

2025 ANNUAL INSPECTION OF CCR LANDFILL BY QUALIFIED PROFESSIONAL ENGINEER
40 CFR 257.84

FACILITY INFORMATION

Facility Name / Location	Jeffrey Energy Center / St Marys, KS
Owner Name	Evergy Kansas Central, Inc.
CCR Unit	FGD Landfill
Inspection Date	December 4, 2025

ANNUAL CCR UNIT INSPECTION REPORT

Rule	Inspection Results
<p>§257.84(b)(2)(i):</p> <p><i>“(2) Inspection report. The qualified professional engineer must prepare a report following each inspection that addresses the following:</i></p> <p><i>(i) Any changes in geometry of the structure since the previous annual inspection;”</i></p>	<p>A visual inspection of the Flue Gas Desulfurization (FGD) Landfill (Landfill) was completed on December 4, 2025, by Mr. Richard Southorn, a qualified professional engineer (QPE).</p> <p>Changes in geometry include the partial removal of a berm between Phases 1A and 1B and the placement of CCR in both Phases 1A and 1B. These activities had a cut of 9,020 cubic yards, a fill of 88,720 cubic yards, resulting in a net fill of approximately 79,700 cubic yards. Geometric changes of approximate 8.8 feet of cut to 9.8 feet of fill occurred across the unit since the last inspection.</p>
<p>§257.84(b)(2)(ii):</p> <p><i>“(ii) The approximate volume of CCR contained in the unit at the time of the inspection;”</i></p>	<p>The approximate volume of CCR material contained in the landfill at the time of the inspection was 1,261,270 cubic yards¹.</p>
<p>§257.84(b)(2)(iii):</p> <p><i>“(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;”</i></p>	<p>At the time of this inspection, there were no signs of actual or potential structural weakness or existing conditions that are disrupting or have the potential to disrupt the operation and/or safety of the CCR landfill. No signs of distress or malfunction were observed.</p>
<p>§257.84(b)(2)(iv):</p> <p><i>“(iv) Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection.”</i></p>	<p>There have been no observed changes to the landfill that have affected the stability or operation of the CCR unit since the previous annual inspection.</p>

1. The 2025 volume estimate was completed by SCS Engineers using the landfill's reported 2024 volume (1,181,570 cy), topographic data provided by PEC dated September 30, 2025, and topographic data provided by PEC dated August 27, 2024. The difference in volume between September 30, 2025 and August 27, 2024 is approximately 79,700 cy.
- 2.
3. The QPE reviewed 7-day reports as part of the annual inspection §257.84(b)(1)(i).

PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of the CCR Rule and has visited and examined the CCR unit or has supervised examination of the CCR unit by appropriately qualified personnel. I hereby certify based on a review of available information within the Jeffrey Energy Center's operating records and observations from my and/or my designated representative's personal on-site inspection, that this CCR unit does not exhibit any appearances of actual/potential structural weakness that would be disruptive to the safety or normal operations of the CCR unit. The unit 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 §257.84.

Name of Professional Engineer: Richard Southorn, P.E.

Professional Engineer Seal:



DEC. 7, 2025