

December 14, 2022

Ms. Hillary Young, P.E.
Chief Engineer
Land Protection Division
Oklahoma Department of Environmental Quality
707 N. Robinson
P.O. Box 1677
Oklahoma City, OK 73162

Re: 2022 Annual Inspection by a Professional Engineer
Coal Combustion and Residuals (CCR) Landfill and Surface Impoundment
Western Farmers Electric Cooperative (WFEC) - Hugo Power Station, Fort Towson, Oklahoma
Solid Waste Permit Nos. 3152008 and 3512008-SI

Dear Ms. Young:

Enclosed, please find a copy of the 2022 Annual Inspection Report for the Coal Combustion Residual (CCR) landfill (CCR Unit 1) and surface impoundment (CCR Unit 3) at Western Farmers Electric Cooperative's (WFEC's) Hugo Facility (Facility). The 2022 Annual Inspection Report is combined for CCR1 and CCR3 and is prepared to meet the requirements as outlined in OAC 252:517-13-4(b)(2) and 252:517-13-5(b)(2). CCR3 is undergoing closure and WFEC anticipates that the inspection described in the 2022 Annual Inspection Report will be the final inspection of CCR3 under the ODEQ CCR Program.

A copy of this report will be placed in the facility's operating record and on the facility's publicly accessible internet web-site. Please notify me at 405-247-4298 or at k_fletcher@wfec.com if you have any questions.

Sincerely,



Kent Fletcher
Environmental Coordinator

cc: John McCreight / Western Farmers Electric Cooperation
Chris Schaefer and Bert Smith / Altamira-US, LLC

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Rural Electric Cooperative • Southeastern Electric Cooperative • Southwest Rural Electric Association

2022 Annual Inspection Report

WESTERN FARMERS ELECTRIC COOPERATIVE HUGO POWER STATION Fort Towson, Oklahoma

December 14, 2022

Prepared for:
Western Farmers Electric Cooperative
P.O. Box 429
Anadarko, Oklahoma 73005

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Table of Contents

1.0	INTRODUCTION	1
2.0	FACILITY DESCRIPTION	1
3.0	SCOPE	2
4.0	INSPECTION.....	3
5.0	FINDINGS	3
5.1	SURFACE IMPOUNDMENT CCR UNIT – SOUTH CELL (CCR3)	3
5.2	CCR LANDFILL UNIT – SOUTH CELL (CCR1)	7
6.0	SUMMARY AND CONCLUSIONS	9
7.0	ENGINEERING CERTIFICATE	11

1.0 INTRODUCTION

Western Farmers Electric Cooperative (WFEC) operates and maintains a coal combustion residual (CCR) Landfill (CCR1), and is in the process of closing the last remaining cell (CCR3) of a CCR Impoundment,¹ at its Hugo Power Station (HPS). Former CCR2 was clean closed as of July 2020 and is currently a regulated impoundment (F08) under the HPS' OPDES Permit issued by the ODEQ Water Quality Division for non-CCR wastewater. In November 2022, an annual inspection of the CCR1 and CCR3 was completed pursuant to Oklahoma Administrative Code Chapter 517, Disposal of Coal Combustion Residuals from Electric Utilities (OAC 252:517) and in accordance with the inspection requirements contained in OAC 252:517-13-4(b) and 252:517-13-5(b)(5). Findings from the inspection are included herein.

2.0 FACILITY DESCRIPTION

The HPS is located approximately 3 miles west of Fort Towson, Oklahoma on U.S. Highway 70 in Choctaw County in southeastern Oklahoma. The HPS is a coal-fired electric generating plant owned and operated by WFEC. It went into commercial operation on April 1, 1982 and currently employs one unit that burns Wyoming coal with a net output of 450 net mega-watts. The HPS occupies approximately 2,560 acres, of which approximately 1,200 acres are developed for power plant operations. The HPS generates CCR in the form of fly ash, economizer ash, or bottom ash.

Fly ash and economizer ash are managed at the Landfill CCR unit (CCR1). CCR1 is a two-cell unit landfill located in the southwestern portion of the HPS and covers an area of approximately 35.2 acres. It has a storage capacity of 1,044,000 cubic yards. Fly ash is pneumatically transported from the electrostatic precipitators and temporarily stored in silos near CCR1. Most of the fly ash is sold for beneficial use. The remaining fly ash is placed in the north cell of CCR1. Economizer ash is pneumatically transported to a silo adjacent to the plant and subsequently placed in the north cell of CCR1. Ash is periodically reclaimed from the north cell of CCR1 for sale for beneficial use. Bottom ash (generated from closure of CCR2 and from the current closure of CCR3) is managed in the south cell of CCR1. As of the inspection on November 9, 2022, the approximate volume of CCR contained in the CCR1 is 485,344 cubic yards, with an approximate remaining capacity of 558,656 cubic yards.

Bottom ash was previously managed in the Surface Impoundment CCR Unit which was formerly comprised of two cells – a former northern cell (CCR2) and a southern cell (CCR3). CCR2 was clean closed as of July 2020 and is currently a regulated impoundment (F08) under the HPS' OPDES Permit issued by the ODEQ Water Quality Division for non-CCR wastewater.

¹ WFEC anticipates that the annual inspection described in this Annual Inspection Report will be the final inspection of CCR3 under the ODEQ CCR program.

As such, it is no longer inspected under CCR regulation.

CCR3 had an estimated storage capacity of 460,060 cubic yards, but is currently in closure via removal of bottom ash and liner material. Wet sluicing of bottom ash from the boiler to CCR3 was replaced with a dry bottom ash system that uses a conveyor to remove bottom ash from the boiler to a storage bunker. On February 4, 2021, CCR3 ceased receiving wastewater and activities including draining and drying of the unit were initiated as part of closure. On April 22, 2021, CCR3 was reported as drained, and on July 29, 2021 CCR3 was reported as dry. Removal of bottom ash and liner material was initiated in May 2022. At the time of this annual inspection, approximately 200,000 cubic yards of bottom ash had been removed from CCR3 as part of closure and placed in the southern cell of CCR1. As of the dates of the annual inspection, an estimated 1,000 cubic yards of bottom ash remain within CCR3, comprising a roadway for vehicle access to complete closure activities. WFEC currently anticipates that bottom ash and liner material will be completely removed from CCR3 prior to March 1, 2023 and that closure paperwork will be submitted to the ODEQ.

3.0 SCOPE

The purpose of the annual inspection is to comply with the requirements of OAC 525:517-13-4 (for CCR Surface Impoundments) and OAC 525:517-13-5 (for CCR Landfills). The regulations require an annual inspection performed by a “Qualified Professional Engineer” as defined in OAC 252:517-1-3. 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.

4.0 INSPECTION

WFEC contracted with Altamira-US, LLC (Altamira) to perform the annual inspection of both CCR1 and CCR3. Altamira's Qualified Professional Engineer (Christopher Schaefer) performed the inspection on November 9 – 10, 2022. Mr. Schaefer reviewed available documentation (including 7-Day Checklist forms, appropriate operation manuals, and appropriate construction drawings). Mr. Schaefer conducted a visual inspection of CCR1 and CCR3 (including the integrity of the hydraulic structures that passed through the cells of CCR1 and CCR3 to the extent possible). The inspection included walking around both structures, taking photographs and making observations, taking notes, and taking level measurements (if necessary) to determine water surface elevation of CCR3. Any berm issues, vegetation growth, or other potential detrimental activity were noted during the visual inspection. Field data and measurements were obtained as applicable for completion of the requirements of the Annual Inspection Report.

5.0 FINDINGS

The following inspection findings are reported according to OAC 252:517-13-4 and OAC 252:517-13-5 based on field observations, measurements, and data provided by WFEC.

5.1 SURFACE IMPOUNDMENT CCR UNIT – SOUTH CELL (CCR3)

Note: *As previously stated, CCR2 has been cleaned closed as of July 2020 and is no longer inspected under CCR regulation.*

Regulation Citation OAC 252:517-13-4(b)(1)(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 OAC 252:517-11-4(c)(1) and OAC 252:517-11-5(c)(1), previous periodic structural stability assessments required under OAC 252:517-11-4(d) and OAC 252:517-11-5(d), the results of inspection by a qualified person and*

results of previous annual inspections).

Findings: Altamira reviewed available information, including the previous annual inspection report, structural stability assessment, and 7-Day Inspection Checklist forms from the past year. Various operational changes have occurred since the commissioning of CCR3 that differ from the original design of the system. The original operation of CCR3 specified the use of stop logs to manage the water level within the cell, which allowed the decanting of water. Bottom ash is no longer sluiced to CCR3 and CCR3 is currently under closure. On February 4, 2021, CCR3 ceased receiving wastewater and activities including draining and drying of the cell were initiated as part of closure. On April 22, 2021, CCR3 was reported as drained and on July 29, 2021 CCR3 was reported as dry. Removal of bottom ash and liner material was initiated in May 2022. The previous inspection did not reveal any deficiencies or releases from CCR3 and the slopes appeared to be stable. It was noted that, construction of three (3) horizontal to one (1) vertical interior slopes may present maintenance difficulties, but that under the HPS standard practice, slope sloughs and other maintenance issues are noted on the 7-day inspection checklist forms and logged into the HPS mechanical maintenance system.

A review of 7-Day Inspection checklists over the previous year did not indicate any structural issues, deficiencies, or releases. The inspection checklists consistently identified gauge level in CCR3 as being low, drained, or empty. The checklist from May 12, 2022 stated that gauge level was “very low, being pumped for ash removal.” Comments on the checklists dated January 27, 2022, March 24, 2022, and April 7, 2022 indicate that CCR3 is in closure, and, starting on May 26, 2022, indicate ash removal from the cell or that cell is in closure. Comments on the checklist dated November 3, 2022 indicate that ash removal is nearly complete.

Regulation Citation OAC 252:517-13-4(b)(1)(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 and 10, 2022. The inspection included: walking around the cell, taking photographs, and taking notes. At the time of inspection, CCR3 was drained and dry with exception of pockets of accumulated water from recent precipitation. CCR3 was nearly empty of ash, as most ash has been removed as part of closure. As of the inspection, an estimated 1,000 cubic yards of ash remained along the north side of CCR3, comprising a roadway to allow vehicle access for closure activities. Removal of this ash was underway during the inspection. Also, most of the liner material had been removed as part of closure. Two areas of slough repair completed in 2019 at the east exterior berm between CCR3 and Process Waste Pond show no signs of failure. Several areas of minor erosion rills were noted on the berm during the inspection. However, there was no indication that these areas would

cause a malfunction in the safe operation of the impoundment (particularly since CCR3 is drained and in closure).

Regulation Citation OAC 252-517-13-4(b)(1)(C) – *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 operation.*

Findings: Although CCR3 is no longer receiving wastewater, the concrete drain outlet structures were still in place at the time of inspection. The concrete drainage structures at each end of the pipe passing under the berm in the east portion of CCR3 appear to be in good condition. The pipe is a HDPE replacement of the original corrugated metal pipe. As the cell is drained and no longer receives wastewater, the level gauge has been removed to facilitate closure. The drains in the concrete structure are such that appropriate freeboard would still remain if the cell was operational.

Regulation Citation OAC 252-517-13-4(b)(2)(A) – *Any changes in geometry of the structure since the previous annual inspection.*

Findings: CCR3 was nearly empty of ash, as most of the ash had been removed as part of closure. An estimated 1,000 cubic yards of ash remained along the north side of CCR3, comprising a roadway to allow vehicle access for closure activities. Removal of this ash was underway during the inspection. Also, most of the liner material has been removed as part of closure. No other noticeable changes in geometry appear to have occurred to CCR3 since construction.

Regulation Citation OAC 252:517-13-4(b)(2)(B) – *The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection.*

Findings: Historically, the water level of CCR3 is measured toward the east end of the cell at the outlet structure using a vertical staff (level gauge) marked with 0.1-foot increments. At the time of the inspection, CCR3 was drained and in closure. As the cell is drained and no longer receives wastewater, the level gauge has been removed from the structure to facilitate closure. A review of the 7-Day Inspection checklist forms over the previous year consistently indicated CCR3 to be drained or empty (and below what the lower level of the level gauge would be) with no maximum recorded readings. At time of inspection, CCR3 was drained and dry with exception of pockets of accumulated water from recent precipitation. Water level was well below what the lower level of the level gauge would be.

Regulation Citation OAC 252:517-13-4(b)(2)(C) – *The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection.*

Findings: Historically, the water level of CCR3 is measured toward the east end of the cell at the outlet structure using a vertical staff (level gauge) marked with 0.1-foot increments. At the time of the inspection, CCR3 was drained and in closure. As the cell is drained and no longer receives wastewater, the level gauge has been removed from the structure to facilitate closure. A review of 7-Day Inspection Checklist forms over the previous year consistently indicated CCR3 to be drained or empty (and below what the lower level of the level gauge would be) with no maximum recorded readings. At time of inspection, CCR3 was drained and dry with exception of pockets of accumulated water from recent precipitation. Water level was well below what the lower level of the level gauge would be. According to the 7-Day Inspection Checklist form dated February 4, 2021, all streams to CCR3 were stopped. On April 22, 2021 CCR3 was reported as drained and on July 29, 2021 CCR3 was reported as dry.

Regulation Citation OAC 252:517-13-4(b)(2)(D) – *The storage capacity of the impounding structure at the time of the inspection.*

Findings: As CCR3 is currently in closure, most of the ash and liner material have been removed and the cell is no longer suitable for wastewater storage. At the time of inspection (November 9 – 10, 2022), CCR3 was drained and dry with exception of pockets of accumulated water from recent precipitation. Based on this, if the cell were used to store wastewater, the remaining storage capacity at normal pool level (three feet below the top of berm) would be at least 3,050,060 cubic yards.

Regulation Citation OAC 252:517-13-4(b)(2)(E) - *The approximate volume of the impounded water and CCR at the time of inspection.*

Findings: At the time of the inspection (November 9-10, 2022), CCR3 was drained and dry with exception of pockets of accumulated water from recent precipitation. Most of the water observed in CCR3 was near the northeast corner of the cell. This water was being pumped during the inspection.

Regulation Citation OAC 252:517-13-4(b)(2)(F) - Any appearances of an actual structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit.

Findings: With exception of access areas along the north side of the cell to facilitate closure, the visual inspection revealed no significant slope sloughing on the interior berms of CCR3 and no structural weaknesses were identified. The berms 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 appear to be disrupting or have the potential to disrupt the operation and safety of CCR3 (particularly since CCR3 is in closure).

Regulation Citation OAC 252:517-13-4(b)(2)(G) - Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.

Findings: Due to closure activities, a minor non-structural slough occurred near the northeast corner of the berm within the past month. This slough was immediately repaired to a new four (4) horizontal to one (1) vertical slope. There have been no other improvements to the cell since the previous inspection. Again, CCR3 is in closure and is no longer receiving wastewater.

5.2 CCR LANDFILL UNIT – SOUTH CELL (CCR1)

Regulation Citation OAC 252:517-13-5(b)(1)(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: Altamira reviewed available information including the previous annual inspection report, and 7-Day Inspection checklist forms from the past year. The previous inspection did not reveal any deficiencies or releases from CCR1. It was noted that bottom ash has been removed from CCR2 and placed in CCR1. It was also noted that under the HPS standard practice, slope sloughs and other maintenance issues are noted on the 7-day Inspection checklist forms and logged into the HPS mechanical maintenance system.

A review of 7-Day Inspection checklists over the previous year did not indicate any structural issues, deficiencies, or releases. The last 7-Day Inspection Report reporting an issue is dated November 4, 2021. This inspection report indicated woody vegetation and trees with a comment that “Woody vegetation is scheduled to be cleared.” Vegetation had started to grow on the inside slope of the berm near the southwest corner of CCR1. The vegetation was cleared in November 2021.

Regulation Citation OAC 252:517-13-5(b)(1)(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 and 10, 2022. The inspection included walking around the structure, taking photographs, and taking notes. At the time of inspection, a large portion of the north cell of CCR1 contained water from recent precipitation. According to WFEC personnel, water periodically accumulates in this cell following precipitation and this cell is then drained as soon as practicable. At the time of inspection, the south cell of CCR1 was actively receiving ash from closure of CCR3. A sump and pump were located near the southwest corner of the south cell of CCR3 to drain water and dry the ash.

A small seep of apparent perched water was observed near the base on the outside of the dike near the southeast corner of the south cell of CCR1. WFEC personnel stated that perched water periodically drains from this area following significant rainfall. More than eight (8) inches of rainfall occurred at HPS over the last half of October and first week of November 2022 in advance of the inspection (after a dry September and first half of October 2022). Also, the pH of the seep was measured to be near neutral and not elevated, indicating that it is perched water and not water that had been in contact with CCR. As there is no standing water in this portion of CCR1 and excess rainwater within the cell is conveyed to a sump on the opposite side (southwest portion) of this cell for removal, and because the seep was observed following significant rainfall, and based on the measured pH of the seep, the observed seep appears to be perched water from the recent precipitation and does not appear to constitute a release or indicate a significant sign of distress or malfunction of CCR1.

It appears that animals (likely feral hogs) have rooted alongside the seep and a small channel has formed downgradient of the seep. Although this seep does not appear to pose a threat to CCR1 structurally, it is recommended that the seep and channel be remedied as soon as practicable and that WFEC correct the areas that have been rooted by the feral hogs. No other signs of distress or malfunction were identified at CCR1.

Regulation Citation OAC 252:517-13-5(b)(2)(A) - *Any changes in geometry of the structure since the previous annual inspection.*

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

Regulation Citation OAC 252:517-13-5(b)(2)(B) - *The approximate volume of CCR contained in the unit at the time of inspection.*

Findings: As of the inspection on November 9, 2022, the approximate volume of CCR contained in the CCR1 is 485,344 cubic yards, with an approximate remaining capacity of 558,656 cubic yards.

Regulation Citation OAC 252:517-13-5(b)(2)(C) - *Any appearances of an actual structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit.*

Findings: The visual inspection revealed that CCR1 was in general good condition. The dikes of CCR1 were designed and constructed at two (2) horizontal to one (1) vertical slope. These slopes require monitoring and occasional repair of sloughing. No conditions were identified that are disrupting or have the potential to disrupt the operation and safety of the CCR unit. The perched water seep previously mentioned does not appear to represent a current structural weakness or present a condition that has potential to disrupt the operation and safety of the CCR Unit.

Regulation Citation 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.

6.0 SUMMARY AND CONCLUSIONS

In November 2022, an annual inspection of CCR1 and CCR3 was completed pursuant to Oklahoma Administrative Code Chapter 517, Disposal of Coal Combustion Residuals from Electric Utilities (OAC 252:517) and in accordance with the inspection requirements contained in OAC 252:517-13-4(b) and 252:517-13-5(b)(5).

- At the time of inspection, CCR3 was drained and dry with exception of pockets of accumulated water from recent precipitation. The cell was nearly empty of ash, as most ash had been removed as part of closure. With exception of access areas along the north side of the cell to facilitate closure, the inspection revealed no significant slope sloughing on the interior berms of CCR3 and no structural weaknesses were identified. No other conditions appear to be disrupting or have the potential to disrupt the operation and safety of CCR3 (particularly since CCR3 is in closure). As CCR3 is currently in closure, most of the ash and liner material has been removed and the cell is no longer used for

wastewater storage. As of the dates of the annual inspection, an estimated 1,000 cubic yards of bottom ash remain within CCR3, comprising a roadway for vehicle access to complete closure activities.

- WFEC currently anticipates that bottom ash and liner material will be completely removed from CCR3 prior to March 1, 2023 and that closure paperwork will be submitted to the ODEQ. WFEC anticipates that the annual inspection described in this Annual Inspection Report will be the final inspection of CCR3 under the ODEQ CCR program.
- At the time of inspection, a large portion of the north cell of CCR1 contained water from recent precipitation. According to WFEC personnel, water periodically accumulates in this cell following precipitation and this cell is then drained as soon as practicable. The south cell of CCR1 was actively receiving ash from closure of CCR3. A sump and pump were located near the southwest corner of the south cell of CCR3 to drain water and dry the ash. As of the inspection on November 9, 2022, the approximate volume of CCR contained in the CCR1 is 485,344 cubic yards, with an approximate remaining capacity of 558,656 cubic yards.
- A small seep of apparent perched water was observed near the base on the outside of the dike near the southeast corner of the south cell of CCR1. WFEC personnel stated that perched water periodically drains from this area following significant rainfall. More than eight (8) inches of rainfall occurred at HPS over the last half of October and first week of November 2022 in advance of the inspection (after a dry September and first half of October 2022). Also, the pH of the seep was measured to be near neutral and not elevated, indicating that it is perched water from and not water that had been in contact with CCR. As there is no standing water in this portion of CCR1 and excess rainwater within the cell is conveyed to a sump on the opposite side (southwest portion) of this cell for removal, and because the seep was observed following significant rainfall, and based on the measured pH of the seep, the observed seep appears to be perched water from the recent precipitation and does not appear to constitute a release or indicate a significant sign of distress or malfunction of CCR1. It appears that animals (likely feral hogs) have rooted alongside the seep and a small channel has formed downgradient of the seep.
- Under the HPS's standard practice, slope sloughs and other maintenance issues are noted on the 7-Day Inspection Checklist forms and logged into the HPS' 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.

This annual inspection under the CCR Rule did not reveal any deficiencies or releases in either CCR1 or CCR3. Altamira finds that CCR1 and CCR3 are designed, constructed, operated, and maintained consistent with recognized and generally accepted good engineering standards. It is recommended that WFEC take measures to remedy the seep and channel as soon as practicable and that WFEC correct the areas that have been rooted by the feral hogs. No other signs of distress or malfunction were identified at CCR1.

7.0 ENGINEERING CERTIFICATE

Pursuant to OAC 252:517-13-4 and OAC 252:517-13-5, and by means of this certification I attest that:

- (i) I am familiar with the requirements of OAC 252:517;
- (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
- (v) I am a "Qualified Professional Engineer" as defined in OAC 252-517-1-3 by the fact that I have the technical knowledge and experience to make specific technical certifications set forth herein.

