



POST CLOSURE CARE PLAN (40CFR Part 257.104)

LOCKWOOD ASH DISPOSAL SITE

Prepared on behalf of:

Lockwood Hills LLC
590 Plant Road, PO Box 187
Dresden, New York 14441

Prepared by:



2620 Grand Island Blvd.
Grand Island, New York 14072-2131

August 2019

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1 INTRODUCTION

Lockwood Hills LLC (Lockwood Hills) manages the Lockwood Ash Disposal Site (Lockwood or the Landfill), an ash monofill located in the Town of Torrey, Yates County, New York on Swarthout Road. Lockwood Hills maintains a 6 NYCRR Part 360 Solid Waste Management Facility permit (Permit No. 8-5736-00005/00003) for this facility issued by the New York State Department of Environmental Conservation (NYSDEC).

2 COMPLIANCE REQUIREMENT

All existing or new coal combustion residuals (CCR) landfills must prepare a post-closure plan. The plan must describe the steps necessary to care for the closed Landfill, including at a minimum the final cover and the groundwater monitoring systems, for a period of at least 30 years. The written plan to care for the closed Landfill must be consistent with the applicable requirements of 40CFR Part 257.104(d)(1)(i) through (iii).

The following minimum information is required:

- Final cover system inspection frequency, maintenance and repair;
- Leachate collection system operation and inspection frequency, maintenance and repair;
- Groundwater monitoring system operation and inspection frequency, maintenance and repair;
- Facility contact information; and
- A description of the planned use(s) of the property during the post-closure care period.

If there is a change in conditions that affects any of the elements in the current document, the plan will require revision. Revised plans are not in effect until they are certified by a qualified professional engineer and placed in the operating record, and the revision must occur at least 60 days prior to any change in the operation of the facility or unit. In the event of an unanticipated event requiring a change in the plan, the revision must be completed no later than 60 days after the triggering event. If post-closure has commenced and the plan requires revision, the revision must occur no later than 30 days after the triggering event.

3 EVALUATION

3.1 FINAL COVER SYSTEM CARE

Lockwood Hills will maintain the integrity and effectiveness of the final cover system. This includes making any repairs to the final cover as required to correct the effects of settlement, subsidence, erosion, or any other events. Additionally, preventing run-off and run-on from eroding or otherwise damaging the final cover system will occur. The owner/operator of the Landfill will conduct post-closure care for 30 years in accordance with Part §257.104. The post closure care plan for the Landfill includes inspections of the final cover system and stormwater management system every month and after any five-year, 24-hour rainfall event. Maintenance and repair activities will be conducted as necessary and may include minor soil erosion repairs and an evaluation and more detailed repair should an unexpected settlement issue be revealed during one of the routine inspections.

3.2 LEACHATE COLLECTION AND REMOVAL SYSTEM OPERATION AND CARE

In accordance with Part §257.70, The leachate collection and removal system will be operated and maintained to collect and remove leachate from the Landfill during the active life and post closure care period. Leachate management activities include proper maintenance of leachate controls, recording of the total volume of the leachate stored at and removed from the facility, evaluation of liner performance, and leachate sampling and analysis. Maintenance also includes repairing any damage to the leachate collection system. The leachate collection and removal system will be operated and maintained as part of post-closure care for 30 years in accordance with Part §257.104. The leachate management system components, the groundwater monitoring wells, the perimeter fencing, and the site roads will be inspected quarterly for at least the first five years. A reduced inspection frequency may be sought after that period but will only occur if approved by the NYSDEC.

3.3 GROUNDWATER MONITORING SYSTEM OPERATION AND CARE

The groundwater monitoring system will be maintained at the Landfill in accordance with the CCR Rule and NYSDEC codes, rules and regulations when they are more stringent. The groundwater monitoring system will be assessed visually for signs of damage to the wells and indications of

surface water drainage ponding around a well casing during quarterly site inspections and at least semi-annually or more frequently during groundwater monitoring field visits when the operability of the system can be evaluated.

3.4 FACILITY CONTACT INFORMATION

The Facility contact for the Lockwood Ash Disposal Site is:

Name: Dale Irwin
Phone: (315)-536-2359
Address: Swarthout Road, Dresden, NY 14441

3.5 PLANNED PROPERTY USE DURING POST-CLOSURE

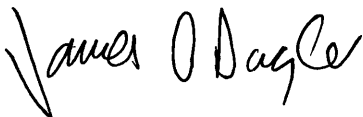
The intended end-use of the property after closure will be an open field. No activities, beyond maintenance and repair of the final cover system, the leachate collection system or the groundwater monitoring system, are anticipated. No future activity or use that may potentially damage the integrity of the final cover system will be permitted without first evaluating any potential impact, designing necessary steps to address any impacts and revising this Plan as necessary.

Any revision of this Plan resulting from a change in the use of the property during the Post Closure Care period must be certified by a professional engineer and entered into the Operating Record as discussed in Section 2.0.

4 CERTIFICATION

"I hereby certify that I have reviewed this Post Closure Care Plan for the Lockwood Ash Landfill owned and operated by Lockwood Hills LLC, and the requirements in federal regulation 40CFR Part 257 Subpart D - Standards for the Disposal of Coal Combustion Residuals (CCR) in Landfills and Surface Impoundments published April 17, 2015 and amended on March 15, 2018. The proposed Post Closure Care Plan meets the requirements specified for CCR units in 40CFR 257.104 – Post-closure Care Requirements. Any future revisions or updates to this Plan will be certified and added to the facility's operating record."

I am a duly licensed professional engineer in the State of New York.



James A Daigler, P.E.



NYSPE LIC # 061689

5 REFERENCES

AES Closure Plan, Lockwood Ash Disposal Site, prepared by Daigler Engineering, P.C., March 2007.

Draft Supplemental Hydrogeologic Evaluation – Lockwood Ash Disposal Site, E.C. Jordan Co., March 1990.

2018 Annual Report, Lockwood Ash Disposal Site, Facility No. 62N01 prepared by Daigler Engineering, P.C., March 2019.

Federal Register Supplementary Information, C.VI.M.7-9., April 17, 2015, pp 21425-21426.

Operation and Maintenance (O&M) Plan – Lockwood Ash Disposal Site, Daigler Engineering, P.C., rev. March 2018.

Groundwater Monitoring System Certification – Lockwood Ash Disposal Site, Daigler Engineering, P.C., June 2019.