2019 ANNUAL CCR INSPECTION

Facility Name: Owner/Operator Name:

Tecumseh Energy Center (TEC)

Evergy Kansas Central, Inc. (f/k/a Westar Energy, Inc)

CCR Unit: Bottom Ash Settling Area

December 5, 2019 Inspection Date:

USEPA CCR Rule Criteria 40 CFR §257.83	Bottom Ash Settling Area Annual Inspection Results
§257.83(b)(2)(i): "(2) Inspection report. The qualified professional engineer must prepare a report following each inspection that addresses the following: (i) Any changes in geometry of the impounding structure since the previous annual inspection;"	A visual inspection of the TEC Bottom Ash Settling Area (Impoundment) and associated hydraulic structures was completed on December 5, 2019 by Mr. Richard Southorn, a qualified professional engineer (QPE). The Impoundment has historically been comprised of the North and South Ponds. In 2019, the Impoundment and all CCR material was removed to support a closure by removal, which has not yet been certified. Geometry changes reflect the removal of all CCR material and regrading of the resultant surface to drain to the northeast.
§257.83(b)(2)(ii): "(ii) The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection;"	No instrumentation is associated with the Impoundment.
§257.83(b)(2)(iii): "(iii) The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection;"	At the time of inspection, there was no impounded water or due to Impoundment removal. Prior to closure, the typical impounded water elevation in the Impoundment prior to dewatering ranged from 0 to 7 feet (877 ft to 884 ft mean seal level (ft MSL), respectively). Prior to closure, the approximate minimum, maximum, and present depth of CCR in the Impoundment ranged from approximately 12 to 20 feet (877 ft MSL to 885 ft MSL, respectively).
§257.83(b)(2)(iv): "(iv) The storage capacity of the impounding structure at the time of the inspection;"	The Impoundment was removed prior to the time of inspection. Thus, there was no storage capacity at the time of inspection.
§257.83(b)(2)(v): "(v) The approximate volume of the impounded water and CCR at the time of the inspection;"	The Impoundment and all CCR material have been completely removed to support a closure by removal. At the time of inspection, there was no impounded water or CCR material.



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§257.83(b)(2)(vi): "(vi) Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit and appurtenant structures;"	At the time of inspection, no embankments were present and the impoundment no longer holds water or CCR, therefore this requirement is no longer applicable.
§257.83(b)(2)(vii): "(vii) Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection."	Changes to the Impoundment since the last annual inspection included removal of the embankments. The unit no longer holds water or CCR, therefore this requirement is no longer applicable.



PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of the CCR Rule and has visited and examined the Impoundment or has supervised examination of the Impoundment by appropriately qualified personnel. I hereby certify based on a review of available information within TEC's operating records and observations from my personal on-site inspection, that the Impoundment does not exhibit any appearances of actual/potential structural weakness that would be disruptive to the normal operations and safety of the Impoundment. The Impoundment is being operated and maintained consistent with recognized and generally accepted good engineering standards and practices. This certification was prepared as required by 40 CFR Part §257.83.

Name of Professional Engineer:	Richard Southorn
Company:	APTIM
Professional Engineer Seal:	
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