, Suite 20
Frankfort, KY 40601
Rebecca.Goodman@ky.gov
Larry.Cook@ky.gov

Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
mkurtz@BKLawfirm.com



Counsel for Kentucky Utilities Company

Kentucky Utilities Company

Application Exhibit 1

**Amended 2016 Environmental
Compliance Plan**

KENTUCKY UTILITIES COMPANY

Amendment to 2016 ENVIRONMENTAL COMPLIANCE PLAN (Case No. 2017-00483)

Project	Air Pollutant or Waste/By-Product To Be Controlled	Control Facility	Generating Station	Environmental Regulation / Regulatory Requirement	Environmental Permit	Actual or Scheduled Completion	Actual (A) or Estimated (E) Projected Capital Cost (\$Million)
Amended 36	Fly & Bottom Ash, Gypsum	CCR Storage Landfill (Phase II) and Main Ash Pond Closure	Brown Station	EPA CCR Rule / 401 KAR Chapter 45	Division of Waste Mgmt - Landfill Permit and Division of Water - KPDES Permit	2019	\$14.7 (E)

\$14.7

KENTUCKY UTILITIES COMPANY
 Amendment to 2016 ENVIRONMENTAL COMPLIANCE PLAN (Case No. 2017-00483)

Project	Air Pollutant or Waste/By-Product To Be Controlled	Control Facility	Generating Station	Estimated Annual Operations and Maintenance Costs (Through 2026)								
				2018	2019	2020	2021	2022	2023	2024	2025	2026
Amended 36	Fly & Bottom Ash, Gypsum	CCR Storage Landfill (Phase II) and Main Ash Pond Closure	Brown Station	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

NOTE: O&M costs related to Amended Phase II will be similar to costs incurred in Phase I and are not distinguishable. KU plans to continue to recover its Brown CCR Landfill O&M costs through its environmental surcharge as part of Project 29 in KU's 2009 ECR Plan.

Kentucky Utilities Company

Application Exhibit 2

**Good Standing Certificates -
Kentucky and Virginia**

Commonwealth of Kentucky
Alison Lundergan Grimes, Secretary of State

Alison Lundergan Grimes
Secretary of State
P. O. Box 718
Frankfort, KY 40602-0718
(502) 564-3490
<http://www.sos.ky.gov>

Certificate of Existence

Authentication number: 196544
Visit <https://app.sos.ky.gov/ftshow/certvalidate.aspx> to authenticate this certificate.

I, Alison Lundergan Grimes, Secretary of State of the Commonwealth of Kentucky, do hereby certify that according to the records in the Office of the Secretary of State,

KENTUCKY UTILITIES COMPANY

is a corporation duly incorporated and existing under KRS Chapter 14A and KRS Chapter 271B, whose date of incorporation is August 17, 1912 and whose period of duration is perpetual.

I further certify that all fees and penalties owed to the Secretary of State have been paid; that Articles of Dissolution have not been filed; and that the most recent annual report required by KRS 14A.6-010 has been delivered to the Secretary of State.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal at Frankfort, Kentucky, this 4th day of December, 2017, in the 226th year of the Commonwealth.



Alison Lundergan Grimes

Alison Lundergan Grimes
Secretary of State
Commonwealth of Kentucky
196544/0028494

Commonwealth OF Virginia



State Corporation Commission

CERTIFICATE OF GOOD STANDING

I Certify the Following from the Records of the Commission:

That KENTUCKY UTILITIES COMPANY is duly incorporated under the law of the Commonwealth of Virginia;

That the date of its incorporation is November 26, 1991;

That the period of its duration is perpetual; and

That the corporation is in existence and in good standing in the Commonwealth of Virginia as of the date set forth below.

Nothing more is hereby certified.



*Signed and Sealed at Richmond on this Date:
December 4, 2017*

Joel H. Peck

Joel H. Peck, Clerk of the Commission

Kentucky Utilities Company

Application Exhibit 3

2014 Special Waste Permit



Steven L. Beshear
Governor

Leonard K. Peters
Secretary

ENERGY AND ENVIRONMENT CABINET

Division of Waste Management
200 Fair Oaks, 2nd Floor
FRANKFORT, KY 40601
TELEPHONE: 502-564-6716
FACSIMILE: 502-564-3492
waste.ky.gov

October 14, 2015

Mr. W. Paul Puckett
Kentucky Utilities, Environmental Affairs Department
P.O. Box 32010
Louisville, Kentucky 40232

Certified Mail No. Delivered via UPS

RE: Site-Wide Groundwater Remedial Action Plan
E.W. Brown Generating Station
Agency Interest No. 3148
Application I.D. No. ARM20150001
Mercer County

Dear Mr. Puckett:

The Kentucky Division of Waste Management (DWM), Solid Waste Branch has completed review of application referenced above. DWM hereby approves this application. Please find enclosed a copy of the approved application and the revised construction permit. The response to comments document is also enclosed and addresses the public comments received.

Be advised that if you consider yourself aggrieved by the issuance of this permit, you have the right to file a petition demanding a hearing with the Cabinet pursuant to KRS 224.10-420(2) and 401 KAR 45:040 Section 2(6). This right shall be limited to a period of thirty (30) days from the receipt of the permit. If you have any questions regarding this matter please contact Lindsey Briggs at (502) 564-6716, extension 4665.

Sincerely,

Kenneth Melton for

Danny Anderson, P.E.
Manager, Solid Waste Branch

Enclosures
DA/jnn

c: Paul Puckett via email: Paul.Puckett@lge-ku.com
Alison Dunn via email: Alison.Dunn@amecfw.com

ORIGINAL

**RESPONSE TO TECHNICAL NOTICE OF
DEFICIENCY (NOD) No.1
SITEWIDE GROUNDWATER
REMEDIAL ACTION PLAN**

**E.W. BROWN GENERATING STATION
MERCER COUNTY, KENTUCKY
AGENCY INTEREST #3148**

19 June 2015

Prepared For:



Generation Services

**Kentucky Utilities Company
815 Dix Dam Road
Harrodsburg, KY 40330**

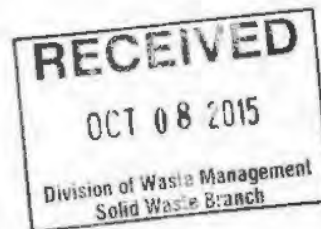
Prepared By:

**Amec Foster Wheeler Environment & Infrastructure, Inc.
11003 Bluegrass Parkway, Suite 690,
Louisville, Kentucky 40299**

Project No. 567530023

Nielsen, Jamie (EEC)

From: Nielsen, Jamie (EEC)
Sent: Thursday, October 08, 2015 9:42 AM
To: Green, Lawrie (EEC)
Cc: Paul.Puckett@lge-ku.com
Subject: FW: Replacement Pages-EW Brown GWAP
Attachments: Page 6-2 Revised in 2015-09-29 GW-RAP.PDF



Lawrie,

This revised page 6-2 should be incorporated into the application.

Thanks,
Jamie

From: Puckett, Paul [<mailto:Paul.Puckett@lge-ku.com>]
Sent: Thursday, October 08, 2015 8:15 AM
To: Nielsen, Jamie (EEC)
Subject: Replacement Pages-EW Brown GWAP

Jamie,

The attached documents are the ones that will be used to replace the outdated ones. I'll bring four sets of each with me.

W. Paul Puckett

Senior Engineer | Environmental Affairs Department | LG&E and KU Energy Services
220 West Main Street, Louisville, KY 40202
O: 502-627-4659 | M: 502-648-7842 | F: 502-217-4836
lge-ku.com

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APPROVED
COMMONWEALTH OF KENTUCKY
DEPARTMENT FOR
ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT

Ken Puckett for Danny Anderson

SIGNATURE

Branch Manager

TITLE

OCT 14 2015

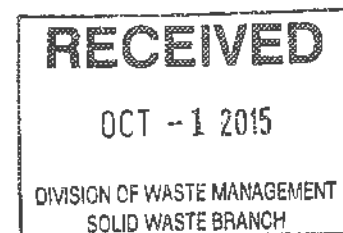
DATE



220 West Main Street
PO Box 32010
Louisville, KY 40232

September 29, 2015

Kentucky Department for Environmental Protection
Division of Waste Management
200 Fair Oaks, 2nd Floor
Frankfort, Kentucky 40601
(502) 564-6716



Attention: Mr. Danny Anderson, P.E. - Manager, Solid Waste Branch

Subject: NOD #2 Site-wide Groundwater Remedial Action Plan
Kentucky Utilities – E.W. Brown Generating Station, Mercer County, KY
(A.I. #3148, ARM20150001)

Dear Mr. Anderson:

Kentucky Utilities Company (KU) has received the Technical Notice of Deficiency (NOD) #2, dated August 21, 2015 relating to the Site-wide Remedial Action Plan for the subject facility. The Division of Waste Management had the following comment:

- 1. DWM asks for the lower bench of the Main Ash Pond Dam slope to be monitored for the life of the cut-off wall for potential vertical and horizontal movements.*

KU recently installed a series of survey monuments on the upper bench of the dam of the former Main Ash Pond. KU is currently monitoring the upper bench monuments visually on a weekly basis and is funding a quarterly evaluation by a KY-registered professional land surveyor on those same monuments to measure the locations relative to an established baseline. A report comparing the baseline, historical, and current data is issued as part of the quarterly survey. These activities are being performed as part of the company's self-initiated program to evaluate the on-going integrity of its berms.

In accordance with DWM's request, KU will install and monitor a similar system of monuments on the lower bench of the dam as shown on the attached drawings BR0-C-01445 Rev. F and BR0-C-01453 Rev. F. Upon completion of the installation of the monuments on the lower bench, KU will modify the weekly and quarterly inspections and reporting described previously to include the lower bench monuments.

The requested certification statement relating to this items is attached, along with the referenced drawings.

In summary, KU agrees with the request. Since KU has agreed to DWM's request, KU believes that all outstanding concerns relating to this project have been resolved. If this is the case, please contact me at (502) 627-2940 and KU will prepare the necessary copies for insertion into the original submission. Otherwise, feel free to contact me if you have any questions or need additional information regarding this document.

Sincerely,



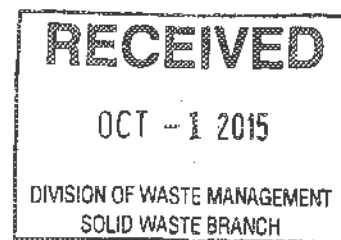
W. Paul Puckett, P.E.
Senior Engineer, Environmental Affairs Department.

Enclosures:

Certification Statement

Drawing Numbers: BRO-C-01453 & BRO-C-01445

Cc: Jeff Heun – Manager, Major Capital Projects, Project Engineering



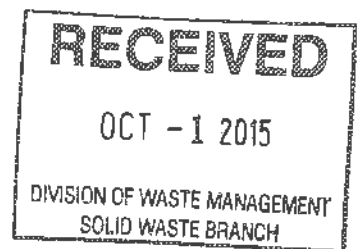
Certification Statement
Site-wide Groundwater Remedial Action Plan-NOD #2 Response
KU's E.W. Brown Generating Station
AI 3148; Application ID No. ARM20150001

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for such violations.

Gary H. Revlett 9-29-2015
Original Signature of Responsible Official Date

Gary H. Revlett, Director of Environmental Affairs
Typed Name & Title of Responsible Official

Kentucky Utilities Company (LG&E and KU Energy)
Name of Corporation





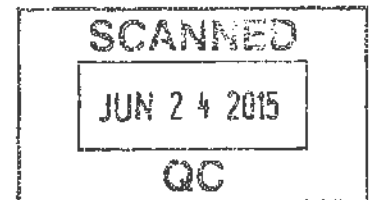
amec
foster
wheeler

19 June 2015

Mr. Danny Anderson, P.E.
Manager, Solid Waste Branch
Division of Waste Management
Kentucky Dept. for Environmental Protection
200 Fair Oaks Lane, 2nd Floor
Frankfort, KY 40601

ORIGINAL

**Subject: Response to Technical Notice of Deficiency (NOD) No.1
Sitewide Groundwater Remedial Action Plan
Kentucky Utilities (KU) - E.W. Brown Generating Station
Burgin, Mercer County, Kentucky
Agency Interest No. 3148
Application ID No. ARM20150001
AMEC Project No. 567530023**



Dear Mr. Anderson:

On behalf of LG&E and KU Services Company (LG&E-KU), Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler) has prepared this document to respond to the Technical Notice of Deficiency No.1 (NOD1), Sitewide Groundwater Remedial Action Plan, issued by the Kentucky Division of Waste Management (DWM), contained in a letter to Mr. Jeffrey S. Fraley of Kentucky Utilities (KU) dated 12 May 2015.

The comments in NOD1 are addressed below in numerical order. For ease of review, the DWM's requests are shown in *italics*, followed by responses in regular (non-italic) **bolded font**. A signed Certification Statement is included in Attachment 1, and other supporting documents are provided in subsequent attachments.

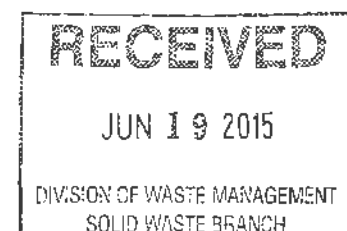
1. *Please fix the grammatical error present in the third paragraph on page 2.9.*

Two typos were found in the referenced paragraph and have been corrected on the attached copy of Page 2-9 (Attachment 2).

2. *Plan sheets must be signed, sealed, and dated by a professional engineer licensed in the Commonwealth of Kentucky pursuant to KRS 322.*

The attached copies of the Plates (Plates 1 and 2) and the plan sheets in Appendices A, B, and C have been signed, sealed and dated by a Professional Engineer licensed in Kentucky. They are provided in Attachment 2.

Amec Foster Wheeler Environment & Infrastructure, Inc.
11003 Bluegrass Pkwy, Suite 690
Louisville, Kentucky 40299
Tel (502) 267-0700
Fax (502) 267-5900
amecfw.com



3. *Provide a narrative depicting a concrete pouring schedule for the cut-off wall including, at a minimum, anticipated daily pour quantities and location of cold seams.*

A total of approximately 168 cubic yards (cy) of concrete is required for the cut-off wall with approximately 56 cy for the foundation/footing and 112 cy for the wall.

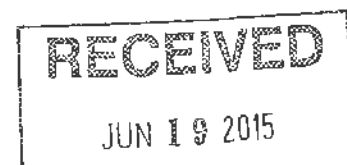
Please note that the “contractor’s approach (means and methods)” may differ from the “engineers approach” described herein, i.e. the order of the wall segments placed could be different or the construction of the foundation may be completed in segments similar to the wall construction segments.

It is possible that the entire footing for the wall, or a total of 56 cy of concrete placed (approximately 6 or 7 truckloads), can be poured in one day (or multiple days). Following approximately 12 hours of cure time for the foundation concrete to allow worker access, the forms and reinforcement for the walls would be installed. As indicated on the cut-off wall drawings, a cold joint is located between the footing and each wall segment which includes a water stop and development reinforcement extending from the footing into the wall segment. The cut-off wall will be constructed in 6 segments of varying wall heights with the highest segment at the middle of the wall alignment and five segments with reducing wall height towards each end of the wall (south and north wall legs). Expansion and control joints for the wall are located between wall segments as shown on the drawings and would be the location for cold joints. It is anticipated that the concrete for the walls will be placed in lifts at an approximate maximum rate 3 to 4 feet per hour to minimize loading of the wall forms but still provide fresh concrete between subsequent lifts. It is expected that wall Segment 1 would be poured first in a single day requiring a total of 56 cy of concrete placed. An expansion joint is located between Segment 1 (middle segment) and each adjacent south and north wall leg Segment 2, which includes a water stop and dowel bars to maintain wall alignment. It is anticipated wall Segments 2 and 3 on both sides of Segment 1 would also be placed in a single day requiring a total of 34 cy of concrete placed. A control joint is located at the end of each Segment 3 between the next wall segment (Segment 4 on the south leg of the wall and Segment 5 on the north leg of the wall) which includes a water stop and development reinforcement extending between adjacent wall segments. Finally, wall Segments 4, 5, and 6 would be placed in a single day requiring a total of 22 cy of concrete placed.

4. *Please specify the methods and instruments that will be used to monitor for potential slope movement on the ash pond dam during cut-off wall construction.*

The downstream slope of the existing ash pond east embankment (Main Pond Dam) includes two benches. The upper bench includes a monitoring system that consists of a series of monuments which can detect both vertical and horizontal movement. We intend to install similar monuments on the lower bench which is in close proximity to the proposed cut-off wall and seepage collection system

Using this type of system allows the horizontal movement to be detected by line-of-sight without the use of optical assistance. Horizontal and vertical movement can also be detected using standard surveying equipment: level, level rod and measuring tape. This system allows monitoring of each monument compared to the adjacent monument.



Monitoring will be conducted on both benches weekly throughout the construction process and for one month following completion on the seepage collection system.

Note: The monitoring system is shown as slide #18 on the PowerPoint presentation provided in Attachment 4.

5. *Provide a slope stability analysis for the existing ash pond dam during and following construction of the cut-off wall.*

AMEC Foster Wheeler has analyzed the stability of the main pond east embankment using the computer software Geo/slope for both the “during construction” phase and post-construction phase. We used the geotechnical parameters for each embankment layer from the original design work done in 1990s by FMSM (now Stantec). The target factors of safety were obtained from “Guidelines for the Geotechnical Investigation and Analysis of Existing Earth Dams” by the Kentucky Division of Water (DOW). AMEC Foster Wheeler analyzed the embankment for the following conditions:

**Total Stress;
Effective Stress;
Effective Stress with Seismic Load;
Effective Stress with Seismic Load and Flooded Toe; and,
Effective Stress and Rapid Drawdown of Flood Event.**

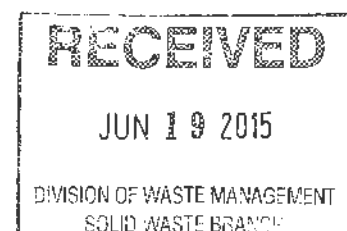
In summary all analyses, except for the short-term exposure of the maximum cut-slope, are above Target Factors of Safety, and the short-term exposure has a factor of safety of at-least 1.252. More detailed information on the stability analyses, including search arrays, soil parameters, slope geometry and minimum Factors of Safety, is contained in the PowerPoint presentation provided in Attachment 4.

6. *Section 2.3.2: Clarify that, in the future, any leachate disposal or management facilities change from those currently permitted shall require a permit modification per 401 KAR 45:040, Section 3.*

KU understands that future changes in leachate disposal or management facilities, from those specified in the approved Special Waste Landfill Permit, will require a permit modification per 401 KAR 45:040, Section 4. This clarification has been added to the corrected pages in Attachment 2.

7. *Section 4.4.1: Provide a timeline for when the entire main ash pond's surface will be covered by the clay-mix soil cover (plan indicates two-thirds of the surface is currently covered).*

The entire surface of the Main Ash Pond will be covered with a clay-mix soil layer by December 2016. This is consistent with Section 6.4.1 of the Sitewide Groundwater Remedial Action Plan, as well as the Implementation Schedule contained in the Main Ash Pond Closure Plan (AMEC, 25 April 2015), submitted prior to issuance of Solid Waste Permit # SW08400010. This clarification has been added to Page 4-4 (Attachment 2).



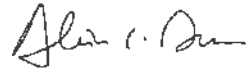
Closing

If you have any questions regarding this submittal, please do not hesitate to contact Jeff Heun of LG&E-KU at (859) 367-1275.

Sincerely,
Amec Foster Wheeler Environment & Infrastructure, Inc.



Nicholas G. Schmitt, P.E.
Senior Principal Engineer

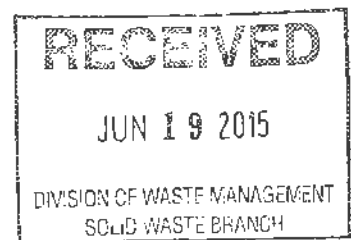


Alison L. Dunn, P.G.
Associate Hydrogeologist

Attachments

- Attachment 1 – Certification Statement
- Attachment 2 – Replacement Text Pages
- Attachment 3 – Stamped Plan Sheets
- Attachment 4 – Dam Stability Analysis

cc: Lindsey Briggs, P.E., DWM - Solid Waste Branch
Jeffrey S. Fraley, KU
Jeffrey B. Heun, LG&E-KU
W. Paul Puckett, LG&E-KU
Kathleen D. Regan, Amec Foster Wheeler



CERTIFICATION

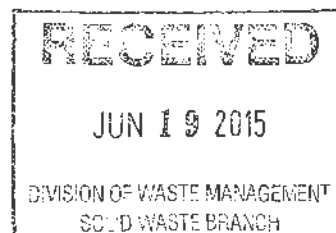
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine or imprisonment for such violations."

Jeffrey S. Fraley
Original Signature of Responsible Official

6/19/2015
Date

Jeffrey S. Fraley
Typed Name of Responsible Official

General Manager – E.W. Brown
Title





220 West Main Street
PO Box 32010
Louisville, KY 40232

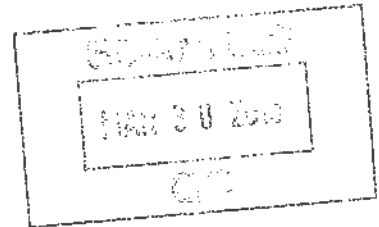
March 26, 2015

Kentucky Division of Waste Management
Solid Waste Branch, Second Floor
200 Fair Oaks Lane
Frankfort, Kentucky 40601
(502) 564-6716



Attention: Mr. Danny Anderson, P.E. - Manager, Solid Waste Branch

Subject: Site-wide Groundwater Remedial Action Plan
Kentucky Utilities -- E.W. Brown Generating Station
A.I. #3148/Application ID ARM20150001



Dear Mr. Anderson:

This letter was prepared in response to the Administrative Notice of Deficiency #1, dated March 19, 2015 which identified two items that were necessary before the application could be deemed administratively complete. Each of two items is restated below, in italics, followed by Kentucky Utilities Company's (KU's) response.

- 1. Pursuant to 401 KAR 45:250, Section 2(1)(f)(7), please submit the \$500 filing fee by providing a check made payable to the Kentucky State Treasurer.*

A check, prepared as described, is enclosed with this document.

- 2. Page iii of the submittal lists the mailing address for the Permittee as 815 Dix Dam Road, Harrodsburg, KY 40330; our records indicated the P O Box used above.*

The permittee mailing information was inadvertently mixed with the facility address. Please maintain the mailing address for the permittee as described in the correspondence and as listed below:

Kentucky Utilities Company
220 W. Main Street, P.O. Box 32010
Louisville, KY 40232

Please contact me at (502) 627-2940 if you have any questions or need additional information regarding this document.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Paul Puckett". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

W. Paul Puckett, P.E.
Senior Engineer, Environmental Affairs Department.

Enclosure:

Check #88567 for \$500, payable to "KY State Treasurer"

Cc: Jeffrey S. Fralcy-General Manager, E.W. Brown Generating Station
Jeff Heun – Manager of Major Capital Projects, Project Engineering
Alison L. Dunn, P.G. – Senior Project Manager, AMEC

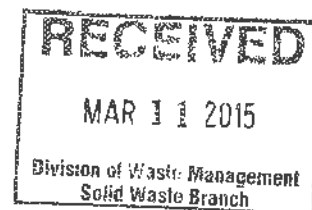


amec
foster
wheeler

27 February 2015

Mr. W. Paul Puckett
Kentucky Utilities Company
815 Dix Dam Road
Harrodsburg, KY 40330

Subject: **Sitewide Groundwater Remedial Action Plan**
E.W. Brown Generating Station
Mercer County, Kentucky
Agency Interest #3148, Activity ID No. AIN20120001
Project No. 567530023



Dear Mr. Puckett:

Amec Foster Wheeler Environment and Infrastructure, Inc. (Amec Foster Wheeler) has prepared this Groundwater Remedial Action Plan for submittal to the Kentucky Department for Environmental Protection, Division of Waste Management (DWM) on behalf of Kentucky Utilities Company (KU).

Please contact Alison Dunn if you have any questions about this document.

Sincerely,

Amec Foster Wheeler Environment & Infrastructure, Inc.

Alison L. Dunn, P.G.
Hydrogeologist / Associate Project Manager
859-566-3729
Alison.Dunn@amecfw.com

Kathleen D. Regan, P.E.
Associate Engineer
859-566-3724
Kathleen.Regan@amecfw.com

cc: Nicholas G. Schmitt, P.E., Amec Foster Wheeler



amec
foster
wheeler

SITEWIDE GROUNDWATER REMEDIAL ACTION PLAN

**E.W. BROWN GENERATING STATION
MERCER COUNTY, KENTUCKY
AGENCY INTEREST #3148**

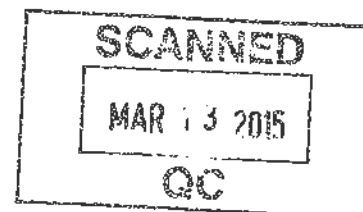
27 February 2015

Prepared For:



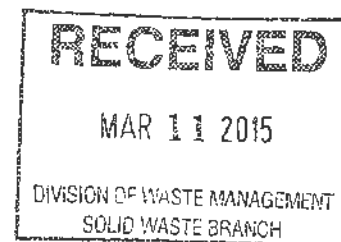
Generation Services

Kentucky Utilities Company
815 Dix Dam Road
Harrodsburg, KY 40330



Prepared By:

Amec Foster Wheeler Environment & Infrastructure, Inc.
13425 Eastpoint Centre Drive, Suite #122
Louisville, Kentucky 40223



Project No. 567530023

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DOCUMENT INFORMATION

FACILITY INFORMATION

KDEP Agency Interest No.: 3148
Solid Waste Permit No.: SW8400010
Facility Name: E.W. Brown Generating Station
Facility Address: 815 Dix Dam Road
Harrodsburg, Kentucky 40330

PERMITTEE INFORMATION

Company Name: Kentucky Utilities Company
Mailing Address: 815 Dix Dam Road
Harrodsburg, Kentucky 40330
Authorized Signer: Jeffrey S. Fraley
General Manager, E.W. Brown Generating Station
Additional Contact: W. Paul Puckett
Engineer, Environmental Affairs Department
LG&E and KU Energy
E-mail Address: paul.puckett@lge-ku.com
Telephone No.: (502) 627-4659
Fax No.: (502) 217-4836

PREPARER INFORMATION

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Lexington, Kentucky 40509
Telephone No.: (859) 566-3724



2. Geologist: Alison L. Dunn, P.G.

Kentucky Registration No.: 1006

Company Name: Amec Foster Wheeler

Address: 2456 Fortune Drive, Suite 100
Lexington, Kentucky 40509

Telephone No.: (859) 566-3729

3. Geotechnical Engineer: Nicholas G. Schmitt, P.E.

Kentucky Registration No.: 10311

Company Name: Amec Foster Wheeler

Address: 11003 Bluegrass Parkway, Suite 690
Louisville, Kentucky 40299

Telephone No.: (502) 267-0700

CERTIFICATION

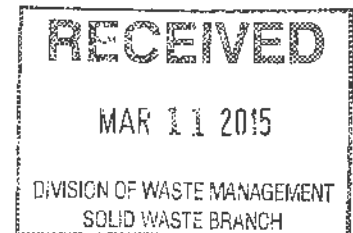
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine or imprisonment for such violations."

Jeffrey S. Fraley
Original Signature of Responsible Official

2/27/15
Date

Jeffrey S. Fraley
Typed Name of Responsible Official

General Manager -- E.W. Brown
Title



ACRONYMS

°C	degrees centigrade
µg/m ³	micrograms per cubic meter
µg/L	micrograms per liter
Ag	silver
Al	aluminum
As	arsenic
ASTM	American Society of Testing Materials
Ba	barium
Be	beryllium
BGS	below ground surface
Ca	calcium
cfs	cubic feet per second
Co	cobalt
COD	chemical oxygen demand
COI(s)	constituent(s) of interest
cm/sec	centimeters per second
Cr	chromium
Cu	copper
DO	dissolved oxygen
DOW	Division of Water in the Kentucky Department for Environmental Protection (KDEP)
DWM	Division of Waste Management in the KDEP
Fe	iron
f _{oc}	fraction organic carbon
ft	feet
ft ³	cubic feet
ft/day	feet per day
ft/ft	feet per foot
ft/min	feet per minute
ft/yr	feet per year
ft BGS	feet below ground surface
ft MSL	feet above mean sea level
g/cm ³	grams per cubic centimeter
gpm	gallons per minute
HCl	hydrochloric acid
Hg	mercury
HSA	hollow stem auger
i	hydraulic gradient
I.D.	inside diameter
ID	identification
in/H ₂ O	inches of water
IUPPS	Indiana Underground Plant Protection Service
K	hydraulic conductivity
K	potassium
KDEP	Kentucky Department for Environmental Protection
KPDES	Kentucky Pollutant Discharge Elimination System
KU	Kentucky Utilities Company
L/day	liters per day
L/min	liters per minute

ACRONYMS (cont'd)

lb/ft ³	pounds per cubic foot
MCL(s)	maximum contaminant level(s) for drinking water
Mg	magnesium
mgd	million gallons per day
mg/Kg	milligrams per kilogram
mg/L	milligrams per liter
mi	mile
ml/min	milliliters per minute
Mn	manganese
mm	millimeter
mm ² /s	square millimeters per second
MS	mass spectrometry
mS/cm ²	milliSiemens per square centimeter
MS/MSD	matrix spike/matrix spike duplicate
mV	millivolts
n	porosity
Na	sodium
NFA	No Further Action
Ni	nickel
No	number
NTU(s)	nephelometric turbidity unit(s)
O ₂	oxygen
O.D.	outside diameter
ORP	oxidation-reduction potential
Pb	lead
POC	perimeter of compliance
PPE	personal protective equipment
ppm	parts per million
ppmv	parts per million by volume
PVC	polyvinyl chloride
QA/QC	quality assurance / quality control
ROW	right-of-way
RSD	relative standard deviation
RQD	rock quality designation
Sb	antimony
SC	specific conductance
scfh	standard cubic feet per hour
Se	selenium
sec	second
SIM	selected ion monitoring
SMP	Soil Management Plan
SSI	Supplemental Site Investigation
SU	standard units (pH)
SW	Solid Waste
TDS	total dissolved solids
TOC	total organic carbon
TOR	top of riser
TWA	time-weighted average

ACRONYMS (cont'd)

USEPA	United States Environmental Protection Agency
USCS	Unified Soil Classification System
USGS	United States Geological Survey
UST	underground storage tank
WET	whole effluent toxicity
v	seepage velocity
V	vanadium
Zn	zinc

1.0 INTRODUCTION

This section reviews the site history, regulatory background and general objectives for the proposed remedial action plan.

1.1 SITE LOCATION

The Kentucky Utilities Company (KU) E.W. Brown Generating Station ("plant") is located in the southern portion of the Inner Bluegrass region, on the east edge of Mercer County, approximately 3.8 miles northeast of the city of Burgin. The area is relatively remote, with limited access to transportation, other than rail (**Figure 1**).

1.2 SITE HISTORY

The E.W. Brown Generating Station is located on the west side of the Dix River next to a hydroelectric dam (Dix Dam) built by KU in the 1920s. A coal-fired generating plant (currently consisting of three units) has been operated at the site since the 1950s, and more recently a combustion turbine (CT) generating plant (consisting of seven CT units that can be fueled by either fuel oil or natural gas) has been added to the Station to meet peak demands.

The plant has handled coal and generated coal ash and CCR since coal combustion began in the 1950s. Historically, CCR consisted primarily of bottom ash and fly ash generated from coal combustion. Beginning in 2009, gypsum began to be produced from scrubbers installed to remove sulfur from the plant's air emissions. Up until the present, ash produced from coal combustion has been transported by water flow (sluicing) to settling ponds. The first pond, referred to as the Main Ash Pond, or Main Pond, was located directly south of the Generating Station. As the Main Pond filled, it was expanded twice, in 1973 and 1989, to its current surface area (approximately 114 acres). The volume of CCR contained in the Main Pond is estimated to be approximately 6 million cubic yards. In the 2000s, a second pond (referred to as the Auxiliary Pond) was constructed as a temporary settling pond until the Main Pond could be expanded again. In late 2008, the Main Pond was taken out of service, and the sluicing operation was switched to the Auxiliary Pond. The Auxiliary Pond, as currently constructed, is expected to be full by 2019.

Storage of CCR over time has occupied a large portion of the available property, and is currently constrained within the property boundaries. However, because the surrounding area is rural (agricultural and recreational), further expansion of the plant area is considered undesirable. Therefore, construction of a special waste landfill over the top of the Main Pond was proposed, as a long-term disposal facility for CCR (including bottom ash, fly ash and gypsum) generated by the plant. A CCR treatment area, where future CCR materials will be dried and conditioned prior to landfilling, is also being constructed adjacent to the landfill, on the northeast corner of the Main Pond.

1.3 REGULATORY BACKGROUND

In 2011, KU began the application process for a permit for a Special Waste Landfill for disposal of CCR at the E.W. Brown Generating Station, to be constructed over the top of the former CCR disposal unit referred to as the Main Pond. The application was made to the Kentucky Department for Environmental Protection (KDEP) Division of Waste Management (DWM).

Groundwater monitoring began in 2011 in support of the application for the new landfill, and continued after that for baseline and assessment purposes. The monitoring identified water quality impacts in springs and drains discharging in the vicinity of the Main Pond, as well as other springs on or near the plant property. A *Groundwater Assessment Plan* (GWAP) was submitted to the DWM in late 2012, and approved by letter on May 1, 2013. A *Groundwater Assessment Report* (GWAR), which included a comprehensive review of the groundwater data collected through early 2013, was submitted to the DWM on September 30, 2013. A Technical Notice of Deficiency (NOD#1) on the GWAR was issued by the DWM on June 3, 2014. In a subsequent meeting and in a written response to the GWAR NOD#1 (dated August 12, 2014), KU agreed that additional groundwater data would be collected for supplemental assessment purposes. A *Groundwater Assessment Report Update* (GWAR Update) is currently in preparation, and will include the data collected in the interim.

The DWM issued a permit (SW08400010) to construct the new landfill on July 30, 2014, and construction of the landfill is currently on-going. A condition of the permit was that a *Sitewide Groundwater Remedial Action Plan* (GW-RAP) be submitted and approved by DWM prior to the issuance of an operating permit for the new Special Waste Landfill. This document has been prepared to fulfill that condition.

1.4 OBJECTIVES

The purpose of this GW-RAP is to comply with the landfill permit condition requiring a Remedial Action Plan, including the regulation referenced therein, 401 KAR 45:160 (*Surface and groundwater monitoring and corrective action for special waste sites or facilities*). Specifically, the requirements for a Remedial Action Plan are described in 401 KAR 45:160, Section 5(9) and include:

- The specific methods to be used to abate groundwater contamination from the facility;
- The specific methods to be used to prevent further groundwater contamination; and
- The means used to restore or replace public or private water supplies affected by contamination from the facility.

This last requirement is not applicable to the E.W. Brown plant, because no public or private drinking water supplies have been found to be affected by plant activities. Therefore, this document focuses on describing the means for abating and preventing impacts to groundwater from the plant's activities.

1.5 REPORT ORGANIZATION

This Remedial Action plan is divided into seven sections. After the Introduction, Section 2 discusses Site Background, including the physical setting, conceptual site model and changes in operating process that are affecting surface and groundwater flows at the site. Section 3 presents the objectives for the planned remedial actions for groundwater sitewide. A discussion of Interim Remedial Measures (measures already conducted or underway at the site) is presented in Section 4. The methodologies proposed to evaluate the effectiveness of the IRMs and evaluation of subsequent remedial measures are presented in Section 5. The Implementation Schedule and References are presented in Sections 6 and 7, respectively.

2.0 SITE BACKGROUND

2.1 PHYSICAL SETTING

A detailed description of the physical setting of the E.W. Brown Station has been provided previously in the GVAR (AMEC, September 2013). Selected information from that document is summarized below.

2.1.1 Topography and Local Drainage

The Dix River above Dix Dam forms Herrington Lake, extending approximately 35 miles to the south. The water level in Herrington Lake fluctuates between elevations of 715 and 760 feet. The E. W. Brown Generating Station and the associated CCR ponds are located on the west side of Herrington Lake, just upstream of Dix Dam.

The CCR ponds (The Main Pond and the Auxiliary Pond) are located adjacent to (and east of) a north-south topographic divide that separates the Dix River valley from the valley of Cedar Branch to the west (**Figure 1**). In the vicinity of the site, the highest elevations along the topographic divide are on the order of 920 feet. Due to rock removal for construction, typical elevations along the divide in the vicinity of the CCR ponds are approximately 900 ft. Cedar Branch, to the west of the divide, is a smaller stream than Dix River and flows north and approximately parallel to the Dix River. Both streams flow into the Kentucky River approximately 2 miles north of the plant, and less than a half-mile apart from each other, at an elevation of approximately 515 feet. A small portion of the E.W. Brown property drains to Cedar Branch. Most of the property (including the CCR ponds) drains to Herrington Lake just above Dix Dam. **Plate 1** is a regional map showing the property and the surrounding areas included in hydrologic studies of the site. **Plate 2** is a closer view of the CCR ponds and the drainage features immediately surrounding them.

The Main Pond (which has been inactive since late 2008) is located in a former tributary valley of the Dix River, approximately 2,000 feet upstream of Dix Dam. The bottom of the tributary valley, which was flooded by the damming of Dix River, is referred to as Curds Inlet. The tributary valley immediately to the south of the valley occupied by the Main Pond, is occupied by the Auxiliary Pond. The stream flowing through the bottom of this valley (below the Auxiliary Pond) is referred to as HQ Stream. It discharges to a smaller inlet referred to as HQ Inlet. Curds and HQ Inlets meet and flow together into Herrington Lake.

CCR in the Main Pond was built up over several decades, beginning in the late 1950s, through a series of successively higher embankments using both upstream and downstream construction. The maximum thickness of the ash, in the deepest part of the tributary valley, is estimated to be 120 to 130 feet. The Auxiliary Pond has been in operation since late 2008, and has been expanded once. The crest elevation of the current embankments containing both CCR ponds is approximately 900 feet (close to the watershed divide elevation). The surface of the

existing CCR in the Main Pond is dry, and slopes from approximately 890 to 880 feet, from west to east and then south, draining to a spillway (referred to as the "old riser") in the southeast corner of the Main Pond. The maximum operating surface elevation of the water in the Auxiliary Pond is 894 (approximately 150 feet above the level of Herrington Lake).

The land immediately east of the CCR ponds slopes eastward toward Lake Herrington, from elevations of approximately 850 feet to the lake level. Drainage in this area includes:

- The ditch receiving discharge from the old riser in the Main Pond (the former Main Pond Principal Spillway), which flows north and then east to the plant's discharge Station 001, monitored under the Division of Water (DOW) Kentucky Pollutant Discharge Elimination System (KPDES) program.
- The principal discharge line from the Auxiliary Pond (the active sluice pond), consisting of a buried pipeline that runs east and then north to a headwall where it joins the Main Pond spillway ditch just above KPDES 001. The water monitored at KPDES 001 flows into Curds Inlet.
- A stream running parallel to the Auxiliary Pond discharge pipeline, which was constructed for mitigation purposes, as replacement for the stream valley occupied by the Auxiliary Pond. This stream also services as the emergency overflow spillway for the Auxiliary Pond. This stream runs north and discharges to a rock quarry (referred to as Old Quarry or East Quarry). The East Quarry discharges to the KPDES 001 channel just downstream of the KPDES 001 monitoring point.
- HQ stream, which receives under-drainage from the valley underlying the Auxiliary Pond, and flows east to Herrington Lake, discharging into HQ Inlet.

2.1.2 Geology and Groundwater

The tributary valleys occupied by the CCR ponds are incised through limestone, shale and dolomite of the Middle Ordovician Lexington Limestone formation, and into the underlying High Bridge Group. The geology of the site is illustrated on the map provided with this report as **Figure 2**.

Existing CCR in the Main Pond overlies (from bottom to top) the Tyrone Formation (the uppermost formation in the High Bridge Group), the Curdsville/Logana Member, and the lower section of the Grier Member of the Lexington Limestone. Generally a relatively thin (less than 5 feet) veneer of clay residuum is present locally over bedrock. However, the areas surrounding the Main Pond and the Auxiliary Pond have been significantly altered by removal of overburden and rock, and placement of man-made rock fill.

Groundwater flow at the site occurs primarily in bedrock, through a relatively shallow system of fractures and poorly to moderately well developed solution channels, generally following topographic gradients. Extensive hydrogeologic characterization activities were performed in 2011 and 2012, relying primarily on dye tracing, to confirm groundwater flow paths. These

investigations and assessment results were documented in the GVAR (AMEC, September 2013). Many of the springs identified in both the Dix River and Cedar Branch watersheds, monitored in the dye trace studies, occur between elevations of 835 feet and 810 feet, and appear to emerge in the upper Tyrone, just below the contact with the overlying Curdsville Member of the Lexington Limestone, most likely due to the presence of bentonite beds in this horizon. Bedrock above this level is assumed to be seasonally dry and only intermittently saturated, with localized flow occurring from recharge into fractures and conduits. Some of the monitored "springs" at the site occur deeper in the Tyrone, at elevations closer to perennial or frequently flowing surface drainage. The discharges into Curds Inlet, at the toe of the Main Pond eastern embankment, emerge at an elevation of about 750 feet, and are assumed to be comprised of discharge from the embankment seepage collection system, mixed with groundwater discharge from bedrock.

Groundwater flow through the watershed containing the active and inactive CCR ponds has been confirmed to emerge in springs east of the CCR ponds, in ditches or streams or directly into inlets leading to Herrington Lake. Curds and HQ Inlets receive the groundwater discharges from the area of the CCR ponds, as well as the plant's surface water discharges permitted through the KPDES program. A surface water divide occurs immediately west of the CCR ponds, between the watershed containing the CCR ponds and the Cedar Branch watershed to the west. Dye tracing has confirmed that a groundwater divide is coincident with this surface water divide, and that groundwater does not flow west into the Cedar Branch watershed from the area of the CCR ponds.

2.1.3 Surface Water Hydrology

Herrington Lake has a surface area of 4.6 square miles (mi²), a volume of 254,000 acre-ft, a length of 35 mi (at full pool), and mean and maximum depths of 78 ft and 250 ft, respectively. Currently KU manages the pool of Herrington Lake so that the base level is set to 725 feet in winter, and 740 feet in summer. In response to precipitation events, the lake level fluctuates higher (occasionally over 750 feet, the bottom level of the spill gates in Dix Dam) for limited periods of time, usually in spring. The 100-year flood elevation shown on Federal Emergency Management Agency (FEMA) mapping of the lake is 760 feet.

The U.S. Environmental Protection Agency (U.S.EPA, 1977) estimated the mean flow through Herrington Lake to be 593 cubic feet per second (cfs). The United States Geologic Survey (USGS, Crain and others, 2000) reported the mean annual discharges for Dix River in 1995 and 1996 were 442 and 591 cfs, respectively, and estimated that average annual runoff in the watershed ranges from 18 to 20 inches. Under low flow conditions, the flow out of Herrington Lake occurs as seepage through Dix Dam. Minimum seepage rates provided by KU for the 10-year period from 2000 through 2009 ranged from less than 10 to 46 cfs, and averaged 22 cfs.

Although most of the property occupied by the E.W. Brown Generating Station drains to Herrington Lake, a portion of the property drains to Cedar Branch, which flows approximately

parallel to the Dix River in the next watershed to the west. The Cedar Branch watershed is 4.1 mi² in surface area. Cedar Branch flows into the Kentucky River at Shakers Landing. Flows measured by Amec Foster Wheeler at the mouth of Dix River just above its confluence with the Kentucky River, in the spring and summer months of 2011 and 2012, ranged from zero to greater than 25 cfs. Both the Dix River and Cedar Branch flow into the Kentucky River just upstream of Lock 7, less than a half-mile apart from each other. The historic High Bridge (a steel railroad bridge) crosses the Kentucky River Palisades between the mouths of Dix River and Cedar Branch. Under low flow conditions, the flow in the Kentucky River at Lock 7 is on the order of 60 cfs.

2.2 CONCEPTUAL SITE MODEL

Water circulating through the site is influenced by surface water used for cooling, water-borne transport of CCR, infiltration, seepage, and surface water discharges. The following subsections present the overall site water balance, followed by a discussion of groundwater flow across the site.

2.2.1 Groundwater Flow

A generalized conceptual model of groundwater flow in the vicinity of the CCR ponds has been developed from the results of dye trace studies performed in 2011 and 2012, along with a comparison of water elevations at springs and streams to piezometric elevations. The findings are discussed in detail in the GVAR, and are summarized below. Locations are shown on **Plates 1 and 2**.

At the time of the dye injections in 2011 and 2012, the Auxiliary Pond was already being used as the active sluice pond for CCR at the plant. Use of the Main Pond for sluice water had been discontinued, and grading of the surface had been initiated to prevent standing water from accumulating. As a result, the CCR in the Main Pond had been partially drained. The CCR in the Main Pond was deposited between elevations of about 770 and 890 feet, with minimal separation from the underlying bedrock. Data collected to date indicates that the CCR in the Main Pond is still saturated in its bottom sections (just above bedrock), and is mostly unsaturated in the upper sections, with some thin saturated, discontinuous lenses (perched zones) occurring above the saturated zone.

In the dye trace studies, dyes were injected into surface or near-surface bedrock features close to the edge of the Main Pond, at elevations of 868 to 885 feet above NAVD88. One dye was injected into the Main Pond CCR in its bottom section, but was never recovered. The monitored springs emerge at elevations between 746 and 828 feet. Many of the springs identified in both the Dix River and Cedar Branch watersheds occur between elevations of 835 feet and 810 feet, and appear to emerge in the upper Tyrone. Some springs occur deeper in the Tyrone, at elevations closer to perennial or frequently flowing surface drainage.

The springs in the Dix River watershed immediately downgradient of the CCR ponds include:

- The discharges at the toe of the Main Pond embankment (Dam Toe, including CH-040, CH-041 and CH-042), emerging at elevations of 752 to 754 feet. Estimates of combined flow at the toe of the Main Pond embankment range from 20 to 300 gpm, or 0.03 to 0.4 mgd.
- Ditch Spring (CH-044) and Beaver Dam Cave Spring (CH-045), discharging to the Main Pond outfall ditch above and south of Curds Inlet, at elevations between 820 and 827 feet. The combined flows measured in Ditch Spring and Beaver Dam Cave Spring range from 8 to 155 gpm, or 0.01 and 0.2 mgd.
- Briar Patch (CH-057) and HQ (CH-046) Springs discharging to HQ Inlet via HQ Stream. Combined flows from these springs range from 400 to 3,000 gpm (0.6 to 4 mgd).

These springs east of the CCR ponds did not go dry during the 2011-2012 study period, even during the very dry summer months of 2012. This is most likely due to a combination of ongoing drainage from the CCR in the Main Pond, which is still saturated to higher levels than the underlying bedrock, and possible leakage from the Auxiliary Pond discharge pipeline (discussed in more detail below, in Section 4.3).

By contrast, in dry conditions, natural recharge is insufficient to maintain flow in bedrock above the lake level to the north, south and west. Although they go dry on a seasonal basis, in wet conditions, flows from the springs to the west and the north (which include Stonewall Spring, Railroad Spring, and the Webb Spring Complex) range up to 200 gpm (0.3 mgd). The springs to the south (Rockhouse, Hardin and Hardin 2) were only monitored for a short period during a relatively dry year, and a representative range of flows is not yet available for these springs.

It has been concluded in previous reports that groundwater flow in bedrock above the level of Herrington Lake under natural conditions is localized in relatively shallow conduit systems that closely follow topographic gradients. The flow is intermittent, tending to dry up in prolonged periods with no recharge. The CCR in the Main Pond, which is saturated in its lower section, acts as a reservoir and potential source of recharge to groundwater in the underlying bedrock, which ultimately flows to Herrington Lake. The Auxiliary Pond discharge pipeline has recently been identified as another potential source of recharge to the groundwater flow system east of the CCR ponds, to be addressed in the planned remedial actions. West of the divide, dye tracing results indicate there is little potential for groundwater from the area of the CCR ponds to reach Cedar Branch.

2.2.2 Constituents of Interest (COIs)

The GVAR (AMEC, September 2013) contains a comprehensive review of the groundwater quality data collected through early 2013. The full water quality characterization list required by DWM Solid Waste regulations and guidance for sampling groundwater in the vicinity of coal ash

landfills (as specified in specified in 401 KAR 45:160, Section 7.2 (a), plus boron) contains 23 parameters, including 5 indicator parameters (pH, SC, COD, TOC and TDS) and 18 individual inorganic elements and compounds, mostly metals. Samples were collected over multiple sampling rounds in 2011, 2012 and early 2013 from 12 springs in the vicinity of the site, including three springs designated as background springs, seven springs and seeps identified by dye tracing as being downgradient from the Main Pond, and two additional springs to the north and northwest. More limited sampling was performed of various surface water bodies, including Herrington Lake, Cedar Branch, and their tributaries.

The data from the three designated background springs (Stonewall Spring, Rockhouse Spring and Hardin Spring) were pooled and used to develop local background concentrations for the parameters without regulatory MCLs. The data from the other nine springs (including the seven downgradient springs) were compared either to the regulatory MCLs (if available) or to the local background concentrations.

An initial risk assessment was performed as part of the GWAR to further evaluate the potential impacts associated with specific elements or compounds. The conclusions drawn from the groundwater characterization and risk assessment studies performed to date are summarized as follows:

- Based on review of the 23 parameters required to be monitored in groundwater, 13 parameters were identified as having multiple exceedances in more than one spring. They included three indicator parameters (SC, TDS and COD), and ten specific elements or compounds (arsenic, boron, calcium, chloride, iron, magnesium, nickel, potassium, sodium and sulfate). These specific elements and compounds, referred to as constituents of interest, were carried through to the preliminary risk assessment. Ten parameters (including two indicator parameters and eight specific elements or compounds) were eliminated; however, the DWM has requested that selenium and lead be added back to the list of COIs and addressed in future risk assessments for the site. The list of COIs for the site, therefore, includes 12 specific elements and compounds: arsenic, boron, calcium, chloride, iron, lead, magnesium, nickel, potassium, selenium, sodium and sulfate
- The potable water use pathway is not a complete pathway for the site, since no users of potentially impacted groundwater for potable supply have been identified. The intake for the Harrodsburg Water Plant is downstream of the E.W. Brown Generating Station, but records indicate that the treated water from the plant is not impacted by the COIs associated with CCRs.
- Of the 10 COIs evaluated in the initial risk assessment (not including lead and selenium), five (calcium, chloride, nickel, potassium, and sodium) were found to pose no significant risk to human health or aquatic organisms at the concentrations detected in groundwater, based on comparison to risk-based screening levels.
- Two more COIs (boron and magnesium) have had only minor/infrequent exceedances of risk-based screening levels, and are not considered to be constituents of concern with regard to human health or aquatic organisms.

- Arsenic and iron are the COIs most directly associated with coal ash in the CCR ponds, and primarily the (inactive) Main Pond. Arsenic is an identified carcinogen, and has very low risk-based screening levels. As such, it is the risk driver for the discharges from the site. However, the risk-based screening levels for arsenic were derived by USEPA based on dissolved (not total) metals in the water column, using data for the most toxic (trivalent) form of arsenic. Biomonitoring (WET testing) of the discharge from the active CCR Pond (KPDES 001, the discharge from the Auxiliary Pond) since 2009 has shown no significant toxicity of the discharge, even though it contains concentrations of arsenic at similar levels to the impacted groundwater springs. These results indicate that the form of arsenic (as well as the other metals) contained in the discharges from the site's CCR is either not bioavailable in significant amounts, or not bioavailable in the dissolved and toxic form on which the water quality criteria are based.
- Sulfate appears to be associated with gypsum (calcium sulfate) handling in the Gypsum Processing Plant (located west of the divide in the Cedar Branch watershed) and in the CCR ponds. It is not considered a constituent of concern with regard to human health. However, sulfate has been found to exceed ecological screening levels for aquatic organisms in two locations: in the springs discharging to Herrington Lake via HQ Inlet southeast of the (inactive) Main Pond and east of the (active) Auxiliary Pond, and in Railroad Spring to the northwest of the Main Pond, which discharges into the Cedar Branch watershed. Gypsum is relatively soluble, and there appears to be enough attenuation capacity (primarily from dilution) in both locations to reduce the concentrations below screening levels within a short distance of these discharges. However, continued monitoring was recommended in the GWAR, and interim remedial actions (described in this Plan) are in process to address sulfate impacts.

2.2.3 Potential Source Areas

Review of the groundwater data included in the GWAR indicated that the distribution pattern was different for some of the COIs than others, as follows:

- The highest concentrations of arsenic and iron were measured in samples from the springs east of the (inactive) Main Pond that discharge into Curds Inlet (Dam Toe Right, Ditch Spring, and Beaver Dam Cave Spring). Arsenic was also detected in the springs discharging to HQ Inlet (Briar Patch and HQ Springs), but at lower concentrations, and iron was not found to exceed background in those springs.
- Concentrations of calcium, chloride, magnesium and sulfate were generally higher in the springs discharging to HQ Inlet (Briar Patch Spring and HQ Spring) than in the springs discharging to Curds Inlet. Concentrations of these parameters were also elevated in Railroad Spring, northwest of the Main Pond, which flows into the Cedar Branch watershed.
- Boron, potassium and sodium tended to be distributed fairly consistently between the springs east of the CCR ponds and Railroad Spring to the northwest. It should be noted that, while elevated relative to background, these elements have had only few or no exceedances of the risk-based criteria derived in the initial risk assessment.

- The Webb Spring Complex, located north of the CCR ponds and discharging to Dix River downstream of Dix Dam, tended to have lower concentrations and significantly fewer exceedances than the other springs in the assessment. A direct connection between this spring complex and activities at the E.W. Brown Station to the south has not been established.

Based on the distribution of COI exceedances in groundwater and understanding of groundwater flowpaths developed from the GVAR, KU identified several potential source areas to be addressed in the GW-RAP. These were:

- The Gypsum Processing Plant (GPP), located northwest of the Main Pond, to the west of the divide between the Dix River and Cedar Branch watersheds.
- The West Quarry (also known as Quarry 2 & 3). This series of quarries was excavated along the ridge at the watershed divide, on the west side of the Main Pond, and was used as a source of rock for construction of the Auxiliary Pond. The West Quarry is not considered to be a source of groundwater impacts, but is a collection point for surface runoff and a potential source of recharge to the groundwater flow system.
- The discharge pipeline for the Auxiliary Pond, the pond that is currently the active sluice pond for CCR at the site.
- The Main Pond, specifically the existing CCR deposited in an unlined basin behind the cross-valley (eastern) embankment.

The interim remedial measures described below in Section 4.0 were developed specifically to begin addressing these potential source areas.

2.2.4 Potential Receptors and Exposure Routes

The GVAR (AMEC, September 2013) included an initial risk assessment evaluating potential impacts associated with specific elements or compounds. The GVAR referenced a Water User Survey performed as part of the Landfill Application in the summer of 2011. As part of that effort, no potable water users were identified that could potentially be impacted by the groundwater discharges from the plant. Therefore, potential exposure pathways involving drinking water and associated human health impacts are considered incomplete. The pathway involving agricultural supply wells and springs, while potentially complete for the identified receptors (livestock and feed crops), were considered limited or de minimus in comparison to the pathways examined in the risk assessment (i.e., human and ecological exposure via surface water). The human health exposure pathways that were considered potentially complete involved recreational users of surface water. They included incidental ingestion and dermal absorption during swimming, and ingestion of fish obtained from Herrington Lake downstream of the discharges. The most sensitive non-human (ecological) receptors would be aquatic populations in surface water.

2.3 PROCESS MODIFICATIONS

The E.W. Brown Generating Station is a steam-electric power plant, generating electricity in part from turbines driven by steam produced by coal-fired boilers. KU is currently implementing a number of changes to process operations at the plant which will significantly reduce both the amount of water moving through the site and the mass and concentrations of COIs potentially discharged into the environment. As a result, historical data and trends cannot be considered good predictors for future groundwater and surface water quality, and ongoing monitoring will be necessary to assess the new equilibrium that will be established once these changes have been fully implemented. The most significant of these changes are briefly described below.

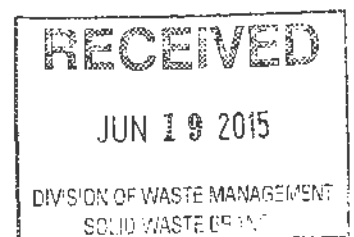
2.3.1 CCR Handling

Fly ash is one of the residues generated in coal combustion, and comprises the fine particles that rise with the flue gases. Ash that does not rise is called bottom ash. Both types of ash at the E.W. Brown Station are currently transported by water flow to a settling pond. The Main Ash Pond was used until 2008, when the sluicing operation was switched to the Auxiliary Pond.

KU is currently constructing a CCR Treatment (CCRT) area on the northeast corner of the Main Pond, as part of a major reorganization of the facilities for handling CCR at the E.W. Brown Generating Station. Fly ash from Unit #3 will be transported to the CCRT area without water (dry handling) via a pneumatic transfer system. Fly ash from Units 1 & 2 will be sluiced to the Auxiliary Pond pending a decision on the remaining life of these units. At the same time, bottom ash from all three units will be sluiced to the CCRT area via a closed loop system (in which water is re-used). Following construction of the new landfill, the only wastewater generated at the plant will be from the flue gas desulfurization (FGD) system and the Units 1 & 2 fly ash transport systems.

The modifications currently in process will significantly reduce the amount of contact between water and CCR, and therefore reduce the mobilization of CCR constituents into water with the potential to be discharged to the environment. The process of closing the Main Pond, converting to dry CCR storage in that unit, and moving the sluice water transport system for CCR to a lined unit, has already resulted in significant changes to the movement of water through the site, and these changes will continue as water use is further reduced after the new landfill goes into operation and a new hydraulic and geochemical equilibrium establishes itself. The following points describe how the water flow through the Main Ash Pond has been altered since 2008.

- The decision to landfill dry ash in the next phase of plant operation was taken in lieu of expanding the Main Pond vertically, so that water sluicing of CCR at the site could be minimized. The Auxiliary Pond was vertically expanded as a stop-gap measure, to serve as interim storage until the landfill could be constructed and permitted.



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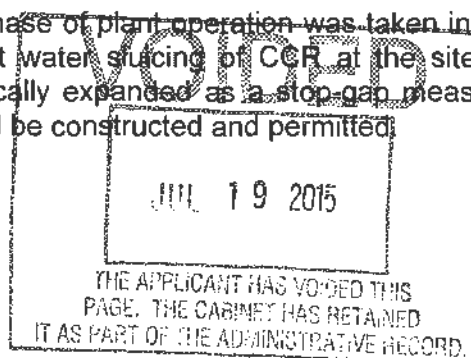
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- The decision to landfill dry ash in the next phase of plant operation was taken in lieu of expanding the Main Pond vertically, so that water sluicing of CCR at the site could be minimized. The Auxiliary Pond was vertically expanded as a stop-gap measure, to serve as interim storage until the landfill could be constructed and permitted.



- The Main Pond was taken out of service in late 2008, and measures were taken at that time to decant as much water as possible from the surface of the pond. As a result, the ash deposits in the pond were already substantially dewatered (and therefore more stable) when the landfill application was submitted in 2011, compared to the sluicing phase of pond operation.
- In order to expedite the dewatering process, and to provide cover for dust control, the CCR in the Main Pond were regraded and covered with soil over two thirds of the pond surface between early 2012 and early 2013. Regrading and covering the surface of the Main Pond reduced infiltration of precipitation through the existing CCR deposits, resulting in additional dewatering (strengthening) of the deposits, and reduced circulation through the deposits, thereby reducing associated leaching.
- In addition, during the regrading of the existing CCR and placement of the soil cover over the southern two-thirds of the Main Pond, an underdrain system was installed (between the soil cover and the regraded CCR surface) to allow for rapid dissipation of any pore pressures developed as a result of the load imposed by the new CCR landfill. If needed, the underdrain system will also serve to promote long-term dewatering of the CCR.
- As part of construction of the CCRT area, the landfill, and the associated ponds and roads, the entire surface of the existing CCR in the Main Pond will be capped with low-permeability materials, including a synthetic membrane under the landfill, and associated ponds, ditches and roads, and hardscaping under the CCRT area. The result will be to further limit and ultimately eliminate the potential infiltration of precipitation or surface water into the existing CCR of the Main Pond.
- Some flow of natural groundwater through the existing CCR in the Main Pond is expected to continue over time, as the natural flow of water that existed before the Pond was filled with CCR continues into the buried valley. However, through the combination of the actions described above, the balance of water through the Main Pond has been significantly altered, and the total water content of the existing CCR is expected to continue to subside over time.

2.3.2 Changing Regulatory Conditions

The USEPA proposed new regulations on disposal of coal combustion residuals from electric utilities in June 2010, and issued its final rule on April 17, 2015. These new CCR regulations become effective six months after the publication date.

The USEPA also released its proposed effluent limitation guidelines (ELGs) for the steam-electric power generating point source category on 19 April 2013, and the dates for finalization and implementation of those regulations are not yet established. The proposed ELGs are designed to establish technology-based treatment standards for existing and new sources of wastewater discharges from steam-electric power generating facilities, and to ensure that these standards are consistent nationwide.

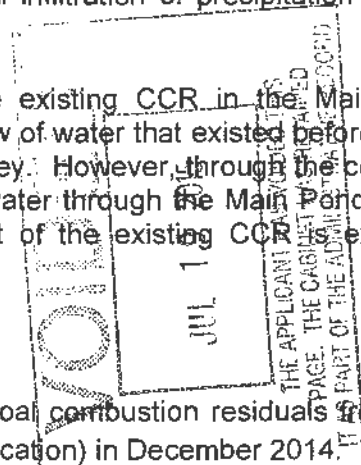
The proposed ELG rule proposes best available technology economically achievable (BAT) effluent limitations on various wastewater streams, and proposes specific effluent limits on

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- As part of construction of the CCRT area, the landfill, and the associated ponds and roads, the entire surface of the existing CCR in the Main Pond will be capped with low-permeability materials, including a synthetic membrane under the landfill, and associated ponds, ditches and roads, and hardscaping under the CCRT area. The result will be to further limit and ultimately eliminate the potential infiltration of precipitation or surface water into the existing CCR of the Main Pond.
- Some flow of natural groundwater through the existing CCR in the Main Pond is expected to continue over time, as the natural flow of water that existed before the Pond was filled with CCR continues into the buried valley. However, through the combination of the actions described above, the balance of water through the Main Pond has been significantly altered, and the total water content of the existing CCR is expected to continue to subside over time.

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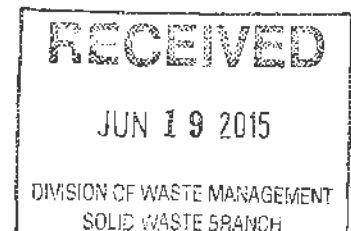
The USEPA also released its proposed effluent limitation guidelines (ELGs) for the steam-electric power generating point source category on 19 April 2013, and the dates for finalization and implementation of those regulations are not yet established. The proposed ELGs are designed to establish technology-based treatment standards for existing and new sources of wastewater discharges from steam-electric power generating facilities, and to ensure that these standards are consistent nationwide.



scrubber wastewater for mercury, arsenic, selenium, and nitrates. Existing facilities are allowed at least three years from the effective date of the final rule to identify compliance plans and schedules for meeting the final ELGs. Specifically, BAT limitations for existing sources would apply as soon as possible after the next NPDES Permit is issued in the permitting cycle beginning July 1, 2007, on a date determined by the state permitting authority. USEPA expects that BAT limitations would become effective at all existing coal-fired units by no later than July 1, 2022. The proposal recognizes that additional time was needed to study available technologies and operational measures for existing facilities, and to design, install, and enhance the technology at each facility before meeting the final BAT limitations.

Although the final form of the ELGs and the date for implementation have not yet been established by the USEPA, KU is actively studying the best means of implementing the proposed rule for the E.W. Brown Generating Station. KU anticipates that the Auxiliary Pond will be phased out of service within the next decade, and replaced with an expanded wastewater treatment unit that is close to or co-located with the Auxiliary Pond. However, the type of treatment systems that may be required and the timeframe for implementing them will depend on the regulatory requirements that are finally adopted. KU understands that future changes in leachate disposal or management facilities, from those specified in the approved Special Waste Landfill Permit, will require a permit modification per 401 KAR 45:040, Section 4.

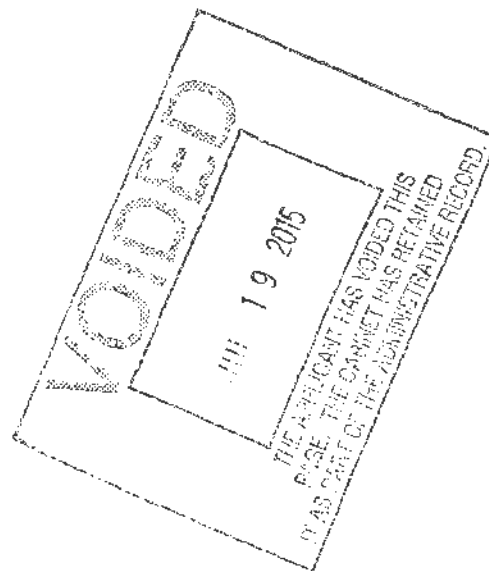
Groundwater and wastewater discharges from the plant impact the same bodies of water (primarily Curds and HQ Inlets on Herrington Lake), and therefore the same receptors. Through operation of the new wastewater treatment unit, the loading of constituents (including the COIs for groundwater) is expected to be significantly reduced in the wastewater discharges from the plant. As a result, the combined loading into Curds and HQ Inlets from both wastewater and groundwater combined, and the associated impacts on potential receptors, are expected to be appreciably mitigated.



The ELG rule proposes best available technology economically achievable (BAT) effluent limitations on various wastewater streams, and proposes specific effluent limits on scrubber wastewater for mercury, arsenic, selenium, and nitrates. Existing facilities are allowed at least three years from the effective date of the final rule to identify compliance plans and schedules for meeting the final ELGs. Specifically, BAT limitations for existing sources would apply as soon as possible after the next NPDES Permit is issued in the permitting cycle beginning July 1, 2007, on a date determined by the state permitting authority. USEPA expects that BAT limitations would become effective at all existing coal-fired units by no later than July 1, 2022. The proposal recognizes that additional time was needed to study available technologies and operational measures for existing facilities, and to design, install, and enhance the technology at each facility before meeting the final BAT limitations.

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3.0 REMEDIAL ACTION OBJECTIVES

Remedial Action Objectives (RAOs) are statements of the general goals of an environmental remediation consisting of multiple remedial actions. The RAOs identified for the remedial actions to be conducted at the E.W. Brown Generating Station are the following:

- Protection of human health and the environment;
- Cleanup consistent with potential land use; and
- Compliance with State and Federal environmental laws.

KU anticipates achieving these goals by both reducing the mass of COIs entering the groundwater flow system from the identified source areas, and reducing the mass of COIs exiting the groundwater flow system into receiving surface water bodies (primarily Herrington Lake). These reductions will be achieved by: reducing the total amount of flow potentially contacting source materials; reducing the transfer of source materials into groundwater flow systems; and intercepting impacted groundwater flow prior to discharge into Herrington Lake.

The following sections provide additional detail on each of the RAOs.

3.1 PROTECTION OF HUMAN HEALTH AND THE ENVIRONMENT

Amec Foster Wheeler has conducted a preliminary human health risk assessment and screening level ecological risk assessment (HHRA/SLERA) to evaluate the initial risks associated with groundwater impacts at the site. The assessment, which was documented in the GVAR (AMEC, September 2013), included:

- An analysis of the exposure pathways and receptors for CCR impacts;
- An assessment of toxicity of the COIs; and
- A preliminary assessment of human health risk and ecological risks.

KU plans to update the initial risk assessment to develop quantitative risk-based threshold concentrations for the site, for use in evaluating the impacts of remedial action. As described above, no users of groundwater have been identified along the flowpaths confirmed to be impacted by source areas at the plant. Furthermore, the surface water bodies receiving groundwater discharges, primarily Herrington Lake via Curds and HQ Inlets, also receive the plant's cooling water and stormwater discharges. Receptors in Herrington Lake, including aquatic organisms and human recreational users, are impacted by the combined surface water and groundwater discharges from the plant. Therefore, KU will work with the DOW to develop a comprehensive approach to risk management that addresses the totality of surface water impacts from both groundwater and surface water discharges. In the meantime, as described in this plan, KU will pursue a strategy of reducing the total mass of COIs entering the lake via the groundwater flow system.

3.2 CLEANUP CONSISTENT WITH POTENTIAL LAND USE

KU has made a significant commitment to the infrastructure at the E.W. Brown Station, and plans to generate electricity at the Station for the foreseeable future. The presence of CCR in the ponds and in the future landfill will restrict long-term use of the property to non-residential purposes. KU will continue to retain control over the property, and can assure that future land use remains consistent with the remedial objectives and required management controls for the site.

3.3 COMPLIANCE WITH STATE AND FEDERAL ENVIRONMENTAL LAWS

Federal authority to regulate solid waste facilities has been delegated in Kentucky to the DWM, administered by the Solid Waste Branch. State standards for groundwater corrective action are established in 401 KAR 45:160, Section 5, *Groundwater Contamination Assessment and Corrective Action*. Paragraph 12 requires that corrective action be conducted until the owner or operator "demonstrates that concentrations have been reduced to levels below the maximum contaminant level (MCL) or naturally occurring background." Surface water impacts must be addressed as necessary to comply with 401 KAR 30:031 (*Environmental performance standards*), which prohibit surface water impacts that violate KRS Chapter 224, or the surface water standards of 401 KAR Chapters 10 or 8.

Operational changes and remedial actions to be implemented at the plant are anticipated to have significant impacts on infiltration and recharge to the groundwater flow system, as well as transfer of COIs to groundwater. These changes will, in turn, limit the contact of clean water with CCR materials and reduce the overall mass of COIs in the groundwater flow system and in discharges to surface water. However, given the physical configuration and the volume of CCR material in the Main Ash Pond, KU cannot accurately predict when concentrations of COIs in the groundwater system in the vicinity of the plant will achieve the regulatory objectives.

3.4 SUMMARY

The primary source of potential groundwater impacts at the site is the Main Pond, which contains about 6 million cubic yards of CCR in an unlined valley fill. Given this volume of source material, and the ongoing (although reduced) flow of water through this material, the numerical cleanup standards specified in Kentucky's solid waste regulations may not be immediately achievable. In lieu of being able to immediately meet the regulatory objectives, therefore, KU will implement a robust system of engineering and management controls to:

- Continue to eliminate and/or intercept flows contacting waste;
- Reduce the overall risk to environmental receptors; and
- Monitor the impact of these actions to verify that risk reduction is achieved.

4.0 INTERIM REMEDIAL MEASURES

In order to proactively address identified source areas, KU is in the process of implementing significant remedial actions that are designed to prevent the transfer of additional COIs into groundwater to the extent possible, and limit migration of groundwater impacts from identified source areas. These actions are termed Interim Remedial Measures (IRMs) because they can be implemented without extensive evaluation. These IRMs, as they are implemented, become part of the permanent Remedial Action for the site. As part of the ongoing groundwater assessment process, the effectiveness of the IRMs described below will be evaluated through groundwater monitoring, and the result of the evaluation may be incorporated (as needed) into additional remedial action at the site, as described below in Section 5.0.

The IRMs that have previously been or are currently being implemented are described in the following sections.

4.1 GYPSUM PROCESSING PLANT

The Gypsum Processing Plant (GPP, shown in **Figure 3**) was constructed in 2009, to handle the gypsum produced from air emission controls on the coal combustion units. Gypsum is conveyed to the GPP as a wet slurry, by pumping from the generating station. At the GPP, gypsum is dried and processed via a vacuum filter belt.

The GPP includes a pond (known as the Gypsum Pond, or West Collection Pond) which receives stormwater runoff from the surrounding area, runoff from geotextile filter tubes used as part of the gypsum dewatering process, and filtrate from the gypsum vacuum dewatering belt.

As originally designed, this pond was excavated into bedrock and was unlined. The outfall from the pond leads to an underground forcemain through which water from the pond is pumped to the Auxiliary Pond.

Based on its location (west of the watershed divide) and the materials handled in this area, the GPP, and more particularly the collection pond associated with it, is considered to have been the most likely source for the COIs (primarily sulfate) detected in Railroad Spring, about 800 feet to the northwest.

In April-May 2014, KU undertook remedial measures to line the pond and the area draining to the pond in order to prevent infiltration of gypsum-impacted water in the area of the GPP. The installed liner system consists of the following, from bottom to top:

- 4 inches minimum of dense graded aggregate (DGA) over grade (rough rock surface), to serve as a cushion under the membrane.
- 60-mil LLDPE flexible membrane liner between two cushion geotextile layers.
- 6-inch fabric form concrete mat.

The total area lined was approximately 55,600 square feet, including the area of the pond and an 18,525 square foot drainage area to the north of the pond, used for the geotextile filter tubes.

Appendix A provides the design drawings and photos showing the liner installation and current appearance of the Gypsum Pond and surrounding area.

The upgrades installed at the GPP are intended as a short-term IRM. In the long term, once the landfill and the CCR Treatment Area are constructed, gypsum processing will be moved to the CCR treatment Area, and dry gypsum will be disposed in the landfill. The current gypsum dewatering system at the GPP will be retained as a backup to the new (redundant) systems in the CCR Treatment Area, but it will only be used in the event of a failure of those systems.

4.2 WEST QUARRY

The West Quarry (also known as Quarry 2 & 3) was excavated along the ridge on the west side of the Main Pond in 2007-2008. It was used as a source of rock for construction of the Auxiliary Pond, and later as temporary storage for bottom ash. The bottom ash was moved to the Main Pond in late 2011, and consolidated with the existing CCR in that pond before it was regraded and covered with soil.

Once emptied, the West Quarry received surface runoff, and may also have a connection to groundwater. The standing water level elevation in the West Quarry in 2014 was approximately 874 feet. In October 2014, KU began dewatering of the quarry, and had lowered the water level elevation to approximately 864 by October 24, 2014. Pumping was discontinued over the weekend during a period without precipitation, and there was no noticeable rise in water level, indicating little to no inflow of groundwater over the two-day period. Based on these observations, the West Quarry appears to act as a collection area for surface runoff, and a potential source of recharge to groundwater immediately upgradient of the Main Pond.

In order to reduce ongoing recharge in this area, KU intends to fill the quarry with inert structural fill (soil and rock), and graded at the surface to shed (rather than infiltrate) precipitation. Design of the fill is currently underway, and filling is planned for 2015. The source of the fill will be borrow generated in previous excavation activities on the property, consisting of mixed soil and rock. The surface of the structural fill will be covered with topsoil and vegetated to minimize erosion.

4.3 AUXILIARY POND DISCHARGE PIPELINE

The relatively high flowrates observed in the springs feeding HQ Stream (HQ Spring and Briar Patch Spring) caused KU to suspect possible leakage from the Auxiliary Pond discharge pipeline. As shown on **Plate 2**, the pipeline exits the Auxiliary Pond on its southwest corner, runs along the southern and eastern perimeters of the pond, and then runs north and northeast,

discharging to the surface at a headwall a short distance above the KPDES 001 monitoring point.

The pipeline is constructed of straight lengths of 30-inch diameter high-density polyethylene (HDPE) pipe, connected through 12 manholes. The manholes are 5-foot diameter concrete cylinders, 6 to 18 feet deep. Based on observations, leaks were suspected of occurring in several manholes at the junctions between the HDPE pipe and the concrete manhole sidewall.

On September 8-10, 2014, Winelco (under subcontract to AMEC) provided testing services to evaluate the integrity of selected lengths of HDPE pipe, and all 12 manholes. The test results for the segments of HDPE line tested indicated no concern. However, the manholes were found to exhibit varying stages of deterioration, including cracking of concrete in the walls and floor, and degradation of the seal round inlet and discharge pipes. In Manholes 8, 9, 10, 11 and 12, cracks were observed all the way through the concrete, and sediment was present in the manholes. In the other manholes, the pipes were sealed and water was introduced to a level 48 inches over the pipe inlets. Manholes 3 and 5 were unable to be tested as the structures were not able to be filled with water. The other manholes tested (1, 2, 6 and 7) all showed substantial water loss (corresponding to water level drops of 36 to 43 inches over one hour of observation) after filling.

Based on these results, the Auxiliary Pond discharge pipeline has been identified as the likely source for most or all of the water quality impacts observed in HQ Stream and the springs feeding it (HQ Spring and Briar Patch Spring). In response to these findings, KU has evaluated options for repairing the existing structures, and has determined that a more effective approach will be to replace the sections of the pipeline and manholes rather than repair it along its entire length. The new structure will most likely be re-routed to the east of the current structure, and will discharge to the same KPDES 001 location. The number of manholes will be reduced, and new manholes will be designed to achieve a durable, water-tight seal with the inlet and outlet lines.

4.4 MAIN POND

Since sluicing of CCR to the Main Pond was discontinued in late 2008, a series of remedial measures have been performed at the Main Pond to limit infiltration, dewater the existing CCR to the extent possible, and ultimately intercept water impacted by the existing CCR so that it can no longer discharge to surface water. These actions are described in the following sections.

4.4.1 Capping of Existing CCR

Between February 2012 and January 2013, the surface of the existing CCR in the Main Pond was regraded to provide drainage for stormwater, and two-thirds of the surface were covered with a clay-mix soil cover (0.5 to 15 feet thick), to prevent dusting from the drying ash and to limit ongoing infiltration. An underdrain system was installed beneath the clay-mix soil, to

capture any free water that might be squeezed upward during future loading from the proposed new landfill. These actions resulted in elimination of standing water from the surface of the existing CCR.

As described in the *Main Ash Pond Closure Plan* (AMEC, April 2014), final capping for closure of the Main Pond will proceed in phases, as the new lined landfill is constructed over the top of the covered existing CCR. This closure approach brings the Main Pond into substantial compliance with EPA's Final Rule on disposal of CCR, issued on April 17, 2015, under which out-of-service ash treatment basins are to be closed by dewatering of the ash, grading to promote runoff, and capping with a low-permeability cover. Placement of the final section of the soil cap is expected to be completed by December 2016.

4.4.2 Abutment Drain Collection

As-built drawings for the last expansion of the Main Pond eastern embankment (dam) showed abutment drains installed in the north and south ends of the dam. The north abutment drain formerly discharged to the ditch carrying plant effluent (Unit #3 cooling tower blowdown) monitored at KPDES 003. This discharge from the abutment drain had been sampled in the monitoring associated with the Groundwater Assessment, and was reported in the GVAR as monitoring point CH-048 (Drain). In March-April 2014 AMEC prepared a design for a pumping station to capture the north abutment drain discharge and transfer it to the Auxiliary Pond. The pump station was installed in June and early July 2014. **Appendix B** provides the design drawings and photos showing the pump station installation.

The south abutment drain was apparently intended to discharge to the outfall channel for the Main Pond discharge, just downstream of the current KPDES 001 monitoring point. However, no flow is observed in the pipe located there. Instead, a seep (shown as "South Abutment Seep" on **Plate 1**) emerges at the ground surface west of KPDES 001, and north of the Main Pond outfall ditch. The seep is thought to represent a break in the south abutment drain line which is diverting all or most of the flow intended to be discharged farther east. A sample has been collected of this seep, and the need for further remedial action to collect the water from the south abutment drain is currently being evaluated.

4.4.3 Toe Drain Collection

Water emerges from the toe of the Main Pond eastern embankment (dam) on a continuous basis, at a rate ranging between 150 and 250 gpm, and possibly higher. Based on as-built drawings for the dam, this water is thought to include at least two components: flow from the internal drainage system for the dam, installed as part of the dam expansion in 1989, emerging as diffuse flow in the area sampled as Dam Toe Middle (CH-041) and Dam Toe Left (CH-042); and flow from a "spring box" that is now buried under the expanded dam. The audible flow noted at the monitoring point referred to as Dam Toe Right (CH-040) is thought to represent flow from this spring box. It is not clear if the spring box had been installed to capture natural



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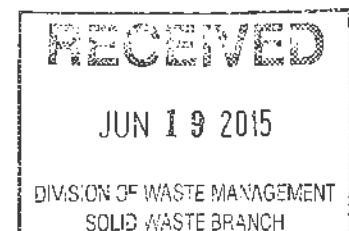
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springs, or was the engineered terminus of a dam drainage system for an earlier phase of the eastern embankment. Most likely, the flow includes a combination of groundwater that underflows the dam through bedrock, and flow through manmade drainage systems. In either case, the flow path from the source (CCR in the Main Pond) to the receiving surface water body (Curds Inlet) is short, and the travel time is relatively fast, leaving little opportunity for attenuation along the way.

Iron staining associated with the discharges is apparent, and samples collected at CH-040 have shown exceedances of the MCL and surface water criteria for arsenic. In response to this finding, KU has made the decision to collect the discharge at the toe of the Main Pond Dam, so that it can be transferred in the short term to the Auxiliary Pond. In the long term, the water pumped from the toe of the dam will be treated with other waste streams at the future enhanced wastewater treatment unit for the plant.

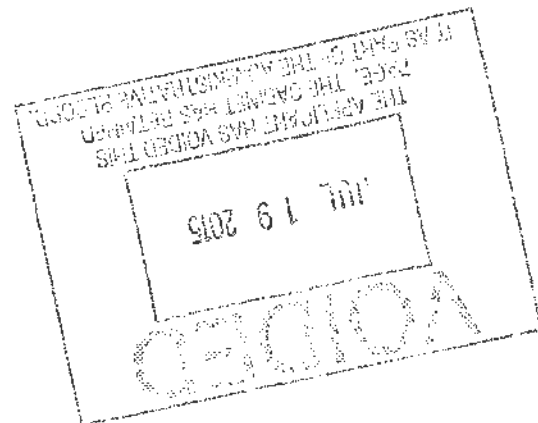
Design and permitting for the planned collection system are currently underway. The current design is provided in **Appendix C**. The first phase will be a cut-off wall constructed across the valley downstream of the toe, to protect the collection system from flood events in Curds Inlet. Construction of the wall is planned for winter 2015, while the lake level is at its lower (wintertime) pool level. Once the cutoff wall is completed, and a temporary water handling system is installed, excavations to locate the drains where the discharges are originating are planned, so that an appropriate collection system can be designed and constructed. Full capture of the toe drain discharges is anticipated to be completed by August 2015.



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Design and permitting for the planned collection system are currently underway. The current design is provided in **Appendix C**. The first phase will be a cut-off wall constructed across the valley downstream of the toe, to protect the collection system from flood events in Curds Inlet. Construction of the wall is planned for winter 2015, while the lake level is at its lower (wintertime) pool level. Once the cutoff wall is completed, and a temporary water handling system is installed, excavations to locate the drains where the discharges are originating are planned, so that an appropriate collection system can be designed and constructed. Full capture of the toe drain discharges is anticipated to be completed by August 2015.



5.0 EVALUATION OF REMEDIAL MEASURES

Remedial measures will be evaluated on an ongoing basis, primarily through groundwater monitoring. Groundwater monitoring will be performed both to evaluate the effectiveness of the IRMs, and to assess the need for additional measures.

5.1 MONITORING EFFECTIVENESS OF INTERIM REMEDIAL MEASURES

A major component of the remedial action process established by this Plan will be to evaluate the effectiveness of the IRMs, as they continue to be implemented.

KU anticipates that the IRMs described in the previous section will result in a significant reduction of mass transfer of COIs into groundwater, and an overall reduction in concentrations of discharges. In combination with the addition of enhanced wastewater treatment that will be implemented over the coming years to meet ELGs in wastewater discharges from the plant, the reduction in groundwater discharges is expected to markedly reduce the transfer of COIs via groundwater to the receiving surface water bodies.

In order to verify and evaluate the impact of the changes that are already in process, KU is committed to ongoing monitoring of groundwater at and near the property. The proposed plan for monitoring is described in the following sections. The plan described below, designed to monitor the effectiveness of the IRMs, also includes the monitoring previously proposed in the landfill Groundwater Monitoring Plan (GWMP) dated October 2013, which has been included in the Landfill Permit.

5.1.1 Monitoring Locations

The locations to be included in ongoing monitoring are described below.

The following springs have been or will be monitored as indicators of background water quality conditions:

- Rockhouse Spring (CH-063)
- Hardin Spring (CH-062)
- Stonewall Spring (CH-052)

The use of Stonewall Spring (CH-052) for background data collection is planned to be phased out, as it is located on property that does not belong to KU. However, it is designated for ongoing monitoring based on the currently approved permit.

The following sampling locations are located east of the Auxiliary Pond on HQ Stream, and will be monitored to verify water quality improvement from replacement of the Auxiliary Pond discharge pipeline:

- HQ Spring (CH-046)
- Briar Patch Spring (CH-057)

The following sampling locations are located east of the Main Pond, at the toe of the dam, and discharge to Curds Inlet:

- Dam Toe Right (CH-040).
- Dam Toe Middle (CH-041) and Dam Toe Left (CH-042).

Collection of these discharges is currently in process, with construction expected to be complete in 2015. Selection of appropriate monitoring points during and after construction will be made based on the final configuration of the collection system. At a minimum, the combined pumped flow from the collection point will be monitored for at least one year, to evaluate the variability in the chemistry of the water emerging from the toe of the Main Pond.

The following sampling locations are located east of the Main Pond, and discharge to (or close to) the Main Pond outfall ditch leading to KPDES 0001:

- Ditch Spring (CH-044)
- Beaver Dam Cave (BDC) Spring (CH-045)
- South Abutment Seep

The water quality at these locations is currently being evaluated, and the need for additional remedial action at these locations (if any) will be assessed based on the results.

The following locations will be monitored to evaluate water quality trends sitewide in response to the remedial actions described in this Plan:

- Railroad Spring (CH-050) – west of the plant
- Webb Spring Complex (CH-028) – north of the plant
- Hardin 2 Spring (CH-065) – south of the plant

5.1.2 Monitoring Parameters

At a minimum, the parameters required to be monitored in groundwater according to the Special Waste Landfill Permit (SW08400010) will be included in all groundwater monitoring. That list (including analytical methods) is presented in the following table:

Analytical Methods	
Parameter	Laboratory Method
Flow (for springs)	field measured
Water Level Elevation	

Parameter	Laboratory Method
pH	
Temperature	
Specific Conductance	
Chemical Oxygen Demand (COD)	Method 410.4
Total Organic Carbon (TOC)	Method 9060A
Total Dissolved Solids (TDS)	Method 2540C
Chloride	Method 9056
Sulfate	
Boron	Method 6010B
Arsenic	Method 6020
Calcium	
Copper	
Sodium	

This list represents a minimum list of parameters. Upon completion of the GVAR Update, additional parameters may be identified that will be useful to include in groundwater monitoring in order to better evaluate the effect of the remedial actions.

5.1.3 Monitoring Frequency

The monitoring frequency required by the landfill permit is semi-annual. However, the dynamics of the groundwater systems being monitored are expected to change relatively rapidly over the next one to two years, as the changes discussed in previous sections are implemented. Quarterly monitoring is proposed as the appropriate frequency for groundwater monitoring beginning in the first quarter of 2015. A quarterly frequency should allow for seasonal fluctuations to be distinguished from long-term trends. Once discernible trends become established, a decreased frequency may be recommended.

5.1.4 Data Evaluation and Reporting

Evaluation of background concentrations in groundwater will continue for the parameters on the list that do not have MCLs. The evaluation will be made, as in the GVAR, using pooled data from background monitoring points, and the USEPA software ProUCL to develop a 95% Upper Prediction Limit for each parameter without a MCL. Selection of appropriate data to be included in the statistical analysis of background conditions will be made based on the findings of the GVAR Update (currently in process).

In addition, as sufficient data over time become available, the key parameters at each monitoring location will be reviewed for statistical trends. Trend analyses will be performed using a combination of graphical methods and statistical methods available in ProUCL.

In the long term, as appropriate risk-based screening criteria are developed and approved by the KDEP, KU will introduce those into the evaluation, so that monitoring data can be evaluated in terms of overall environmental risk, rather than solely with regard to background.

A Groundwater Monitoring Report will be prepared semi-annually, beginning with the first half (two first quarters of 2015). The GWMR will be submitted within 60 days from the end of the second and fourth quarters. MCL or statistical exceedances for the permit-required parameters will be reported to the DWM within 48 hours of being identified.

5.1.5 Monitoring Plan Modifications

It is anticipated that modifications to the monitoring plan described above will be appropriate as the results of the Groundwater Assessment Report Update and ongoing monitoring are fully evaluated. The following types of modifications may be proposed by KU, and implemented if approved by the DWM Solid Waste Branch:

- Drop/add monitoring points. Over time, additional monitoring points may be proposed, if discovered or created by new construction or collection procedures. Monitoring points may be proposed to be dropped from the list if they go permanently dry, if they are combined into a collection point, or if long-term trend analysis indicates that relevant data are no longer being generated.
- Drop/add monitoring parameters. The geochemical assessment currently being performed for the Groundwater Assessment Report Update will provide a more complete picture of the parameters that may be COIs with regard to the specific sources at the plant. Long-term, KU may propose modifications to the parameter list so that the appropriate COIs are being monitored, and parameters that are typically not detected over background are eliminated.
- Modify frequency of sampling and/or reporting. Over time, as the rate of dynamic change in the water balance and mass balances in the system decrease, KU may propose a decrease in the frequency of sampling and/or reporting.

It is understood that modifications to permit-required sampling points, parameters or frequency will require submittal and approval of a Permit Modification for the landfill.

5.2 EVALUATION OF ADDITIONAL REMEDIAL MEASURES

The measures described in Section 4.0 have already been implemented, or are in process of being implemented. The need for additional measures will be evaluated on an on-going basis, based on:

- Groundwater monitoring results and trends; and
- Results from ongoing technical evaluations.

It is anticipated that different COIs may respond differently, or distribute differently in groundwater, in response to the planned remedial actions. Therefore, while some concentrations of some COIs may decrease at all locations, concentrations of selected COIs could increase at some locations in the short-term. These increases, if they persist, will be evaluated to determine if additional engineering controls or other actions could be required to further reduce risk.

In parallel with the on-going monitoring described in the previous section, KU proposes to continue the evaluation of the existing CCR in the Main Pond that has been started in 2014. This evaluation is being performed primarily to assess geotechnical and hydraulic response of the CCR to loading from the new landfill, and the studies being performed in 2014-2015 will establish a baseline for comparison to the post-filling data.

It is anticipated that hydraulic evaluation of CCR in the Main Pond will continue through the operational life of the landfill. The instruments installed in the Main Pond in advance of landfilling include:

- Nine settlement monitors anchored into the bedrock just below the CCR.
- Nine sets of vibrating wire piezometers, installed at two levels to monitor water level response in the existing CCR.
- Four wells (three 2-inch and one 4-inch) screened at the bottom of the CCR and equipped with transducers, for comparison to the vibrating wire piezometers, and to evaluate the need and potential to extract water from the CCR.

Locations are shown on **Plate 2**. In addition to the geotechnical and hydraulic evaluations planned for the Main Pond CCR, samples have been retrieved from the newly installed wells in the CCR to evaluate geochemistry of the water within the primary body of waste potentially impacting groundwater at the site. The data generated in the geochemical assessment, which will be reported in the GVAR Update planned for early 2015, will be used for:

- Comparison to concentrations of COIs in groundwater outside the Main Pond.
- Chemical "fingerprinting" of water that has contacted the existing CCR in the Main Pond, for comparison to groundwater samples at other locations.
- Evaluation of the potential for natural attenuation in the groundwater systems.
- Evaluation of potential ex-situ treatment methods, if needed.

In addition, selected monitoring points east of the Main Pond have exhibited concentrations of COIs that could require additional remedial action. These include Ditch Spring and Beaver Dam

Cave Spring (both discharging to the Main Pond outfall ditch), as well as the South Abutment Seep. These points will be specifically targeted in the geochemical assessment as well as the ongoing monitoring to evaluate if they should be captured for transfer to the Auxiliary Pond.

These ongoing studies can be used as the basis for evaluating additional remedial actions, beyond the measures described in Section 4.0, if the results of on-going monitoring indicate they are needed to further reduce risk from groundwater discharges.

6.0 IMPLEMENTATION SCHEDULE

The implementation schedule for the remedial actions described in Section 4 will be integrated with the schedule for and construction of the new landfill and the CCR Treatment area, as well as for the Auxiliary Pond operation. The schedule for each of the IRMs and the monitoring is summarized below.

6.1 GYPSUM PROCESSING PLANT

The IRM described for the Gypsum Processing Plant (lining of the Gypsum Pond and associated drainage area) was completed in May 2014.

6.2 WEST QUARRY

The IRM for the West Quarry involves filling, grading and covering. It is anticipated the design for the planned fill will be completed by mid-2016. Filling will proceed concurrently with construction of Phase 1 of the new landfill, and will be completed as the available fill material is freed up from various stockpiles during construction. It is anticipated that filling and revegetation of the West Quarry area will be completed by late 2016.

6.3 AUXILIARY POND DISCHARGE PIPELINE

The IRM for the Auxiliary Pond discharge pipeline will involve repairing or replacing the manholes and sections of the line. KU is still evaluating alternatives, and anticipates the design for the new pipeline will be completed by the end of June 2015. It is anticipated that the new pipeline will be constructed and in operation within a year, by the end of June 2016.

6.4 MAIN POND

6.4.1 Capping of Existing CCR

A Closure Plan for the Main Pond has been previously submitted (AMEC, April 2014), and provides an overview of how the Main Pond capping will be integrated with construction of the new landfill. According to the schedule proposed in that plan, the following activities will be completed by December 2016:

- Completion of the cover (landfill geomembrane liner) over the Phase 1 area (southern 1/3 of the permitted area for the landfill).
- Completion of the three lined ponds (two for stormwater, one for leachate, in eastern portion of the permitted area, east of the fill).
- Start of construction of the Phase 2 cover (landfill geomembrane liner over middle 1/3 of permitted area).

- Placement of 12-inch interim soil cap over Phase 3 (northern 1/3 of permitted area).
- Hardscaping of the CCR Treatment Area; and paving of the internal roadways between the landfill and the ponds.

By the end of 2016, it is anticipated that the surface of the entire Main Pond area will be graded and covered, so that future infiltration into existing CCR will be minimized.

6.4.2 Abutment Drain Collection

Interception and collection of the flow from the North Abutment Drain on the east embankment of the Main Pond was completed in July 2014. That flow is currently being transferred to the Auxiliary Pond via a pumping station.

Monitoring of the South Abutment Drain seep will continue, along with the nearby springs in the Main Pond outfall ditch (Ditch Spring CH-044, and Beaver Dam Cave CH-045), in order to evaluate if concentrations in the South Abutment Drain seep will attenuate over time, or if interception of that flow may be warranted in the future.

6.4.3 Toe Drain Collection

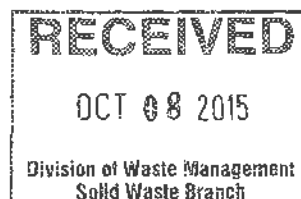
The toe drain system will consist of a cutoff wall across the valley at the toe of the Main Pond eastern embankment, with a collection and pumping system to transfer all or part of the water that flows into this area to the Auxiliary Pond. Design and permitting are underway, and construction of the wall is planned for winter 2015. Full capture of the toe drain discharges is anticipated to be completed by August 2015.

6.5 MONITORING

The results of the most recent studies and sampling performed in 2014 will be summarized in the GVAR Update, planned for submittal to the DWM by the end of April 2015.

Routine groundwater monitoring will begin at a quarterly frequency in the first quarter of 2015, including the monitoring points and parameters specified above in Section 5.1. Results will be reported semi-annually, within 60 days from the end of the second and fourth quarters.

In addition to the revised groundwater monitoring program, KU will install, monitor, and survey a series of permanent monuments along the lowest bench of the former ash pond dam face (at approximate elevation 800 feet NGVD) to evaluate potential vertical and horizontal movements. The condition of the monuments will be regularly evaluated and the monuments will be surveyed quarterly by a KY-registered professional land surveyor as part of the company's program to evaluate and track berm integrity. Monitoring will be performed and reported to DWM for the duration of the operation of the cutoff wall/toe drain collection system or until remedial measures are completed.



- Placement of 12-inch interim soil cap over Phase 3 (northern 1/3 of permitted area).
- Hardscaping of the CCR Treatment Area; and paving of the internal roadways between the landfill and the ponds.

By the end of 2016, it is anticipated that the surface of the entire Main Pond area will be graded and covered, so that future infiltration into existing CCR will be minimized.

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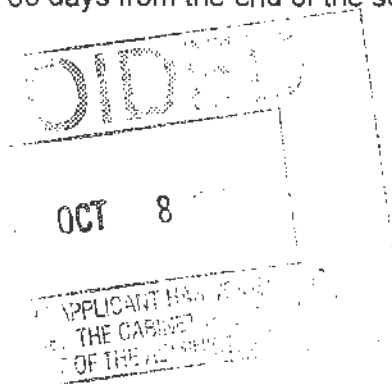
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7.0 REFERENCES

- AMEC, 2013. *Groundwater Assessment Report, E.W. Brown Generating Station (GWAR)*. Report prepared for KU. September 13, 2013.
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C

FIGURES

C

C



SOURCE PHOTOGRAPHS TAKEN JULY 2010. FSA NAIP IMAGERY, FROM KY GIS.



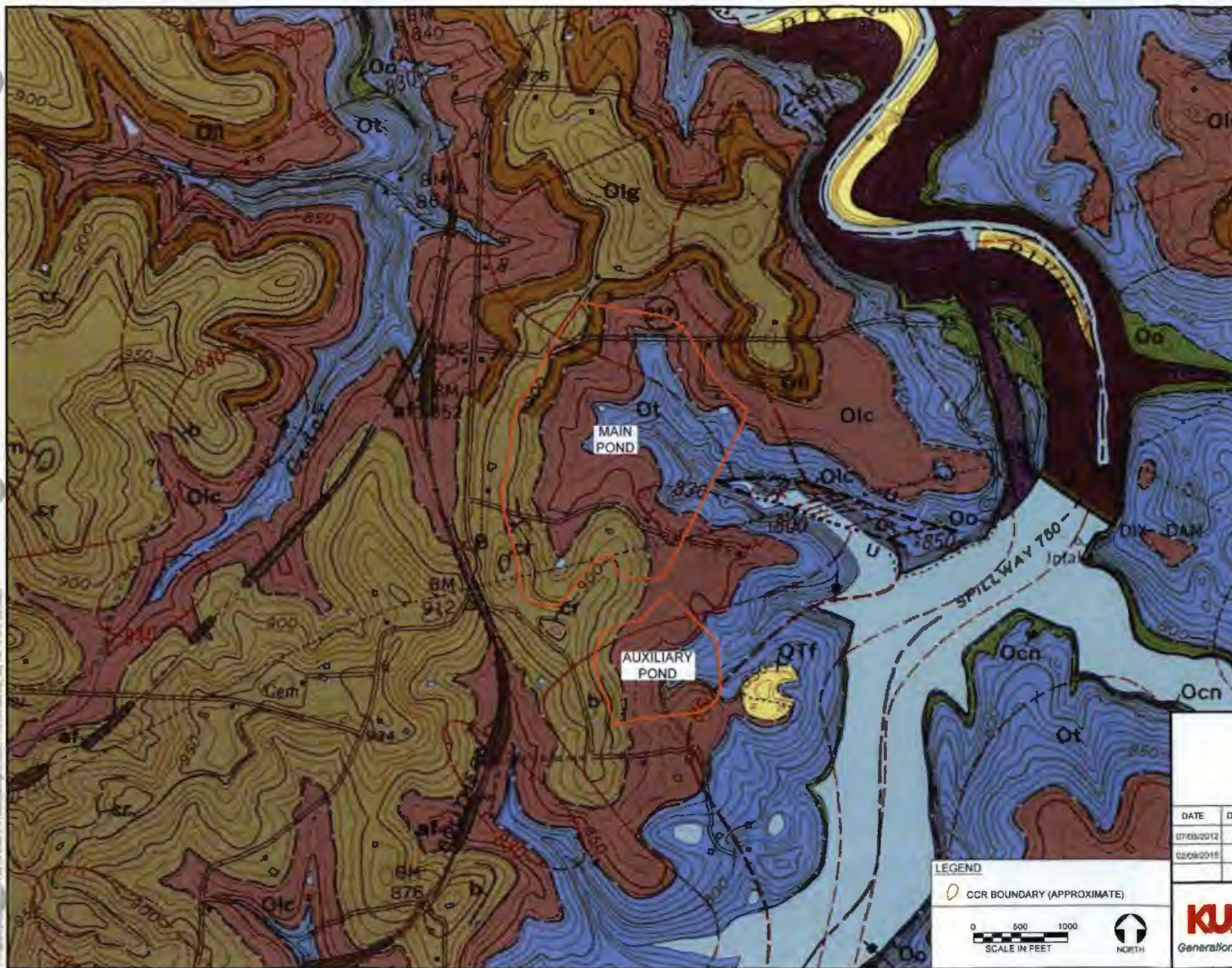
Environment & Infrastructure, Inc.
 11003 Bluegrass Parkway, Ste 690
 Louisville, KY 40299
 Phone: 502-267-0700

SITE LAYOUT
E.W. BROWN GENERATING STATION
MERCER COUNTY, KENTUCKY 40330

PROJECT NUMBER: 567530023

SCALE	1" = 1500'
DATE	01/21/2015
DRAWN BY	CSRP
APPROVED BY	ALD

FIG. 1



SITE AREA GEOLOGIC MAP
E.W. BROWN GENERATING STATION
MERCER COUNTY, KENTUCKY

AMEC PROJECT NUMBER: 597530023

DATE	DRAWN BY	APPROVED	DESCRIPTION
07/03/2012	CSRP	ALD	ORIGINAL DRAWING
02/09/2018	CSRP	ALD	REVISION 01

LEGEND

CCR BOUNDARY (APPROXIMATE)

0 500 1000
SCALE IN FEET

NORTH

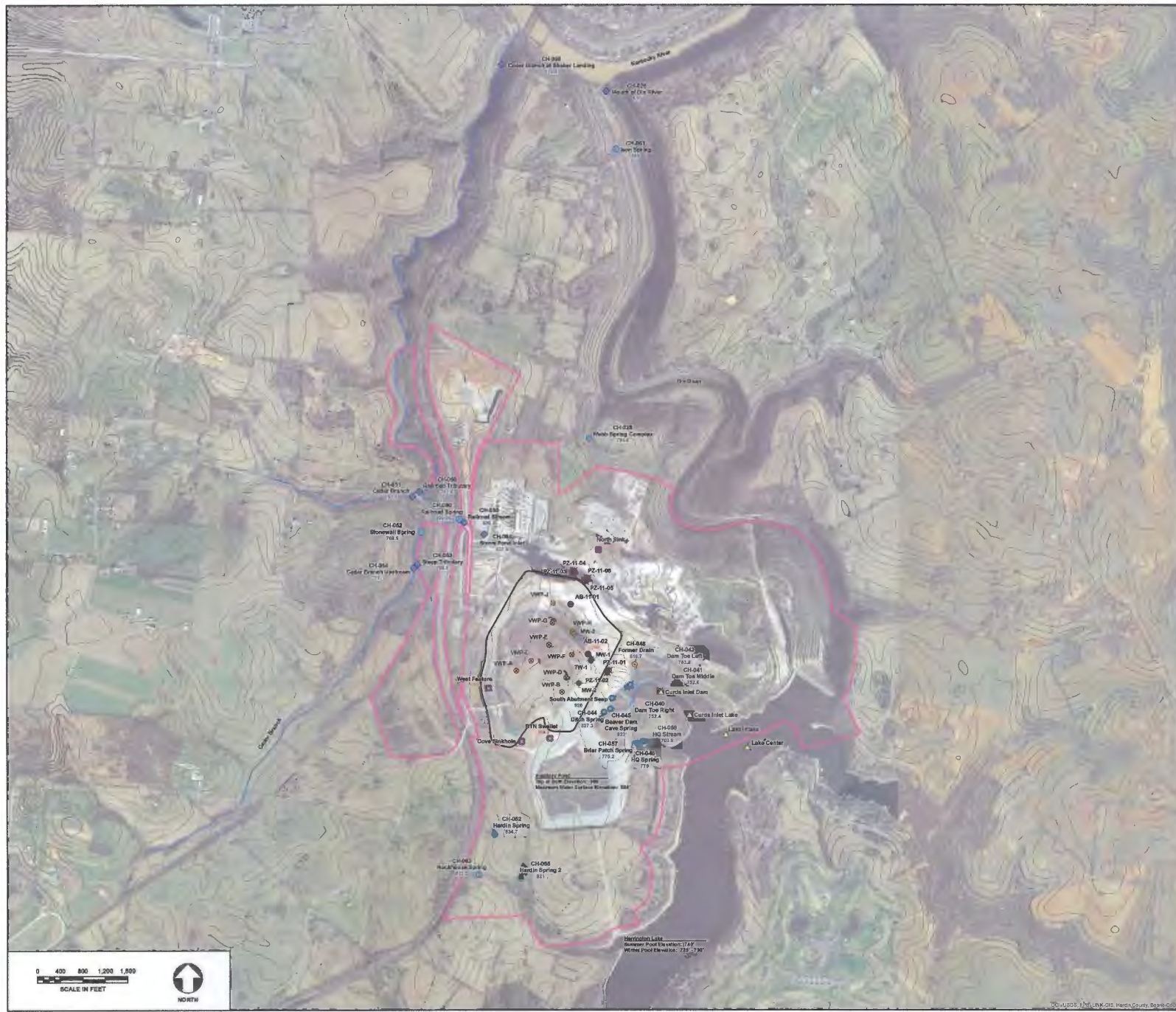
KU Kentucky Utilities Company
Generation Services

amec foster wheeler Environment & Infrastructure Inc.
 11023 Bluegrass Parkway, Ste 400
 Louisville, KY 40299
 Phone: 502-267-9700

FIG 2

SOURCE: USGS 7.5' GEOLOGIC QUADRANGLE MAP, WILMORE, KY, 1970

PLATES



- Legend**
- PROPOSED LANDFILL WASTE BOUNDARY
 - KU PROPERTY BOUNDARY
 - STREAM / DITCH (INTERMITTENT)
 - STREAM / DITCH (PERENNIAL)
- MONITORING POINTS AND INVENTORIED SPRINGS**
- ◆ CCR MONITORING WELL
 - ◆ CCR TEST WELL
 - PIEZOMETER
 - VIBRATING WIRE PIEZOMETER
 - DRAIN PIPE
 - SPRING / SEEP
 - ◆ SURFACE WATER (STREAM)
 - ▲ SURFACE WATER (LAKE)
 - BORING / TEMPORARY PIEZOMETER
 - SINKHOLE / SWALLET
- ELEVATION CONTOUR, IN FEET NGVD29 (MSL)
 CONTOUR INTERVAL: 20 FEET
 SOURCE: USGS National Elevation Dataset (2002)



HYDROGEOLOGIC STUDY LOCATIONS

E.W. BROWN GENERATING STATION
 MERCER COUNTY, KENTUCKY
 PROJECT NUMBER: 567530023

RECEIVED
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 DIVISION OF WASTE MANAGEMENT
 505 EAST WHELER BLVD.

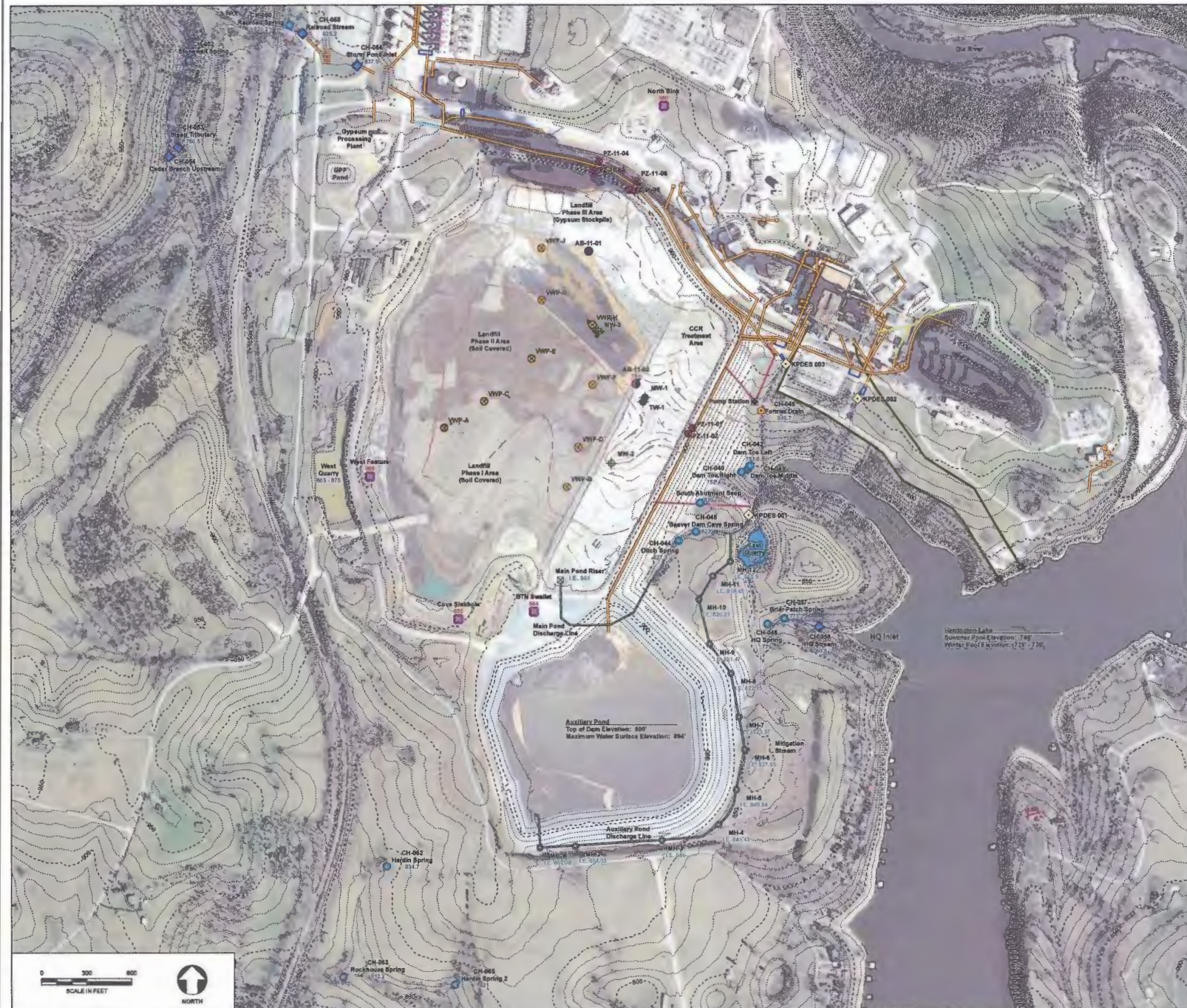
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12/17/2014	TMR	ALD	UPDATE
8/8/2015	TMR	ALD	UPDATE



PLATE 1

SOURCE: KENTUCKY AERIAL PHOTOGRAPHY & ELEVATION DATA PROGRAM, DATE OF PHOTOGRAPHY: OCTOBER 2012; USDA NADP, DATE OF PHOTOGRAPHY: 2006

DC-UGS-128-LEW-05, Harlan County, Boone County



LEGEND

- VIBRATING WIRE PIEZOMETER
- MONITORING POINTS AND INVENTORIED SPRINGS**
- ◆ CCR TEST WELL - 2 INCH (2014)
- ◆ CCR TEST WELL - 4 INCH (2014)
- PIEZOMETER
- ◆ DRAIN PIPE
- ◇ KPDES OUTFALL
- SPRING / SEEP
- SURFACE WATER (STREAM)
- BORING / TEMPORARY PIEZOMETER
- SINKHOLE / SWALLET USED FOR DYE INJECTION
- PUMP STATION
- MAIN POND RISER
- MANHOLE
- POND UNDERGROUND DISCHARGE LINE
- ESTIMATED STORM SEWER
- INTAKE
- OIL WATER SEPARATOR
- SANITARY SEWER
- STORM SEWER
- TURBINE SEWER
- UNDERGROUND PIPE
- ABUTMENT DRAIN
- STREAM / DITCH (INTERMITTENT)
- STREAM / DITCH (PERENNIAL)
- 884 DYE INJECTION ELEVATION, IN FEET NAVD88 (2011-2012)
- 827 APPROXIMATE WATER LEVEL ELEVATION, IN FEET NAVD88
- I.E. 861 INVERT ELEVATION, IN FEET NAVD88
- ELEVATION CONTOURS, IN FEET NAVD88**
- CONTOUR INTERVAL: 10 FEET**
- SOURCE: Kentucky Aerial Photography and Elevation Dataset (2012)
- INTERMEDIATE CONTOUR
- INDEX CONTOUR (LABELED)
- ORIGINAL TOPOGRAPHIC ELEVATION CONTOURS FOR THE MAIN CCR POND, IN FEET NGVD29 (MSL)**
- CONTOUR INTERVAL: 10 FEET**
- SOURCE: USGS National Elevation Dataset (2003)
- INTERMEDIATE CONTOUR
- INDEX CONTOUR (LABELED)



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**DRAINAGE MAP
VICINITY OF CCR PONDS**
E.W. BROWN GENERATING STATION
MERCER COUNTY, KENTUCKY
PROJECT NUMBER: 567530023

DATE	DRAWN BY	APPROVED	DESCRIPTION
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1/21/2014	TMR	ALD	UPDATE
6/8/2015	TMR	ALD	UPDATE

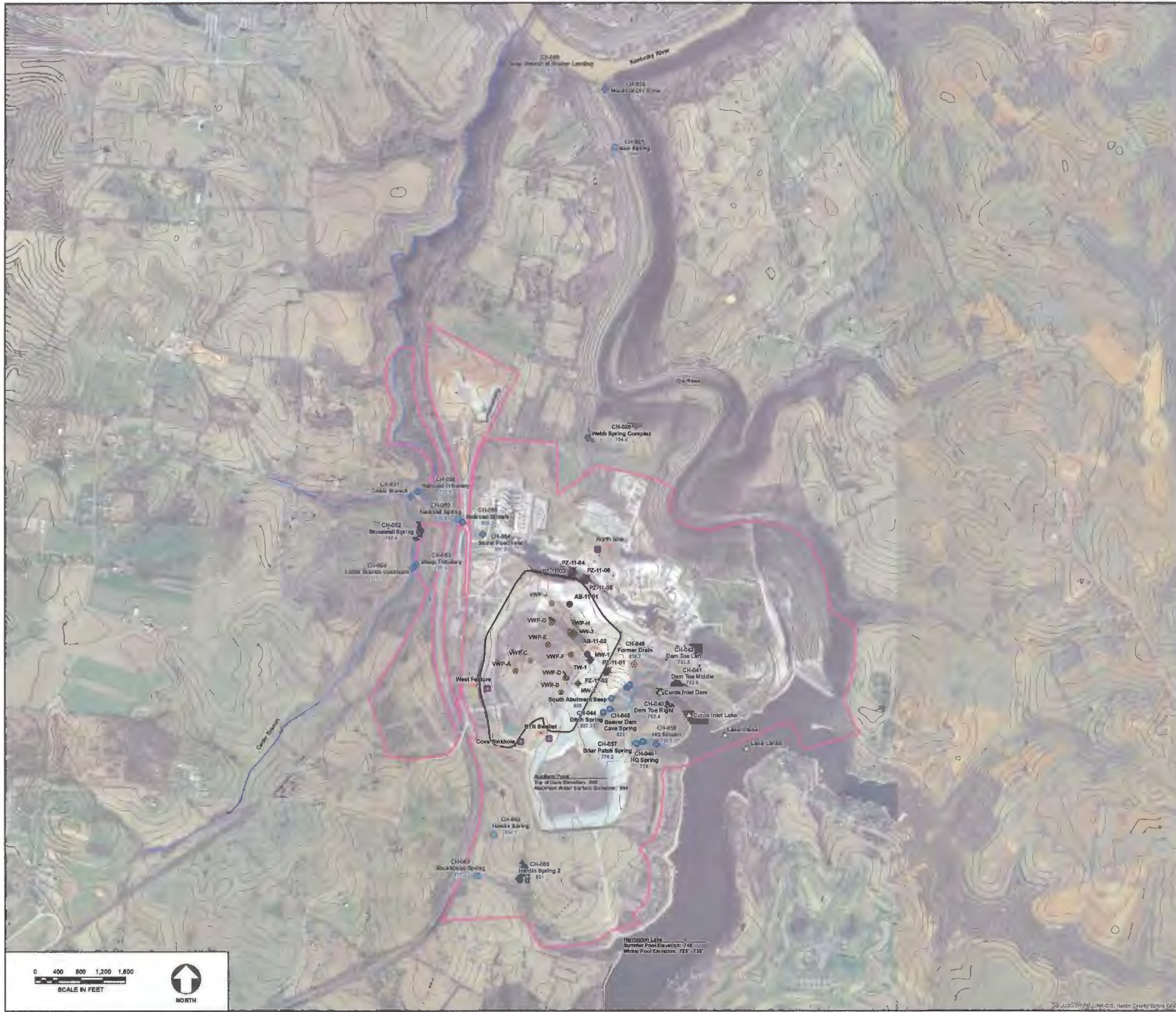
KU Kentucky Utilities Company
Generation Services

amec foster wheeler

11063 Bluegrass Parkway
Suite 600
Louisville, KY 40299
Phone: 602-267-0700

PLATE 2

SOURCE: KENTUCKY AERIAL PHOTOGRAPHY & ELEVATION DATA PROGRAM, DATE OF PHOTOGRAPHY: OCTOBER 2012



- Legend**
- PROPOSED LANDFILL WASTE BOUNDARY
 - KU PROPERTY BOUNDARY
 - STREAM / DITCH (INTERMITTENT)
 - STREAM / DITCH (PERENNIAL)
- MONITORING POINTS AND INVENTORIED SPRINGS**
- ◆ CCR MONITORING WELL
 - ◆ CCR TEST WELL
 - ✕ PIEZOMETER
 - VIBRATING WIRE PIEZOMETER
 - DRAIN PIPE
 - SPRING / SEEP
 - ◆ SURFACE WATER (STREAM)
 - △ SURFACE WATER (LAKE)
 - BORING / TEMPORARY PIEZOMETER
 - SINKHOLE / SWALLET
- ELEVATION CONTOUR, IN FEET NAVD83
CONTOUR INTERVAL: 20 FEET
SOURCE: USGS National Elevation Dataset (2002)

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SOLID WASTE BRANCH

HYDROGEOLOGIC STUDY LOCATIONS
E.W. BROWN GENERATING STATION
MERCER COUNTY, KENTUCKY
AMEC PROJECT NUMBER: 3143101364

DATE	DRAWN BY	APPROVED	DESCRIPTION
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1/21/2015	TMR	ALD	UPDATE

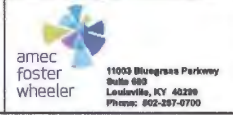
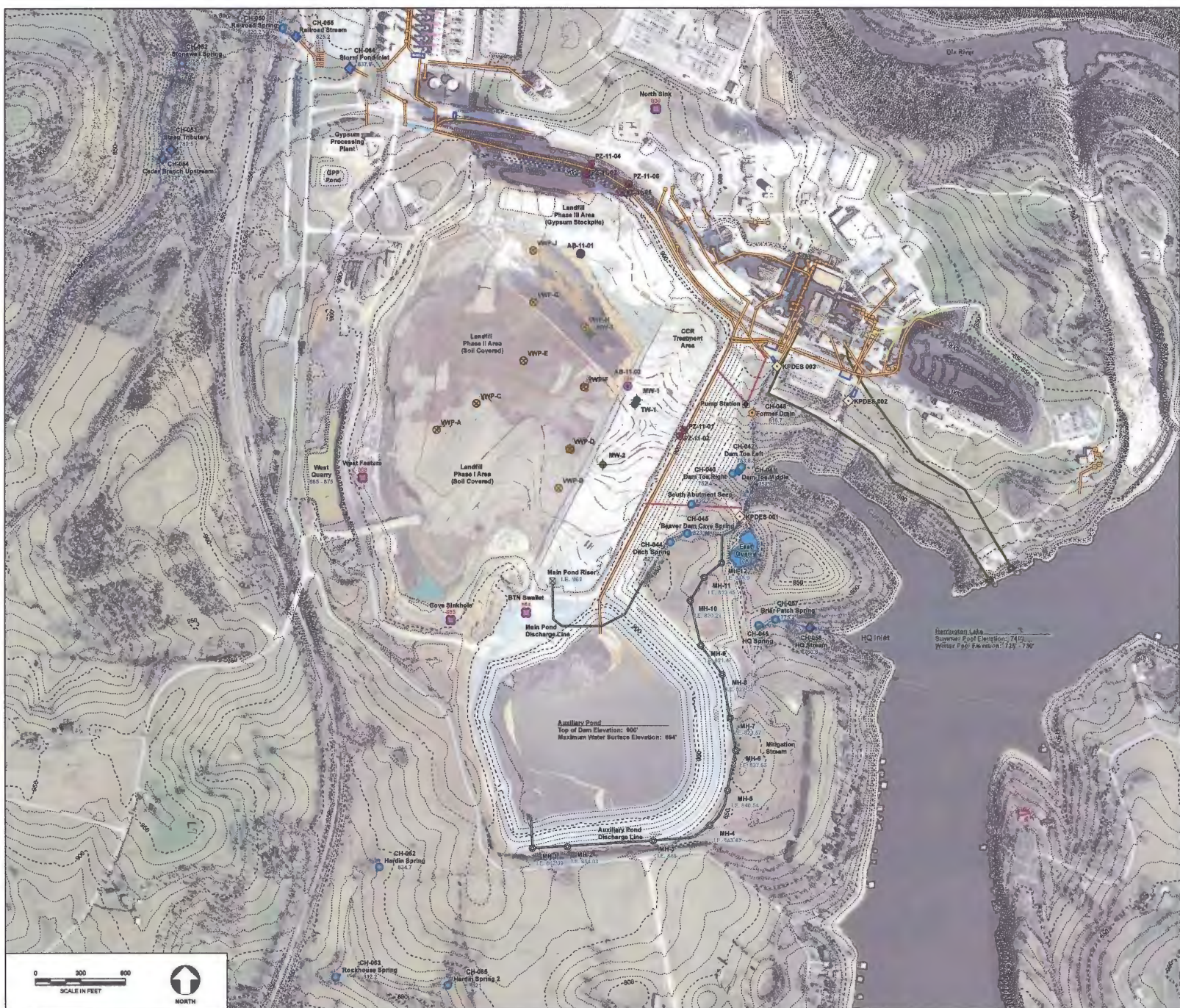


PLATE
1

SOURCE: KENTUCKY AERIAL PHOTOGRAPHY & ELEVATION DATA PROGRAM, DATE OF PHOTOGRAPHY: OCTOBER 2012; USDA NAIP, DATE OF PHOTOGRAPHY: 2006

DD:JUS25/Fall Line 05, Harlan County (Borne Collier)



LEGEND

- VIBRATING WIRE PIEZOMETER
- MONITORING POINTS AND INVENTORIED SPRINGS**
- ◆ CCR TEST WELL - 2 INCH (2014)
- ◆ CCR TEST WELL - 4 INCH (2014)
- PIEZOMETER
- DRAIN PIPE
- ◇ KPDES OUTFALL
- SPRING / SEEP
- SURFACE WATER (STREAM)
- BORING / TEMPORARY PIEZOMETER
- SINKHOLE / SWALLET USED FOR DYE INJECTION
- PUMP STATION
- MAIN POND RISER
- MANHOLE
- POND UNDERGROUND DISCHARGE LINE
- ESTIMATED STORM SEWER
- INTAKE
- OIL WATER SEPARATOR
- SANITARY SEWER
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- 884 DYE INJECTION ELEVATION, IN FEET NAVD88 (2011-2012)
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- I.E. 861 INVERT ELEVATION, IN FEET NAVD88
- ELEVATION CONTOURS, IN FEET NAVD88**
- CONTOUR INTERVAL: 10 FEET
- SOURCE: Kentucky Aerial Photography and Elevation Dataset (2012)
- INTERMEDIATE CONTOUR
- INDEX CONTOUR (LABELED)
- ORIGINAL TOPOGRAPHIC ELEVATION CONTOURS FOR THE MAIN CCR POND, IN FEET NGVD29 (MSL)**
- CONTOUR INTERVAL: 10 FEET
- SOURCE: USGS National Elevation Dataset (2002)
- INTERMEDIATE CONTOUR
- INDEX CONTOUR (LABELED)

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DRAINAGE MAP
VICINITY OF CCR PONDS
E.W. BROWN GENERATING STATION
MERCER COUNTY, KENTUCKY
AMEC PROJECT NUMBER: 567530023

VOIDED
JUN 19 2015

DATE	DRAWN BY	APPROVED	DESCRIPTION
7/23/2014	TMR	ALD	ORIGINAL DRAWING
1/21/2014	TMR	ALD	UPDATE
2/19/2014	TMR	ALD	UPDATE



Generation Services

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Suite 600
Louisville, KY 40298
Phone: 502-267-0700

PLATE
2

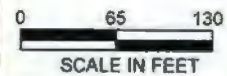
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APPENDICES

APPENDIX A
GPP LINER INSTALLATION



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SOURCE PHOTOGRAPHS TAKEN 10-09-2013. IMAGERY FROM GOOGLE PRO.

**amec
foster
wheeler**
Environment & Infrastructure, Inc.
11003 Bluegrass Parkway, Ste 690
Louisville, KY 40299
Phone: 502-267-0700

**GYPSUM PROCESSING PLANT
BEFORE INTERIM REMEDIAL ACTION**

**E.W. BROWN GENERATING STATION
MERCER COUNTY, KENTUCKY 40330**

PROJECT NUMBER: 567530023

SCALE	1" = 130'
DATE	01/21/2015
DRAWN BY	CSRP
APPROVED BY	ALD

**FIG.
A-1**



PHOTO 1:

Original gypsum pond,
being pumped down
prior to lining.



PHOTO 2:

Cushion geotextile is
laid across graded
surface of pond and in
drying area to the
north.



PHOTO 3:

Black LLDPE
membrane liner is
placed over cushion
geotextile.



PHOTO 4:

Liner extends past the
edges of the pond,
under dewatering area
to the north.



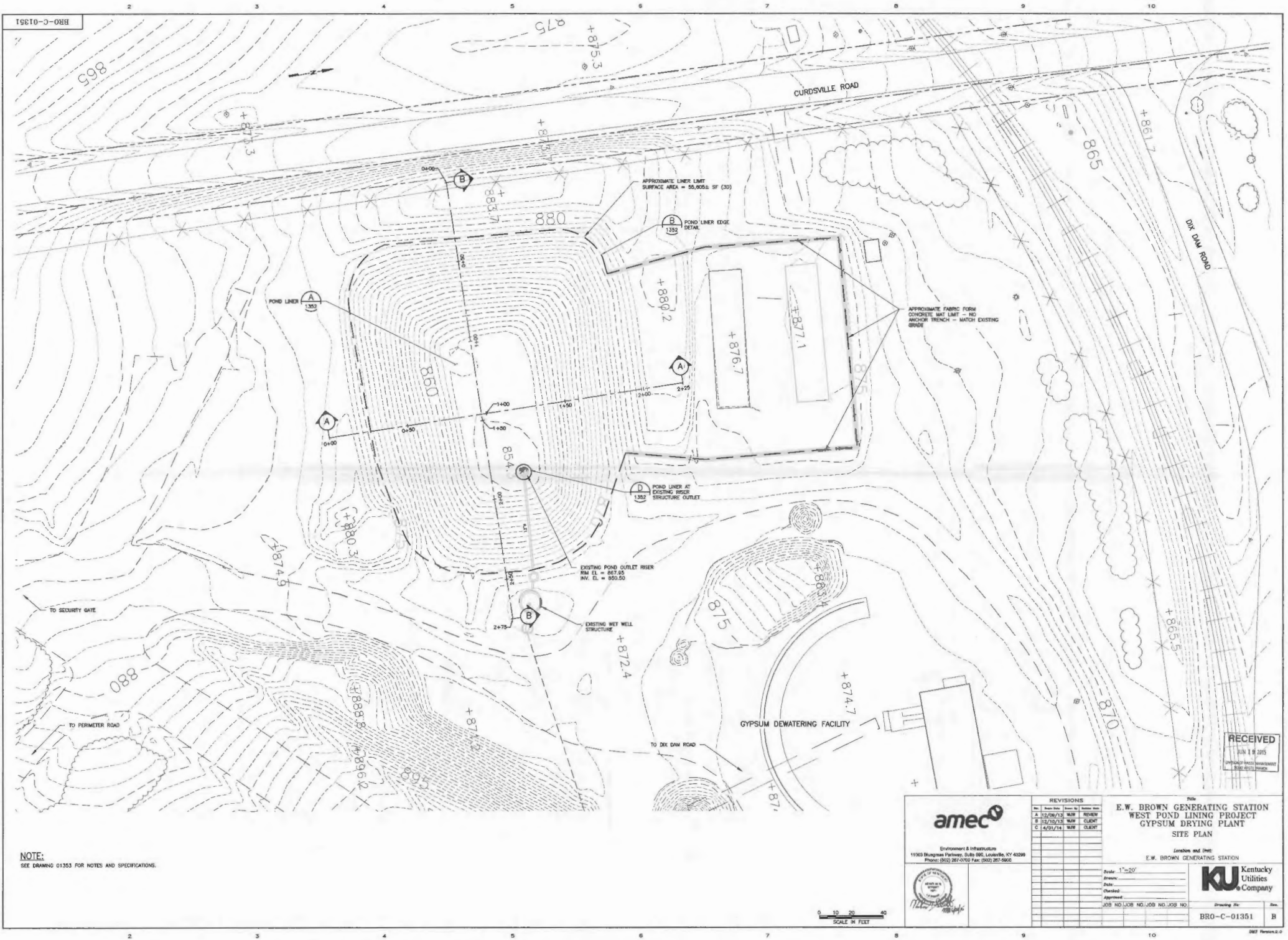
PHOTO 5:

Another layer of cushion geotextile is placed above liner.



PHOTO 6:

Fabric form concrete mats are used to protect exposed liner under pond and in gypsum drying area.



NOTE:
SEE DRAWING 01353 FOR NOTES AND SPECIFICATIONS.

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3150 25th Street



Environment & Infrastructure
11003 Bluegrass Parkway, Suite 500, Louisville, KY 40299
Phone: (502) 261-0100 Fax: (502) 261-0800



Rev.	Date	By	Check	Description
A	12/08/13	WJW	REVIEW	
B	12/12/13	WJW	CHECK	
C	4/23/14	WJW	CHECK	

Title
**E.W. BROWN GENERATING STATION
WEST POND LINING PROJECT
GYPSUM DRYING PLANT
SITE PLAN**

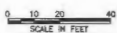
Location and Unit:
E.W. BROWN GENERATING STATION

Scale: 1"=20'
Drawn:
Date:
Checked:
Approved:

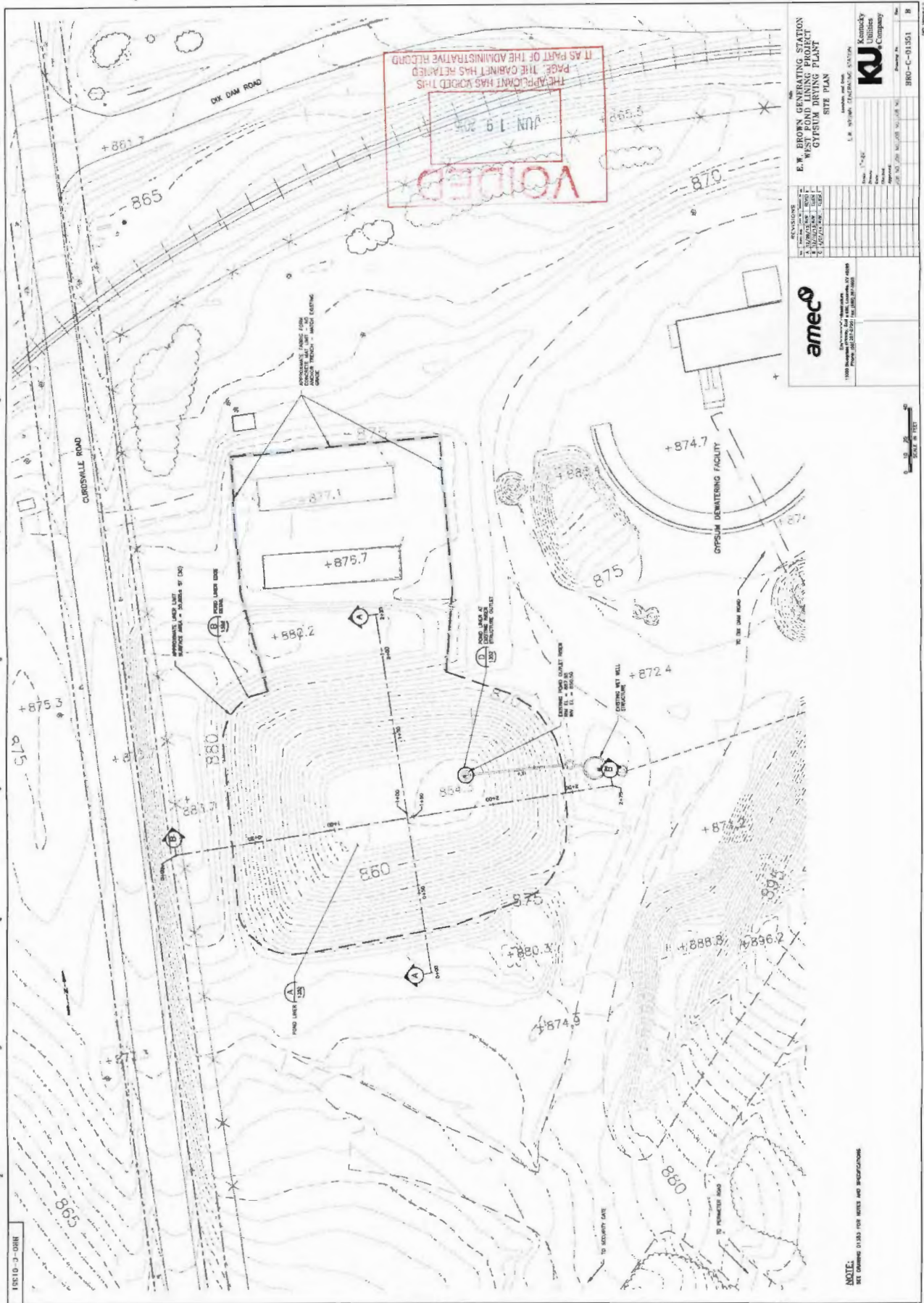


Job No./Job No./Job No./Job No.
Drawing No.

BRO-C-01351 B



EN10-J-001



THE APPLICANT HAS VOIDED THIS PAGE. THE CABINET HAS RETAINED IT AS PART OF THE ADMINISTRATIVE RECORD.

APR 19 2005

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amco

10000 Highway 100, Suite 100
 Louisville, KY 40223
 Phone: (502) 261-1100 Fax: (502) 261-1101

amco
 Kentucky
 Utilities
 Company

KU

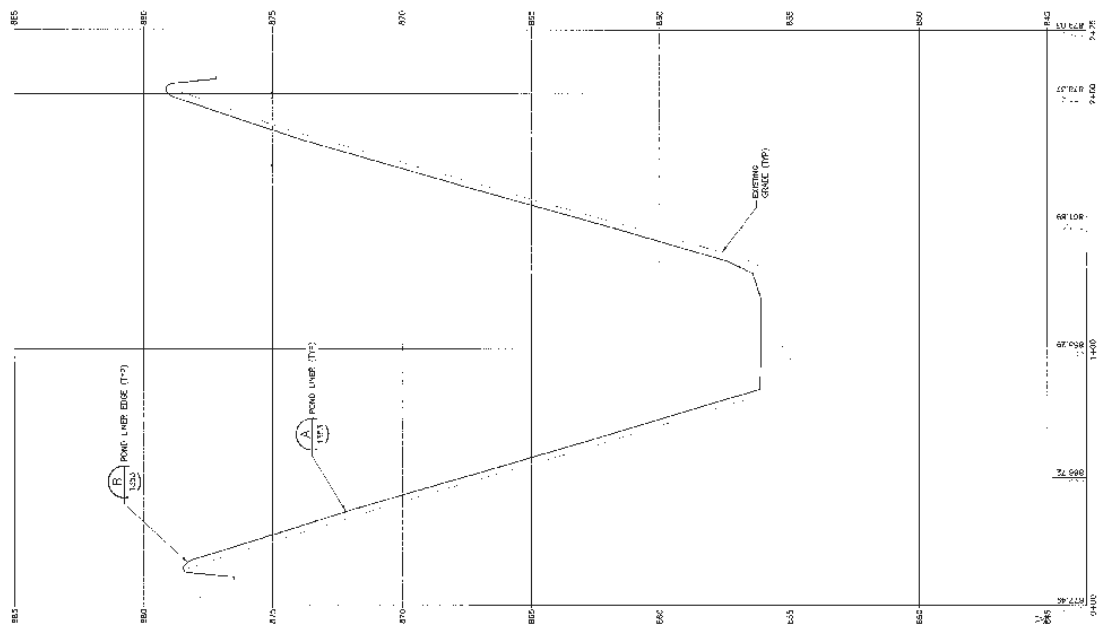
E. K. BRON, GENERATING STATION
 WASTEWATER TREATMENT PROJECT
 CYPRUS DENITRIFICATION PLANT
 SITE PLAN

Scale: 1" = 40'

NO. REV.	DATE	DESCRIPTION
1	10/10/00	ISSUE FOR PERMITTING
2	01/10/01	REVISED TO SHOW CHANGES
3	03/10/01	REVISED TO SHOW CHANGES
4	05/10/01	REVISED TO SHOW CHANGES
5	07/10/01	REVISED TO SHOW CHANGES
6	09/10/01	REVISED TO SHOW CHANGES
7	11/10/01	REVISED TO SHOW CHANGES
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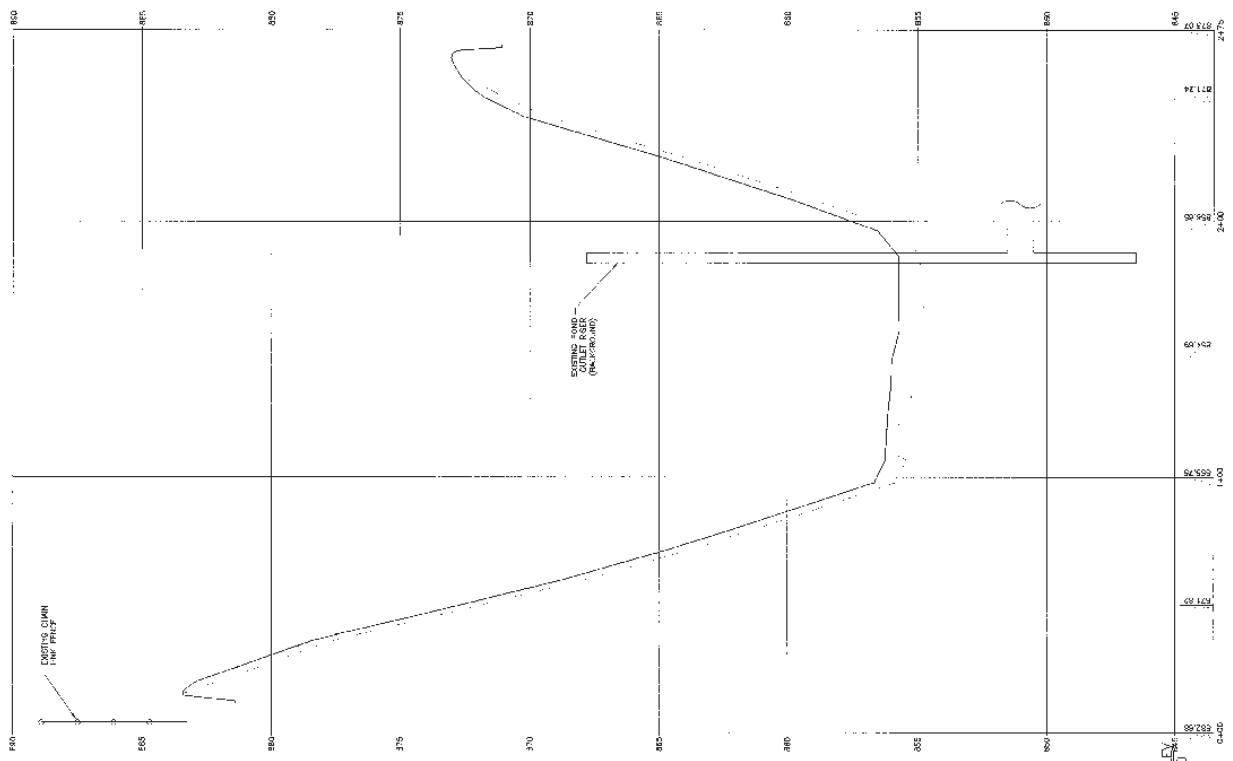
NOTE: SET DRAWING 0.18.1 FOR NOTES AND SPECIFICATIONS.

SCALE: 1" = 40'



SECTION A

NOTE:
SEE DRAWING 01382 FOR NOTES AND SPECIFICATIONS.



SECTION B



Delaware Valley Region
1800 Broomfield Drive, Suite 200
P.O. Box 1000, Fort Mill, SC 29505

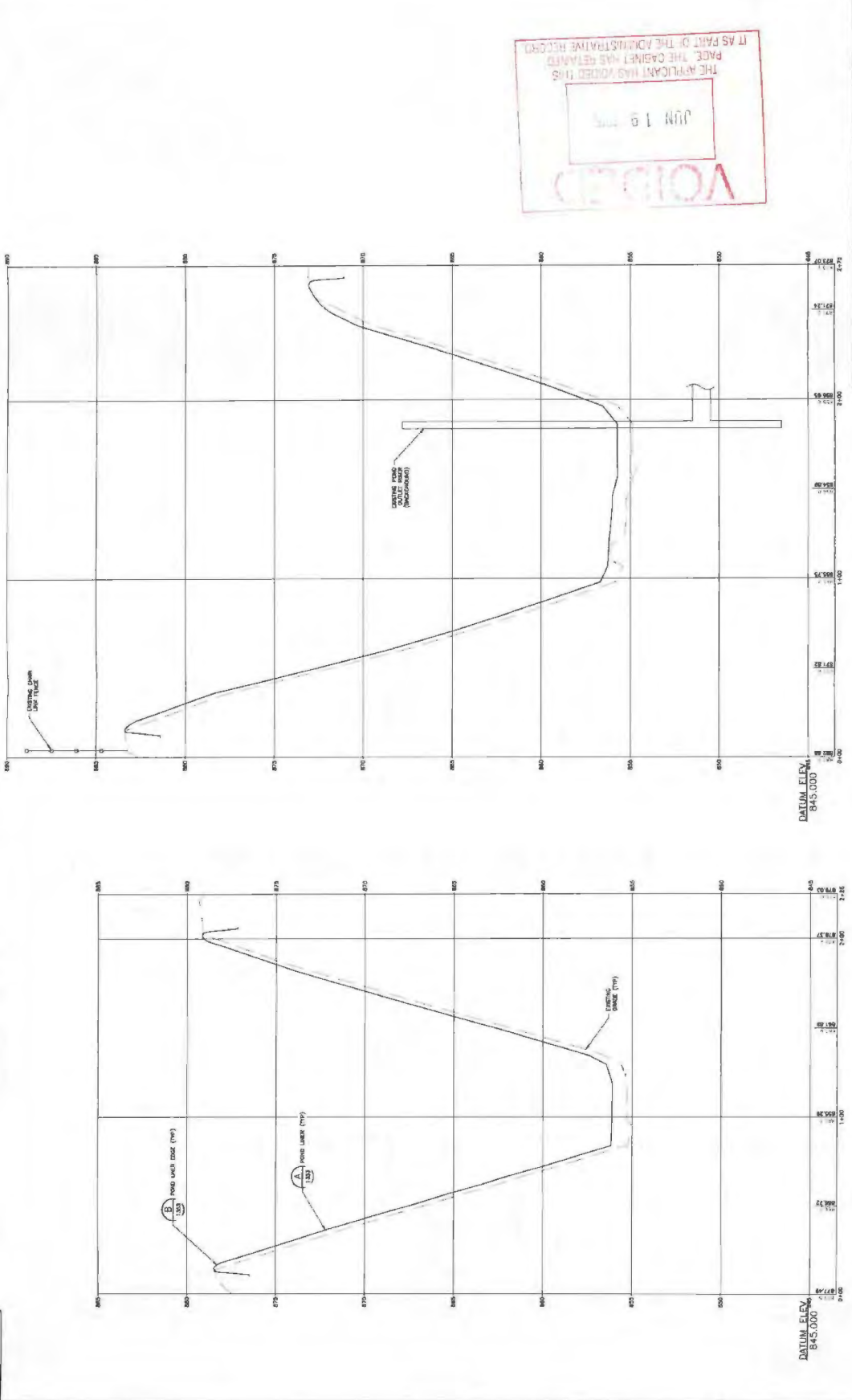


RECEIVED
JUN 18 2015
PROJECT NUMBER: 01382

PROJECT NO.	01382
DATE	06/18/15
PROJECT NAME	E.W. BROWN GENERATING STATION WEST POND LINING PROJECT
CLIENT	CYFUSLM DIVISION
DESIGNER	AMEC
CHECKER	
DATE	
SCALE	
PROJECT NO.	01382
DATE	
PROJECT NAME	E.W. BROWN GENERATING STATION WEST POND LINING PROJECT
CLIENT	CYFUSLM DIVISION
DESIGNER	AMEC
CHECKER	
DATE	
SCALE	



SECTION C-01352



VOIDED
 JUN 19 1975
 THE APPLICANT HAS VOIDED THIS PAGE OF THE ADMINISTRATIVE RECORD IT AS PART OF THE ADMINISTRATIVE RECORD

NOTE:
SEE DRAWING 01353 FOR NOTES AND SPECIFICATIONS.

amec
 Environmental Professionals
 10000 ...
 Phone 402.222.7272 Fax 402.222.7200

SECTION B

SECTION A

REVISIONS:

NO.	DATE	DESCRIPTION
1	10/15/74	ISSUED FOR PERMIT
2	11/15/74	ISSUED FOR PERMIT
3	12/15/74	ISSUED FOR PERMIT
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E. W. DEWITT ENGINEERING, INC.
 WEST RIVER DRIVING PROJECT
 GYPSUM DRIVING PLANT
 SECTIONS

E. W. DEWITT ENGINEERING, INC.
 Kentucky
 Utilities
 Company

Project No. BR0-C-01352 B

NOTES AND SPECIFICATIONS:

1. BASE MAT IS BASED ON AERIAL PHOTOGRAPHIC SURVEY PERFORMED BY GWR AERIAL SURVEYS OF LEXINGTON, KY, ON OCTOBER 15, 2011.
2. THE CONTRACTOR SHALL VERIFY EXISTING CONDITIONS AND DIMENSIONS PRIOR TO START OF CONSTRUCTION AND PRIOR TO PURCHASING, ORDERING AND/OR FABRICATING MATERIALS FOR THE NEW WORK.
3. THROUGHOUT THE WORK ACTIVITIES, THE CONTRACTOR SHALL CONDUCT THE WORK THAT IS NECESSARY TO MAINTAIN THE EXISTING STRUCTURE AND SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY TRAFFIC CONTROLS, INCLUDING SIGNAGE, FLAGMEN, AND CONSTRUCTION BARRIERS TO MAINTAIN THE EXISTING STRUCTURE.
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REVISIONS:

NO.	DATE	DESCRIPTION
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3	11/18/15	ISSUED FOR PERMIT

E.W. BROWN GENERATING STATION WEST POND LINING PROJECT GYPSUM DRYING PLANT NOTES AND DETAILS

Author and Date: E.W. BROWN GENERATING STATION
 Project Name: WEST POND LINING PROJECT
 Notes and Details: GYPSUM DRYING PLANT
 Date: JUL 18 2015
 Project No: 1501000000

REVISIONS:

NO.	DATE	DESCRIPTION
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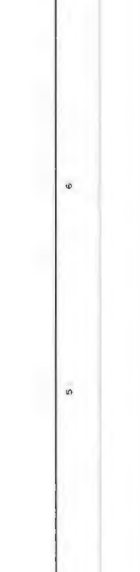
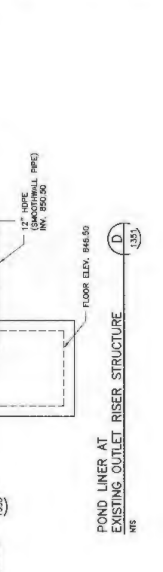
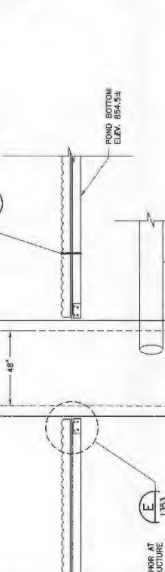
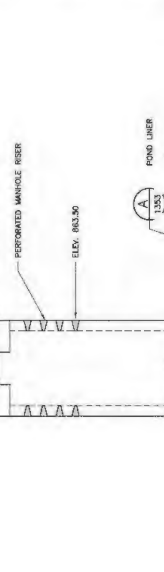
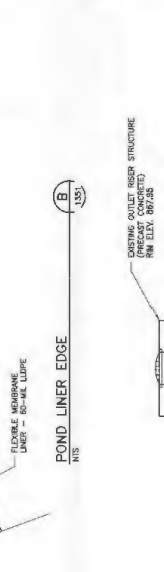
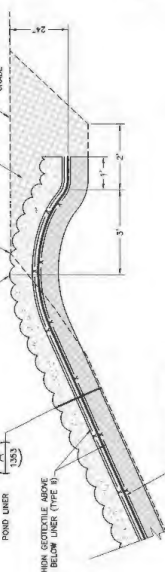
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Author and Date: E.W. BROWN GENERATING STATION
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APPENDIX B
NORTH ABUTMENT DRAIN
PUMP STATION INSTALLATION



PHOTO 1:

Sampling Point CH-048, discharge from north abutment drain prior to collection.



PHOTO 2:

New pumping station installed to capture the north abutment drain discharge and transfer it to the Auxiliary Pond. The former discharge point (CH-048) is downslope to the left (southeast)



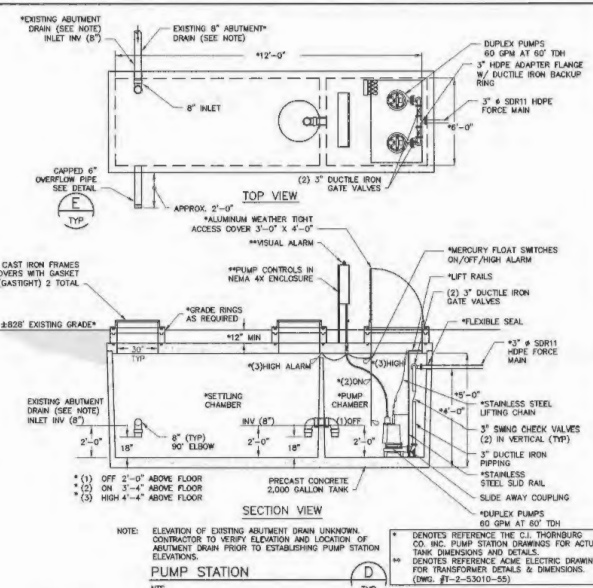
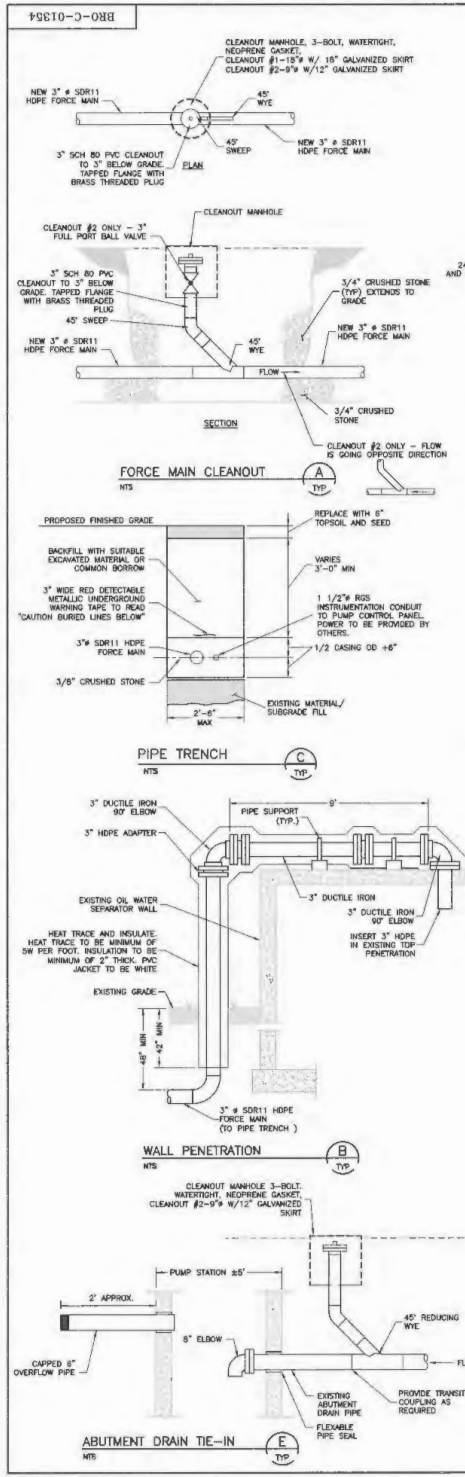
PHOTO 3:

New pumping station,
view from the south,
Main Pond
embankment (dam) to
the left (west).



PHOTO 4:

Interior of the pump
station.



GENERAL NOTES

- Aerial topographic mapping was performed by GRW Aerial Surveys of Lexington, KY, on October 15, 2011.
- The CONTRACTOR shall verify existing conditions and dimensions prior to start of construction activities and prior to purchasing, obtaining and/or fabricating materials for the new installation.
- Throughout the work activities, the CONTRACTOR shall maintain traffic on facility and public roads to the maximum extent possible by providing of necessary traffic control, including signage, warning barriers, and flaggers.
- The CONTRACTOR is responsible proper layout for the work. Provide survey control and identify existing lines, levels, contours, and station.
- The CONTRACTOR will verify the location of all existing utilities or structures within the limits of work prior to conducting construction activities.
- OWNER to provide power for the lift station. The CONTRACTOR shall coordinate power requirements with the OWNER and shall provide electrical service to the control panel.

PUMP PERFORMANCE REQUIREMENTS

- Pumping Station: Capable of pumping effluent at flow rate of 60 gpm at a total dynamic head of 80 feet.
- Operation: Locate four floats consisting of "pump off", "pump on", "high level pump chamber", and "high level settling chamber" in basin. Alternate pump starts automatically when "pump off" float is activated. Stop other pump automatically when "pump off" float is activated. Signal alarm condition automatically when "high level pump chamber" or "high level settling chamber" float is activated. Set float elevations in accordance with drawings.

SUBMITTALS

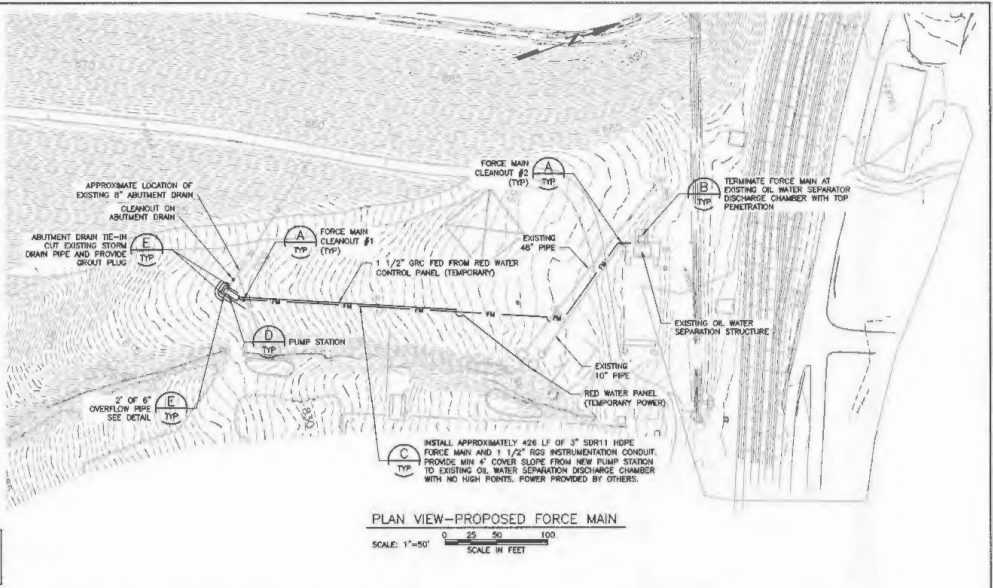
- Shop Drawings: Indicate layout of pumping station. Show size, materials, and components of systems. Indicate lifting cables, check valve locations, gate valve locations, pump locations, cleanout locations, discharge pipe locations, junction box location, guide rail assembly location, level control locations.
- Product Data: Submit for the packaged pumping station.
- Include catalog data for slide rail, performance curve, and access frame data.
- Include control panel diagram and panel wiring schematic.
- Manufacturer's installation instructions: Submit manufacturer's published installation instructions.
- Field Reports: Submit start-up report before final acceptance of pumps to document pumping station operation status performance requirements.
- Record old locations of packaged pumping stations including pumps, floats, valves, meter and control panel.
- Submit executed certification of pumping stations after final acceptance.
- Provide Operation and Maintenance Manual containing operating and maintenance requirements for pumping station and schedule of recommended maintenance.

WARRANTY

- Furnish five year printed manufacturer's warranty on pump units.

SYSTEM

- Product Description: 1. Submersible duplex centrifugal lift/station water pumping system including rail assemblies, lift cable or chain, discharge and fittings, check valves, level controls, and control panel with PLC and alarms.
- Inlet Size: 4 inches.
- Discharge Size: 3 inch NPT.
- Rail System: Slide rail assemblies consisting of 304 stainless steel upper and lower rail brackets and pump guide brackets.
- Junction Box: NEMA 250 type G with cable grips for incoming direct burial cable.
- Electric Cable: 3" for direct burial cable for field installation.
- Float Plats: (G used): ASTM D1745, Schedule 40 PVC, 1/2 inch.
- Level Controls: Four mechanical float or mercury type pilot duty liquid level controls with AWG 18-22 S.W.G. cable in polypropylene housing for mounting to PVC support post.



MECHANICAL SEALS

- Each pump shall be provided with a tandem mechanical seal used in conjunction of two latest independent seal assemblies. The seals shall operate in a tandem manner that system constantly lubricates the lapped seal faces at a constant rate. The lower, primary seal shall be able to contain/containment the pump media. The seal shall be carbon/carbon. The seals shall require neither maintenance nor adjustment nor depend on direction of rotation for sealing.

WATER TIGHTNESS

- The cable entry seal assembly shall include a single cylindrical elastomer grommet, flanked by washers, all having a close tolerance fit against the cable outside diameter and the cable entry cover and compressed by the cable containing a strain relief function, separate from the function of sealing the cable. The assembly shall provide ease of changing the cable when necessary using the same entry seal. A junction box shall be completely sealed off from the pump media. Gaskets, seals, or other secondary sealing systems shall not be acceptable.

LIFTING DEVICE: Stainless Steel Chain, 1/2 inch, minimum breaking strength of 2000 pounds supplied for removing the pumps. Length shall be 3 feet greater than the overall well depth.

VALVES

- Swing Check Valve:
- Anti-Siphon Check Valves, 3 inches.
- Housing: Cast iron or PVC with flanged ends.
- Seat: Resilient seat with vulcanized Nitrile rubber gaskets.
- Temperature: 175 degrees F peak.
- Pressure Test: 150 psig.
- Gate Valve:
- Three inch; iron body bronze mounted; outer mounting bolts and nuts shall be stainless steel; rubber or EPDM encapsulated, resilient, self-sealing ends.
- Gate valves shall be designed for 150 psi minimum working pressure.
- Gate valves shall be hand wheel operated, non-raising stem type with flanged ends.
- When full open, gate valves shall have a clear pathway equal to the inside diameter of the pipe. The operating nut or wheel shall have an arrow cast in the metal indicating the direction of opening.

SUPPORTS: Use supports for piping, valves, and meter consisting of Schedule 40 galvanized steel piping conforming to ASTM A53. Provide either ASME B16.3 or ASME B16.11 galvanized threaded fittings.

MAIN CONTROL PANEL

- Product Description: 1. Factory fabricated, self-contained duplex including low volume pump effluent pump on high level, high level alarm (red light), attenuator to attenuate pump duty light between pumps on successive cycles or switch operation of pumps on pump failure. Include high water audible and visual alarm light and red light to warn of high water condition or failure of pumps. Flashing light and audible alarm to be large and robust to be seen and heard from a vehicle. Include an hour meter on each pump.
- Manufacturer Rating: As required for selected pump.
- Phase: 3.
- Voltage: 480 volts.
- Coordinate power requirements with OWNER.
- Enclosure: NEMA 4x rate light, outdoor mounting, G90 galvanized steel, gray polyester powder finish, padlock hang/strap with captive stainless screws for door closure and locking. Provide continuous stainless piano hinge with stainless removable pin. Aluminum panel drilled and tapped, machine screw mounted components.
- Circuit Breaker: For short circuit protection.
- Overload Protection: Class 10 quick trip, one heater for each motor phase.
- Switch: Hand-Off-Automatic, 1/2 inch NEMA 1.
- Motor: 1/2 HP motor run, 1/2 inch NEMA 1.
- Sub Plate: Switch and light mounting.
- Fuse: Control transformer primary use. Meet requirements of NEC.
- Terminal Strip: Box lugs for wiring.
- Wiring: Color coded to IEC requirements; black power wiring, red neutral control wiring, white numerical control wiring, green ground wiring.
- Material: Aluminum.
- Pump run odometers.
- Slide Hook (2 analog, 4 digital)
- Lockable HORN switches.

PIPE

- Provide pressure piping and related accessories for force main piping inside the well and for the force main to the OWS.
- Ductile iron pipe discharge piping, AWWA C151/A21.51, thickness Class 52.
- 3 inch SDR11 High Density Polyethylene force main piping.
- 3 inch Schedule 40 PVC potential future containment conduit, with spring inside the well and for the force main to the OWS.

MAIN CONTROL PANEL INSTALLATION

- Mount and wire control panel for pumping station operation. The panel shall be mounted to the structure. Mount control panel enclosure on 1-5/8 inch Unistrut galvanized steel frame. Frame support post/brackets size plate to be mounted to top of well slab with steel angle anchor bolts or if installed next to the well wall to be set in concrete filled tube-base set a minimum of 4 feet below finished grade.
- Control panel enclosure to be installed mounted to the top of the pump station or next to structure at the pump end of the structure as shown on the drawings. Mount control panel enclosure on 1-5/8 inch Unistrut galvanized steel frame. Frame support post/brackets size plate to be mounted to top of well slab with steel angle anchor bolts or if installed next to the well wall to be set in concrete filled tube-base set a minimum of 4 feet below finished grade.
- Reinforcing steel extend into the tongue and groove of the structure section or make use of alternative section with.
- Coating methods must ensure each unit to be very dense in structure and impervious to water. Paint the exterior of precast structures with two heavy coats of ultraviolet paint.

REVISONS

REV.	DATE	DESCRIPTION
A	03/29/14	JW
B	04/08/14	SR
C	04/24/14	RJR
D	05/20/14	SR

E.W. BROWN GENERATING STATION
CCR LANDFILL
PUMP STATION AND FORCE MAIN
PLAN VIEW, DETAILS, AND SPECIFICATIONS

Scale: 1" = 50'

Project No. 1009

Drawn by: [Signature]

Checked by: [Signature]

Approved by: [Signature]

Job No. 1009

Sheet: B

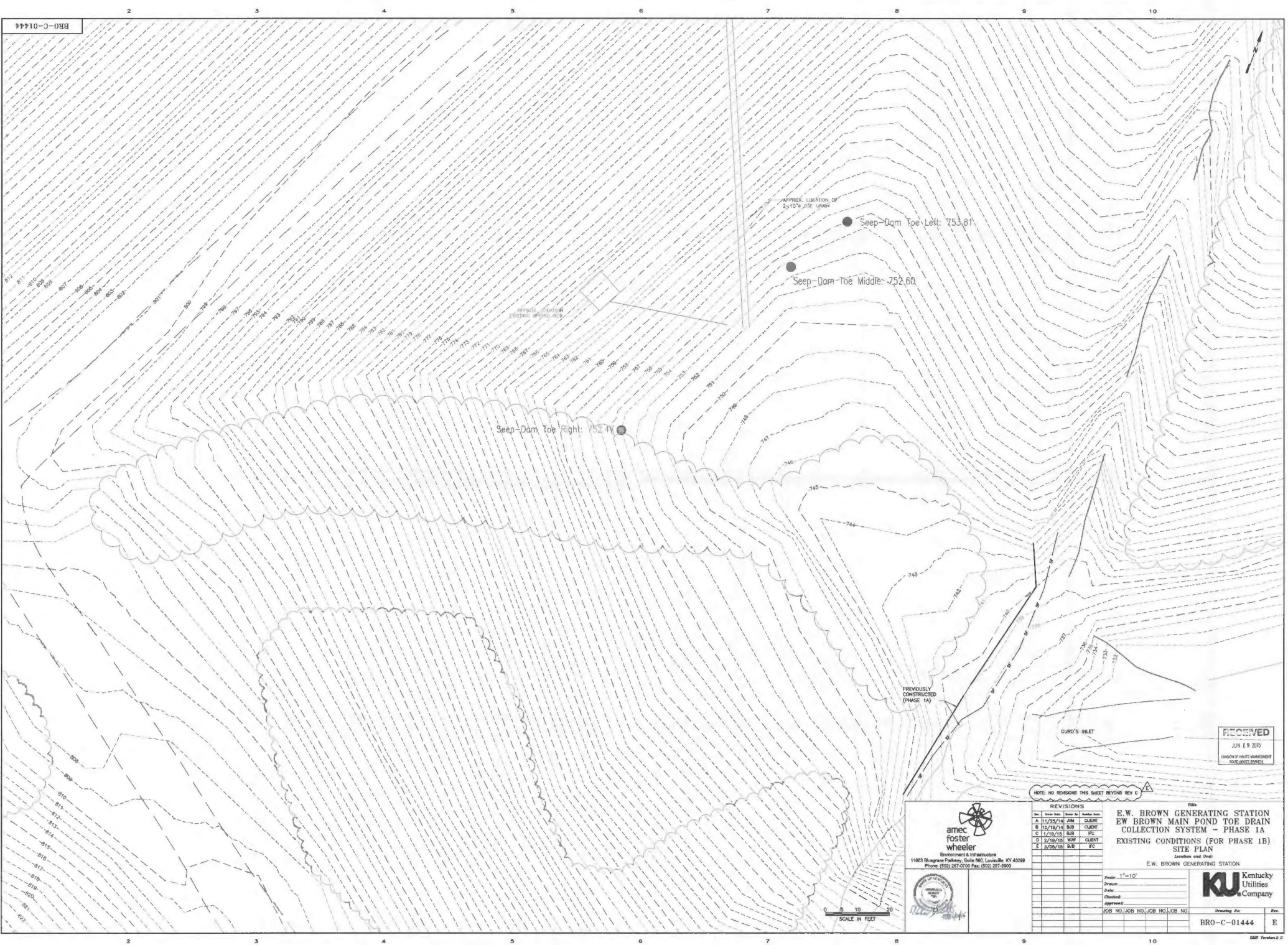
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JUN 19 2015

DESIGN OF PROJECTS

WATER MAINS DIVISION

APPENDIX C
MAIN POND TOE DRAIN
COLLECTION SYSTEM DESIGN



BR0-C-01444

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JUN 19 2015
DIVISION OF WATER MANAGEMENT
SOUTH BEND INDIANA

NOTE: NO REVISIONS THIS SHEET BEYOND REV C

REVISIONS

No.	Date	By	Check	Reason
A	11/29/14	JAU	CLIENT	
B	12/19/14	BJB	CLIENT	
C	1/19/15	BJB	J.C.	
D	2/18/15	WVW	CLIENT	
E	3/26/15	WVW	J.C.	

15616
E.W. BROWN GENERATING STATION
EW BROWN MAIN POND TOE DRAIN
COLLECTION SYSTEM - PHASE 1A
EXISTING CONDITIONS (FOR PHASE 1B)
SITE PLAN

Scale and Date: E.W. BROWN GENERATING STATION

**amec
foster
wheeler**
Environmental & Infrastructure
11003 Blagrove Parkway, Suite 600, Louisville, KY 40299
Phone: (502) 267-0700 Fax: (502) 267-9900



Scale: 1"=10'
Drawn: _____
Date: _____
Checked: _____
Approved: _____



JOB NO./JOB NO./JOB NO./JOB NO. Drawing No. Rev.
BR0-C-01444 E

SCALE IN FEET
0 5 10 20



11110-3-000E

FOR THE
E.W. BROWN GENERATING STATION
E.W. BROWN MAIN POND TOE DRAIN
COLLECTION SYSTEM - PHASE 1A
 EXISTING CONDITIONS (FOR PHASE 1B)
 SITE PLAN
 E.W. BROWN GENERATING STATION

NO.	DATE	BY	DESCRIPTION
1	11/10/14	JL	ISSUED FOR PERMIT
2	11/10/14	JL	ISSUED FOR PERMIT
3	11/10/14	JL	ISSUED FOR PERMIT
4	11/10/14	JL	ISSUED FOR PERMIT
5	11/10/14	JL	ISSUED FOR PERMIT
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7	11/10/14	JL	ISSUED FOR PERMIT
8	11/10/14	JL	ISSUED FOR PERMIT
9	11/10/14	JL	ISSUED FOR PERMIT
10	11/10/14	JL	ISSUED FOR PERMIT

KY
 Kentucky
 Utilities
 Company

Project No. BBO-C-01444
 Drawing No. E

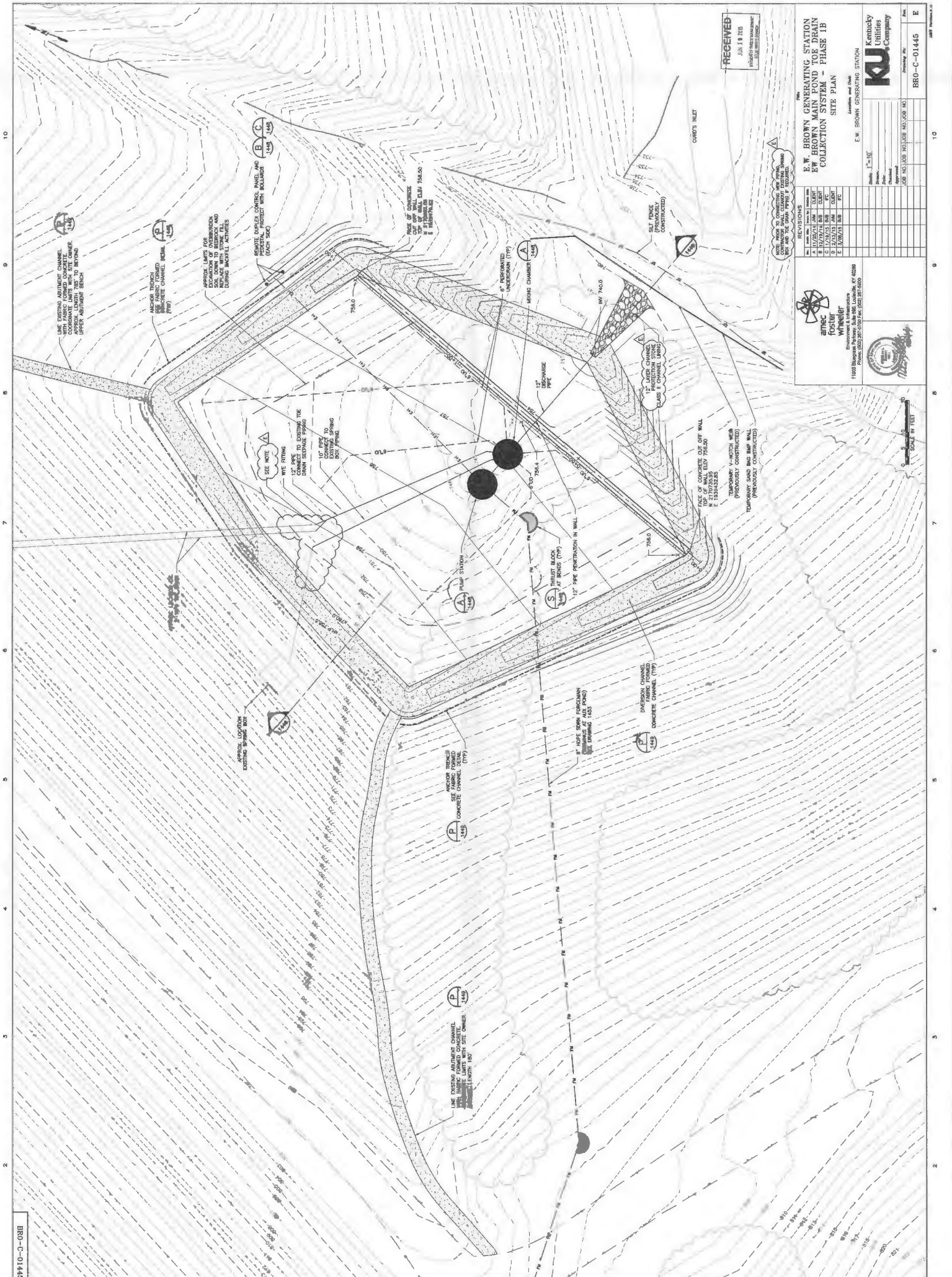
AMEC
FOSTER
 CONSULTANTS & ENGINEERS
 11000 Woodloch Forest Dr., Suite 200
 Louisville, KY 40242-1000
 Phone: 502.261.1000
 Fax: 502.261.1001
 www.amecfoster.com

SCALE: 1" = 100'

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BR0-C-01445

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JAN 11 2010
ELECTRICAL ENGINEERING

DATE: _____
SCALE: 1"=10'

NO.	DATE	BY	REVISIONS
A	11/22/10	JAN	CLEAR
B	11/22/10	JAN	REVISED
C	11/22/10	JAN	REVISED
D	12/17/10	JAN	REVISED
E	12/23/10	JAN	REVISED
F	12/23/10	JAN	REVISED
G	12/23/10	JAN	REVISED
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U	12/23/10	JAN	REVISED
V	12/23/10	JAN	REVISED
W	12/23/10	JAN	REVISED
X	12/23/10	JAN	REVISED
Y	12/23/10	JAN	REVISED
Z	12/23/10	JAN	REVISED

PROJECT NO. BR0-C-01445
JOB NO. 10108
JOB NO. 10108
JOB NO. 10108

**E.W. BROWN GENERATING STATION
E.W. BROWN MAIN POND TOE DRAIN
COLLECTION SYSTEM - PHASE 1B
SITE PLAN**

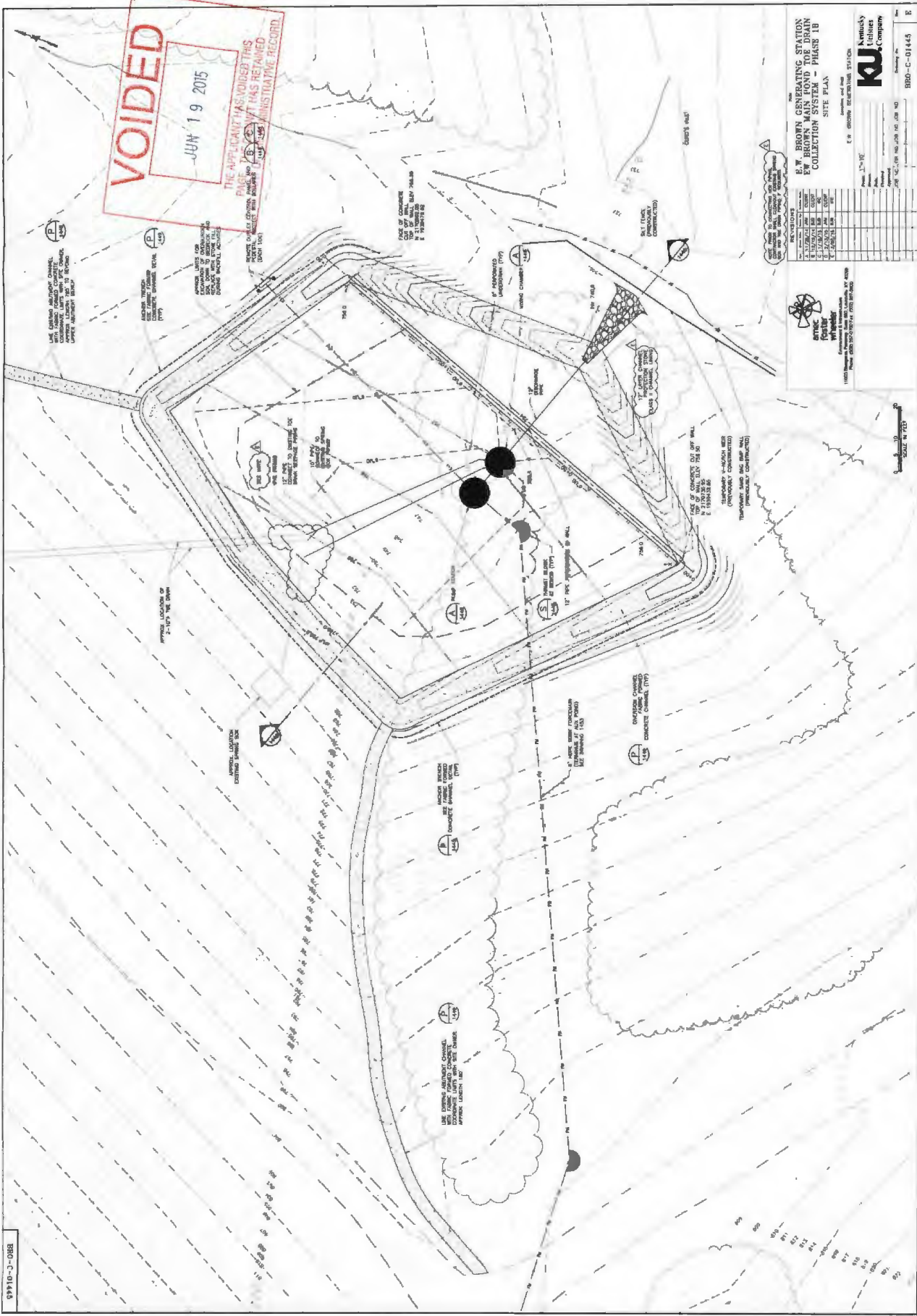
amtec foster wheeler
Environmental Engineering
11000 Bluegrass Parkway, Suite 400, Louisville, KY 40226
Phone: (502) 961-0101 Fax: (502) 961-0200

KU Kentucky Utilities Company
Project No. BR0-C-01445



89710-C-01445

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JUN 19 2015
THE APPLICANT HAS VOIDED THIS PLAN. THE PLAN HAS BEEN RETURNED TO THE ADMINISTRATIVE RECORD.



**E.W. BROWN GENERATING STATION
E.W. BROWN MAIN POND AND DRAIN
COLLECTION SYSTEM - PHASE 1B
SITE PLAN**

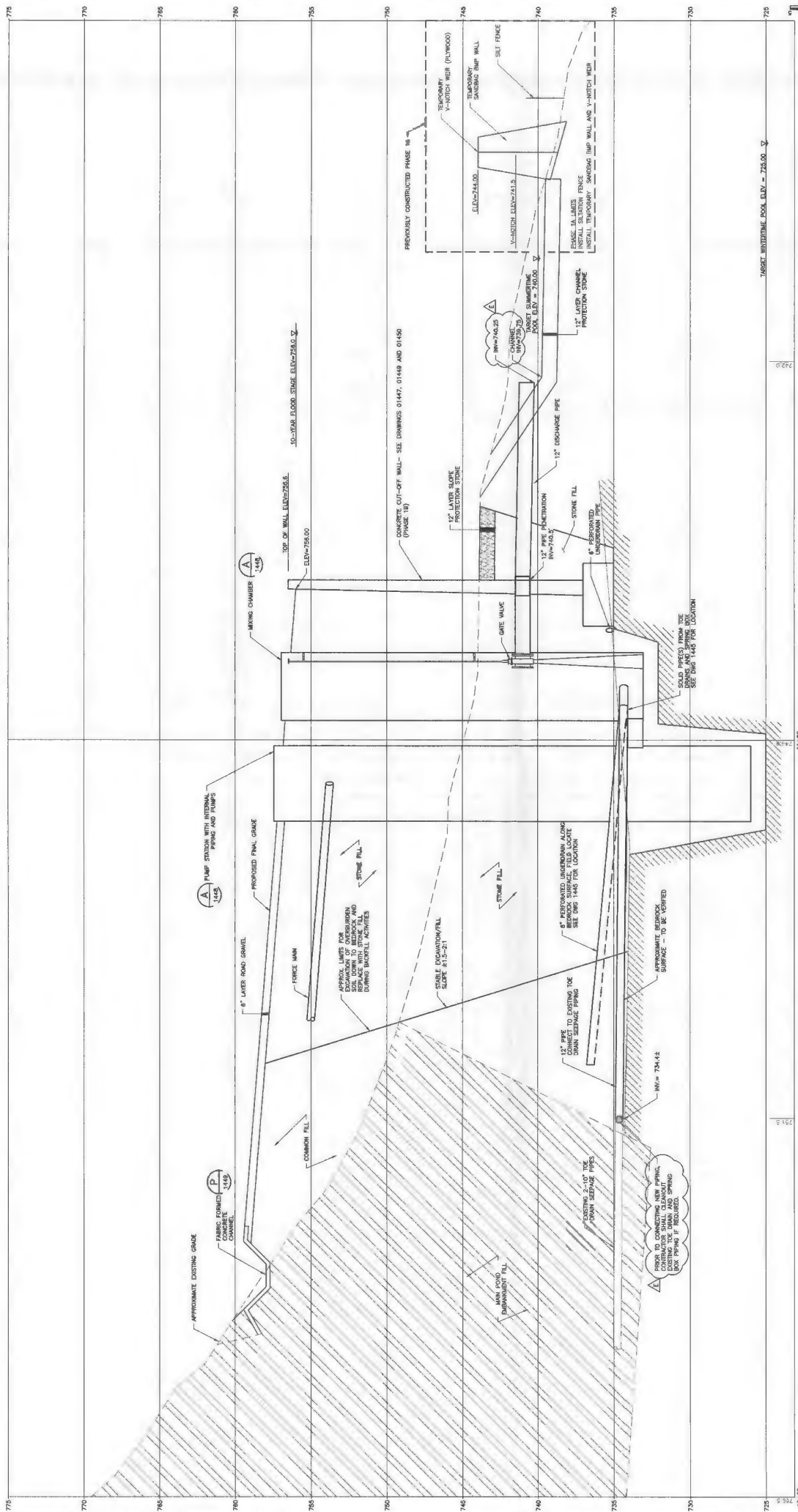
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Checked by:
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Drawing No.:
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Revision:
Date:
By:
Checked:
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Checked:
Date:

Author:
Project Manager:
Engineer:
Surveyor:
Inspector:
Contractor:
Subcontractor:
Material Supplier:
Equipment Supplier:
Laborer:
Other:

Approved by:
Date:
Signature:
Title:
Company:
Address:
City:
State:
Zip:
Phone:
Fax:
E-mail:
Web:
Project:
Drawing:
Sheet:
Revision:
Date:
By:
Checked:
Date:



11



RECEIVED
 JUN 18 2015
 PROJECT CONTRACT NUMBER: 09PT10-3-08E
 SHEET NUMBER: 10

SCALE IN FEET
 0 2.5 5 10

TOE DRAIN COLLECTION SYSTEM - PROFILE A
 100' HORIZ. TO 25' VERT.

REVISED

NO.	DATE	BY	CHKD.	DESCRIPTION
A	11/25/14	JMB	JKC	REVISED TO REFLECT CHANGES TO THE FORCE MAIN
B	12/15/14	JMB	JKC	REVISED TO REFLECT CHANGES TO THE FORCE MAIN
C	1/14/15	JMB	JKC	REVISED TO REFLECT CHANGES TO THE FORCE MAIN
D	2/13/15	JMB	JKC	REVISED TO REFLECT CHANGES TO THE FORCE MAIN
E	2/26/15	JMB	JKC	REVISED TO REFLECT CHANGES TO THE FORCE MAIN

E.W. BROWN GENERATING STATION
 E.W. BROWN MAIN POND TOE DRAIN
 COLLECTION SYSTEM - PHASE 1B
 PROFILE A

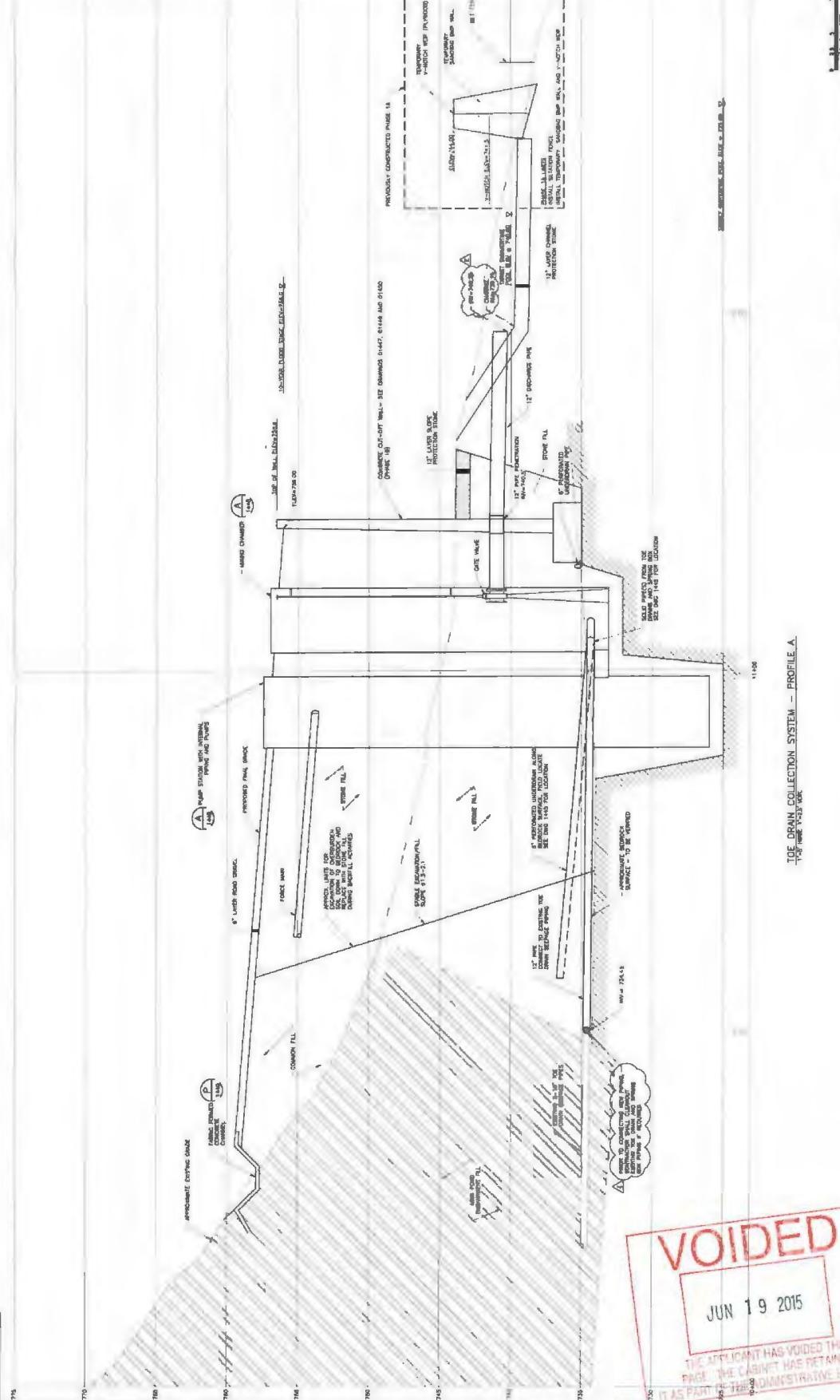
Contract No. 09PT10-3-08E
 E.W. BROWN GENERATING STATION
 Project: L-5H, L-257
 Drawn: JMB
 Checked: JKC
 Date: 06/18/15
 Job No. 09PT10-3-08E, N/A/JOB NO.
 BRO-C-01446

attec
 foster
 wheeler
 Engineering
 11000 Bergman Parkway, Suite 500, Louisville, KY 40299
 Phone: (502) 262-2100 Fax: (502) 262-2000

Kentucky
 Utilities
 Company

BP710-3-CBB

10 9 8 7 6 5 4 3 2 1



ATKINS
 Foster
 11000
 11000
 11000

REVISIONS

NO.	DATE	DESCRIPTION
1	11/14/14	ISSUED FOR PERMIT
2	11/14/14	ISSUED FOR PERMIT
3	11/14/14	ISSUED FOR PERMIT
4	11/14/14	ISSUED FOR PERMIT
5	11/14/14	ISSUED FOR PERMIT

E. W. HEARN GREEN ENGINEERING
 500 BROWN MAIN ROAD, TOE DRAIN
 COLLECTION SYSTEM - PHASE II
 PROFILE A

Kennedy
 Utilities
 Company

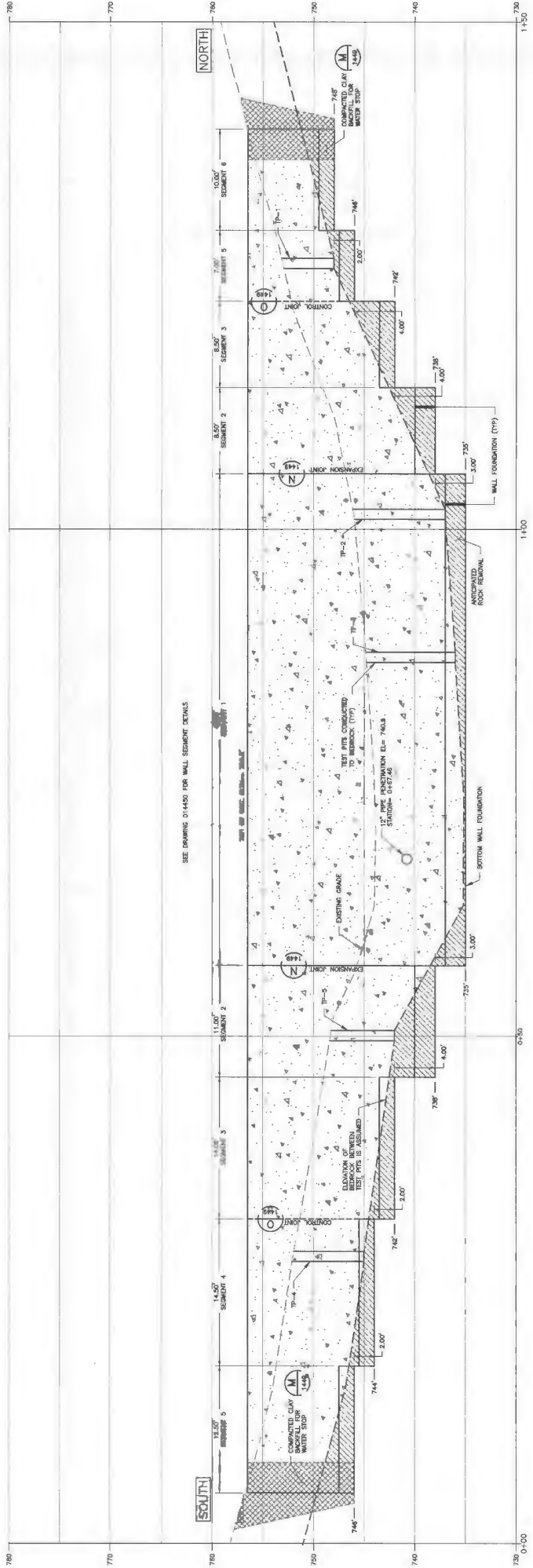
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JUN 19 2015

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TOE DRAIN COLLECTION SYSTEM - PROFILE A



CUT-OFF WALL PROFILE

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NOTE: NO RECORDING THIS SHEET BEYOND BOX C

REVISIONS:

NO.	DATE	DESCRIPTION
A	10/17/14	ISSUE FOR PERMIT
B	11/17/14	ISSUE FOR PERMIT
C	12/15/14	ISSUE FOR PERMIT
D	12/15/14	ISSUE FOR PERMIT
E	12/08/15	ISSUE FOR PERMIT

Scale: 1" = 4'

1900 Burgum Parkway, Suite 400, Louisville, KY 40208
 Phone: (502) 262-5100 Fax: (502) 261-6600

antec foster wheeler
 ENGINEERS ARCHITECTS

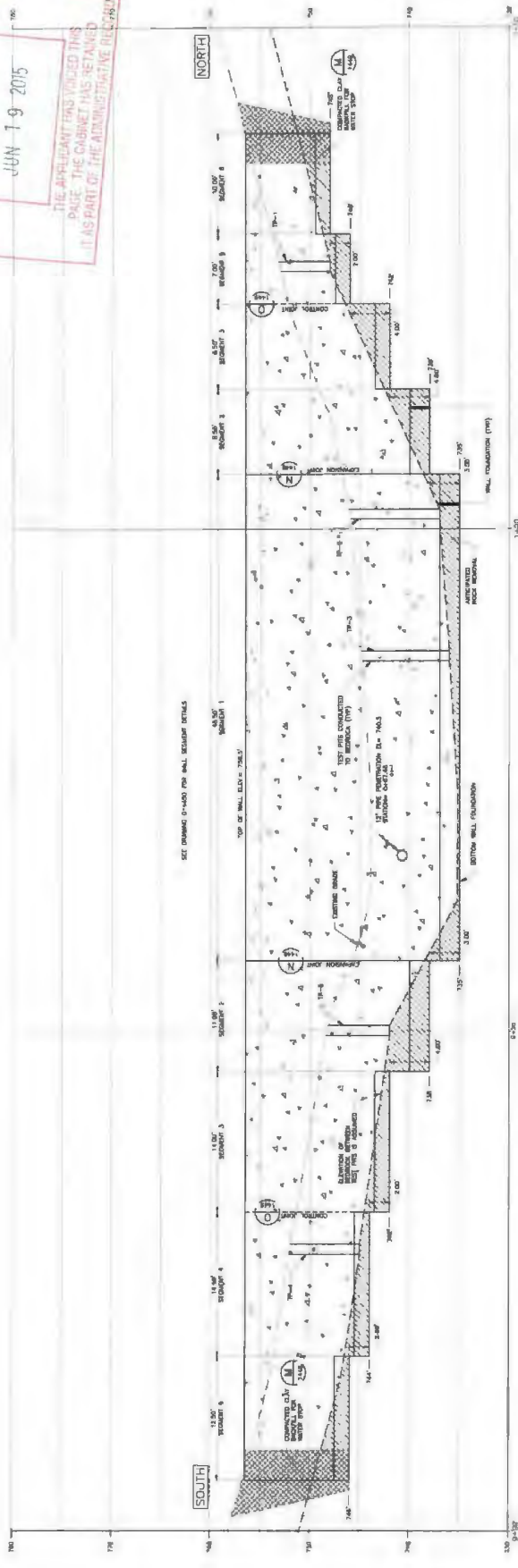
E.W. BROWN GENERATING STATION
 E.W. BROWN MAIN POND TOE DRAIN
 COLLECTION SYSTEM - PHASE 1B
 CUT-OFF WALL PROFILE

E.W. BROWN GENERATING STATION
 Kentucky Utilities Company

Job No. 10-108 NO. 108 NO. 108
 Drawing No. EBR0-C-01447

ZNF13-C-088

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JUN 19 2015
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CUT-OFF WALL PROFILE

NOTE: SEE DRAWING FOR WALL SECTION DETAILS

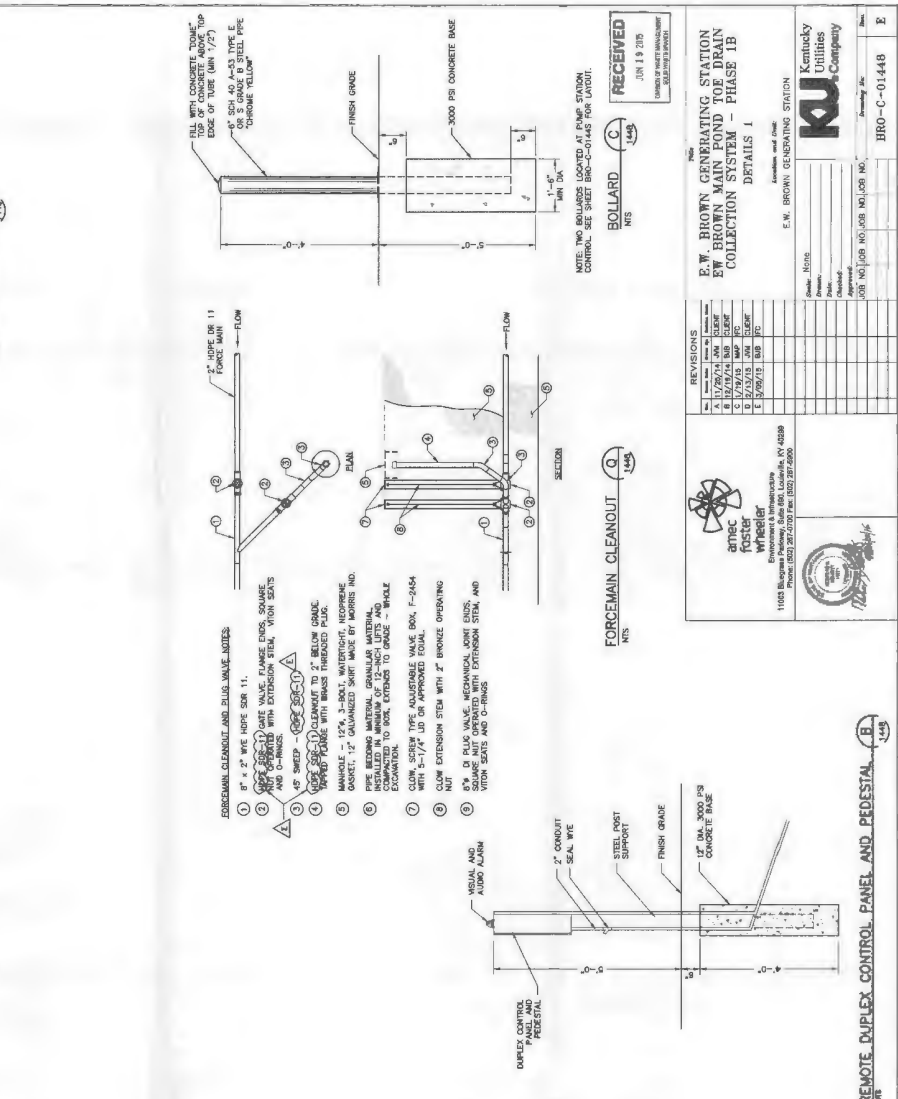
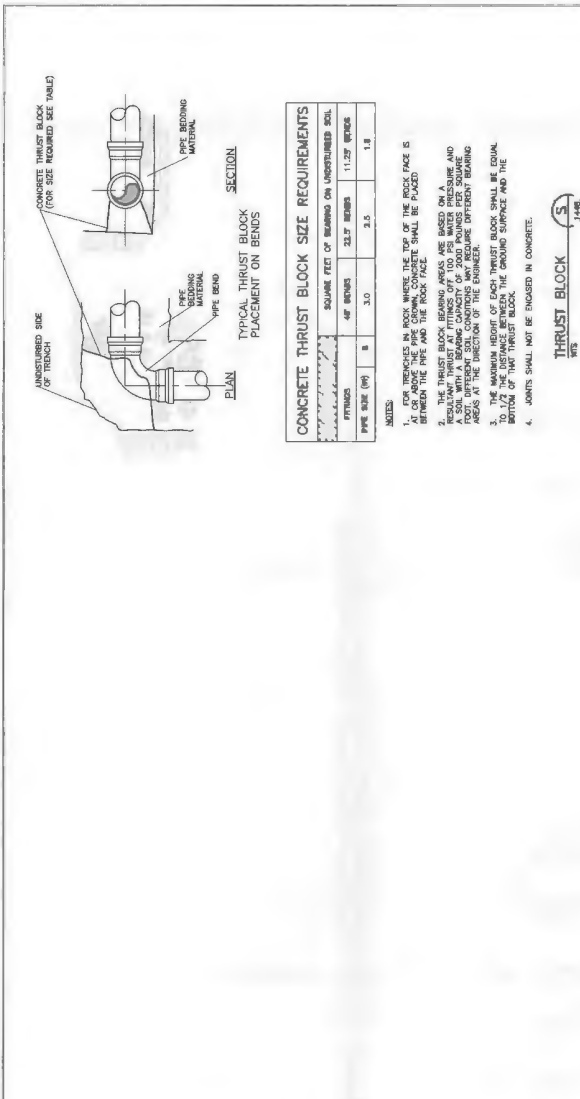
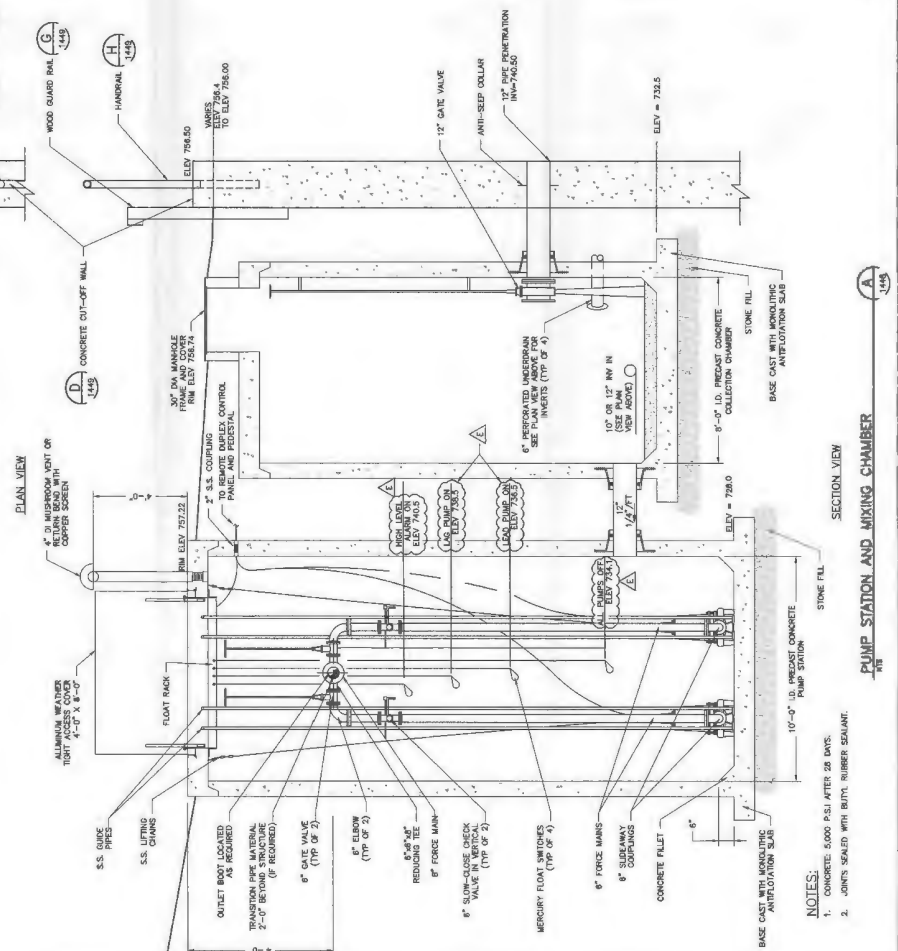
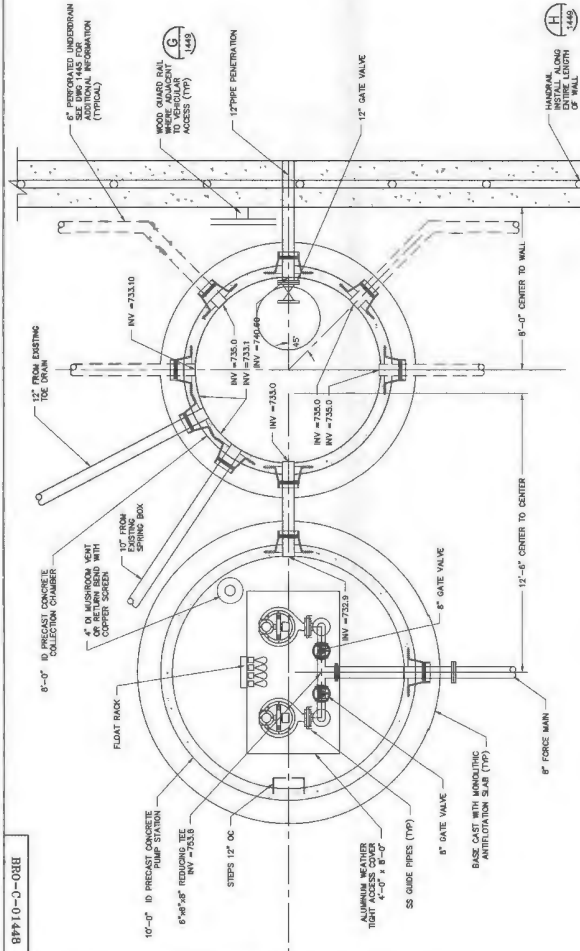


PROJECT: BRUNN OIL REFINERY OFFSHORE PLATFORM MAINTENANCE COLLECTION SYSTEM - PHASE 1B
CUT-OFF WALL PROFILE

DATE: 6/9/2015
DRAWN BY: [Name]
CHECKED BY: [Name]
APPROVED BY: [Name]

PROJECT NO: BRD-C-01447
SHEET NO: 10





- NOTES:
1. CONCRETE 5000 P.S.I. AFTER 28 DAYS.
 2. JOINTS SEALED WITH BUTYL RUBBER SEALANT.

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UNIVERSITY OF KY FACILITIES
ELECTRICAL DIVISION

E.W. BROWN GENERATING STATION
E.W. BROWN MAIN POND TOE DRAIN
COLLECTION SYSTEM - PHASE 1B
DETAILS 1

anec
factor
11003 Bluegrass Parkway, Suite 800, Louisville, KY 40258
Phone: (502) 262-0100 Fax: (502) 262-0000

E.W. BROWN GENERATING STATION
Kentucky Utilities Company
HRO-C-01448

REVISED DATE
A 1/27/14 J.M. CHASE
B 2/17/14 J.M. CHASE
C 3/13/14 J.M. CHASE
D 5/20/15 J.M. CHASE
E 5/20/15 J.M. CHASE

DATE PLOTTED: 10/10/15 10:52 AM
PLOTTER: HP DesignJet 2500

PROJECT: E.W. BROWN GENERATING STATION
E.W. BROWN MAIN POND TOE DRAIN
COLLECTION SYSTEM - PHASE 1B
DETAILS 1

DESIGNED BY: J.M. CHASE
CHECKED BY: J.M. CHASE
DATE: 5/20/15

SCALE: AS SHOWN

PROJECT NO.: HRO-C-01448

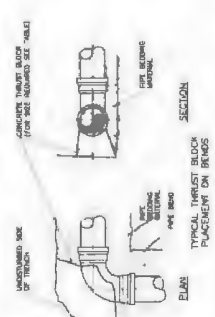
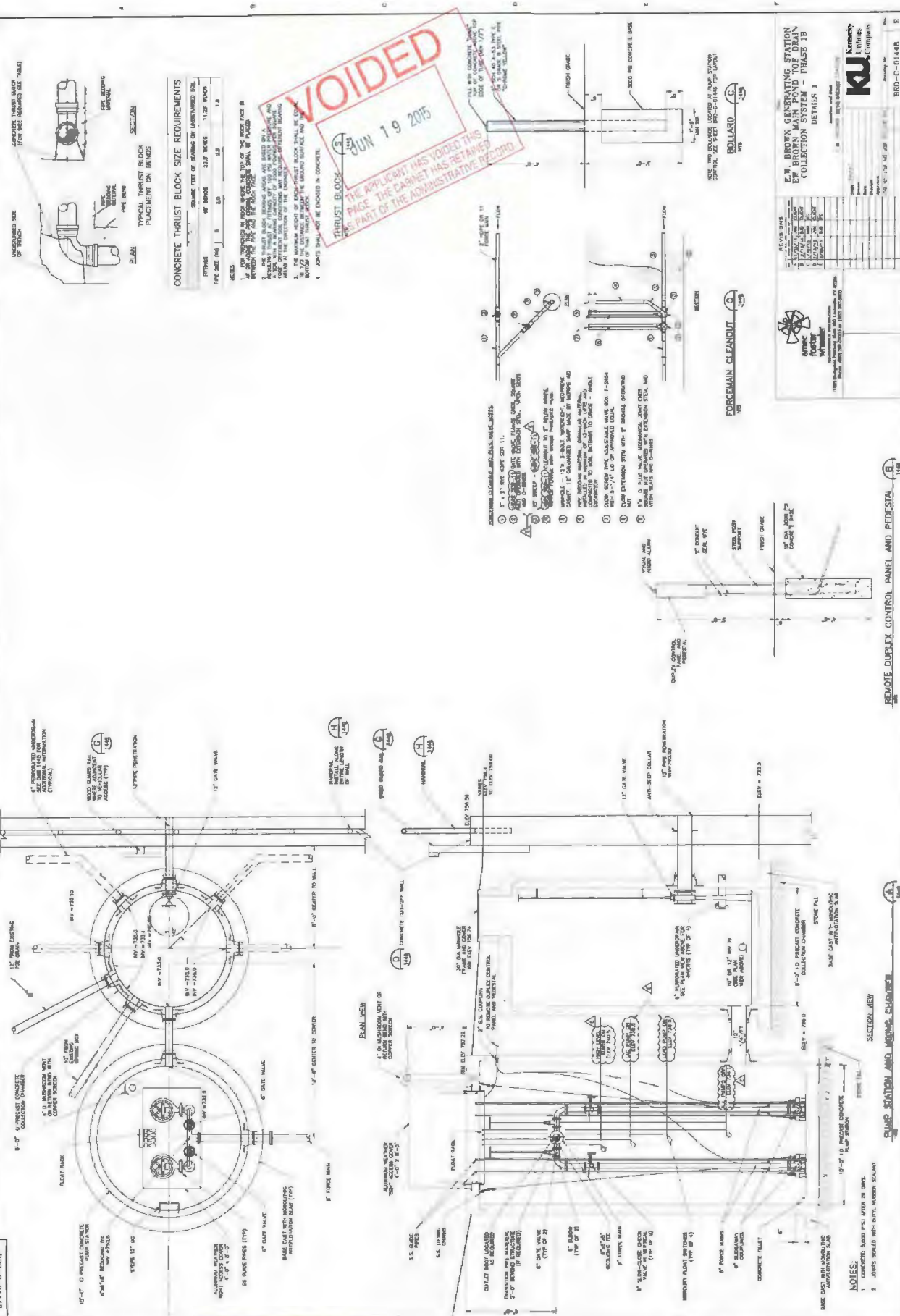
DATE: 5/20/15

BY: J.M. CHASE

APPROVED BY: J.M. CHASE

DATE: 5/20/15

BRID-C-0148B



CONCRETE THRUST BLOCK SIZE REQUIREMENTS

ITEM	MIN. SIZE (IN.)	MAX. SIZE (IN.)
1. MIN. SIZE	18"	18"
2. MAX. SIZE	36"	36"

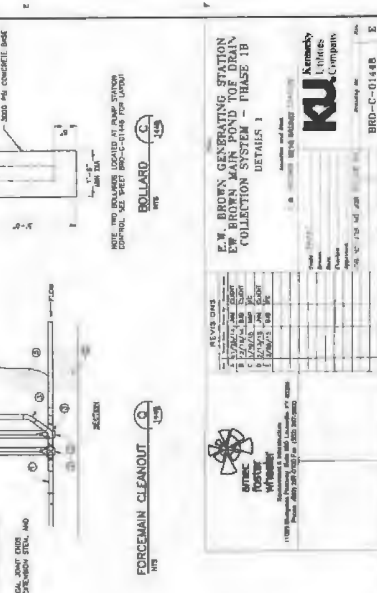
NOTES:
 1. ALL THRUST BLOCKS SHALL BE CAST WITH CONCRETE OF STRENGTH NOT LESS THAN 3,000 PSI.
 2. THE THRUST BLOCK SHALL BE REINFORCED WITH #4 REBAR AT 12" ON CENTER.
 3. THE MINIMUM THICKNESS OF THE THRUST BLOCK SHALL BE 18".
 4. ALL JOINTS SHALL NOT BE LOCATED IN CONCRETE.

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JUN 19 2015

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- CONCRETE CLEANOUT DETAILS**
1. 8" DIA. CONCRETE CLEANOUT
 2. 2" DIA. STEEL PIPE
 3. 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
 4. 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
 5. 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
 6. 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
 7. 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
 8. 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
 9. 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
 10. 2" DIA. STEEL PIPE WITH 2" DIA. GASKET



NOTES:

1. CONCRETE SHALL BE CAST WITH CONCRETE OF STRENGTH NOT LESS THAN 3,000 PSI.
2. JOINTS SHALL NOT BE LOCATED IN CONCRETE.

REVISIONS:

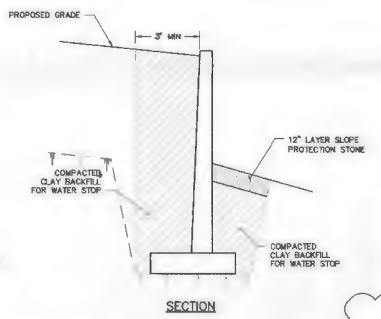
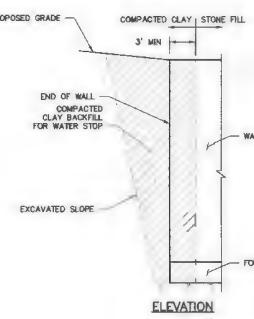
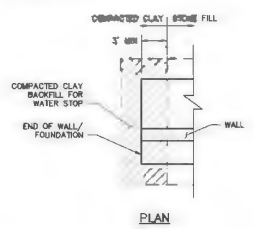
NO.	DATE	DESCRIPTION
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2	03/15/10	REVISED TO SHOW 18" DIA. CONCRETE CLEANOUT
3	05/15/10	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
4	07/15/10	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
5	09/15/10	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
6	11/15/10	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
7	01/15/11	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
8	03/15/11	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
9	05/15/11	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
10	07/15/11	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
11	09/15/11	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
12	11/15/11	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
13	01/15/12	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
14	03/15/12	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
15	05/15/12	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
16	07/15/12	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
17	09/15/12	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
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21	05/15/13	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
22	07/15/13	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
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31	01/15/15	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
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33	05/15/15	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
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68	03/15/21	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
69	05/15/21	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
70	07/15/21	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
71	09/15/21	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
72	11/15/21	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
73	01/15/22	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
74	03/15/22	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
75	05/15/22	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
76	07/15/22	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
77	09/15/22	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
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79	01/15/23	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
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89	09/15/24	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
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93	05/15/25	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
94	07/15/25	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
95	09/15/25	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
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97	01/15/26	REVISED TO SHOW 2" DIA. STEEL PIPE WITH 2" DIA. GASKET
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BRID-C-0148B

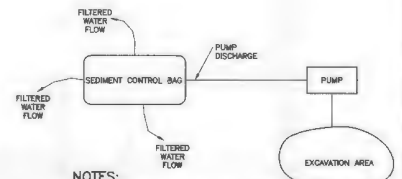
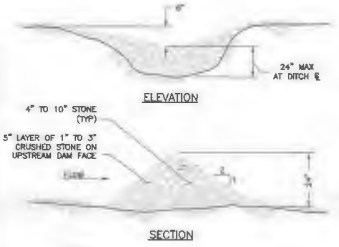
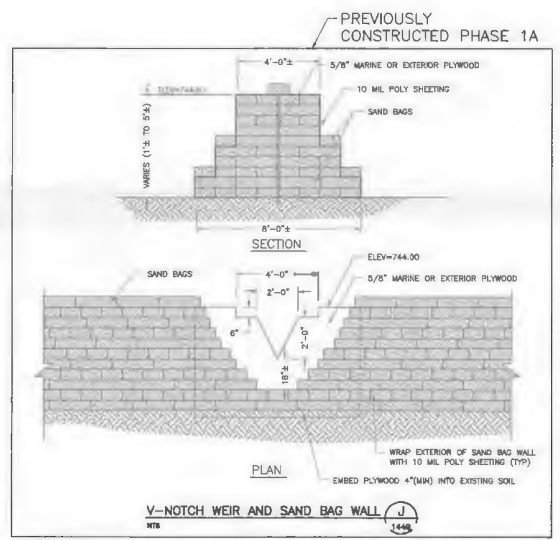
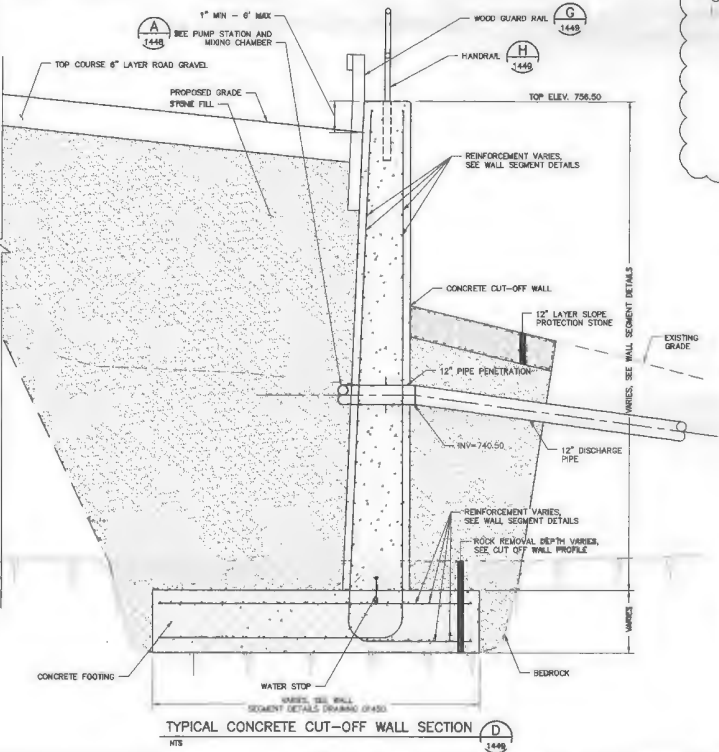
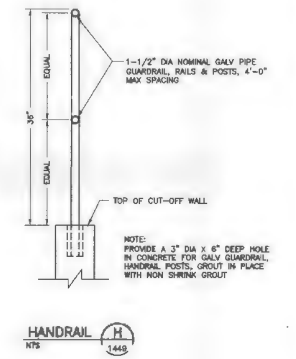
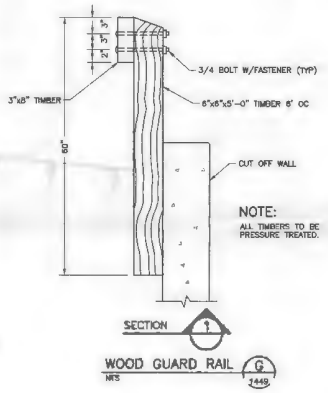
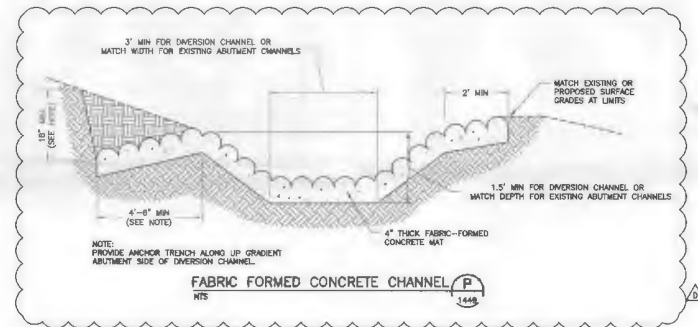
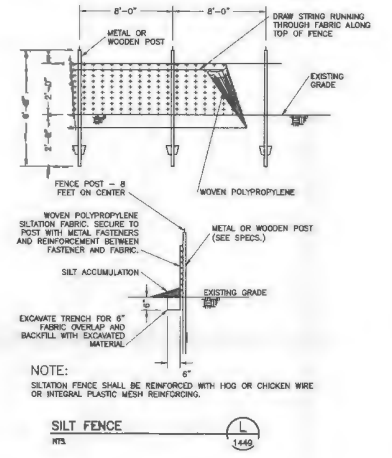
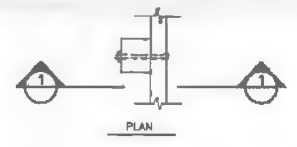
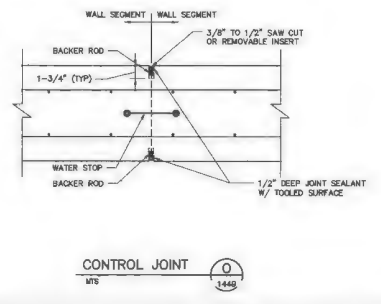
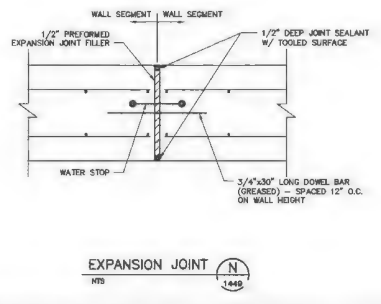
SECTION 1

W. W. BROWN ENGINEERING, INC.
 1500 N. 10TH ST., SUITE 100
 DENVER, CO 80202
 PHONE: 303.733.1100
 FAX: 303.733.1101
 WWW.WWBROWNENGINEERING.COM

Kenamdy
 Limited
 Company
 BRID-C-0148B



TYPICAL CLAY BACKFILL WATER STOP
NTS



- NOTES:**
- BAG MUST BE LOCATED AWAY FROM RECEIVING WATERS AND/OR CONSTRUCTION ACTIVITIES.
 - BAGS MUST BE DISPOSED OF ACCORDING TO MANUFACTURER'S INSTRUCTIONS. BAGS MAY NOT BE REUSED.

NOTE:
ONCE DISTURBED AREA IS STABILIZED, INCORPORATE STONE FROM CHECK DAM INTO CORRESPONDING RIPRAP SMALE LINING.

amec foster wheeler
Environmental & Infrastructure
1100 Bluegrass Parkway, Suite 800, Louisville, KY 40206
Phone: (502) 267-0100 Fax: (502) 267-8900

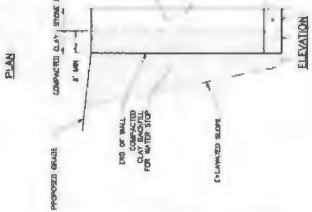
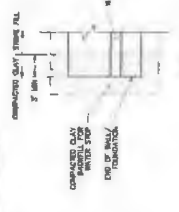
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B	12/18/14	BJS	CLM
C	1/15/15	BJS	PC
D	2/13/15	JM	CLM
E	3/05/15	BJS	PC

**E.W. BROWN GENERATING STATION
EW BROWN MAIN POND TOE DRAIN
COLLECTION SYSTEM - PHASE 1B
DETAILS 2**

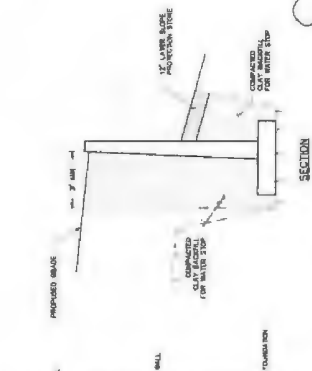
E.W. BROWN GENERATING STATION



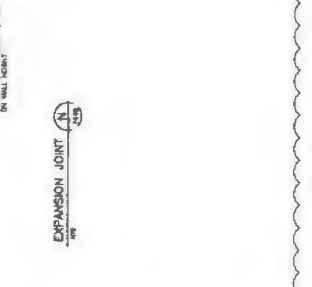
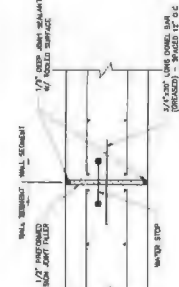
BRD-C-018



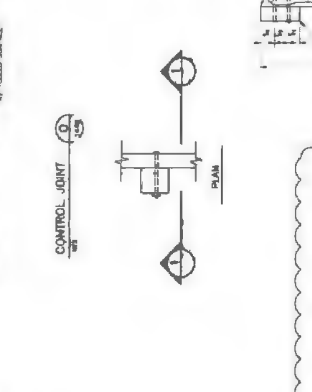
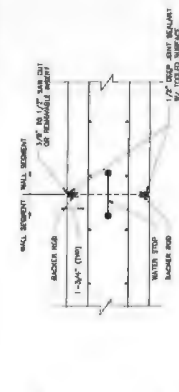
TYPICAL CLAY BACKFILL WATER STOP



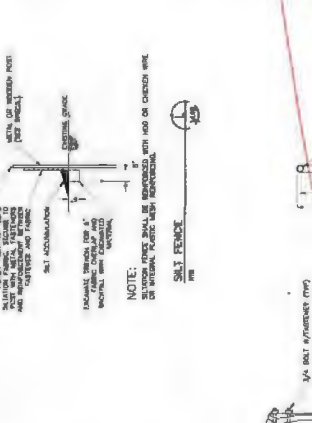
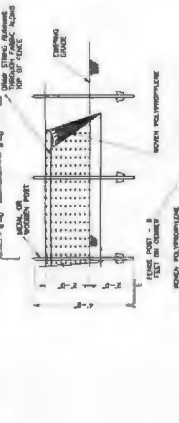
TYPICAL CONCRETE CUT-OFF WALL SECTION



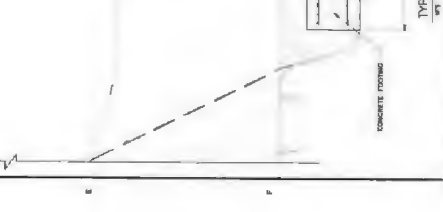
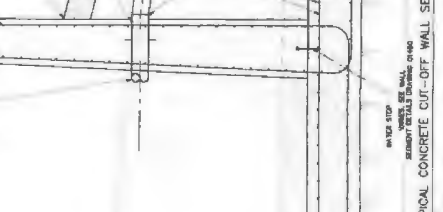
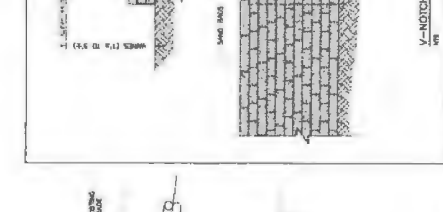
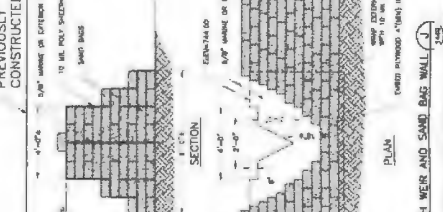
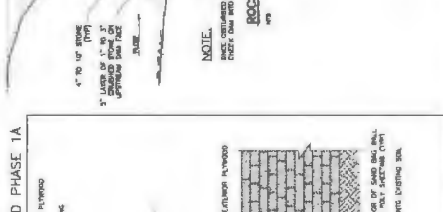
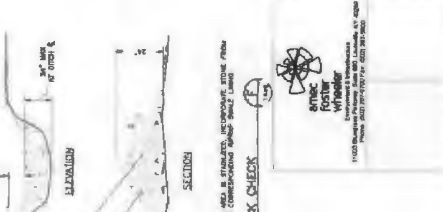
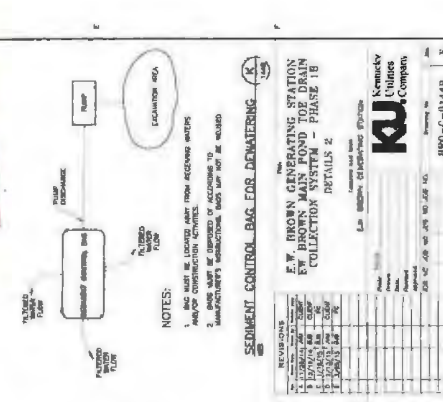
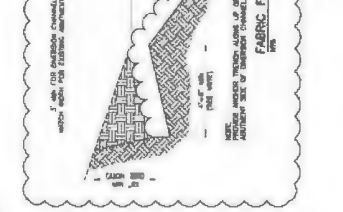
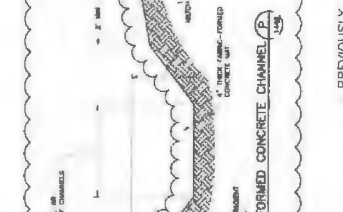
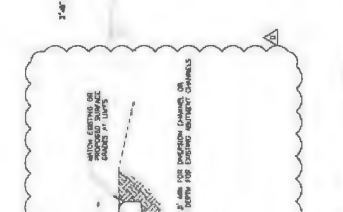
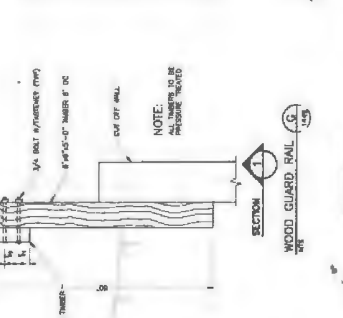
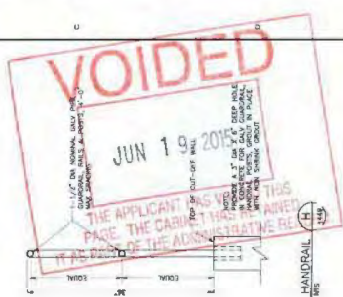
EXPANSION JOINT



CONTROL JOINT



SALT FENCE



NOTES:
 1. BAG MUST BE LOCATED AND NOW RECEIVED AND/OR CONSTRUCTION SCHEDULE.
 2. BAG MUST BE SUBMITTED TO THE ASSESSOR FOR REVIEW AND APPROVAL.

SEDIMENT CONTROL BAG FOR DEWATERING

RECURRENCE
 E.W. BROWN GENERATING STATION
 COLLECTION SYSTEM - PHASE 1B
 DETAILS 2

BRD-C-018

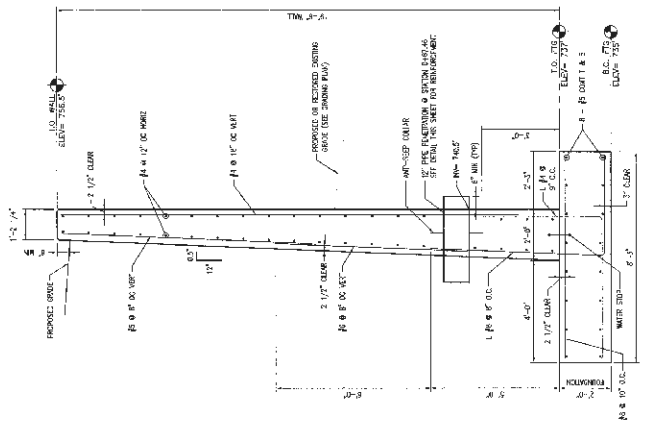
BRD-C-018

BRD-C-018

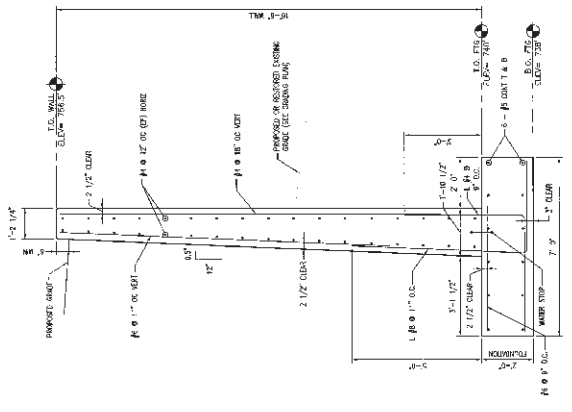
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BRD-C-018

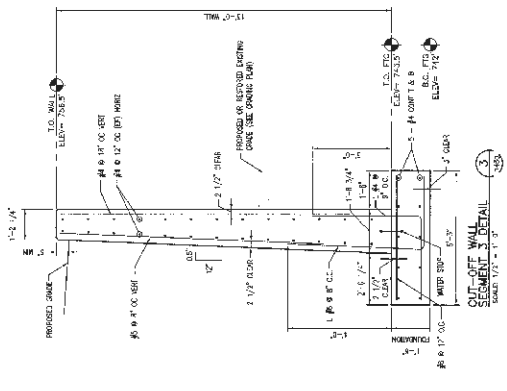
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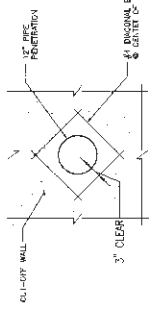
CUT-OFF WALL SEGMENT I DETAIL SCALE 1/2" = 1'-0"



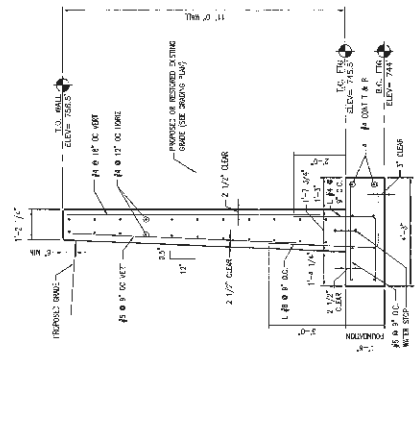
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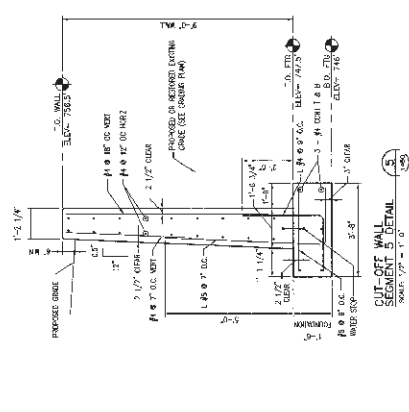
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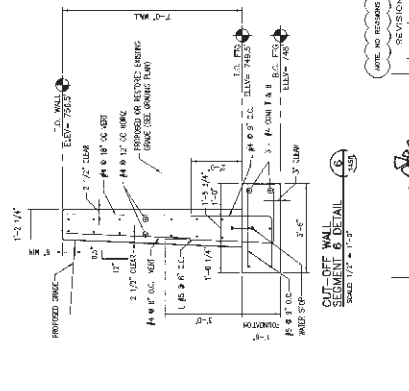
CUT-OFF WALL PIPE PENETRATION DETAIL SCALE 3/4" = 1'-0"



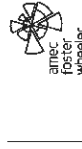
CUT-OFF WALL SEGMENT 4 DETAIL SCALE 1/2" = 1'-0"



CUT-OFF WALL SEGMENT 5 DETAIL SCALE 1/2" = 1'-0"



CUT-OFF WALL SEGMENT 6 DETAIL SCALE 1/2" = 1'-0"



amec foster
Wheeler
Engineering and Construction
1900 Blue Bell Road, Blue Bell, Pennsylvania, PA 19068
Phone: 610-261-2200 Fax: 610-261-2202

DATE: 11/20/07

SCALE: 1/2" = 1'-0"

PROJECT: E.W. BROWN GENERATING STATION
E.W. BROWN MAIN POND TOE DRAIN COLLECTION SYSTEM - PHASE 1B
CUT-OFF WALL DETAILS

REVISIONS:

NO.	DATE	BY	DESCRIPTION
1	11/20/07	JW	ISSUED FOR PERMITS
2	11/20/07	JW	ISSUED FOR PERMITS
3	11/20/07	JW	ISSUED FOR PERMITS
4	11/20/07	JW	ISSUED FOR PERMITS
5	11/20/07	JW	ISSUED FOR PERMITS
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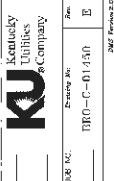
DESIGNED BY: JW
CHECKED BY: JW
DATE: 11/20/07

CONTRACT NO.: BR0-C-01450

PROJECT NO.: BR0-C-01450

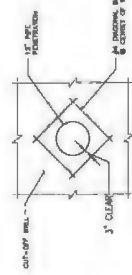
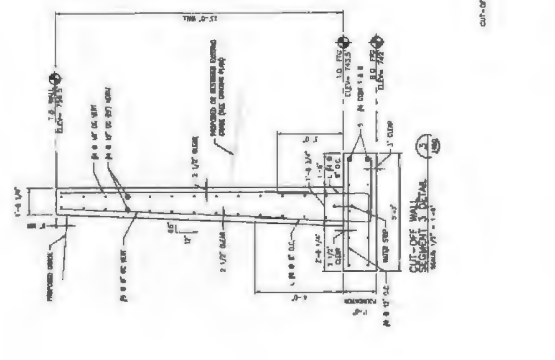
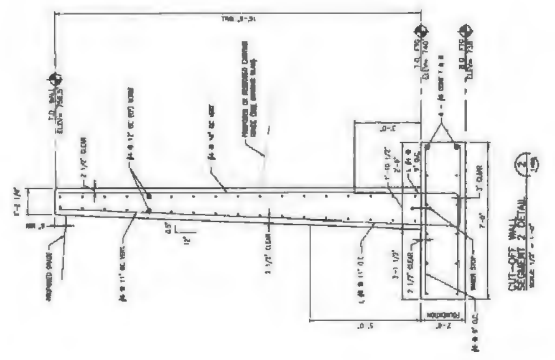
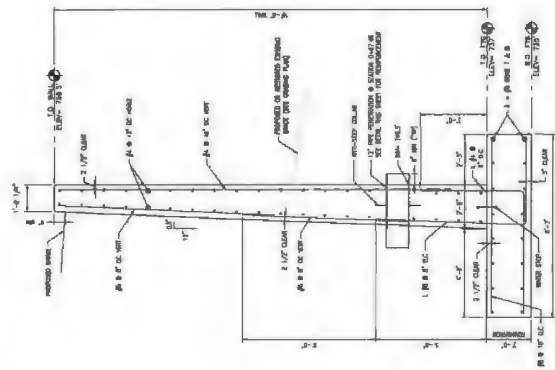
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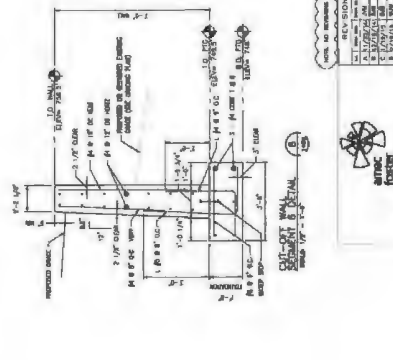
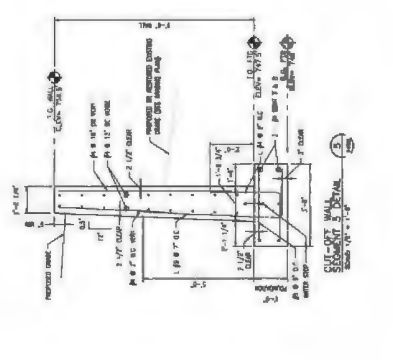
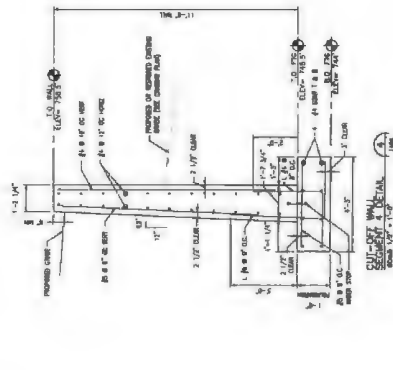


KUMBLISS & COMPANY
Engineering and Construction
1900 Blue Bell Road, Blue Bell, Pennsylvania, PA 19068
Phone: 610-261-2200 Fax: 610-261-2202

BRG-C-01450



CUT-OFF WALL
SEGMENT DETAIL
SCALE 1/4" = 1'-0"



CUT-OFF WALL
SEGMENT DETAIL
SCALE 1/4" = 1'-0"

VOIDED
JUN 19 2015
THE APPLICANT HAS VOIDED THIS PAGE. THE CABINET HAS RETAINED IT AS PART OF THE ADMINISTRATIVE RECORD.

REV. 05/08
SCALE: 1/4" = 1'-0"

FOR ALL REVISIONS SEE SHEET BRG-C-01450-1

NO. DATE BY

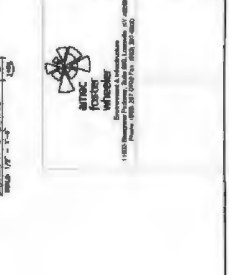
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30	05/08	AW

PROJECT: E.W. BROWN GENERATING STATION
REVISION: BROWN WALL FOUNDATION
SYSTEM COLLECTION SYSTEM - PHASE 1B
CUT-OFF WALL DETAILS

DESIGNED BY: AW
CHECKED BY: AW
DATE: 05/08

KENNEDY
Utilities
Company

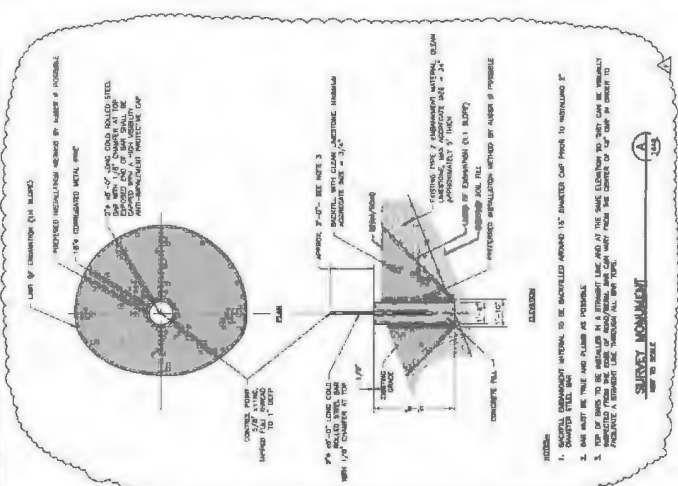
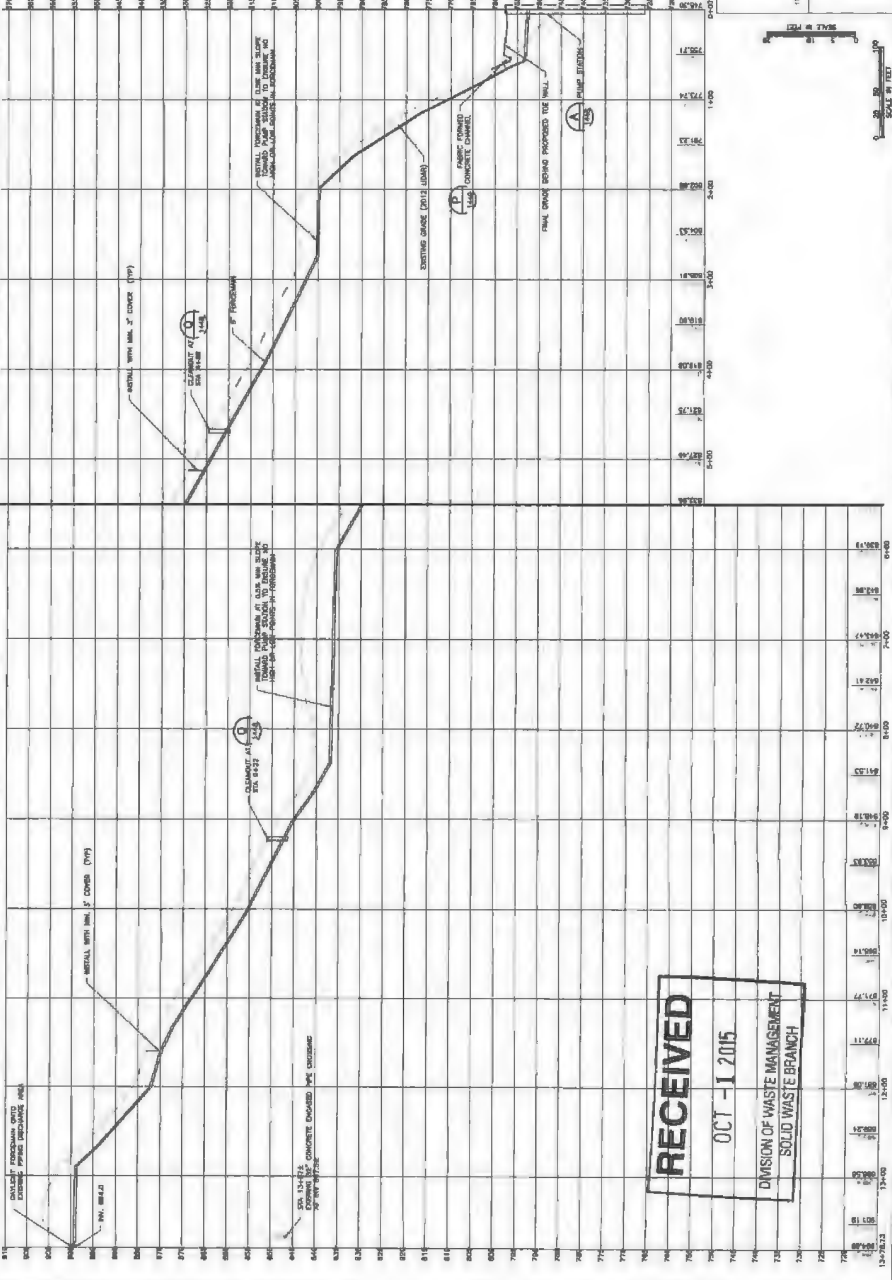
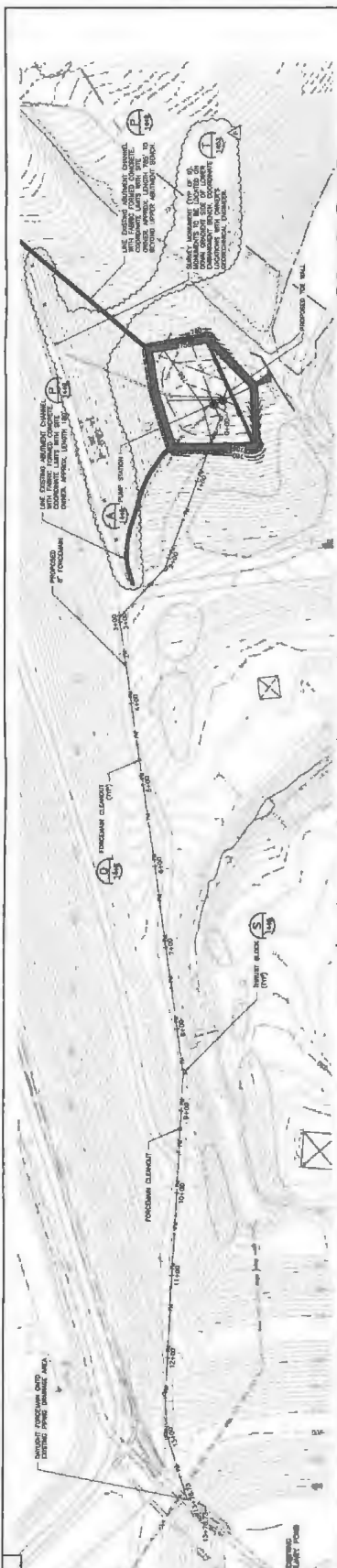
BRG-C-01450



AT&T
Factor
Wireless

11000 West 23rd Street, Suite 200
Denver, CO 80202

BS7-D-11453



RECEIVED
OCT - 1 2015
DIVISION OF WASTE MANAGEMENT
SOLID WASTE BRANCH

CONCRETE

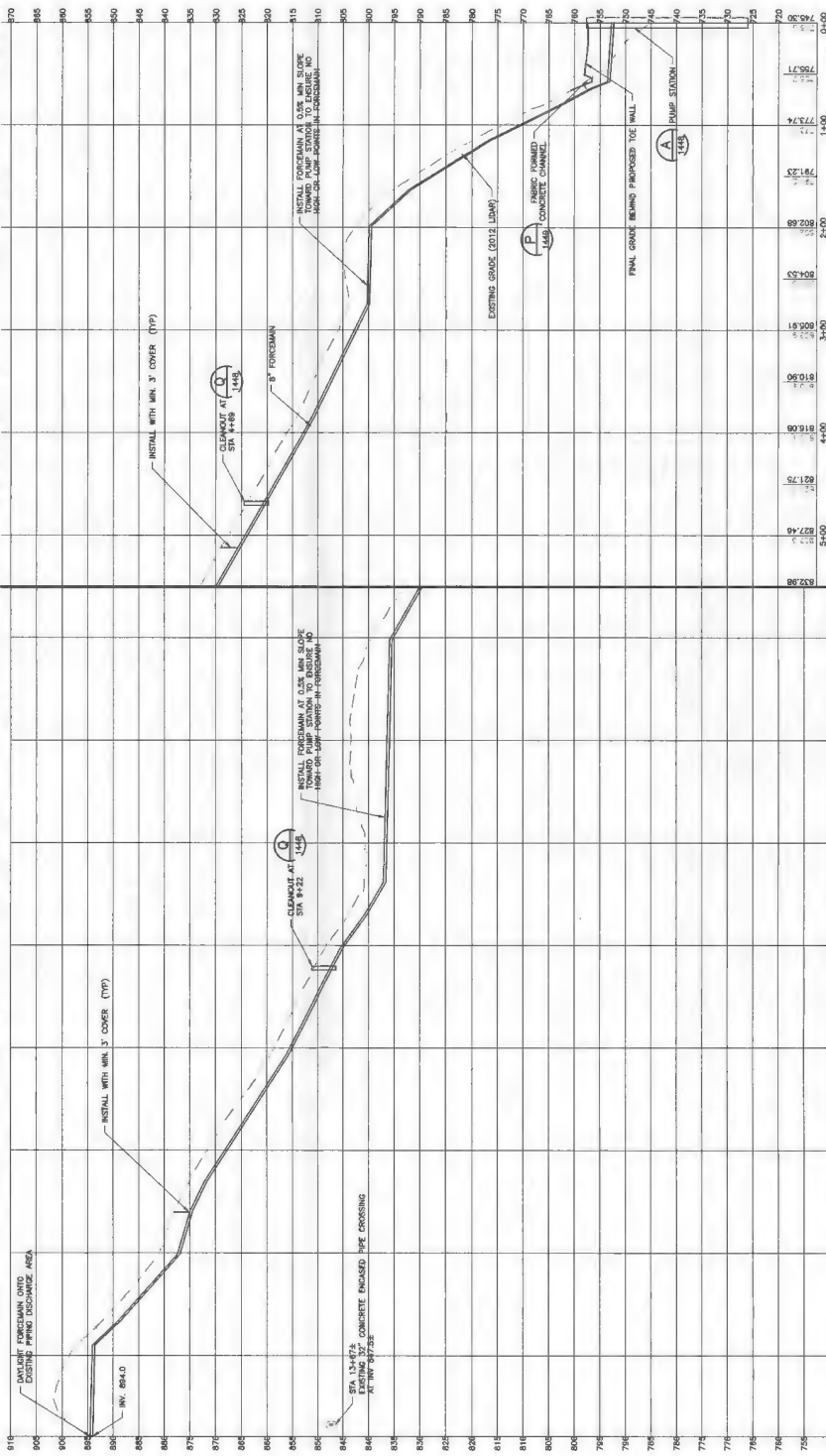
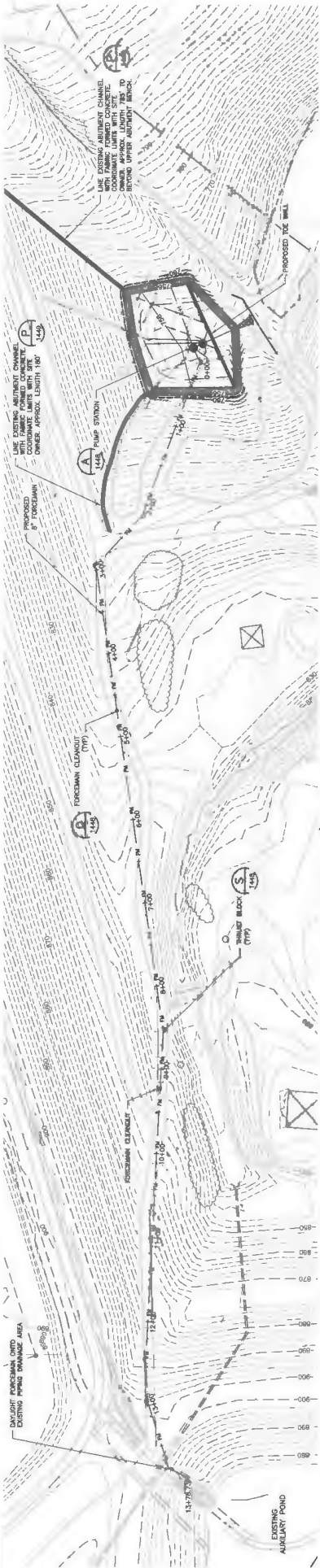
REVISIONS

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90	12/15/12	ADD COMMENTS TO DRAWING

E. W. BRIDEN GENERATING STATION
WASTEWATER TREATMENT PLANT
COLLECTION SYSTEM - PHASE 1C
FOR DRAIN FORCE MAIN TO OXIDATION POND

Project No. BS7-D-11453
Scale: AS SHOWN
Drawing No. BS7-D-11453-11
Date: 12/15/12

W
Wastewater
Company



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JUN 18 1986
LANDING PROJECT MANAGEMENT
BY: [Signature]

SCALE IN FEET
0 25 50 100

NOTE: NO REVISIONS THIS SHEET BEYOND NO. 0

REVISIONS

NO.	DATE	DESCRIPTION
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		

PROJECT: E.W. BROWN GENERATING STATION
SUBJECT: E.W. BROWN MAIN POND TOE DRAIN COLLECTION SYSTEM - PHASE 1C
DRAWN BY: [Name]
CHECKED BY: [Name]
DATE: [Date]

1988 Registered Professional Engineer, State of Kentucky
Professional Seal of [Name]

1988 Registered Professional Engineer, State of Kentucky
Professional Seal of [Name]

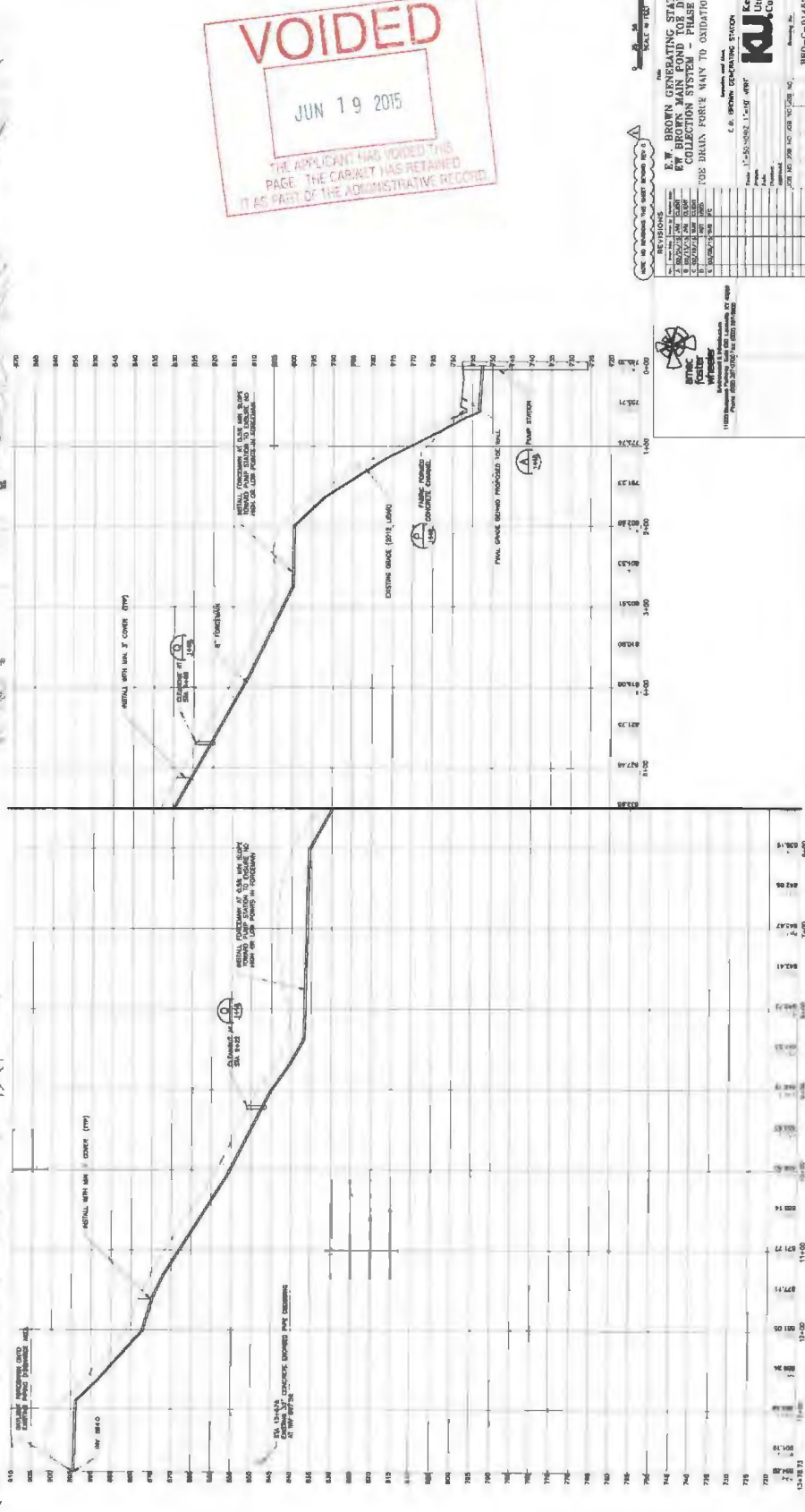
ENTERIC
FOSTER
WHEELER
CONSULTANTS

1988 Registered Professional Engineer, State of Kentucky
Professional Seal of [Name]

E.W. BROWN GENERATING STATION
Kentucky Utilities Company

BR0-C-01453

65710-C-018



VOIDED

JUN 19 2015

THE APPLICANT HAS VOIDED THIS PAGE. THE CABINET HAS RETAINED IT AS PART OF THE ADMINISTRATIVE RECORD.

REVISIONS

NO.	DATE	DESCRIPTION
1	11/11/14	ISSUED FOR PERMITTING
2	11/11/14	REVISED PER COMMENTS FROM THE PERMITTING AGENCY
3	11/11/14	REVISED PER COMMENTS FROM THE PERMITTING AGENCY
4	11/11/14	REVISED PER COMMENTS FROM THE PERMITTING AGENCY
5	11/11/14	REVISED PER COMMENTS FROM THE PERMITTING AGENCY
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7	11/11/14	REVISED PER COMMENTS FROM THE PERMITTING AGENCY
8	11/11/14	REVISED PER COMMENTS FROM THE PERMITTING AGENCY
9	11/11/14	REVISED PER COMMENTS FROM THE PERMITTING AGENCY
10	11/11/14	REVISED PER COMMENTS FROM THE PERMITTING AGENCY

ATOMIC
Energy
Center

11800 Brown Station Road
Brownsville, TX 77802

Kentucky
Utilities
Company

Project: 1-140-0086.1-2-01-001
Sheet: 1-140-0086.1-2-01-001-001

**E.W. BROWN GENERATING STATION
TURBINE BUILDING
COLLECTION SYSTEM - PHASE 1C**

NOISE DRAIN FROM MAIN TO OXIDATION POND

Scale: 1" = 10'-0"

North Arrow

DATE: 11/11/14

BY: [Signature]

PROJECT NO: 1-140-0086.1-2-01-001

SHEET NO: 1-140-0086.1-2-01-001-001

CONTRACT NO: 1-140-0086.1-2-01-001

DATE: 11/11/14

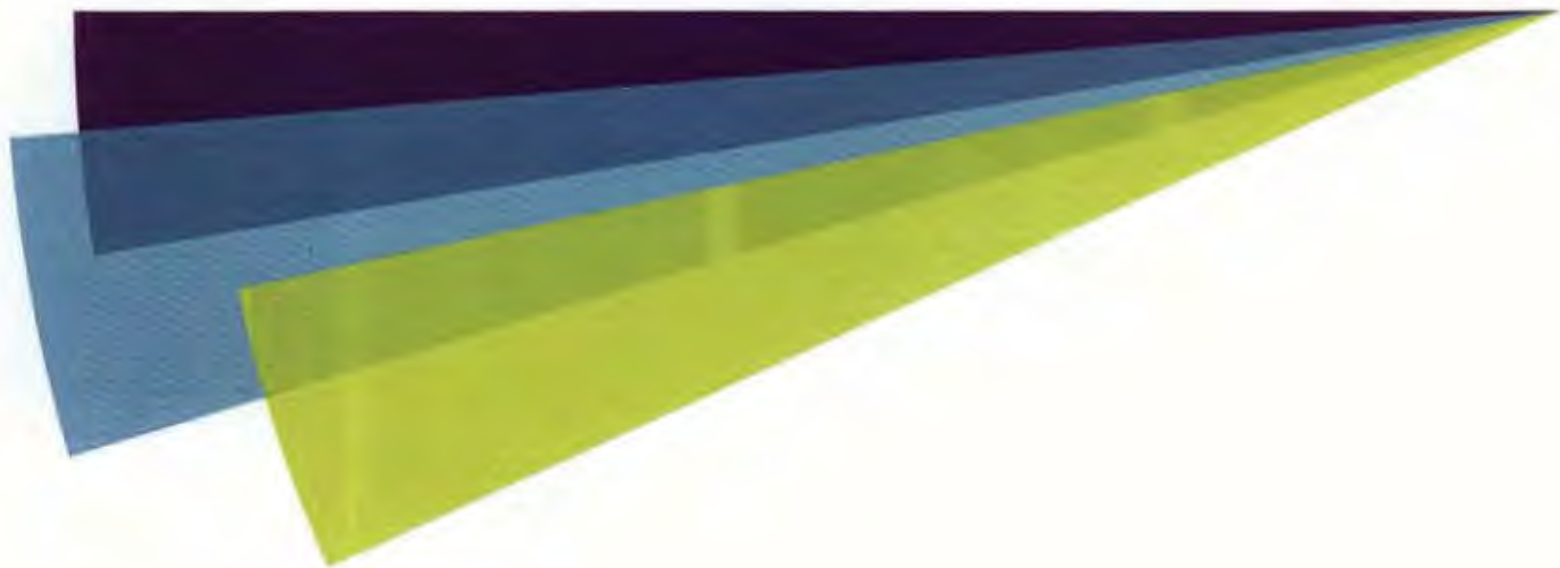
BY: [Signature]

ATTACHMENT 4
DAM STABILITY ANALYSIS



E.W. Brown Main Ash Pond Dam Stability

Proposed Toe Drain Cut-off Wall **Seepage Collection Excavation**



Toe Drain Excavation Stability Analysis

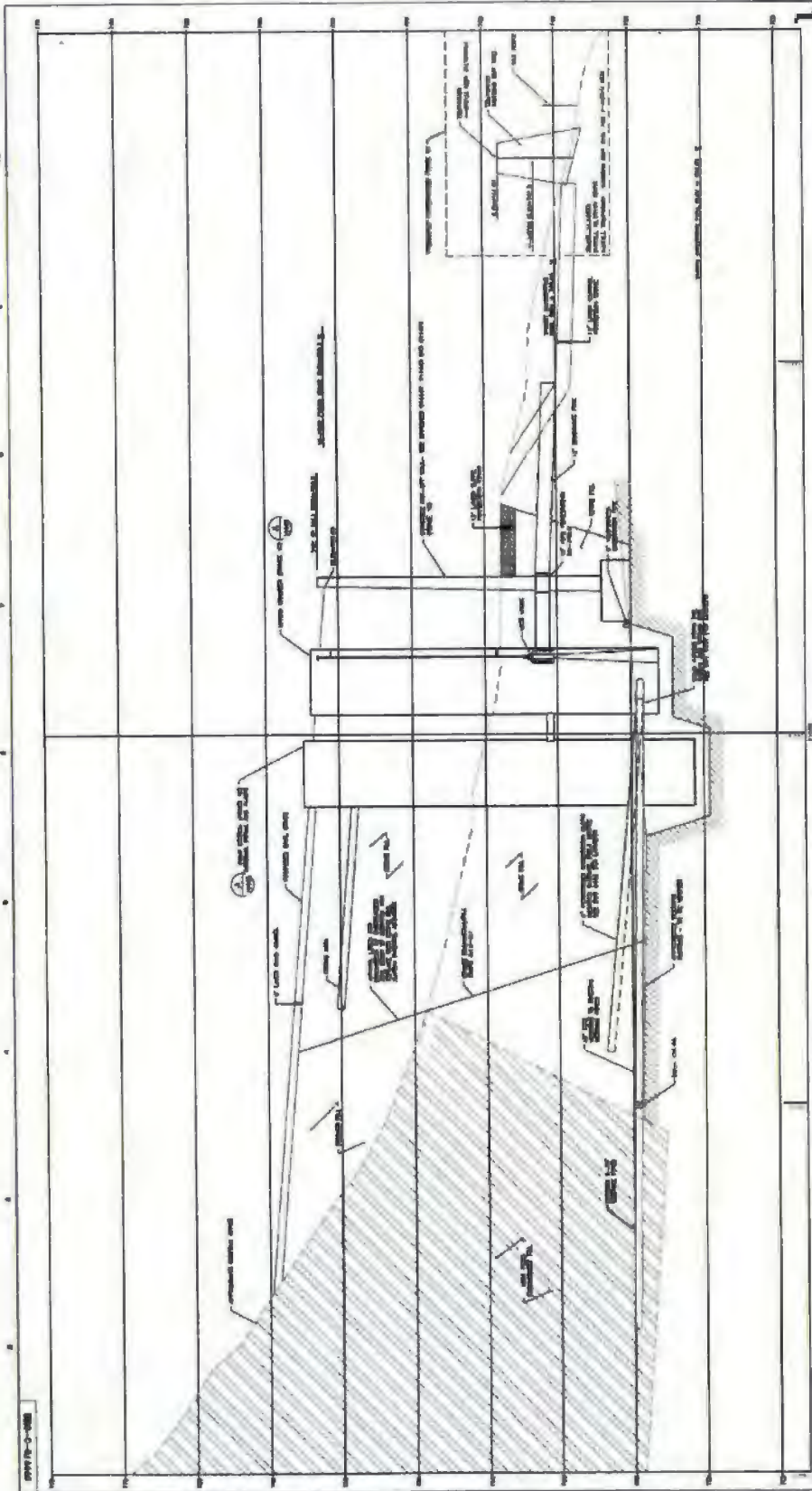
- ▶ Background
 - ▶ Closing Main Ash Pond with a Landfill
 - ▶ Seepage Collection System Water Shows Contamination
- ▶ Toe Drain Collection System
- ▶ Cut-Off Wall Profile
- ▶ FMSM Stability Analysis
 - ▶ 1990 As Built Plans
- ▶ Amec Foster Wheeler Stability Analysis
 - ▶ Total Stress
 - ▶ Effective Stress
 - ▶ Effective Stress with Seismic Load
 - ▶ Effective Stress with Seismic Load and Flooded Toe.
 - ▶ Effective Stress with Rapid Drawdown of Flood Event

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E.W. Brown Main Pond Toe Drain Collection System



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 SOLID WASTE BRANCH

amec

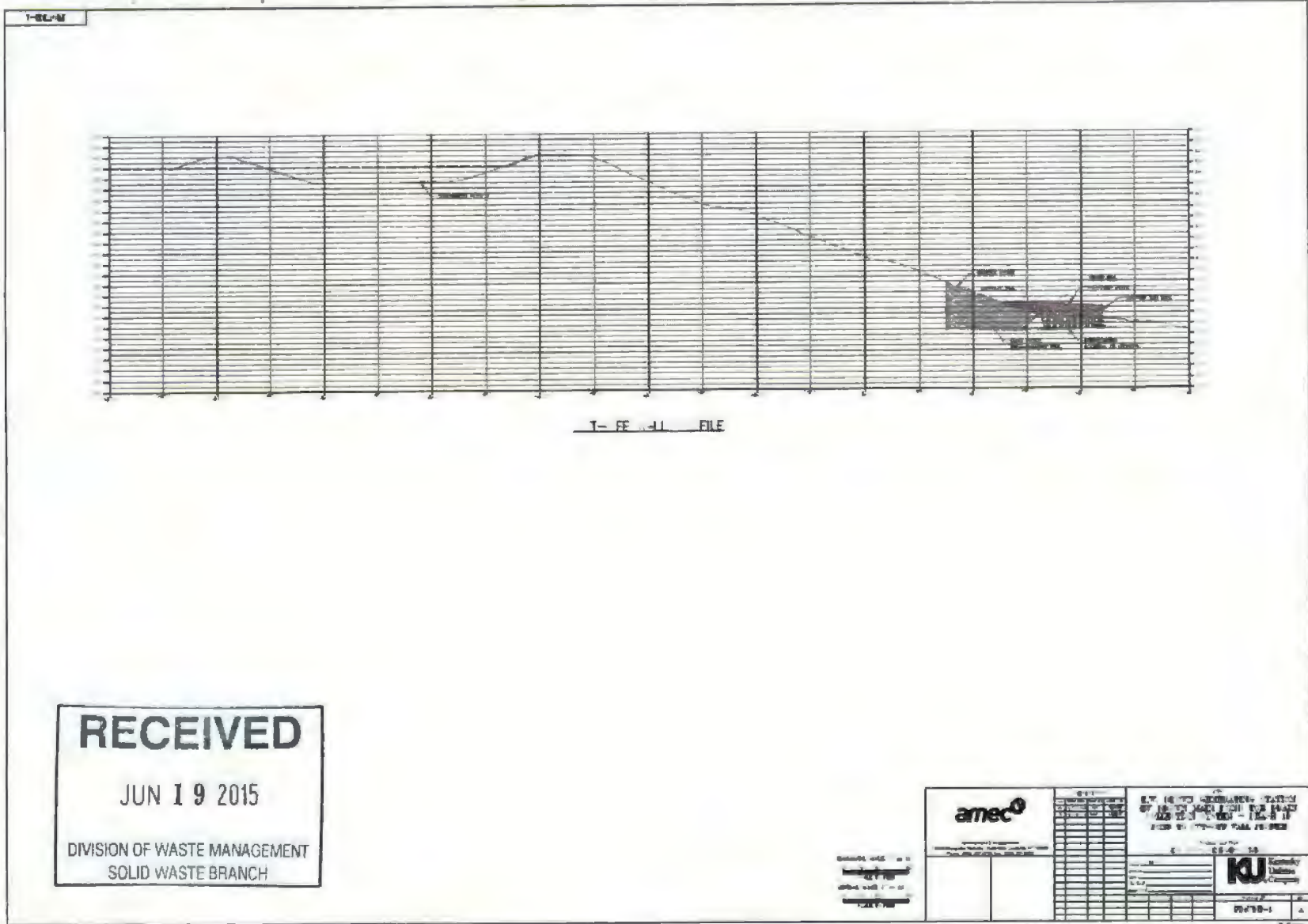
AMEC FOSTER WHEELER
 215 AVENUE OF THE STARS
 SUITE 2000
 FORT MYERS, FL 33902
 TEL: 888-686-7629
 FAX: 888-686-7630
 WWW.AMECFW.COM

KU

UNIVERSITY OF KANSAS
 1535 W. 17TH AVENUE
 LAWRENCE, KS 66044
 TEL: 785-843-8800
 FAX: 785-843-8801
 WWW.KU.EDU

NO. OF SHEETS	1
TOTAL SHEETS	1
DATE	06/18/15
PROJECT	E.W. BROWN MAIN POND TOE DRAIN COLLECTION SYSTEM - PHASE 1
DRAWN BY	
CHECKED BY	
DATE	

E.W. Brown Main Pond Cut off Wall Profile



Stability Analysis FMSM 1990 As Built Plans



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SOLID WASTE BRANCH

SUMMARY OF STABILITY ANALYSES

Case	Failure Location	n	F	A	Factor of Safety
1	Failure from plan 1990	100	30.1	1.57	1.1
2	Failure from plan 1990	100	30.1	1.57	1.1
3	Failure from plan 1990	100	30.1	1.57	1.1
4	Failure from plan 1990	100	30.1	1.57	1.1
5	Failure from plan 1990	100	30.1	1.57	1.1

SUMMARY OF SHEAR STRENGTH PARAMETERS

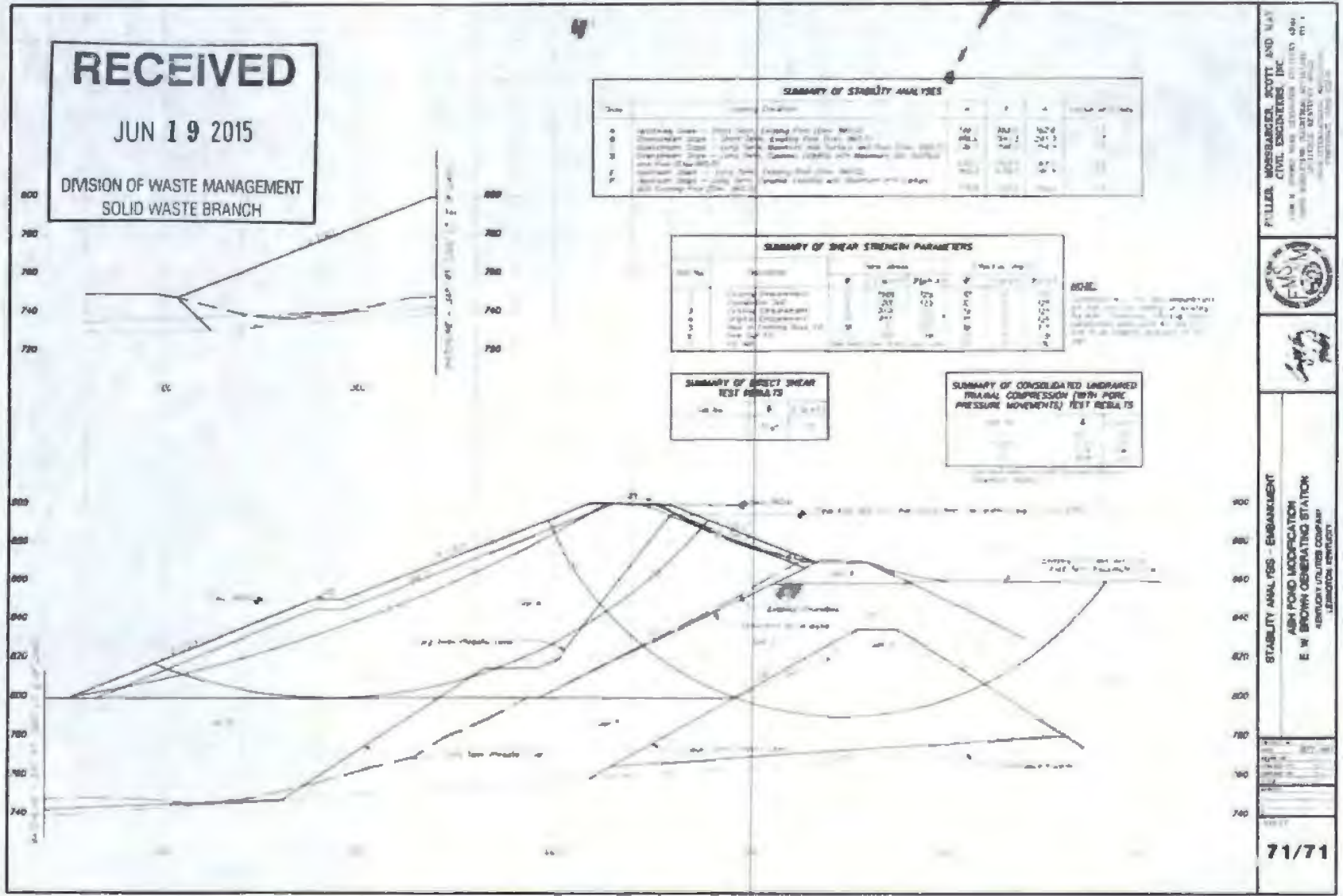
Soil No.	Soil Name	c (kPa)	phi (deg)	psi (kPa)	psi (kPa)
1	Fill	0	30.1	1.57	1.1
2	Fill	0	30.1	1.57	1.1
3	Fill	0	30.1	1.57	1.1
4	Fill	0	30.1	1.57	1.1
5	Fill	0	30.1	1.57	1.1

SUMMARY OF DIRECT SHEAR TEST RESULTS

Soil No.	Soil Name	c (kPa)	phi (deg)
1	Fill	0	30.1
2	Fill	0	30.1
3	Fill	0	30.1
4	Fill	0	30.1
5	Fill	0	30.1

SUMMARY OF CONSOLIDATED UNDRAINED TRIAXIAL COMPRESSION WITH PORE PRESSURE MOVEMENTS TEST RESULTS

Soil No.	Soil Name	c (kPa)	phi (deg)
1	Fill	0	30.1
2	Fill	0	30.1
3	Fill	0	30.1
4	Fill	0	30.1
5	Fill	0	30.1



FILED: MOSEBARGER, SCOTT AND MAY
CIVIL ENGINEERS, INC.
1000 N. W. 10TH AVENUE, SUITE 1000
MIAMI, FLORIDA 33136
TEL: 305.575.1100
FAX: 305.575.1101
WWW: WWW.MSEBARGER.COM



STABILITY ANALYSIS - ENHANCEMENT
ASH FORD WASTEWATER
E W BROWN GENERATING STATION
ENERGY UTILITIES COMPANY
LELAND, FLORIDA

DATE	07/15/10
BY	SCOTT MAY
CHECKED	SCOTT MAY
APP. NO.	1000
SCALE	AS SHOWN
PROJECT NO.	1000
SHEET NO.	71/71

71/71

Existing Slope – Total Stress Analysis Lowest Factor of Safety

Lined Pond is shown as a loading condition.

Phreatic Surface is based on piezometer, seepage collection system and observed seepage.

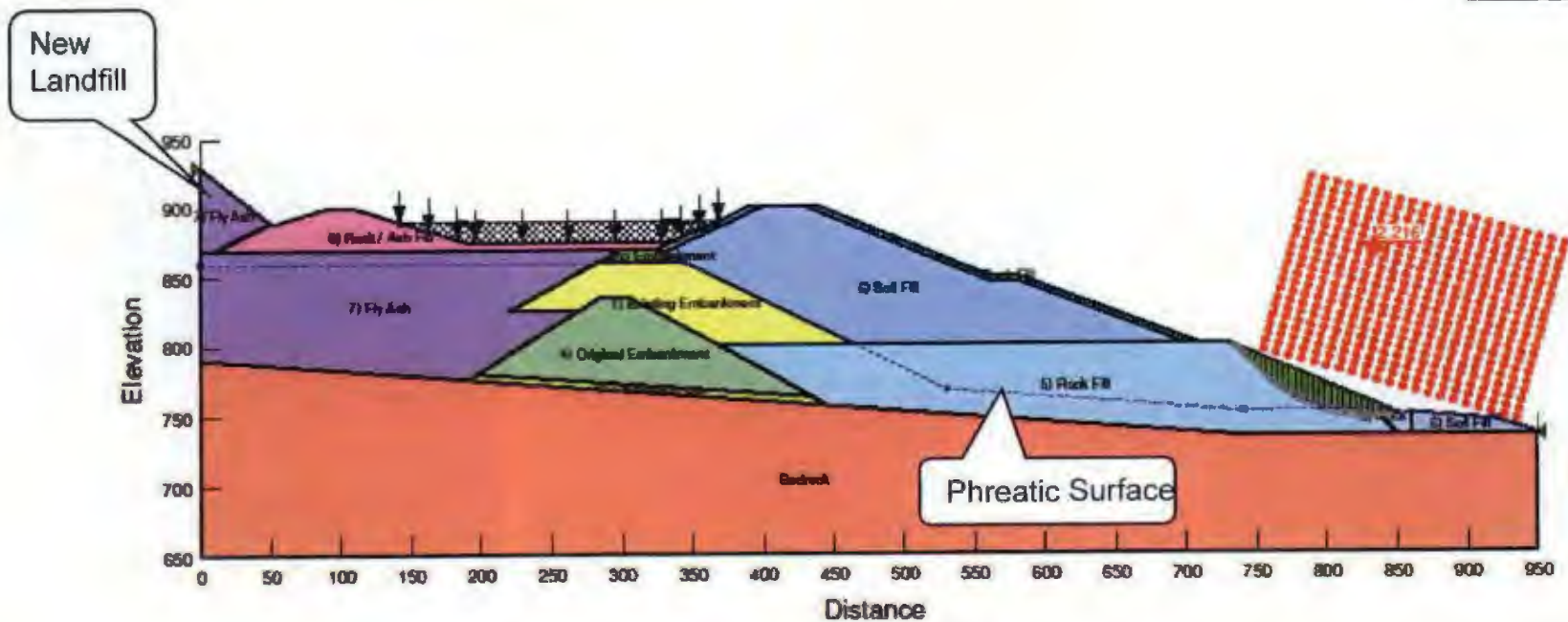
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- Name: 2) Foundation Soil Unit Weight: 125 pcf Cohesion: 1200 psf Phi: 0 ° Piezometric Line: 1
- Name: 3) Existing Embankment Unit Weight: 125 pcf Cohesion: 3000 psf Phi: 0 ° Piezometric Line: 1
- Name: 4) Original Embankment Unit Weight: 125 pcf Cohesion: 600 psf Phi: 0 ° Piezometric Line: 1
- Name: 5) Rock Fill Unit Weight: 115 pcf Cohesion: 100 psf Phi: 38 ° Piezometric Line: 1
- Name: 6) Soil Fill Unit Weight: 118 pcf Cohesion: 1500 psf Phi: 0 ° Piezometric Line: 1
- Name: 7) Fly Ash Unit Weight: 100 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 8) Rock / Ash Fill Unit Weight: 105 pcf Cohesion: 0 psf Phi: 34 ° Piezometric Line: 1
- Name: Bedrock Piezometric Line: 1

FOS = 2.216

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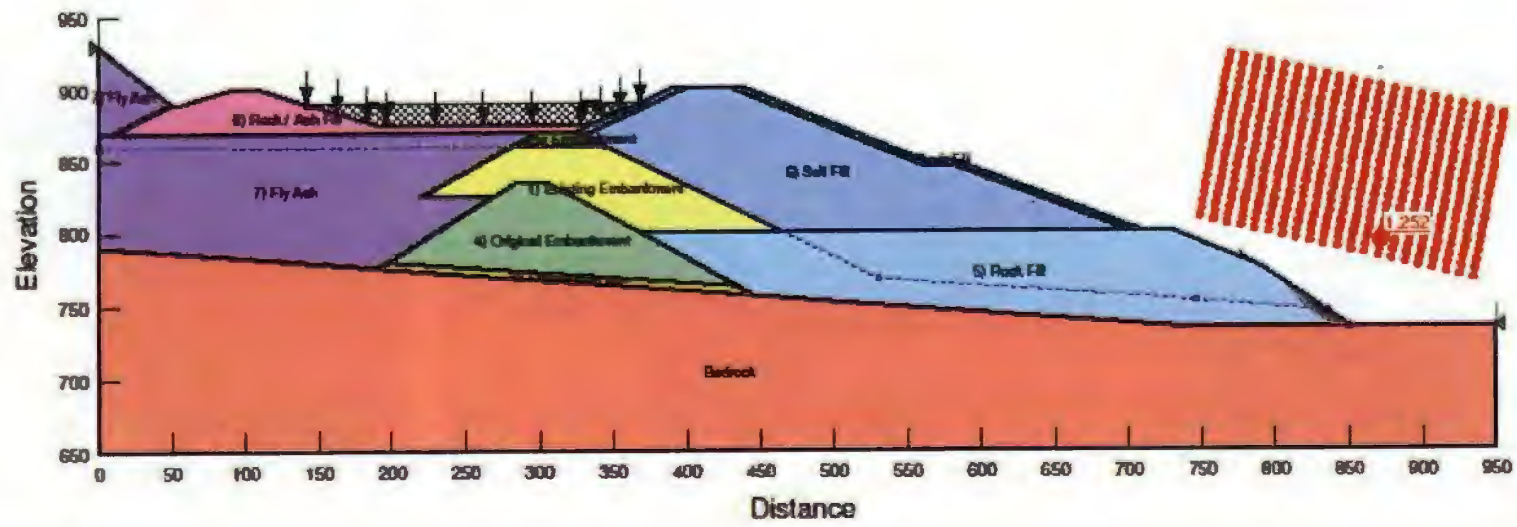


Excavated Slope – Total Stress Analysis Lowest Factor of Safety

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- Name: 1) Existing Embankment Unit Weight: 125 pcf Cohesion: 1500 psf Phi: 0 ° Piezometric Line: 1
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- Name: 4) Original Embankment Unit Weight: 125 pcf Cohesion: 600 psf Phi: 0 ° Piezometric Line: 1
- Name: 5) Rock Fill Unit Weight: 115 pcf Cohesion: 100 psf Phi: 38 ° Piezometric Line: 1
- Name: 6) Soil Fill Unit Weight: 118 pcf Cohesion: 1500 psf Phi: 0 ° Piezometric Line: 1
- Name: 7) Fly Ash Unit Weight: 100 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 8) Rock / Ash Fill Unit Weight: 105 pcf Cohesion: 0 psf Phi: 34 ° Piezometric Line: 1
- Name: Bedrock Piezometric Line: 1

FOS = 1.252

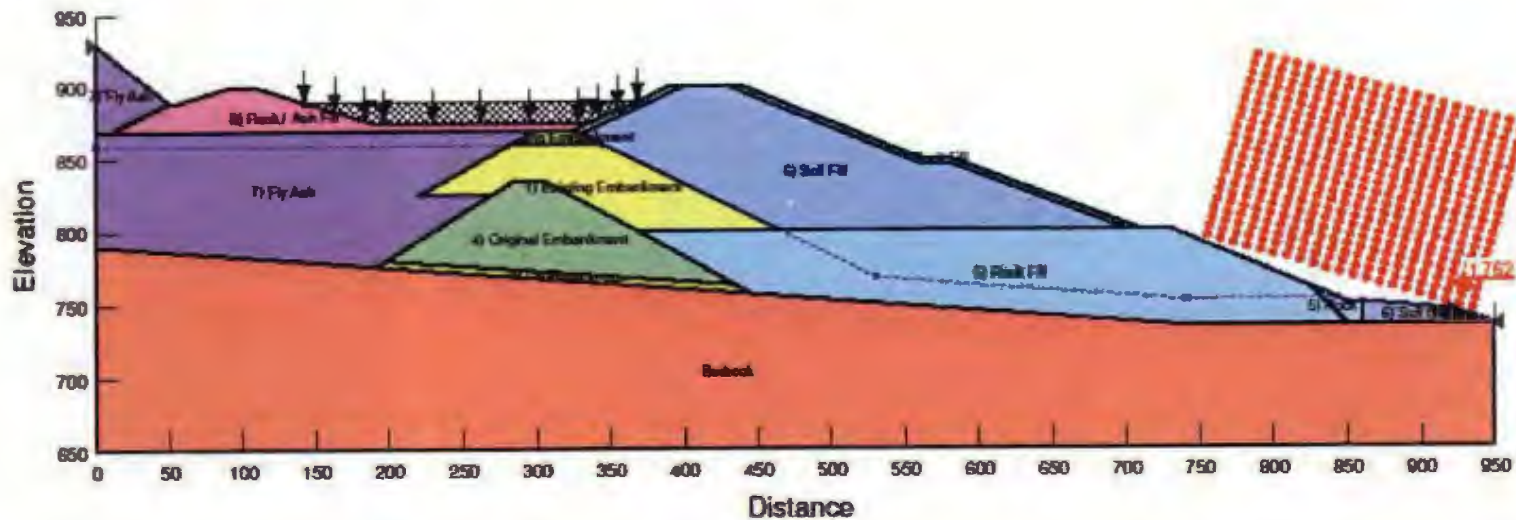


Existing Slope – Effective Stress Analysis Lowest Factor of Safety

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DIVISION OF WASTE MANAGEMENT
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- Name: 1) Existing Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 30 ° Piezometric Line: 1
- Name: 2) Foundation Soil Unit Weight: 125 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 3) Existing Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 28 ° Piezometric Line: 1
- Name: 4) Original Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 5) Rock Fill Unit Weight: 115 pcf Cohesion: 100 psf Phi: 38 ° Piezometric Line: 1
- Name: 6) Soil Fill Unit Weight: 118 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 7) Fly Ash Unit Weight: 100 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 8) Rock / Ash Fill Unit Weight: 105 pcf Cohesion: 0 psf Phi: 34 ° Piezometric Line: 1
- Name: Bedrock Piezometric Line: 1

FOS = 1.762



Excavated Slope – Effective Stress Analysis Lowest Factor of Safety

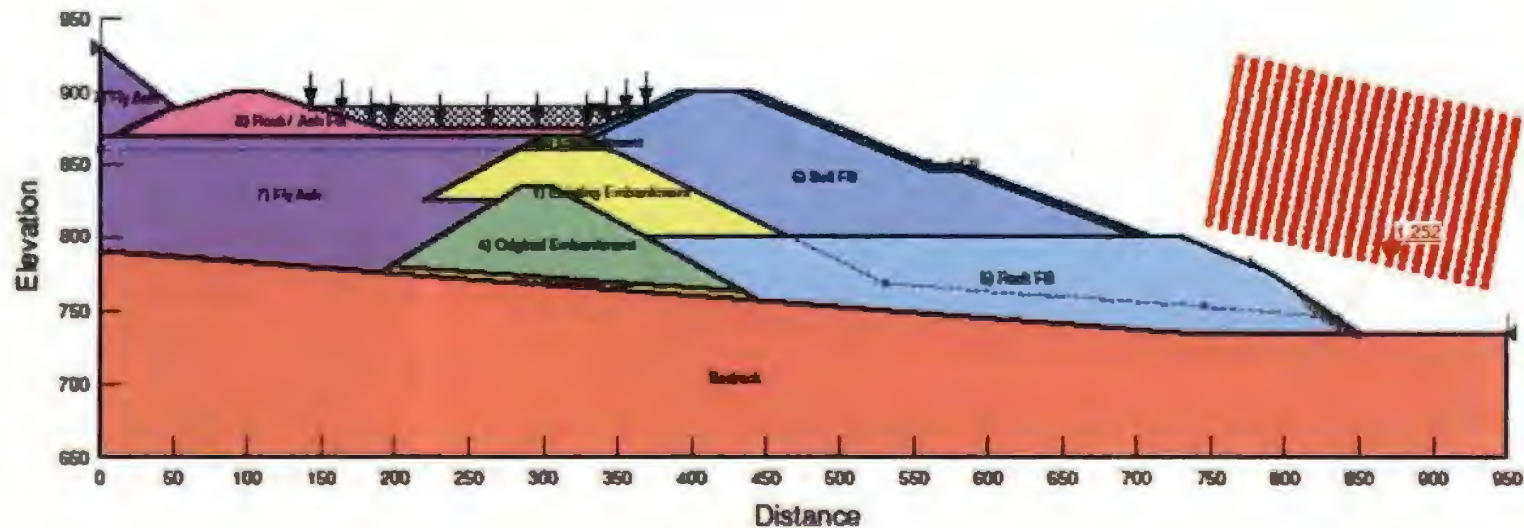
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DIVISION OF WASTE MANAGEMENT
SOLID WASTE BRANCH

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 Name: 3) Existing Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 28 ° Piezometric Line: 1
 Name: 4) Original Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
 Name: 5) Rock Fill Unit Weight: 115 pcf Cohesion: 100 psf Phi: 38 ° Piezometric Line: 1
 Name: 6) Soil Fill Unit Weight: 118 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
 Name: 7) Fly Ash Unit Weight: 100 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
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 Name: Bedrock Piezometric Line: 1

FOS = 1.252



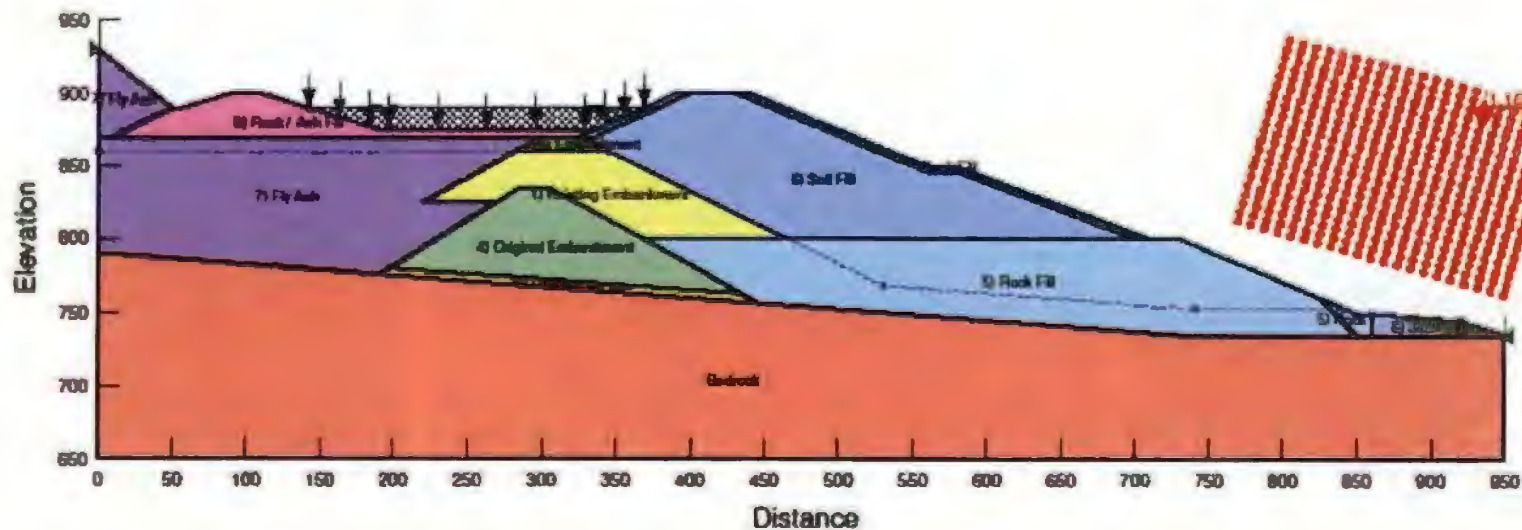
Existing Slope Effective Stress Analysis with Seismic Lowest Factor of Safety



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SOLID WASTE BRANCH

- Name: 1) Existing Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 30 ° Piezometric Line: 1
- Name: 2) Foundation Soil Unit Weight: 125 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 3) Existing Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 28 ° Piezometric Line: 1
- Name: 4) Original Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 5) Rock Fill Unit Weight: 115 pcf Cohesion: 100 psf Phi: 38 ° Piezometric Line: 1
- Name: 6) Soil Fill Unit Weight: 118 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 7) Fly Ash Unit Weight: 100 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 8) Rock / Ash Fill Unit Weight: 105 pcf Cohesion: 0 psf Phi: 34 ° Piezometric Line: 1
- Name: Bedrock Piezometric Line: 1 Horz Seismic Load: 0.085

FOS = 1.162



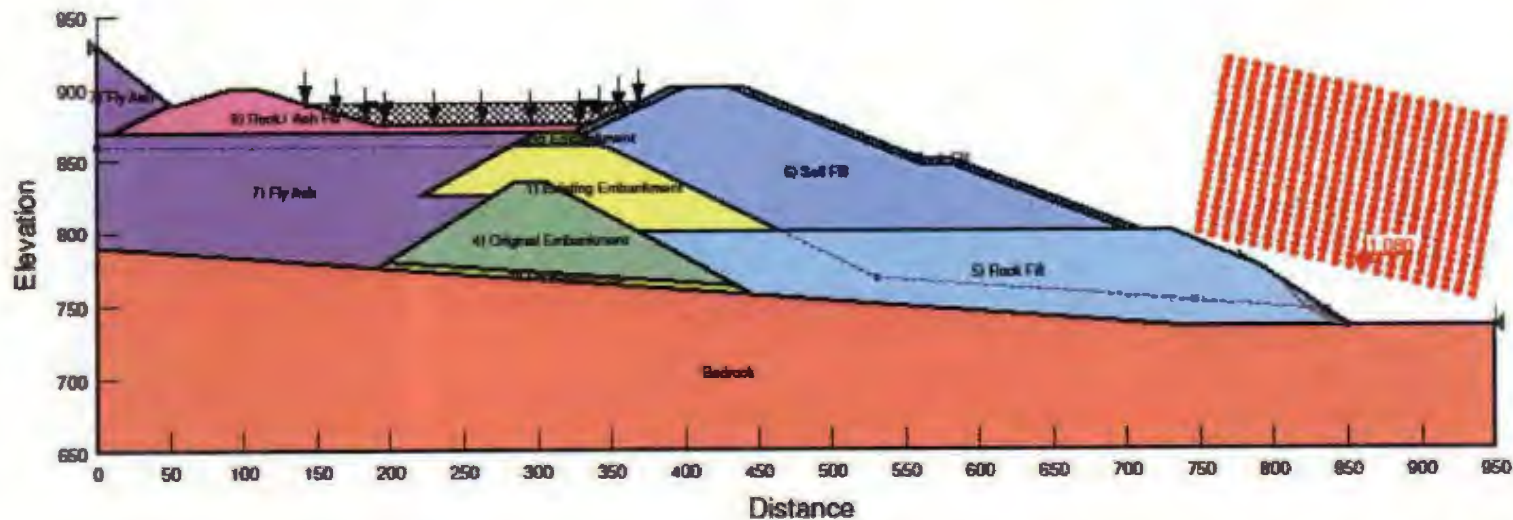
Excavated Slope Effective Stress Analysis with Seismic Lowest Factor of Safety



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JUN 19 2015
DIVISION OF WASTE MANAGEMENT
SOLID WASTE BRANCH

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 Name: 6) Soil Fill Unit Weight: 118 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
 Name: 7) Fly Ash Unit Weight: 100 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
 Name: 8) Rock / Ash Fill Unit Weight: 105 pcf Cohesion: 0 psf Phi: 34 ° Piezometric Line: 1
 Name: Bedrock Piezometric Line: 1 Horz Seismic Load: 0.085

FOS = 1.080



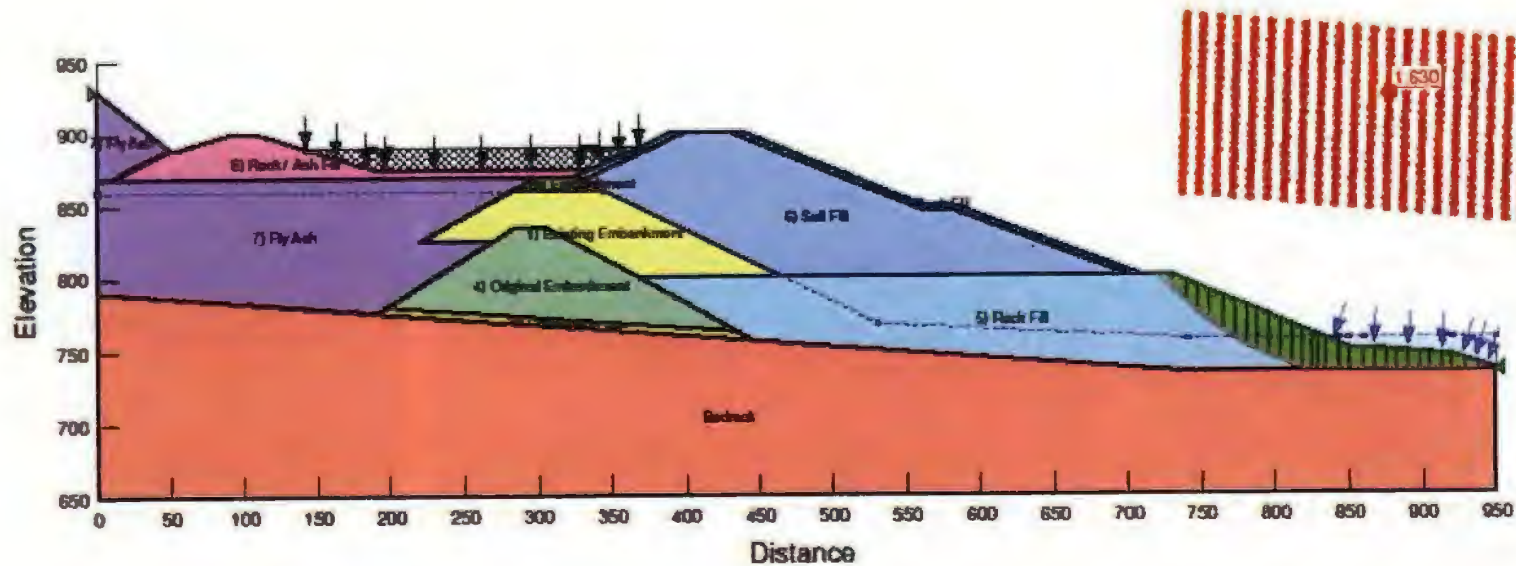
Existing Slope Effective Stress Analysis with Seismic and Flooded Lowest Factor of Safety



RECEIVED
JUN 19 2015
DIVISION OF WASTE MANAGEMENT
SOLID WASTE BRANCH

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 Name: 4) Original Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
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 Name: 6) Soil Fill Unit Weight: 118 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
 Name: 7) Fly Ash Unit Weight: 100 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
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FOS = 1.630



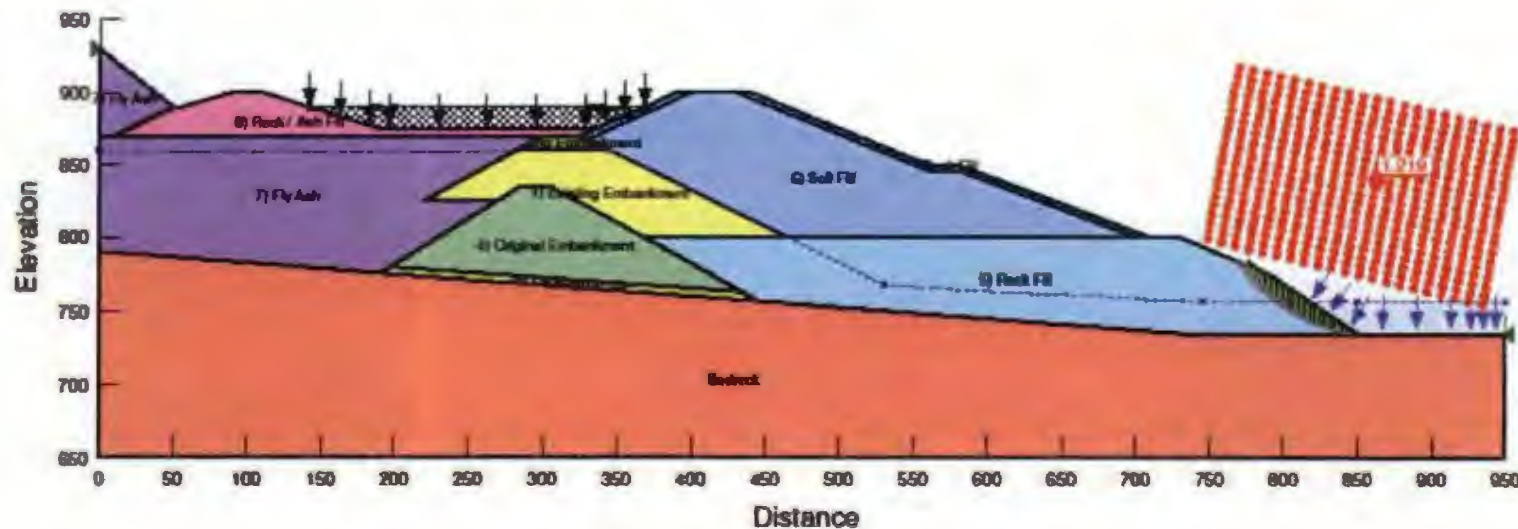
Excavated Slope Effective Stress Analysis with Seismic and Flooded Lowest Factor of Safety



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JUN 19 2015
DIVISION OF WASTE MANAGEMENT
SOLID WASTE BRANCH

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 Name: 4) Original Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
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 Name: 6) Soil Fill Unit Weight: 118 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
 Name: 7) Fly Ash Unit Weight: 100 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
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FOS = 1.219



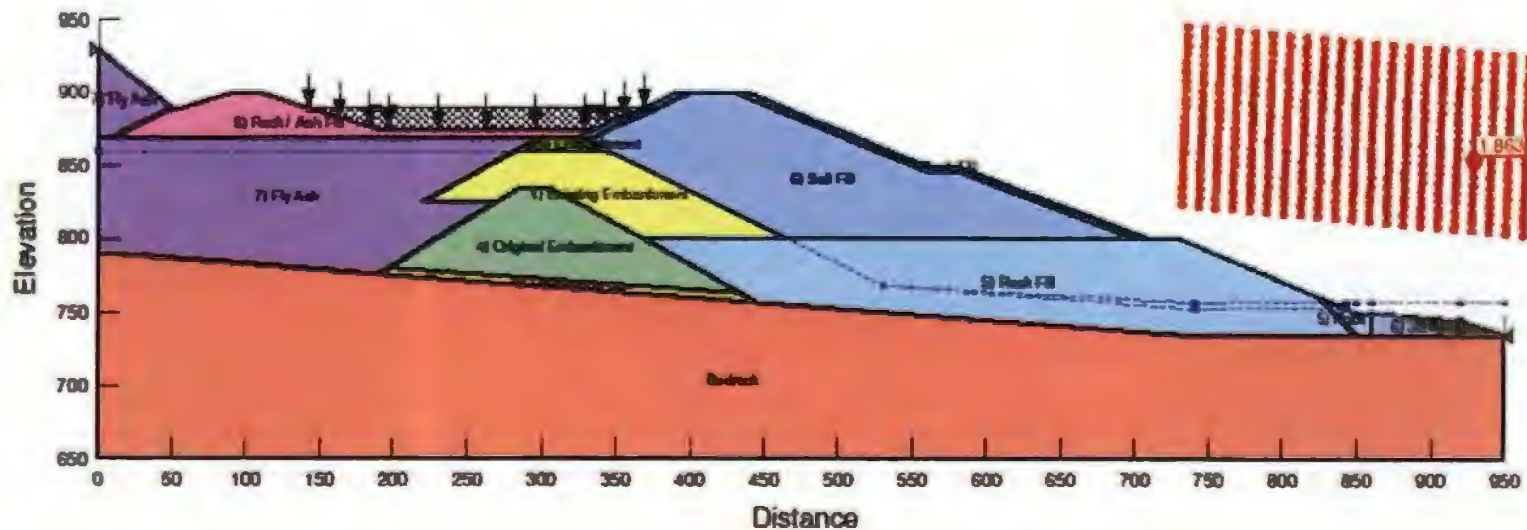
Existing Slope Rapid Drawdown Analysis Lowest Factor of Safety



RECEIVED
JUN 19 2015
DIVISION OF WASTE MANAGEMENT
SOLID WASTE BRANCH

- Name: 1) Existing Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 30 ° Piezometric Line: 1
- Name: 2) Foundation Soil Unit Weight: 125 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 3) Existing Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 28 ° Piezometric Line: 1
- Name: 4) Original Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 5) Rock Fill Unit Weight: 115 pcf Cohesion: 100 psf Phi: 38 ° Piezometric Line: 1
- Name: 6) Soil Fill Unit Weight: 118 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 7) Fly Ash Unit Weight: 100 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
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FOS = 1.863



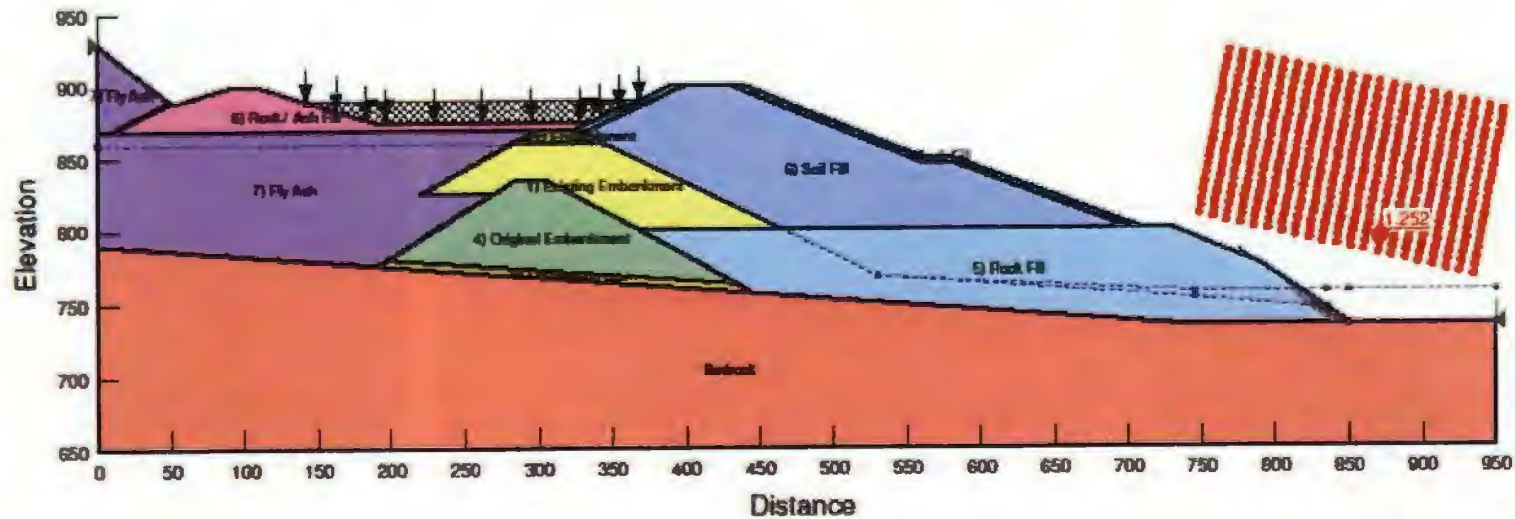
Excavated Slope Rapid Drawdown Analysis Lowest Factor of Safety



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JUN 19 2015
DIVISION OF WASTE MANAGEMENT
SOLID WASTE BRANCH

- Name: 1) Existing Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 30 ° Piezometric Line: 1
- Name: 2) Foundation Soil Unit Weight: 125 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 3) Existing Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 28 ° Piezometric Line: 1
- Name: 4) Original Embankment Unit Weight: 125 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
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- Name: 6) Soil Fill Unit Weight: 118 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 7) Fly Ash Unit Weight: 100 pcf Cohesion: 0 psf Phi: 32 ° Piezometric Line: 1
- Name: 8) Rock / Ash Fill Unit Weight: 105 pcf Cohesion: 0 psf Phi: 34 ° Piezometric Line: 1
- Name: Bedrock Piezometric Line: 1

FOS = 1.252



Toe Drain Excavation Stability Analysis Summary



Analysis Condition	Lowest Factor of Safety		Target Factor of Safety
	Existing Slope	Excavated Slope	
Total Stress	2.216	1.252	1.5
Effective Stress	1.762	1.252	1.5
Effective Stress with Seismic	1.162	1.080	1.0
Effective Stress with Seismic and Flooded Toe	1.630	1.219	1.0
Rapid Drawdown	1.863	1.252	1.2

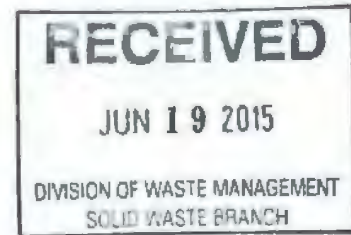


- ▶ The Excavated Slope is laid back to a 1:1.5 slope.
 - ▶ Excavated slope will have a short-term exposure a few months or less
- ▶ The material properties are based on FMSM design properties with a small amount of cohesion added to the rock fill material.
- ▶ Target FOS from "Guidelines for the Geotechnical Investigation and Analysis of Existing Earth Dams" Kentucky Division of Water.

Toe Drain Excavation Stability Analysis Summary



- ▶ Amec Foster Wheeler Stability Analysis
 - ▶ Total Stress
 - ▶ Effective Stress
 - ▶ Effective Stress with Seismic Load
 - ▶ Effective Stress with Seismic Load and Flooded Toe
 - ▶ Effective Stress with Rapid Drawdown of Flood Event
- ▶ All Factors of Safety above Target Values except
 - ▶ Short-term exposure cut-slope (FS = 1.252)
- ▶ Stability Analyses Results suggest Strength Parameter Selection is Conservative
- ▶ Movement of Dam Slope will be Monitored (See slide #18)



RECEIVED

JUN 19 2015

DIVISION OF WASTE MANAGEMENT
SOLID WASTE BRANCH

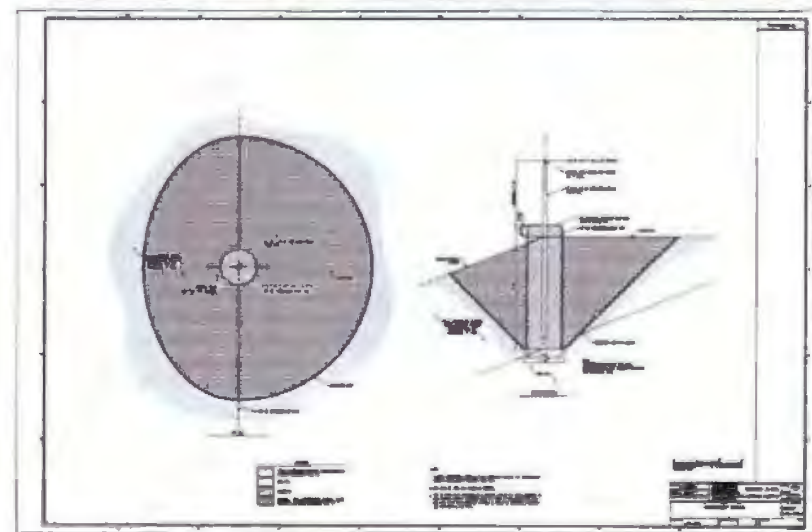


Embankment Movement Monitoring

Monuments exist on Upper Bench

Similar monuments to be installed on the Lower Bench

Monuments to be monitored weekly until excavation is backfilled, and for one month after backfilling





**Kentucky Energy and Environment Cabinet
Department for Environmental Protection
Division of Waste Management**

PERMIT

Facility: **E. W. Brown Generating Station**
815 Dix Dam Rd
Harrodsburg, KY 40330

Permittee: **Kentucky Utilities Co**
220 W Main St
PO Box 32010
Louisville, KY 40232

Agency Interest: **KY Utilities Co - Brown Station**
815 Dix Dam Rd
Harrodsburg, KY 40330

The Division has issued the permit under the provisions of KRS Chapter 224 and regulations promulgated pursuant thereto. This permitted activity or activities are subject to all conditions and operating limitations contained herein. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses or approvals required by this Division or other state and local agencies.

No deviation from the plans and specifications submitted with your application or any condition specified herein is allowed, unless authorized in writing from the Division. Violation of the terms and conditions specified herein may render this permit null and void. All rights of inspection by representatives of the Division are reserved. Conformance with all applicable Waste Management Regulations is the responsibility of the permittee.

Agency Interest ID #: **3148**

Solid Waste Permit #: **sw08400010**

County: **Mercer**

Permitted Activities:

Subject Item	Activity	Type	Status
ACTV002	Special Waste Landfill Coal/08400010	Construction/Operation	Active
ACTV004	Coal Combustion Residuals Surface Impoundment/08400010	Registered Permit by Rule	Active
ACTV005	Coal Combustion Residuals Surface Impoundment/08400010	Registered Permit by Rule	Active

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Acreage Summary:

Waste Disposal Area (in Acres):

Activity	Disposal Area
Coal Combustion Residuals Surface Impoundment	8.80
Coal Combustion Residuals Surface Impoundment	29.90
Special Waste Landfill-Coal	105.30
Total Disposal Area	144.00
Total Permitted Area	377.00

Cost Estimate Summary:

Coverage Type	Cost Estimate	Effective	Comments
Closure	\$11,027,960.00	09/22/2016	Approved under APE20160001
Post-Closure	\$1,586,778.00	09/22/2016	Approved under APE20160001

Financial Assurance Summary:

The owner or operator shall maintain the following financial assurance approved by the Division in compliance with KRS Chapter 224.40-650, KRS Chapter 224.50-862, 401 KAR 45:080, and 401 KAR 48:310:

Instrument Type	Instrument Number	Amount	Date Received	Comments
Surety Bond	106094008	\$3,000,000.00	09/12/2014	
Surety Bond	106569019	\$12,614,738.00	09/13/2016	

First Operational Permit Effective Date: 09/22/2016

Permit Effective Date: 09/22/2016

Permit Expiration Date: Life of Facility

Permit issued: 09/22/2016



Danny Anderson, P.E.
Manager, Solid Waste Branch

PERMIT

Permit Conditions:**Facility Information and/or Conditions**

Description of Special Waste Activities:

ACTV0002 - Special Waste Landfill-Coal Combustion By-Products totaling 105.3 acres (Formal Permit);

ACTV0004 - Coal Combustion By-Products Surface Impoundment-Main Ash Pond totaling 114.1 acres (105.3 acres overlapped by landfill, 8.80 acres remain) (Registered Permit-by-Rule);

ACTV0005 - Coal Combustion By-Products Surface Impoundment-Auxiliary Ash Pond totaling 29.9 acres (Registered Permit-by-Rule); and

GSTR0002 - Groundwater Monitoring - Spring Monitoring Group applies to the entire facility and includes the Special Waste Landfill (ACTV0002), the Main Ash Pond (ACTV0004), and the Auxiliary Ash Pond (ACTV0005).

Subject Items**ACTV0002 - Special Waste Landfill-Coal****Standard Requirements:**

1. General: The owner or operator of a special waste facility shall comply with KRS Chapter 224 and 401 KAR Chapters 30, 40 and 45 for the construction and operation of special waste facilities. [KRS 224.50-760]
2. General: For construction and operation of the special waste landfill, the owner or operator shall comply with KRS Chapter 224.50-760, 401 KAR 45:030, 45:110 and the approved permit application(s). [401 KAR 45:110]

Variances, Alternate Specifications and Special Conditions:

1. Operation: Wastes shall be placed uniformly across the landfill. With the exception of the first layers used to fill in the sawtooth valleys, the waste shall be placed across the landfill in even layers no greater than ten (10) feet thick. The owner or operator shall place waste in thin lifts and adjoining phases shall not differ in thickness by more than ten (10) feet. Waste shall be placed only on constructed and approved liner. Waste shall be sloped to allow for proper drainage. This pattern of uniform loading across the landfill shall continue until final volume and slopes are achieved. [401 KAR 45:140 Section 2]
2. Construction: The owner or operator shall use a fully-loaded tandem axle dump truck or equivalent during proof-roll inspection(s). [401 KAR 45:140 Section 2]
3. Variance: A variance has been granted to the buffer zone requirement in 401 KAR 45:130, Section 1(3). The Special Waste Landfill (ACTV0002) bottom liner shall be constructed and maintained in accordance with the permit and approved plans. [401 KAR 45:130 Section 1, 401 KAR 30:020 Section 2]

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4. Construction: The permittee shall install leachate collection systems using a minimum collection pipe diameter of 6 inches. [401 KAR 45:110 Section 1, 401 KAR 45:140 Section 2]
5. Construction: The distance between leachate collection system cleanouts shall be 1,000 ft or less. [401 KAR 45:110 Section 1, 401 KAR 45:140 Section 2]
6. Operation: This facility shall not result in a public nuisance because of blowing litter, debris, or other waste or material including, but not limited to, dust. The permittee may utilize non-contact storm water run-off throughout the facility to control dust. The permittee may also apply process water and/or leachate in waste areas directly above the liner system on days without precipitation at a rate not to exceed 6,000 gallons per day to control dust. [401 KAR 30:031 Section 11, 401 KAR 45:140 Section 2]
7. Construction: The bottom liner of the Special Waste Landfill, which also serves as the closure cap of the Main Ash Pond (ACTV0004), shall meet the construction requirements outlined in the approved landfill application (APE20110003) and closure plan (APE20140007). Any proposed deviation from the approved plans must be submitted to the Cabinet for approval prior to construction activities. [401 KAR 45:140 Section 2, 401 KAR 45:110]
8. Financial Assurance: The maximum extent of operation includes the area of the landfill identified by an operating permit and for which the final cover Construction Progress Report has not yet been approved by the Cabinet. The current maximum extent of operation for this activity is less than or equal to 105.3 acres. [401 KAR 45:080]
9. Wastestreams: The owner or operator may dispose of utility wastes (fly ash, bottom ash, scrubber sludge) generated by the E. W. Brown Generating Facility located in Mercer County, Kentucky. Any new waste stream or source shall be approved by the Cabinet prior to accepting the waste. [401 KAR 45:110 Section 3(7), 401 KAR 45:040 Section 1(3)(o), KRS 224.50-760]

Approved Applications - The owner or operator shall comply with applicable statutes and regulations and the following approved applications:

1. 05-01-2013 - Groundwater Assessment Plan - AIN20120001 (The assessment process is site-wide.)
2. 07-30-2014 - New Special Waste Landfill, Construction Permit - APE20110003
3. 08-27-2015 - Modification to Remove Tracer Requirement - APE20150004
4. 10-14-2015 - Groundwater Remedial Action Plan - ARM20150001 (The assessment process is site-wide.)
5. 09-22-2016 - Construction Progress Report, Phase 1 Liner (42.3 acres) - APE20160001

ACTV0004 - Coal Combustion Residuals Surface Impoundment

Variations, Alternate Specifications and Special Conditions:

1. General: ACTV0004 consists of the Main Ash Pond totaling 114.1 acres. The Special Waste Landfill (ACTV0002, 105.3 acres) shall be constructed and operated on top of this coal combustion by-products surface impoundment; the remaining 8.80 acres (area not overlapped by the landfill) represents the remaining portion of the Main Ash Pond operating under the authority of a registered permit-by-rule. [401 KAR 45:140 Section 2, 401 KAR 45:060 Section 2(2)]

PERMIT

2. General: The Main Ash Pond is upgraded from a Permit-by-Rule to a Registered Permit-by-Rule in accordance with the requirements of 401 KAR 45:060. [401 KAR 45:060 Section 2(2), 401 KAR 30:031]
3. Construction: The permittee shall mechanically compact the temporary cap of Phase 3 of the Main Ash Pond to at least 92 percent of maximum dry density. After completion, the Cabinet shall be notified within two (2) working days in order to schedule inspection of the temporary cap. [401 KAR 40:020 Section 2(4), 401 KAR 45:140 Section 2]
4. Closure: The closure cap of the Main Ash Pond, which also serves as the bottom liner of the Special Waste Landfill (ACTV0002), shall meet the construction and operating requirements outlined in the approved landfill application (APE20110003) and closure plan (APE20140007). Any proposed deviation from the approved plans must be submitted to the Cabinet for approval prior to construction activities. [401 KAR 45:110, 401 KAR 45:140 Section 2]

Approved Applications - The owner or operator shall comply with applicable statutes and regulations and the following approved applications:

1. 05-01-2013 - Groundwater Assessment Plan - AIN20120001 (The assessment process is site-wide.)
2. 07-30-2014 - Upgrade from Permit-by-Rule to a Registered Permit-by-Rule - APE20110003
3. 07-30-2014 - Main Ash Pond Closure Plan - APE20140007
4. 10-14-2015 - Groundwater Remedial Action Plan - ARM20150001 (The assessment process is site-wide.)

ACTV0005 - Coal Combustion Residuals Surface Impoundment

Variances, Alternate Specifications and Special Conditions:

1. General: ACTV0005 consists of an ash pond totaling 29.9 acres and is identified as the Auxiliary Ash Pond. This coal combustion by-products surface impoundment is approximately 100 feet to the south of the Main Ash Pond (ACTV0004). [401 KAR 45:140 Section 2]
2. General: The Auxiliary Ash Pond is upgraded from a Permit-by-Rule to a Registered Permit-by-Rule in accordance with the requirements of 401 KAR 45:060. [401 KAR 45:060 Section 2(2), 401 KAR 30:031]

Approved Applications - The owner or operator shall comply with applicable statutes and regulations and the following approved applications:

1. 05-01-2013 - Groundwater Assessment Plan - AIN20120001 (The assessment process is site-wide.)
2. 07-30-2014 - Upgrade from Permit-by-Rule to a Registered Permit-by-Rule - APE20110003
3. 10-14-2015 - Groundwater Remedial Action Plan - ARM20150001 (The assessment process is site-wide.)

Financial Assurance

ACTV0003 - Financial Assurance

The following is a history of the financial assurance for this facility:

1. 09-12-2014 - SB # 106094008, \$3,000,000.00
2. 09-13-2016 - SB# 106569019, \$12,614,738.00

PERMIT

Monitoring Conditions**GSTR0002 - Groundwater Monitoring - Spring Monitoring Group**

Group Members: STRC0007 - Spring CH-040; STRC0008 - Spring CH-044; STRC0009 - Spring CH-057; STRC0010 - Spring CH-052

Standard Requirements:

1. The owner or operator shall satisfy the requirements of 401 KAR 45:160 for all wastes and waste constituents contained in the site or facility. [401 KAR 45:160 Section 1]
2. The permittee shall monitor for other parameters as required by the Cabinet. [401 KAR 45:160 Section 8(2)(c)]
3. The owner or operator shall monitor groundwater on the approved schedule at each approved groundwater monitoring location in accordance with 401 KAR 45:160, the permit, and the approved plans. A table summarizing the parameters to be monitored, their respective limits and monitoring frequency is included herein. [401 KAR 45:160, 401 KAR 45:140 Section 1(1)]
4. The groundwater analytical data and statistical analysis shall be submitted on forms provided by the Cabinet, within sixty (60) days after sampling or 15 days of the completion of statistical analysis, whichever is sooner. [401 KAR 45:160 Section 4]
5. If the analysis of groundwater sample results indicates contamination (i.e., a statistical or MCL exceedence) as specified in 401 KAR 45:160 Section 5, the owner or operator shall notify the Cabinet within (forty-eight) 48 hours of receiving the results and shall arrange to split samples no later than ten (10) days from the receipt of the results. [401 KAR 45:160 Section 5]
6. The owner or operator shall provide alternate water supplies to all affected parties within twenty-four (24) hours of notification of the Cabinet that sample results indicate contamination of a drinking water supply if it has been determined that the special waste site or facility is the probable source of the contamination. [401 KAR 45:160 Section 3]
7. If required by the Cabinet, groundwater contamination assessment and corrective action shall be performed in full compliance with all provisions of 401 KAR 45:160 Section 5. [401 KAR 45:160 Section 5]

Variances, Alternate Specifications and Special Conditions:

1. General: GSTR0002 - Groundwater Monitoring-Spring Monitoring Group applies to the entire site. Activities included are ACTV0002, ACTV0004 and ACTV0005. [401 KAR 45:160]
2. Groundwater Assessment: The owner or operator shall submit a groundwater assessment report meeting the requirements of 401 KAR 45:160. [401 KAR 45:160, 401 KAR 45:030 Section 9(12), 401 KAR 45:140 Section 2]

PERMIT

3. Remedial Action Plan: The owner or operator shall, no later than 90 days of Cabinet approval of the Groundwater Assessment Report, submit a remedial action plan that meets the requirements of 401 KAR 45:160. [401 KAR 45:160, 401 KAR 45:030 Section 9(12), 401 KAR 45:140 Section 2]
4. Groundwater Monitoring: The permittee shall monitor Stonewall Spring (CH-052) as the background monitoring point in accordance with the approved groundwater monitoring plan. [401 KAR 45:160 Section 2(3)]
5. Groundwater Monitoring: The permittee shall monitor Dam Toe Right Spring (CH-040), Ditch Spring (CH-044), and Briar Patch Spring (CH-057) as the downgradient compliance monitoring points in accordance with the approved groundwater monitoring plan. Because the original location of the monitoring point for Dam Toe Right has been covered as a consequence of construction, this monitoring point shall be moved to the cutoff wall toe drain. [401 KAR 45:140 Section 2, 401 KAR 45:160 Section 2(3)]
6. Groundwater Monitoring: The permittee shall monitor groundwater at all approved monitoring locations pursuant to 401 KAR 45:160. Groundwater monitoring parameters listed in this permit were determined by the Cabinet based on the chemical analysis of the waste to be disposed pursuant to 401 KAR 45:160 Section 8(3). [401 KAR 45:140 Section 2, 401 KAR 45:160 Section 8(3)]
7. The owner or operator shall conduct statistical analysis of the groundwater data in accordance with 401 KAR 45:160 Section 6 and the approved applications. The statistical test chosen shall be conducted separately for each parameter at each monitoring location for each monitoring event. The results shall be maintained as part of the facility record throughout the operating and post-closure life of the facility. [401 KAR 45:160 Section 6, 401 KAR 45:140 Section 1(1)]
8. The owner or operator shall be required to prepare and submit an additional groundwater contamination assessment plan if laboratory analyses of one (1) or more public or private water supplies, or monitoring locations at the site, shows the presence of one (1) or more parameters above the maximum contaminant level (MCL), as specified in 401 KAR 30:031 or a statistically significant increase over background levels for parameters that have no MCL. [401 KAR 45:160 Section 5, 401 KAR 30:031]

PERMIT

Groundwater Monitoring Limits:

Subject Item	CAS Number	Parameter	Frequency	Lower Limit	Upper Limit	Units	Statistical Limit	Report Only
GSTR0002	07440-36-0	Antimony, Total (as Sb)	semiannually		0.006	mg/L		
GSTR0002	07440-38-2	Arsenic, Total (as As)	semiannually		0.01	mg/L		
GSTR0002	07440-39-3	Barium, Total (as Ba)	semiannually		2.0	mg/L		
GSTR0002	07440-41-7	Beryllium, Total	semiannually		0.004	mg/L		
GSTR0002	07440-42-8	Boron	semiannually			mg/L	Yes	
GSTR0002	07440-43-9	Cadmium, Total (as Cd)	semiannually		0.005	mg/L		
GSTR0002	07440-70-2	Calcium	semiannually			mg/L	Yes	
GSTR0002		Carbon, Total Organic	semiannually			mg/L	Yes	
GSTR0002		Chemical Oxygen Demand (COD)	semiannually			mg/L	Yes	
GSTR0002	16887-00-6	Chloride	semiannually			mg/L	Yes	
GSTR0002	07440-47-3	Chromium, Total (as Cr)	semiannually		0.1	mg/L		
GSTR0002	07440-48-4	Cobalt, Total	semiannually			mg/L	Yes	
GSTR0002	16984-48-8	Fluoride	semiannually		4.0	mg/L		
GSTR0002		Groundwater Elevation	semiannually			feet above mean sea level based on a USGS datum		Yes
GSTR0002	07439-89-6	Iron, Total (as Fe)	semiannually			mg/L	Yes	
GSTR0002	07439-92-1	Lead, Total (as Pb)	semiannually		0.015	mg/L		
GSTR0002		Lithium, (Total) as Li	semiannually			mg/L	Yes	
GSTR0002	07439-97-6	Mercury, Total (as Hg)	semiannually		0.002	mg/L		
GSTR0002		Molybdenum, Total (as Mo)	semiannually			mg/L	Yes	
GSTR0002		Radium 226 + Radium 228, Total	semiannually		5.0	pCi/L		
GSTR0002	07782-49-2	Selenium, Total (as Se)	semiannually		0.05	mg/L		
GSTR0002		Sodium, Total (as Na)	semiannually			mg/L	Yes	
GSTR0002		Solids, Total Dissolved	semiannually			mg/L	Yes	
GSTR0002		Specific Conductance	semiannually			umho/cm	Yes	
GSTR0002		Sulfate, Total (as SO4)	semiannually			mg/L	Yes	
GSTR0002		Temperature, Water Fahrenheit	semiannually			degrees Fahrenheit		Yes
GSTR0002	07440-05-3	Thallium, Total	semiannually		0.002	mg/L		
GSTR0002		pH	semiannually	6.0	8.5	standard units		

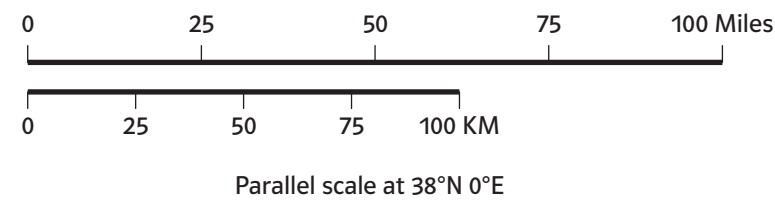
Kentucky Utilities Company

Application Exhibit 4

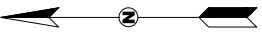
Maps and Drawings



a PPL company






 0 200' 400' 800'
 APPROX. SCALE: 1"=400'
 STRUCTURES NOT TO SCALE
 NOVEMBER 2014

E.W. BROWN GENERATING STATION OVERALL SITE PLAN

Kentucky Utilities Company

Application Exhibit 5

Environmental Cost Recovery Surcharge

Tariff Sheets - Clean Version

Kentucky Utilities Company

P.S.C. No. 18, First Revision of Original Sheet No. 87
Canceling P.S.C. No. 18, Original Sheet No. 87

Adjustment Clause

ECR

Environmental Cost Recovery Surcharge

APPLICABLE

In all territory served.

AVAILABILITY OF SERVICE

This schedule is mandatory to all Standard Electric Rate Schedules listed in Section 1 of the General Index except PSA and Special Charges, all Pilot Programs listed in Section 3 of the General Index, and the FAC (including the Off-System Sales Tracker) and DSM Adjustment Clauses. Standard Electric Rate Schedules subject to this schedule are divided into Group 1 or Group 2 as follows:

Group 1: Rate Schedules RS; RTOD-Energy; RTOD-Demand; VFD; AES; LS; RLS; LE; and TE.
Group 2: Rate Schedules GS; PS; TODS; TODP; RTS; FLS; EVSE; EVC; SPS; STOD; and OSL.

RATE

The monthly billing amount under each of the schedules to which this mechanism is applicable, shall be increased or decreased by a percentage factor calculated in accordance with the following formula.

$$\text{Group Environmental Surcharge Billing Factor} = \text{Group E(m)} / \text{Group R(m)}$$

As set forth below, Group E(m) is the sum of Jurisdictional E(m) of each approved environmental compliance plan revenue requirement of environmental compliance costs for the current expense month allocated to each of Group 1 and Group 2. Group R(m) for Group 1 is the 12-month average revenue for the current expense month and for Group 2 it is the 12-month average non-fuel revenue for the current expense month.

DEFINITIONS

- 1) For all Plans, $E(m) = [(RB/12) (ROR + (ROR - DR) (TR / (1 - TR)))] + OE - EAS + BR$
 - a) RB is the Total Environmental Compliance Rate Base.
 - b) ROR is the Rate of Return on Environmental Compliance Rate Base, designated as the overall rate of return [cost of short-term debt, long-term debt, preferred stock, and common equity].
 - c) DR is the Debt Rate [cost of short-term debt, and long-term debt].
 - d) TR is the Composite Federal and State Income Tax Rate.
 - e) OE is the Operating Expenses. OE includes operation and maintenance expense recovery authorized by the K.P.S.C. in all approved ECR Plan proceedings.
 - f) EAS is the total proceeds from emission allowance sales.
 - g) BR is the operation and maintenance expenses, and/or revenues if applicable, associated with Beneficial Reuse.
 - h) Plans are the environmental surcharge compliance plans submitted to and approved by the Kentucky Public Service Commission pursuant to KRS 278.183.

DATE OF ISSUE: January 26, 2018

DATE EFFECTIVE: July 31, 2018

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Lexington, Kentucky

**Issued by Authority of an Order of the
Public Service Commission in Case No.
2017-00483 dated XXXX**

Kentucky Utilities Company

P.S.C. No. 18, First Revision of Original Sheet No. 87.1
Canceling P.S.C. No. 18, Original Sheet No. 87.1

Adjustment Clause

ECR
Environmental Cost Recovery Surcharge

DEFINITIONS (continued)

- 2) Total E(m) (sum of each approved environmental compliance plan revenue requirement) is multiplied by the Jurisdictional Allocation Factor. Jurisdictional E(m) is adjusted for any (Over)/Under collection or prior period adjustment and by the subtraction of the Revenue Collected through Base Rates for the Current Expense month to arrive at Adjusted Net Jurisdictional E(m). Adjusted Net Jurisdictional E(m) is allocated to Group 1 and Group 2 on the basis of Revenue as a Percentage of Total Revenue for the 12 months ending with the Current Month to arrive at Group 1 E(m) and Group 2 E(m).
- 3) The Group 1 R(m) is the average of total Group 1 monthly base revenue for the 12 months ending with the current expense month. Base revenue includes the customer, energy, and lighting charges for each rate schedule included in Group 1 to which this mechanism is applicable and automatic adjustment clause revenues for the Fuel Adjustment Clause and the Demand-Side Management Cost Recovery Mechanism as applicable for each rate schedule in Group 1.
- 4) The Group 2 R(m) is the average of total Group 2 monthly base non-fuel revenue for the 12 months ending with the current expense month. Base non-fuel revenue includes the customer, non-fuel energy, and demand charges for each rate schedule included in Group 2 to which this mechanism is applicable and automatic adjustment clause revenues for the Demand-Side Management Cost Recovery Mechanism as applicable for each rate schedule in Group 2. Non-fuel energy is equal to the tariff energy rate for each rate schedule included in Group 2 less the base fuel factor as defined on Sheet No. 85.1, Paragraph 6.
- 5) Current expense month (m) shall be the second month preceding the month in which the Environmental Surcharge is billed.

DATE OF ISSUE: January 26, 2018

DATE EFFECTIVE: July 31, 2018

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Lexington, Kentucky

**Issued by Authority of an Order of the
Public Service Commission in Case No.
2017-00483 dated XXXX**

Kentucky Utilities Company

Application Exhibit 5

Environmental Cost Recovery Surcharge

Tariff Sheets - Redline Version

Kentucky Utilities Company

P.S.C. No. 18, First Revision of Original Sheet No. 87
Canceling P.S.C. No. 18, Original Sheet No. 87

Adjustment Clause

ECR

Environmental Cost Recovery Surcharge

APPLICABLE

In all territory served.

AVAILABILITY OF SERVICE

This schedule is mandatory to all Standard Electric Rate Schedules listed in Section 1 of the General Index except PSA and Special Charges, all Pilot Programs listed in Section 3 of the General Index, and the FAC (including the Off-System Sales Tracker) and DSM Adjustment Clauses. Standard Electric Rate Schedules subject to this schedule are divided into Group 1 or Group 2 as follows:

Group 1: Rate Schedules RS; RTOD-Energy; RTOD-Demand; VFD; AES; LS; RLS; LE; and TE.
Group 2: Rate Schedules GS; PS; TODS; TODP; RTS; FLS; EVSE; EVC; SPS; STOD; and OSL.

RATE

The monthly billing amount under each of the schedules to which this mechanism is applicable, shall be increased or decreased by a percentage factor calculated in accordance with the following formula.

$$\text{Group Environmental Surcharge Billing Factor} = \text{Group E(m)} / \text{Group R(m)}$$

As set forth below, Group E(m) is the sum of Jurisdictional E(m) of each approved environmental compliance plan revenue requirement of environmental compliance costs for the current expense month allocated to each of Group 1 and Group 2. Group R(m) for Group 1 is the 12-month average revenue for the current expense month and for Group 2 it is the 12-month average non-fuel revenue for the current expense month.

DEFINITIONS

- 1) For all Plans, $E(m) = [(RB/12) (ROR + (ROR - DR) (TR / (1 - TR)))] + OE - EAS + BR$
 - a) RB is the Total Environmental Compliance Rate Base.
 - b) ROR is the Rate of Return on Environmental Compliance Rate Base, designated as the overall rate of return [cost of short-term debt, long-term debt, preferred stock, and common equity].
 - c) DR is the Debt Rate [cost of short-term debt, and long-term debt].
 - d) TR is the Composite Federal and State Income Tax Rate.
 - e) OE is the Operating Expenses. OE includes operation and maintenance expense recovery authorized by the K.P.S.C. in all approved ECR Plan proceedings.
 - f) EAS is the total proceeds from emission allowance sales.
 - g) BR is the operation and maintenance expenses, and/or revenues if applicable, associated with Beneficial Reuse.
 - h) Plans are the environmental surcharge compliance plans submitted to and approved by the Kentucky Public Service Commission pursuant to KRS 278.183.

DATE OF ISSUE: January 26, 2018

Deleted: July 7, 2017

DATE EFFECTIVE: July 31, 2018

Deleted: July 1, 2017

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Lexington, Kentucky

Issued by Authority of an Order of the
Public Service Commission in Case No.
2017-00483 dated XXXX

Deleted: 2016-00370

Deleted: June 22, 2017 and modified June 29, 2017

