SCS ENGINEERS

Initial Closure Plan
Phase 1 Module 1
Phase 1 Module 2
Phase 1 Module 3

Columbia Dry Ash Disposal Facility

Prepared for:

Wisconsin Power and Light Company

Columbia Energy Center
W8375 Murray Road
Pardeeville, Wisconsin 53954

Prepared by:

SCS ENGINEERS
2830 Dairy Drive
Madison, Wisconsin 53718-6751
(608) 224-2830

October 2016
File No. 25216112.00

Offices Nationwide
www.scsengineers.com

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Phase 1 Module 1
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PE CERTIFICATION

I, Eric J. Nelson, hereby certify the following:

- This Initial Closure Plan meets the requirements of 40 CFR 257.102(b)
- The final cover system described in this Initial Closure Plan meets the design requirements in 40 CFR 257.102(d)(3)

The Initial Closure Plan was prepared by me or under my direct supervision, and that I am a duly licensed Professional Engineer under the laws of the State of Wisconsin.

E J Nelson 10/6/2016

(signature) (date)

Eric J. Nelson

(printed or typed name)

License number E-37855-6

My license renewal date is 7/31/18.

Pages or sheets covered by this seal:
October 2016 Initial Closure Plan –
WPL Columbia Dry Ash Disposal Facility

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1.0 INTRODUCTION AND PROJECT SUMMARY

On behalf of Wisconsin Power and Light Company (WPL), SCS Engineers (SCS) has prepared this Initial Closure Plan for the Columbia (COL) Dry Ash Disposal Facility Phase 1 Modules 1 through 3 as required by 40 CFR 257.102(b), as stated below.

40 CFR 257.102(b). *"Written closure plan—(1) Content of the plan. The owner or operator of a CCR unit must prepare a written closure plan that describes the steps necessary to close the CCR unit at any point during the active life of the CCR unit consistent with recognized and generally accepted good engineering practices. The written closure plan must include, at a minimum, the information specified in paragraphs (b)(1)(i) through (vi) of this section."*

The COL facility includes an active coal combustion residue (CCR) landfill, which currently consists of three CCR units, all located in Phase 1 of the facility:

- Phase 1, Module 1 - this unit has received some final cover over completed outer sideslope areas that will no longer receive additional CCR. The final cover placed complies with the CCR Rule.
- Phase 1, Module 2 - this unit is currently being filled.
- Phase 1, Module 3 – construction of this unit was recently completed and approved by the Wisconsin Department of Natural Resources (WDNR) to receive CCR.

Future CCR units (Phase 1 Modules 4-6 and Phase 2 Modules 7-13) are permitted with the WDNR, but have not been developed. When developed, the units will be new CCR landfills, as defined in 40 CFR 257.53. Future CCR units are not addressed in this plan and are not discussed further herein.

Figure 1 shows the site location. **Figure 2** shows the closure areas. A detail of the final cover system is shown on **Figure 3**.

2.0 PROPOSED CLOSURE PLAN NARRATIVE

40 CFR 257.102(b)(1)(i). *"A narrative description of how the CCR unit will be closed in accordance with this section."*

When CCR placement is completed in the CCR unit, or if early closure is required, the unit will be closed by covering the CCR with the final cover system described in **Section 3.0**. Prior to final cover system construction, the CCR surfaces will be graded and compacted to establish a firm subgrade for final cover construction. The timing for completion of CCR placement in the units that are addressed with this closure plan will depend on CCR generation and disposal rates. Future CCR unit development will also impact the timing of closure. Each of the existing CCR units is designed to receive additional CCR once adjacent units are constructed and overlay airspace is available for filling. Based on the current CCR units alone, if early closure of all

units were required, final cover will be placed in the active landfill areas shown on **Figure 2**. A closure schedule is discussed in **Section 6.0** and presented in **Appendix B**.

The initiation of closure activities will commence no later than 30 days after the final receipt of CCR as required by 40 CFR 257.102(e)(1), or in accordance with 40 CFR 257.102(e)(2).

3.0 FINAL COVER SYSTEM AND PERFORMANCE

40 CFR 257.102(b)(1)(iii). *"If closure of the CCR unit will be accomplished by leaving CCR in place, a description of the final cover system, designed in accordance with paragraph (d) of this section, and the methods and procedures to be used to install the final cover. The closure plan must also discuss how the final cover system will achieve the performance standards specified in paragraph (d) of this section."*

"(d) Closure performance standard when leaving CCR in place.
(1) The owner or operator of a CCR unit must ensure that, at a minimum, the CCR unit is closed in a manner that will:

(i) Control, minimize or eliminate, to the maximum extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate, or contaminated run-off to the ground or surface waters or to the atmosphere;

The final cover system design will minimize or eliminate infiltration, as further described below.

(ii) Preclude the probability of future impoundment of water, sediment, or slurry;

The final cover system will meet these criteria, as further described below.

(iii) Include measures that provide for major slope stability to prevent the sloughing or movement of the final cover system during the closure and post-closure care period;

The final cover system is designed to provide slope stability and to prevent sloughing or movement during the closure and post-closure care period. Stability of the final cover system was assessed as part of the WDNR landfill permitting process and is further addressed below.

(iv) Minimize the need for further maintenance of the CCR unit; and

Maintenance of the final cover will be minimized by the establishment of vegetative cover and the erosion control systems, which are further described below.

(v) Be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices."

All closure activities for the CCR units will be completed within 6 months, as stated in **Section 7.0** below.

"(2) Drainage and stabilization of CCR surface impoundments."

This does not apply to the COL CCR landfill units.

"(3) Final cover system"

The final cover system (see **Figure 3** for details) in place on part of Module 1 will also be installed in the remaining areas of the CCR Units. The final cover system is as follows from the bottom up:

- Three-inch grading layer
- Geosynthetic clay liner (GCL)
- Forty-mil liner low density polyethylene (LLDPE) geomembrane
- Twelve inches of drainage material
- Twelve inches of rooting zone
- Six inches of topsoil

This final cover meets and exceeds the minimum requirements of 40 CFR 257.102(d)(3)(i)(A) through (D) as follows:

- Per 257.102(d)(3)(i)(A), the permeability of the final cover system is less than or equal to the permeability of the bottom liner system and is less than $1x10^{-5}$ cm/sec required by the rule. The COL cover system contains a GCL with a permeability of $1x10^{-9}$ cm/sec. The geomembrane above the GCL makes the cover system even less permeable.

  The bottom liner system for the CCR Units is as follows:

  - Phase 1 Module 1 South:
    - GCL
    - Forty-mil high density polyethylene (HDPE) geomembrane
    - The layers of the liner system are less than the cover system layers; therefore infiltration will be more than the cover system.

  - Phase 1 Module 1 North:
    - Three feet of compacted ash
    - The liner here does not include a geomembrane, and therefore the infiltration through the cover system will be less than this base liner.

  - Phase 1 Modules 2 and 3:
    - Two feet of compacted clay
    - GCL
    - Sixty-mil HDPE geomembrane

Based on a comparison of the design slopes and drainage system components in the liner system and final cover system, the final cover system is less permeable than the liner system in Phase 1 Modules 2 and 3.

- Per 257.102(d)(3)(i)(B), the final cover system includes 2.5 feet of soil, which is greater than the 18 inches of earthen material required to minimize infiltration.

- Per 257.102(d)(3)(i)(C), erosion of the final cover system is minimized with a vegetative support layer consisting of 12 inches uncompacted rooting zone material and 6 inches of topsoil. This provides more than the required 6-inch thickness for plant growth.

  Also, this final cover system limits infiltration while promoting surface water run-off in a controlled manner to minimize erosion and promote stability. The surface layer of 18 inches of soil supports vegetation that assists with erosion control. Water that infiltrates will be collected by the 12-inch drainage layer and will be routed to the perimeter drainage system.

  In addition, the surface has intermediate drainage swales to reduce the flow lengths down the final cover slope, also aiding in erosion control. Where needed, the intermediate drainage swales are connected to downslope channels to control storm water runoff and prevent erosion of the final cover.

- Per 257.102(d)(3)(i)(D), the design of the final cover system minimizes disruptions to the final cover system. Stability of the final cover system was assessed as part of the WDNR landfill permitting process. The stability calculations are included in **Attachment A**.

  The design of the final cover system accommodates settling and subsidence of the CCR fill below the cover. The CCR at COL is placed dry and is compacted in place. CCR continues to consolidate and gain strength as filling progresses prior to final cover placement. The final cover system is designed with a maximum slope of 25 percent (4 horizontal to 1 vertical). Because the final cover has a relatively large positive slope and the CCR has been gaining strength over time, the final cover is expected to easily accommodate the remaining relatively minor settlement potential of the CCR fill when fill placement ends and the landfill is closed.

All final cover materials will be tested to confirm they meet specifications and construction will be overseen and documented by a licensed engineer. Rooting zone and topsoil layers will be checked for thickness. All areas will be restored after final cover is placed. Vegetation will be monitored and maintained.

4.0 MAXIMUM INVENTORY OF CCR

40 CFR 257.102(b)(1)(iv). *"An estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit."*

The following table reflects the estimated maximum volumes of CCR in the CCR landfill units at the COL facility.

Area	Capacity (cy)
Phase 1 Module 1	741,423
Phase 1 Module 2	575,280
Phase 1 Module 3	596,050
Total Maximum CCR Quantity	**1,912,753**

The estimated maximum inventory of CCR ever on site over the active life of the CCR landfill units is based on the design capacity of each unit. The design capacity of each unit is defined in the WDNR approved 2010 Plan of Operation Update.

5.0 LARGEST AREA OF CCR UNIT REQUIRING FINAL COVER

40 CFR 257.102(b)(1)(v). *"An estimate of the largest area of the CCR unit ever requiring a final cover as required by paragraph (d) of this section at any time during the CCR unit's active life."*

The largest area of each CCR Unit requiring final cover is the open area shown on **Figure 2**, with areas as follows:

Areas Requiring Final Cover (acres)	
Phase 1 Module 1	5.0
Phase 1 Module 2	3.9
Phase 1 Module 3	4.0
Total	12.9

6.0 SCHEDULE OF SEQUENTIAL CLOSURE ACTIVITIES

40 CFR 257.102(b)(1)(vi). *"A schedule for completing all activities necessary to satisfy the closure criteria in this section, including an estimate of the year in which all closure activities for the CCR unit will be completed."*

CCR placement is estimated to be complete in each of the existing CCR units as follows:

CCR Unit	Filling Completed
Phase 1 Module 1	September 2048
Phase 1 Module 2	December 2057
Phase 1 Module 3	August 2067

These estimated closure dates are based on the site life calculated from the design capacity of each unit and currently anticipated disposal rates. These dates also account for periods when the sideslopes will not receive CCR or non-CCR waste. These periods are a part of normal plant operations, as described in the Plan of Operations approved by WDNR. Finally, the dates assume that the adjacent future CCR units that are currently permitted with WDNR will be constructed allowing for the overlay of additional CCR onto the existing units. The preliminary schedule for closure of the existing CCR units is provided in **Appendix B**.

7.0 COMPLETION OF CLOSURE ACTIVITIES

40 CFR257.102((f)(1). *"Except as provided for in paragraph (f)(2) of this section, the owner or operator must complete closure of the CCR unit:*

(i) For existing and new CCR landfills and any lateral expansion of a CCR landfill, within six months of commencing closure activities."

As shown on the enclosed schedule, closure of each CCR unit will be completed within 6 months of commencing closure activities.

40 CFR 257.102(f)(3). *"Upon completion, the owner or operator of the CCR unit must obtain a certification from a qualified professional engineer verifying that closure has been completed in accordance with the closure plan specified in paragraph (b) of this section and the requirements of this section."*

A qualified licensed engineer will oversee the final cover construction. The engineer will verify final cover materials and methods and oversee material testing. At the end of construction, the engineer will provide a report summarizing and documenting construction and will certify compliance with the requirements.

8.0 CERTIFICATION

40 CFR 257.102(b)(4). *"The owner or operator of the CCR unit must obtain a written certification from a qualified professional engineer that the initial and any amendment of the written closure plan meets the requirement of this section."*

Eric Nelson, PE, a licensed professional engineer in the State of Wisconsin has overseen the preparation of this Initial Closure Plan. A certification statement is provided on **page iii** of this plan.

40 CFR 257.102(d)(2)(iii). *"The owner or operator of the CCR unit must obtain a written certification from a qualified professional engineer that the design of the final cover system meets the requirement of this section."*

Eric Nelson, PE, a licensed professional engineer in the State of Wisconsin has overseen the design of the final cover system and certifies that the design meets the requirements of 40 CFR 257.102(d). The certification statement is provided on **page iii** of this plan.

9.0 RECORDKEEPING AND REPORTING

40 CFR 257.102(b)(vi)(2)(iii). *"The owner or operator has completed the written closure plan when the plan including the certification required by paragraph (b)(4) of this section, has been placed in the facility's operating record as required by Section 257.105(i)(4)."*

The Closure Plan will be placed in the facility's operating record and on Alliant Energy's CCR Rule Compliance Data and Information website.

Amendments to the written Closure Plan will be done when there is a change in the operation of the CCR unit that affects the plan or when unanticipated events warrant revision to the written Closure Plan as required by 40 CFR 257.102(b)(3).

WPL will provide notification as follows:

- Intent to initiate closure.
- Closure completion.
- Availability of the written Closure Plan and any amendments.

All notifications will be placed in the facility's operating record and on the website per 40 CFR 257.105(i), 257.106(i), 257.107(i).

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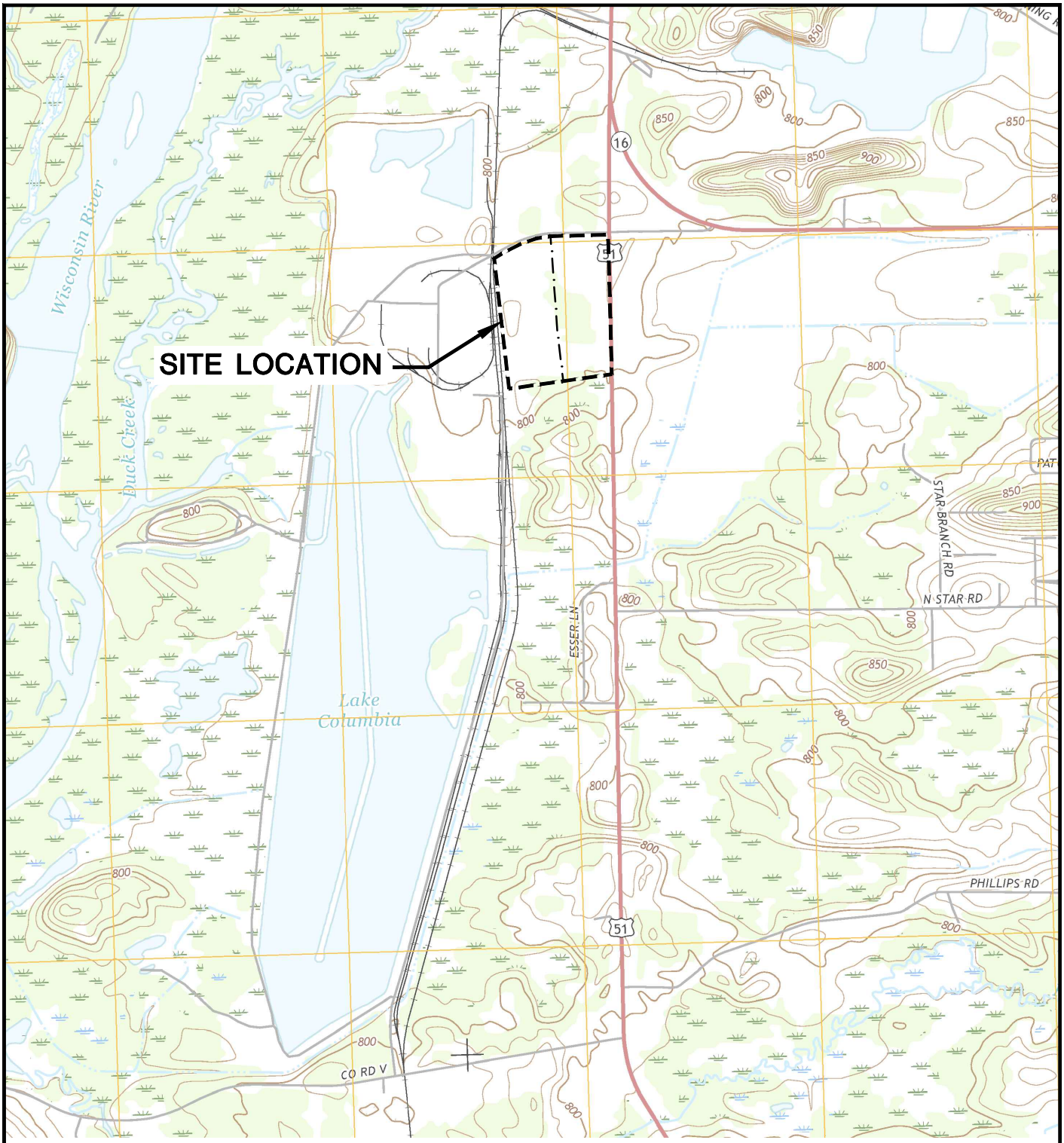
FIGURES



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POYNETTE QUADRANGLE
WISCONSIN–COLUMBIA CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)
2016
SCALE: 1" = 2,000'

CLIENT	WISCONSIN POWER AND LIGHT COLUMBIA ENERGY CENTER W8375 MURRAY ROAD PARDEEVILLE, WISCONSIN 53954	SITE	INITIAL CLOSURE PLAN COLUMBIA DRY ASH DISPOSAL FACILITY TOWN OF PACIFIC, WISCONSIN

SITE LOCATION MAP

PROJECT NO.	25216112.00	DRAWN BY:	AHB
DRAWN:	08/09/16	CHECKED BY:	RJG
REVISED:	08/09/16	APPROVED BY:	EN 10/06/16

ENGINEER

SCS ENGINEERS
2830 DAIRY DRIVE MADISON, WI 53718–6751
PHONE: (608) 224–2830

FIGURE
1

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LEGEND

- ASH DISPOSAL FACILITY LIMITS
- APPROVED LIMITS OF ASH FILL
- PHASE/MODULE LIMIT
- 810 EXISTING GRADE (5' CONTOUR)
- EXISTING GRADE (1' CONTOUR)
- PAVED ROAD
- UNPAVED ROAD
- RAILROAD TRACKS
- VEGETATION
- FENCE
- SWALE
- EDGE OF WATER
- 2' THICK CLAY LINER LIMITS
- APPROXIMATE LIMITS OF EXISTING LEACHATE/SURFACE WATER POND LINER
- FINAL COVER LIMITS
- CULVERT
- TRANSMISSION TOWER
- WATER SUPPLY WELL
- STAFF GAUGE
- WATER TABLE WELL
- PIEZOMETER
- SURFACE WATER SAMPLE LOCATION
- LYSIMETER
- LEACHATE HEADWELL
- ABANDONED WATER TABLE WELL
- ABANDONED PIEZOMETER
- BENCHMARK
- PROPOSED FINAL GRADE (2' CONTOUR)
- 820 PROPOSED FINAL GRADE (10' CONTOUR)
- ACTIVE LANDFILL AREA
- PROPOSED DIVERSION BERM
- PROPOSED DOWNSLOPE CHANNEL
- CLOSED AREA
- AREA TO BE CLOSED

NOTES:

1. BASE MAP CREATED FROM AERIAL SURVEY BY KBM, FLOWN DECEMBER 1, 2014.
2. MONITORING WELL LOCATIONS AND ELEVATIONS SURVEYED BY WISCONSIN POWER AND LIGHT, INC. IN DECEMBER 1994, NOVEMBER 1996, APRIL 2003, AND AUGUST 2012.

N

200 0 200

SCALE: 1" = 200'

COAL PILE
WPDES POND
MW-83
SG-4
MW-33AR
MW-33B
MW-34A
MW-34B
BM6
C. M. ST. P. & P. RR.
CLOSED LANDFILL
ACTIVE LANDFILL
MW-302
MW-5R
MODULE 1
MODULE 2
MODULE 3
PHASE 1
FUTURE MODULE 4
FUTURE MODULE 5
FUTURE MODULE 6
PLANT ENTRANCE ROAD
LIMITS OF 2009 FINAL COVER CONSTRUCTION
SURPLUS SELECT CLAY FILL STOCKPILE (SOURCE: RAMSEY ROAD QUARRY)
SURPLUS GENERAL FILL STOCKPILE
MW-37A
MW-92B
MW-92A
LS-3R
MW-91AR
MW-91B
MW-16
LP-1
MW-89A/B
LEACHATE/ SURFACE WATER POND
FUTURE MODULE 7
FUTURE MODULE 8
FUTURE MODULE 9
FUTURE MODULE 10
FUTURE PHASE 2
FUTURE MODULE 11
FUTURE MODULE 12
FUTURE MODULE 13
MW-30
MW-1AR
MW-1B
MW-84B
MW-84A
MW-86
U.S.H. 51
BM19

INITIAL CLOSURE PLAN

SITE

COLUMBIA DRY ASH DISPOSAL FACILITY
INITIAL CLOSURE PLAN
TOWN OF PACIFIC, WISCONSIN

CLIENT

WISCONSIN POWER AND LIGHT
COLUMBIA ENERGY CENTER
W8375 MURRAY ROAD
PARDEEVILLE, WISCONSIN 53954

ENGINEER
SCS ENGINEERS
2830 DAIRY DRIVE MADISON, WI 53718-6751
PHONE: (608) 224-2830

FIGURE 2

PROJECT NO.	25216112.00	
DRAWN:	08/09/16	DRAWN BY: KP
REVISED:	09/08/16	CHECKED BY: RJG
		APPROVED BY: EN 10/06/16

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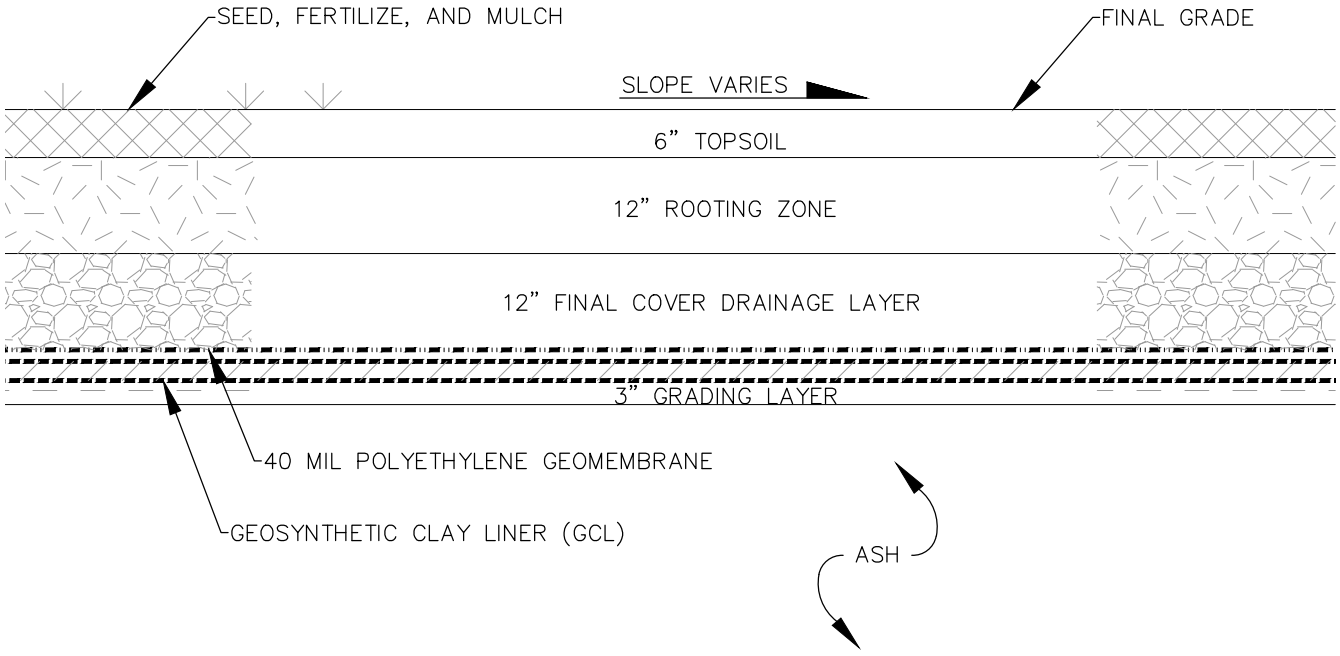

FINAL COVER SYSTEM

SCALE: 1" = 5'

CLIENT	Wisconsin Power and Light Company WISCONSIN POWER AND LIGHT COLUMBIA ENERGY CENTER W8375 MURRAY ROAD PARDEEVILLE, WISCONSIN 53954	SITE	INITIAL CLOSURE PLAN COLUMBIA DRY ASH DISPOSAL FACILITY TOWN OF PACIFIC, WISCONSIN	FINAL COVER SYSTEM	
PROJECT NO.	25216112.00	DRAWN BY:	KP	ENGINEER	SCS ENGINEERS 2830 DAIRY DRIVE MADISON, WI 53718-6751 PHONE: (608) 224-2830
DRAWN:	08/17/16	CHECKED BY:	RJG		FIGURE 3
REVISED:	08/17/16	APPROVED BY:	EN 10/06/16		

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APPENDIX A

Stability Calculations

E-3 Liner Slope Stability

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CIVIL & ENVIRONMENTAL ENGINEERING

Sheet No. 1			
Calc. No.			
Rev. No.			
Job No. 4071	Job: Columbia Ash Generation Landfill	By: PEG	Date 9/23/10
Client: Alliant	Subject: Liner Side Slope Drainage Layer Stability	Chk'd: DLN	Date 9/24/10

EVALUATION:

Evaluate the Phase 1 landfill liner side slope drainage layer for static veneer slope stability.

The side slope on the modules base runs at a 3:1 slope for an approximate maximum of 80 feet.

The following calculations evaluate the static veneer slope stability of the 3:1 slope.

REFERENCES:

1.) Koerner, Robert M. & Te-Yang Soong, Analysis and Design of Veneer Cover Soils, Geosynthetic Research Institute.

2.) U.S. Department of Transportation - Federal Highway Administration Recycled Materials, Coal Bottom Ash User's Guide

EQUATIONS:

$FS = (-b+(b^2-4*a*c)^{1/2})/(2*a)$

$a = (W_A-N_A*\cos\beta)*\cos\beta$

$b = -((W_A-N_A*\cos\beta)*\sin\beta*\tan\phi+(N_A*\tan\delta+C_a)*\sin\beta*\cos\beta+(C+W_P*\tan\phi)*\sin\beta)$

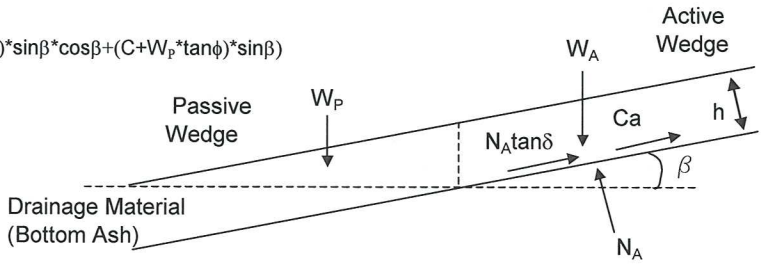
$c = (N_A*\tan\delta+C_a)*(\sin\beta)^2*\tan\phi$

$N_A = W_A*\cos\beta$

$W_A = \gamma*h^2*(L/h-1/\sin\beta-\tan\beta/2)$

$W_P = (\gamma*h^2)/\sin 2\beta)$

$C_a = c_a(L-h/\sin\beta)$



DEFINITIONS OF VARIABLES:

FS = Factor of Safety

a, b, & c = intermediate variables (= calculated variable)

N_A = Effective force normal to the failure plane of the active wedge (= calculated variable)

W_A = Total weight of active wedge (= calculated variable)

W_P = Total weight of passive wedge (= calculated variable)

β = Soil slope angle beneath the geomembrane (= 18.42 degrees or 0.322 radians based on liner slope of 3 to 1)

ϕ = Friction angle of the drainage layer material (= 35 degrees 0.611 radians based on Ref #2)

δ = Interface friction angle for liner system geosynthetics (to be determined)

c_a = Adhesion for liner system geosynthetics at active wedge (to be determined) , Variable

γ = Unit weight of the drainage layer material (= 135 pcf based on conservative wet density of bottom ash).

C = Cohesive force along the failure plane of the passive wedge (assumed 0 for drainage layer material)

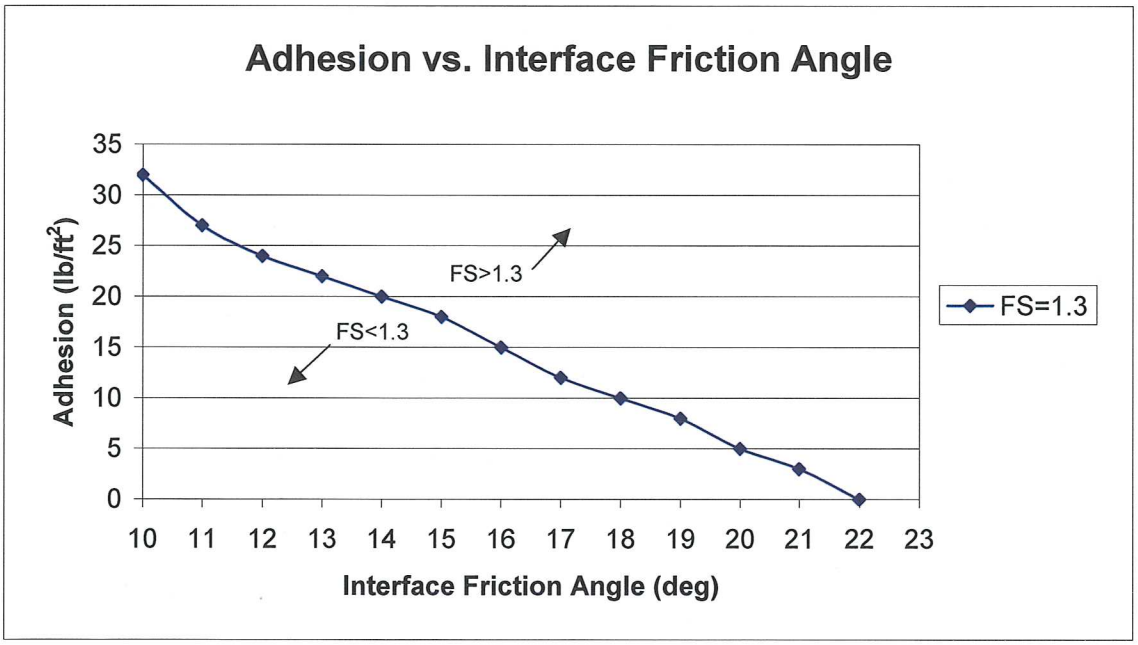
C_a = Adhesive force of the active wedge for the liner system geosynthetics

h = Thickness of the drainage layer material(= 1.0 foot based on base design)

L = Length of slope measured along the geomembrane (= 80 feet based on base design)

CALCULATIONS:

δ		c_a	W_A	W_P	N_A	C_a	a	b	c	FS
(deg)	(rad)	(lb/ft^2)	(lb/ft)	(lb/ft)	(lb/ft)	(lb/ft)	(lb/ft)	(lb/ft)	(lb/ft)	
10	0.175	32	10,350	225	9,820	2,459	981	-1,535	293	**1.3**
11	0.192	27	10,350	225	9,820	2,075	981	-1,473	279	**1.3**
12	0.209	24	10,350	225	9,820	1,844	981	-1,457	275	**1.3**
13	0.227	22	10,350	225	9,820	1,690	981	-1,465	277	**1.3**
14	0.244	20	10,350	225	9,820	1,537	981	-1,473	279	**1.3**
15	0.262	18	10,350	225	9,820	1,383	981	-1,482	281	**1.3**
16	0.279	15	10,350	225	9,820	1,153	981	-1,468	277	**1.3**
17	0.297	12	10,350	225	9,820	922	981	-1,455	274	**1.3**
18	0.314	10	10,350	225	9,820	768	981	-1,465	277	**1.3**
19	0.332	8	10,350	225	9,820	615	981	-1,477	279	**1.3**
20	0.349	5	10,350	225	9,820	384	981	-1,465	277	**1.3**
21	0.367	3	10,350	225	9,820	231	981	-1,478	280	**1.3**
22	0.384	0	10,350	225	9,820	0	981	-1,468	277	**1.3**



CONCLUSION:

The landfill liner side slope drainage layer was evaluated for static veneer slope stability along its longest slope. Calculations were performed to determine the minimum adhesion necessary for a range of interface friction angles to reach a FS of 1.3 or greater. Each interface friction angle and the coinciding adhesion was graphed in order to easily determine if a material interface is acceptable along the side slope.

BT SQUARED

Sheet No.	1 of 1		
Calc. No.			
Rev. No.			
Job No. 4071	Job: Columbia Ash Generation Landfill	By PEG	Date 9/27/10
Client: Alliant	Subject: GCL Internal Shear for Liner System	Chk'd DLN	Date 9/29/10

Purpose: Determine the maximum shear stress acting on a Geosynthetic Clay Liner (GCL) and the GCL internal shear strength required to provide a minimum slope stability safety factor (FS) of 1.5 for the liner system.

Approach: Use maximum shear stress formula and assumed values.

References: **Design of GCL Barrier for Final Cover Side Slope Applications**
Gregory N. Richardson, Ph.D., P.E. Geosynthetics '97 - 541

Calculation: The maximum shear stress acting on the GCL can be calculated as follows:

$$\tau_{act} = W_T \sin \beta$$

$$\beta = 18.4^{\circ}$$

$$W_T = \gamma * h$$

Where,

γ = Ash Unit Weight = 135 pcf

h = drainage layer thickness = 1 ft

$$W_T = 135 \text{ psf}$$

$$\tau_{act} = 42.6 \text{ psf}$$

$$FS = \frac{\tau_{resist}}{\tau_{act}} = 1.5$$

$$\tau_{resist} = FS * \tau_{act} = 1.5 * 42.6 = 64 \text{ psf}$$

Assumptions: 1. Slope angle, β=18.4° (3:1 horizontal/vertical liner side slope).
2. Ash unit weight, γ = 135 pcf

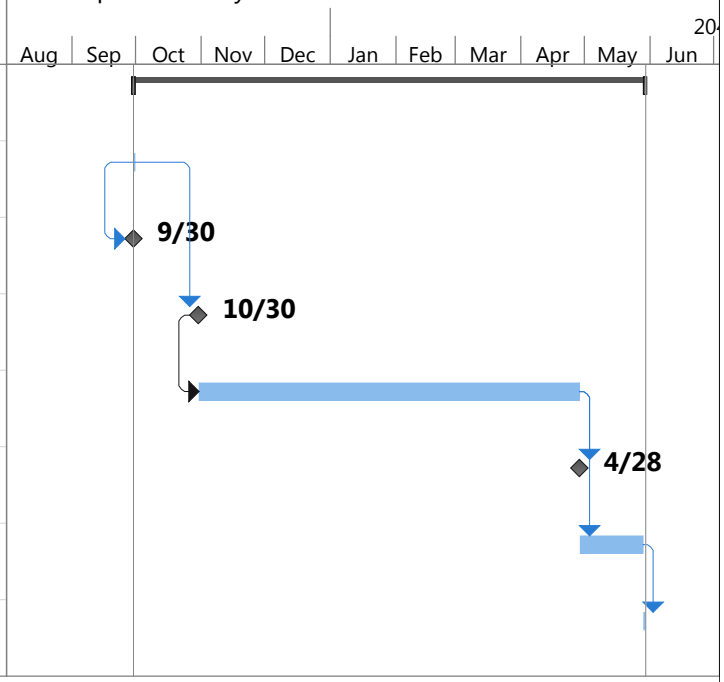
Conclusions: For a total weight of the leachate drainage layer of 135 psf and a slope angle of 3:1, the maximum shear stress will be 42.6 psf. A minimum GCL internal shear strength of 64 psf is required to provide a slope stability safety factor of 1.5.

APPENDIX B

Schedule

Initial Closure Plan Schedule Phase 1 Module 1 -Columbia Dry Ash Disposal Facility

ID	Task Name	Duration	Start	Finish
1	**Phase 1 Module 1 Closure**	**242 days**	**Wed 9/30/48**	**Sat 5/29/49**
2	Ash Filling Ceases	1 day	Wed 9/30/48	Wed 9/30/48
3	Other Regulatory Permits - None	0 days	Wed 9/30/48	Wed 9/30/48
4	Notification of Intent to Close	0 days	Fri 10/30/48	Fri 10/30/48
5	Construction Activities	180 days	Sat 10/31/48	Wed 4/28/49
6	Notification of Closure Completion	0 days	Wed 4/28/49	Wed 4/28/49
7	Documentation of Closure	30 days	Thu 4/29/49	Fri 5/28/49
8	State Submittal of Documentation Report	1 day	Sat 5/29/49	Sat 5/29/49

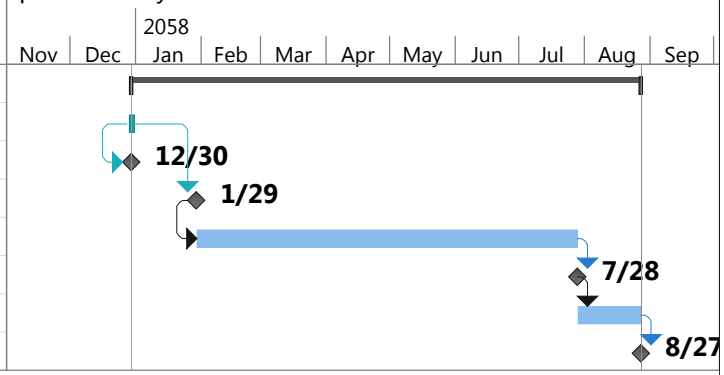


Project: Appendix B Ph 1 Mod1
Date: Tue 9/20/16

Task	Inactive Summary	External Tasks
Split	Manual Task	External Milestone
Milestone	Duration-only	Deadline
Summary	Manual Summary Rollup	Progress
Project Summary	Manual Summary	Manual Progress
Inactive Task	Start-only	
Inactive Milestone	Finish-only	

Initial Closure Plan Phase 1 Module 2 - Columbia Ash Disposal Facility

ID	Task Name	Duration	Start	Finish
1	**Phase 1 Module 2 Closure**	**241 days**	**Sun 12/30/57**	**Tue 8/27/58**
2	Ash Filling Ceases	1 day	Sun 12/30/57	Sun 12/30/57
3	Other Regulatory Permits - None	0 days	Sun 12/30/57	Sun 12/30/57
4	Notification of Intent to Close	0 days	Tue 1/29/58	Tue 1/29/58
5	Construction Activities	180 days	Wed 1/30/58	Sun 7/28/58
6	Notification of Closure Completion	0 days	Sun 7/28/58	Sun 7/28/58
7	Documentation of Closure	30 days	Mon 7/29/58	Tue 8/27/58
8	State Submittal of Documentation Report	0 days	Tue 8/27/58	Tue 8/27/58

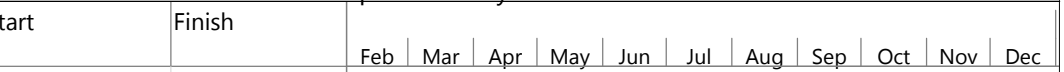


Project: Module 2 Closure Sche
Date: Tue 9/20/16

Task	Inactive Summary	External Tasks
Split	Manual Task	External Milestone
Milestone	Duration-only	Deadline
Summary	Manual Summary Rollup	Progress
Project Summary	Manual Summary	Manual Progress
Inactive Task	Start-only	
Inactive Milestone	Finish-only	

Initial Closure Plan Phase 1 Module 3 - Columbia Ash Disposal Facility

ID	Task Name	Duration	Start	Finish
1	**Phase 1 Module 3 Closure**	**241 days**	**Tue 8/30/67**	**Thu 4/26/68**
2	Ash Filling Ceases	1 day	Tue 8/30/67	Tue 8/30/67
3	Other Regulatory Permits - None	0 days	Tue 8/30/67	Tue 8/30/67
4	Notification of Intent to Close	0 days	Thu 9/29/67	Thu 9/29/67
5	Construction Activities	180 days	Fri 9/30/67	Tue 3/27/68
6	Notification of Closure Completion	0 days	Tue 3/27/68	Tue 3/27/68
7	Documentation of Closure	30 days	Wed 3/28/68	Thu 4/26/68
8	State Submittal of Documentation Report	0 days	Thu 4/26/68	Thu 4/26/68



Date: Tue 9/20/16