

ANNUAL INSPECTION REPORT

**Western Farmers  
Electric Cooperative  
Hugo, Oklahoma**

**Combined Coal Combustion Residual  
Surface Impoundments and Landfill  
Annual Inspection Report  
Hugo Plant**



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Parkhill Project # 01104320  
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## **BACKGROUND**

### **Facility Description**

Western Farmers Electric Cooperative (WFEC) engaged Parkhill | Cardinal Engineering (Parkhill) through subcontract from Altamira to perform the Annual Inspection of the Coal Combustion Residual (CCR) impoundments and landfill at its Hugo Power Plant (Hugo Plant). The annual inspection is a requirement of the Environmental Protection Agency (EPA) final rule titled Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments in 40 CFR Part 257, Subpart D, published in the Federal Register on April 17, 2015 and Oklahoma Administrative Code titled Disposal of Coal Combustion Residuals from Electric Utilities, OAC 252:517, effective date September 15, 2017.

The Hugo Plant is located on Highway 70, west of Fort Towson, Oklahoma in Choctaw County. Operation of the plant began in April 1982. The Hugo plant has one unit that burns Wyoming coal with a net output of 450 net mega-watts (MW).

The three types of ash generated from burning the coal are classified as fly ash, economizer ash or bottom ash. At the Hugo Plant, the fly ash is stored in silos or in the CCR landfill (labeled CCR1), economizer ash is managed in CCR1 and as of November 2018 the bottom ash is also managed in CCR1.

Parkhill performed the inspection of the impoundments and landfill in accordance with the requirements outlined in 40 CFR 257.83(b) and 40 CFR 257.84(b) on November 9, 2020 by William Bird-Melton, E.I.T. The inspection site visit during which the Hugo Plant's Operating Records, and available data were collected and reviewed. During the site visit, Parkhill walked the perimeter of CCR1, CCR2 and CCR3 to inspect for signs of distress or malfunction of each unit and appurtenant structures, and to obtain field measurements required to determine the remaining capacity of the landfill and impoundments. The volumes are not based on topographic level accuracy but were calculated based on field measurements and original drawings of the landfill and impoundments.

### **Fly Ash**

The fly ash landfill is a two-cell unit, labeled CCR1 that has a storage capacity of 1,044,000 cubic yards (cyds). The fly ash is pneumatically conveyed to the fly ash silo then loaded onto a truck and stored in the CCR landfill or silos. Most of the fly ash is sold for beneficial use. There is an estimated 288,882 cyds of fly ash in the landfill and a remaining capacity of 755,118 (cyds)

## **Bottom Ash**

There is a single bottom ash impoundment consisting of two (2) cells. The north cell of the impoundment is labeled CCR2 and the south cell of the impoundment is labeled CCR3. CCR3 has an estimated storage capacity of 1,198,708 cyds and is currently storing an estimated 155,00 cyds of bottom ash. During a recent planned maintenance outage, the Hugo Plant underwent an upgrade to comply with Environmental Protection Agency (EPA) Coal Combustion Residuals Rules. Wet sluicing bottom ash from the boiler to either CCR2 or CCR3 was replaced with a dry bottom ash system. The new system uses a conveyer to remove bottom ash from the boiler to a storage bunker. Additionally, bottom ash has been removed from CCR2 and stored in CCR1. The CCR Unit 2 has been closed and a new permitted impoundment under the ODEQ Water Quality Division is being constructed. The CCR Unit 3 is slated for closure once the new impoundment is completed and in use. As of July 2, 2020, the CCR 2 has been closed and will no longer be inspected after the 2020 annual inspection report under the current permit.

CCR2 was clean closed as of July 2020. It is a new impoundment (F08) under the facility's NPDES Permit, ODEQ Water Quality Division.

WFEC inspects both cells each day. The cells are designed with a three-foot normal pool level freeboard. This normal pool level freeboard is currently maintained by a 24" diameter constant elevation vertical pipe spillway that discharges into the Process Waste Pond located on the east side of the cells. Water level below the three-foot normal pool level freeboard is lowered by operating a set of manual valves.

## **SCOPE OF INSPECTION**

The purpose of the annual inspection is to meet the requirements outlined in 40 CFR 257.83(b) and 40 CFR 257.84(b) and OAC 525:517-13-4. The regulations require an annual inspection performed by a "Qualified Professional Engineer" as defined in 40 CFR 257.53. The CCR Rule specifies the Annual Inspection Report must address the following items for a CCR impoundment:

- Changes in geometry since the previous annual inspection
- Location and type of existing instrumentation and maximum recorded readings of each instrument since the previous annual inspection
- Approximate minimum, maximum, present depth, and elevation of the impounded water and CCR since the previous annual inspection
- Storage capacity of the surface impoundment at time of inspection
- Approximate volume of the impounded water and CCR at the time of inspection
- Appearance of an actual or potential structural weakness
- Existing conditions that are disrupting or have the potential to disrupt the operation and safety of the impoundment
- Any other changes which may have affected the stability or operation of the impounding structure since the previous annual inspection

- Deficiencies or releases

The CCR Rule specifies the Annual Inspection Report must address the following items for a CCR landfill:

- Changes in geometry since the previous annual inspection.
- Approximate volume of CCR at the time of inspection.
- Appearance of an actual or potential structural weakness.
- Existing conditions that are disrupting or have the potential to disrupt the operation and safety of the impoundment.
- Any other changes which may have affected the stability or operation of the landfill since the previous annual inspection.
- Deficiencies or releases.

## **SITE INSPECTION**

An agent for Parkhill's Qualified Professional Engineer made a trip to the Hugo Plant to review documentation and gather all the necessary field data and measurements for completion of the requirements of this Annual Inspection Report. The first trip on November 9, 2020 consisted of data gathering and initial site reconnaissance, including inspection of the integrity of the hydraulic structures that passed through the cells of the impoundment and landfill to the extent possible, obtaining field measurements and an additional site reconnaissance of both the impoundments and landfill.

Site visits included visual inspections of CCR1, CCR2 and CCR3. Any dike integrity issues, vegetation growth, or other potential detrimental activity was noted during the visual inspections.

The field measurements for the impoundment cell CCR3 included the following:

- Verify the elevation of the vertical pipe spillway.
- Verify the relation between the level gauges, 3-foot freeboard, and the overflow (vertical pipe spillway).
- Verify the dimensions of the impoundment and slopes of the dikes.
- Determine the bottom topography of the cells using design and as built drawings.

The field measurements for the landfill (CCR1) included the following:

- Verify the dimensions of the impoundment and slope of the dikes.
- Verify the amount of ash in the landfill.

During the first site visit on November 9, 2020, Parkhill reviewed 7 Day Checklist forms, operation manuals, and construction drawings, as well as made a cursory inspection of CCR1, CCR2, and CCR3.

All three units, CCR1, CCR2, and CCR3, were visually inspected on November 9, 2020 by Parkhill staff. The inspection included walking around all three structures, taking photographs, taking notes and taking level measurements to determine water surface elevation of CCR3. CCR2 was drained at the time of inspection for rehab and reconstruction into a storm water detention pond. No slope sloughing issues were observed. The design interior slopes of the dikes are 3H:1V. The steep slopes hinder the maintenance of the CCR's by limiting access to equipment for mowing and repairs.

The depth of water contained in CCR2 was visually observed and determined the impoundment was drained. Operating records indicate CCR2 has been drained for closure preparation since September 2019. At the time of this report, bottom ash from CCR2 had been placed in CCR1. CCR2 has been clean closed as of July 2020. It is a new impoundment (F08) under the facility's NPDES Permit, ODEQ Water Quality Division. CCR3 unit water depth was below the water level gauge and estimated to be approximately 6' in depth.

## **FINDINGS**

The following inspection findings are reported according to 40 CFR 257.83 and 40 CFR 257.84 based on field observations, measurements and data provided by WFEC.

### **1.0 Bottom Ash Impoundment CCR2 (north cell) and CCR3 (south cell)**

*Note: As previously stated above, CCR2 has been cleaned closed as of July 2020.*

### **1.1 Regulation Citation §257.83 (b)(I) and OAC 252:517-13-5(b)(A)**

*Review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (e.g. CCR unit design and construction information required by §§257.73(c)(1) and 257.74(c)(1), previous periodic structural stability assessments required under §§257.73(d) and 257.74(d), the results of inspection by a qualified person and results of previous annual inspections).*

**Findings:** Reviewed available information including previous annual inspection report, structural stability assessment, and 7 Day Inspection Checklist forms from the past year. Based on the observed site condition, slopes appear stable. However, construction of 3 (3) horizontal to one (1) vertical interior slopes may present maintenance difficulties. It is previously noted that the CCR Unit 2 has been clean closed as of July 2020.

### **1.2 Regulation Citation §257.83(b)(ii) and OAC 252:517-13-5-(b)(B)**

*A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit*

**Findings:** CCR3 was visually inspected on November 9, 2020 and. The inspection included: walking around the cell, taking photographs and taking notes. As previously stated, the CCR Unit 2 has been clean closed and is now permitted impoundment under the ODEQ Water Quality

Division. CCR3 appeared to be lowered at the time of inspection. Although several areas of minor erosion rills were noted during the inspection, there was no indication that these areas would cause a malfunction in the safe operation of the impoundments.

**1.3 Regulation Citation §257.83(b)(iii) and OAC 252-517-13-5(b)(2)**

*A visual inspection of any hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operations*

**Findings:** Concrete structures at each end of the pipe passing under the CCR dike are in good condition. This pipe is a recent HDPE replacement of the original corrugated metal pipe.

**1.4 Regulation Citation §257.83(b)(2)(a) and OAC 252-517-13-5(b)(2)**

*Any changes in geometry of the structure since the previous annual inspection*

**Findings:** No noticeable changes appear to have occurred to CCR3 since construction. The CCR Unit 2 has been closed and is now a new permitted impoundment under the ODEQ Water Quality Division. The two areas of slough repair completed in 2019 at the east exterior berm between CCR2, CCR3 and Process Waste Pond show no signs of failure.

**1.5 Regulation Citation §257.83(b)(2)(ii) and OAC 252:517-13-5(b)(2)**

*The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection.*

**Findings:** The water level of CCR2 and CCR3 are both measured toward the east end of the cells using a vertical staff marked with 0.1-foot increments. At the time of the inspection, CCR3 water level was approximately 6 feet below the water depth gauge and 16 feet below the top of the dike. CCR2 was drained. A review of 7 Day Inspection Checklist forms provided the maximum recorded reading for CCR2 and CCR3. Since the previous annual inspection, the maximum recorded readings are 14 feet below the top of the dike for CCR3 and CCR2 was drained all year.

**1.6 Regulation Citation §257.83(b)(2)(iii) and OAC 252:517-13-5(b)(2)**

*The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection*

**Findings:** Observed water elevation is measured at the outlet structure. CCR2 was drained at the time of inspection. CCR3 impoundment water level was 16 feet below the top of the dike at the time of inspection. According to the 7 Day Inspection Checklist forms, the maximum water elevation was reported at 14 feet below the top of the dike for CCR3. Minimum water elevation reported from the weekly inspection reports for CCR3 units was 22 feet below the top of the dike.

**1.7 Regulation Citation §257.83(b) (2)(iv) and OAC 252:517-13-5(b)(2)**

*The storage capacity of the impounding structure at the time of the inspection*

**Findings:** At the time of the inspection (on November 9, 2020), the remaining storage capacity at normal pool level, three feet below the top of dike, for CCR3 was 431,000 cyds. CCR2 was cleaned closed as of July 2020.

**1.8 Regulation Citation §257.83(b)(2)(v) and OAC 252:517-13-5(b)(2)**

*The approximate volume of the impounded water and CCR at the time of inspection*

**Findings:** At the time of the inspection (on November 9, 2020), the volume of impounded water in CCR3 was 133,400 cyds (at an elevation of 424.0 ft). Elevation readings are based on the elevation of 446 feet assigned to the top of the discharge structure in construction drawings. CCR2 was drained cleaned closed as of July 2020.

**1.9 Regulation Citation §257.83(b)(2)(vi) (part 1) and OAC 252:517-13-5(b)(2)**

*Any appearances of an actual structural weakness of the CCR unit*

**Findings:** The visual inspection revealed there are no slope sloughing on the interior berms of CCR3. As identified previously, CCR3 had slope slough repairs on the outside slope of the east portion of the embankment between CCR3 and the Process Waste Pond. No structural weaknesses were identified.

**1.10 Regulation Citation §257.83(b)(2)(vi) (part 2) and OAC 252:517-13-5(b)(2)**

*Any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit*

**Findings:** The dikes of CCR3 were designed and constructed at three (3) horizontal to one (1) vertical slope. These slopes require monitoring and repair of sloughing as needed. No other conditions are disrupting or have the potential to disrupt the operation and safety of the CCR units.

**1.11 Regulation Citation §257.83(b)(2)(vii) and OAC 252:517-13-5(b)(2)**

*Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.*

**Findings:** There have been no improvements to the impoundment since the previous inspection.



**2.0 Fly Ash Landfill CCR1**

**2.1 Regulation Citation §257.84(b)(i) and OAC 252:517-13-5(b)(A)**

*Review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (e.g. results of inspections by a qualified person, and results of previous annual inspection)*

**Findings:** Repairing pump pad was noted on the 7-day inspection report 6-25-2020 for CCR1.

**2.2 Regulation Citation §257.84(b)(ii) and OAC 252:517-13-5(b)(B)**

*A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit*

**Findings:** CCR1 was visually inspected on November 9, 2020. The inspection included walking around the structure, taking photographs, taking notes, and measuring the approximate distance below the top of the dike of the landfilled fly ash. No signs of distress or malfunction were identified.

**2.3 Regulation Citation §257.84(b)(2)(i) and OAC 252:517-13-5(b)(2)**

*Any changes in geometry of the structure since the previous annual inspection*

**Findings:** No noticeable changes appear to have occurred to CCR1 since the previous annual inspection report.

**2.4 Regulation Citation §257.84(b)(2)(ii) and OAC 252:517-13-5(b)(2)**

*The approximate volume of CCR contained in the unit at the time of inspection*

**Findings:** The approximate volume of fly ash contained in CCR1 at the time of inspection on November 9, 2020 was 288,882 cyds.

**2.5 Regulation Citation §257.84(b)(2)(iii) (part 1) and OAC 252:517-13-5(b)(2)**

*Any appearances of an actual structural weakness of the CCR unit*

**Findings:** The visual inspection revealed that CCR1 was in good condition.

**2.6 Regulation Citation §257.84(b)(2)(iii)(part 2) and OAC 252:517-13-5(b)(2)**

*Any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit*

**Findings:** The dikes of CCR1 were designed and constructed at two (2) horizontal to one (1) vertical slope. These slopes require monitoring and repair of sloughing. No conditions were identified that are disrupting or have the potential to disrupt the operation and safety of the CCR unit.

**2.7 Regulation Citation §257.84(b)(2)(iv) and OAC 252:517-13-5(b)(2)**

*Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection*

**Findings:** There were no changes identified that would affect the stability or operation of CCR1 since the previous annual inspection report.

## **CONCLUSION**

Overall, this annual inspection under the CCR Rule did not reveal any deficiencies or releases in either CCR1, CCR2, or CCR3. Under the Hugo Plant's standard practice, slope sloughs and other maintenance issues are noted on the 7 Day Inspection Checklist forms and logged into the Hugo Plant's mechanical maintenance system. Specifically, slope sloughs are assigned maintenance work orders by priority based on location and severity of the slough. Severity of a slope slough is objective and based on the amount of displaced material.

Various operational changes have occurred since the commissioning of CCR1, CCR2, and CCR3 that differ from the original design of the systems. The original operation of the CCR2 and CCR3 specified the use of stop logs to manage the water level within the impoundments, which allowed the decanting of water. Bottom ash is no longer sluiced to CCR2 or CCR3. The Hugo Plant underwent an upgrade to comply with Environmental Protection Agency (EPA) Coal Combustion Residuals Rules. Wet sluicing bottom ash from the boiler to either CCR2 or CCR3 was replaced with a dry bottom ash system. The new system uses a conveyor to remove bottom ash from the boiler to a storage bunker. Additionally, bottom ash has been removed from CCR2 and placed in CCR1.

Parkhill finds that at the time of this annual inspection of the Hugo Plant, CCR1, CCR2, and CCR3 are designed, constructed, operated, and maintained consistent with recognized and generally accepted good engineering standards.

## **ENGINEERING CERTIFICATE**

Pursuant to 40 CFR 257.83 and 40 CFR 257.84, and by means of this certification I attest that:

- (i) I am familiar with the requirements of OAC 252:517 and 40 CFR Part 257 (CCR Rule);
- (ii) I, or my agent, have visited and inspected the CCR units at the facility that are the subject of the Annual Inspection Report;
- (iii) The aforementioned inspection(s) and this Annual Inspection Report have been conducted and prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of the CCR Rule; and
- (iv) This Annual Inspection Report meets the requirements of OAC 252:517, 40 CFR 257.83 and 40 CFR 257.84
- (v) I am a “Qualified Professional Engineer” as defined in 40 CFR 257.53 by the fact that I have the technical knowledge and experience to make specific technical certifications set forth herein.