

INSPECTION REQUIREMENTS FOR CCR LANDFILLS

40 CFR 257.84(b) Annual Inspections by a Qualified Professional Engineer

- (1) Existing and new CCR landfills and any lateral expansion of a CCR landfill must be inspected on a periodic basis by a qualified professional engineer to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards. The inspection must, at a minimum, include:
 - (i) 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; and
 - (ii) A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit.
- (2) The qualified professional engineer must prepare a report following each inspection that addresses the following:
 - (i) Any changes in geometry of the structure since the previous annual inspection.
 - (ii) The approximate volume of CCR contained in the unit at the time of the inspection.
 - (iii) 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
 - (iv) Any other change(s) which may have affected the stability or operation of the CCR Unit since the previous annual inspection.

TRANSALTA CENTRALIA MINING LLC

LIMITED PURPOSE LANDFILL, ANNUAL INSPECTION REPORT

Date, Time, and Weather Conditions of the Inspection:

The annual inspection of the Coal Combustion Residual (CCR) unit, the TransAlta Centralia Mining LLC (TCM) Limited Purpose Landfill (LPLF) was conducted on **January 15, 2025**, beginning at around 10:30AM. The inspection was conducted by Steven J. Mahr, a qualified professional engineer, and accompanied by Marc Read, the manager of landfill operation.

Weather conditions at the time of inspection were cloudy and cool.

In accordance with the requirement the following observations were made during the inspection:

Review of available information

The CCR Operation records were reviewed for the CCR unit, otherwise known as the TCM LPLF. This included the weekly landfill inspection reports on file for the calendar year of 2024. Also reviewed were the weekly fugitive dust control inspection reports. No issues or items of concern developed from the records review.

Visual Inspection of the CCR unit

As noted above, a visual inspection of the TCM LPLF was conducted on January 15, 2025. The inspection began by driving around the perimeter access roads as an initial assessment of the landfill. This was followed by physically walking around the toe of the TCM LPLF and examining the slopes for structural integrity.

(1) Changes in Geometry

There were no changes to geometry in 2024.

(2) Approximate Volume of CCR Contained in the Unit

Records indicate the TCM LPLF contains approximately **851,722 cubic yards** of approved waste materials. Approximately 5,427 cubic yards of waste material was added to the landfill in 2024.

(3) Structural Integrity of the CCR unit

Based on the observations made during the perimeter inspection and the physical walk around the toe of the TCM LPLF there were no appearances of actual or potential structural weakness of

the landfill. **No conditions were observed** at the time of inspection to indicate a disruption of or have the potential to disrupt the operation and safety of the landfill.

CERTIFICATION OF ENGINEER:

By means of this certification, I attest that I am familiar with the requirements and provisions of Title 40 CFR Section 257.84(b), that I, Steven J. Mahr, a registered professional engineer in the State of Washington have visited and examined the CCR unit identified in this report, and that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards.

