ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER 40 CFR § 257.83(B)	Rev. 12/10/2019
(b)(l) If the existing or new CCR surface impoundment or any lateral expansion of the CCR surface impoundment is subject to the periodic structural stability assessment requirements under §257.73(d) or §257.74(d), the CCR unit must additionally 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 (e.g., CCR unit design and construction information required by §§ 257.73(c)(l) and 257.74(c)(l), previous periodic structural stability assessments required under §§ 257.73(d) and 257.74(d), the results of inspections by a qualified person, and results of previous annual inspections); (ii) A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit and appurtenant structures; and (iii) A visual inspection of any hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation.	

SITE INFORMATION	
Site Name / Address / Date of Inspection	CTI Development (former Wood River Power Station) Madison County, Illinois 62017 02/17/2020
Operator Name/ Address	CTI Development LLC 2275 Cassens Dr., Suite 118 Fenton, MO 63026
CCR Unit	Primary East Ash Pond

INSPECTION REPORT 40 CFR §257.83(B)(2) Date of Inspection 02/17/2020	
(b)(2)(i) Any changes in geometry of the structure since the previous annual inspection.	Based on a review of the CCR unit's records and visual observation during the on-site inspection, no changes in geometry of the structure appear to taken place since the previous annual inspection.
(b)(2)(ii) The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection.	See attached.
(b)(2)(iii) The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection;	See attached.
(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection.	Approximately 550 acre-feet.
(b)(2)(v) The approximate volume of the impounded water and CCR contained in the unit at the time of the inspection.	Approximately 300 acre-feet.
(b)(2)(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.	Based on a review of the CCR unit's records and visual observation during the on-site inspection, there was no appearance of an actual or potential structural weakness of the CCR unit, nor an apparent condition that is disrupting or would disrupt the operation and safety of the unit.
(b)(2)(vii) Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.	Based on a review of the CCR unit's records and visual observation during the on-site inspection, no other changes which may have affected the stability or operation of the CCR unit appear to have taken place since the previous annual inspection.

40 CFR § 257.83(b) - Annual inspection by a qualified professional engineer.

I, John E. Shively, P.E., certify under penalty of law that the information submitted in this report was prepared by me and that I am a duly Registered Professional Engineer under the laws of the state of Illinois. The information submitted, is to the best of my knowledge and belief, true, accurate and complete. Based on the annual inspection, the design, construction, operation, and maintenance of the CCR Unit is consistent with recognized and generally accepted good engineering standards.

John E. Shively, P.E.
Illinois PE No. 062-043477, Expires: 11/30/2021
Date: 03/02/2020

Site Name: CTI Development, LLC (former Wood River Station)
CCR Unit: Primary East Ash Pond

40 CFR § 257.83(b)(2)(ii)		
Instrument ID#	Type	Maximum recorded reading since previous annual inspection (ft)
P001	piezometer	426.7'
P002	piezometer	422.1'
P003	piezometer	424.7'
P004	piezometer	427.1'
P005	piezometer	425.2'
P006	piezometer	423.6'

40 CFR § 257.83(b)(2)(iii)						
	Approximate Depth / Elevation					
Since previous inspection:	Elevation (ft)			Depth (ft)		
	Minimum	Present	Maximum	Minimum	Present	Maximum
Impounded Water						
CCR						

CTI Development, LLC
(former Wood River Station)
Primary East Ash Pond