

**ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER**  
**40 CFR § 257.83(b)**

Rev.(0) - 12/1/2020

(b)(1) 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 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(d) and §257.74(d), the results of inspections by a qualified person, and the 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	Former Wood River Power Station Madison County, Illinois 62017
Date of Inspection	12/30/2020
Operator Name/ Address	CTI Development, LLC 2275 Cassens Drive, Suite 118 Fenton, MO 63026
CCR Unit	West Ash Pond 1

**INSPECTION REPORT 40 CFR §257.83(B)(2)**

**DATE OF INSPECTION: 12/30/2020**

(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 on-site inspection, no changes in geometry of the structure have 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 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 435 acre-feet
(b)(2)(v) The approximate volume of 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 on-site inspection, no changes in geometry of the structure have taken place since the previous annual inspection.
(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 on-site inspection, no changes in geometry of the structure have taken place since the previous annual inspection.

**40 CFR § 257.83(b) – ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER**

I, Adam Peetz, P.E., certify under penalty of law that the information submitted in this report was prepared by me and I am a 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.



Adam Peetz, P.E.

Illinois PE No. 062-071969 , Expires 11/30/21

Date: 12/30/2020

**SITE NAME: CTI Development, LLC (Formerly Wood River Power Station)**  
**CCR UNIT: West Ash Pond 1**

**40 CFR § 257.83(b)(2)(ii)**

Instrument ID#	Type	Maximum recorded reading since previous annual inspection (ft)
P016	Piezometer	N/A
P020	Piezometer	422.9
P025	Piezometer	431
P026	Piezometer	431.1

**40 CFR § 257.83(b)(2)(iii)**

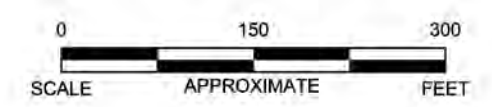
Since Previous Inspection	Approximate Elevation & Depth					
	Elevation (ft)			Depth (ft)		
	Minimum	Present	Maximum	Minimum	Present	Maximum
Impounded Water		N/A			N/A	
CCR	430		438	16		24

# WEST ASH POND COMPLEX



### LEGEND

- PIEZOMETER LOCATION
- WEST ASH POND 1
- PROPERTY BOUNDARY




 **ATON**

FIGURE  
WEST POND 1 PIEZOMETER MAP  
WOOD RIVER, FORMER DYNEGY  
Alton, IL

DESIGN: RAC	DRAWN: LMC	CHKD.: RAC
DATE: 02/02/21	SCALE: AS SHOWN	REV.: 01
W.O.NO.: ATONWOOD RIVER, WEST POND 1 PIEZOMETER MAP		

Source: Natural Resource Technology; Figure 1, Project No. 2285

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**SITE INFORMATION**

Site Name & Address	Former Wood River Power Station Madison County, Illinois 62017
Date of Inspection	12/30/2020
Operator Name/ Address	CTI Development, LLC 2275 Cassens Drive, Suite 118 Fenton, MO 63026
CCR Unit	West Ash Pond 2E

**INSPECTION REPORT 40 CFR §257.83(B)(2)**

**DATE OF INSPECTION: 12/30/2020**

(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 on-site inspection, no changes in geometry of the structure have 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 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 435 acre-feet
(b)(2)(v) The approximate volume of impounded water and CCR contained in the unit at the time of the inspection	Approximately 410 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 on-site inspection, no changes in geometry of the structure have taken place since the previous annual inspection.
(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 on-site inspection, no changes in geometry of the structure have taken place since the previous annual inspection.

**40 CFR § 257.83(b) – ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER**

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Adam Peetz, P.E.

Illinois PE No. 062-071969 , Expires 11/30/21

Date: 12/30/2020

**SITE NAME: CTI Development, LLC (Formerly Wood River Power Station)**  
**CCR UNIT: West Ash Pond 2E**

**40 CFR § 257.83(b)(2)(ii)**

Instrument ID#	Type	Maximum recorded reading since previous annual inspection (ft)
No Instruments		

**40 CFR § 257.83(b)(2)(iii)**

Since Previous Inspection	Approximate Elevation & Depth					
	Elevation (ft)			Depth (ft)		
	Minimum	Present	Maximum	Minimum	Present	Maximum
Impounded Water		N/A			N/A	
CCR	427		443	13		29

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Site Name & Address	Former Wood River Power Station Madison County, Illinois 62017
Date of Inspection	12/30/2020
Operator Name/ Address	CTI Development, LLC 2275 Cassens Drive, Suite 118 Fenton, MO 63026
CCR Unit	West Ash Pond 2W

**INSPECTION REPORT 40 CFR §257.83(B)(2)**

**DATE OF INSPECTION: 12/30/2020**

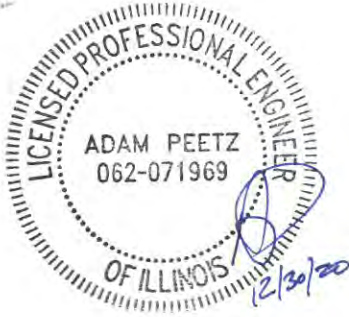
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(b)(2)(iii) The approximate minimum, maximum, and present depth and elevation of impounded water and CCR since the previous annual inspection.	See attached
(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection.	Approximately 435 acre-feet
(b)(2)(v) The approximate volume of impounded water and CCR contained in the unit at the time of the inspection	Approximately 410 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 on-site inspection, no changes in geometry of the structure have taken place since the previous annual inspection.
(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 on-site inspection, no changes in geometry of the structure have taken place since the previous annual inspection.

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Adam Peetz, P.E.

Illinois PE No. 062-071969 , Expires 11/30/21

Date: 12/30/2020

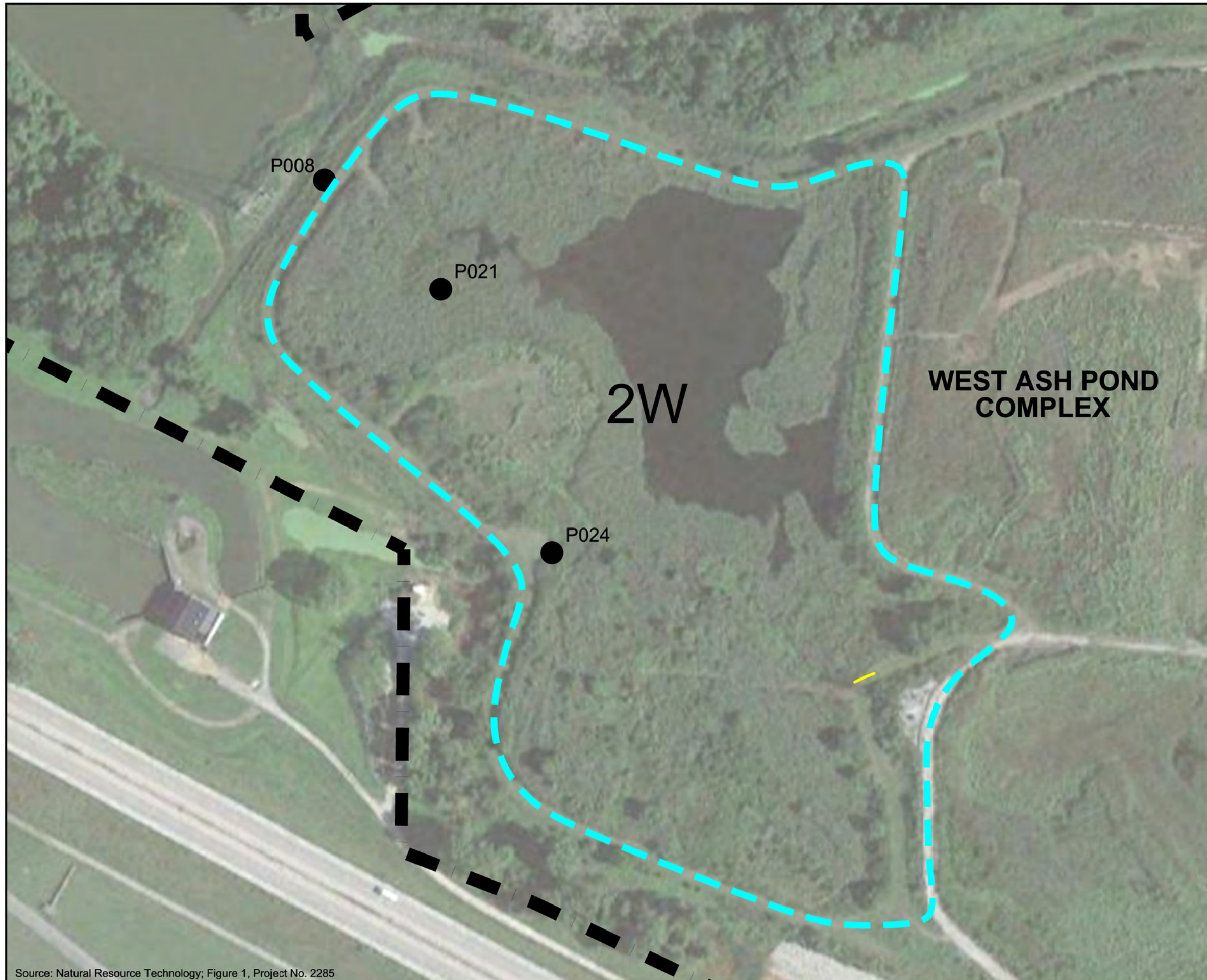
**SITE NAME: CTI Development, LLC (Formerly Wood River Power Station)**  
**CCR UNIT: West Ash Pond 2W**

**40 CFR § 257.83(b)(2)(ii)**

Instrument ID#	Type	Maximum recorded reading since previous annual inspection (ft)
P008	Piezometer	411.5
P021	Piezometer	411.8
P024	Piezometer	412.8

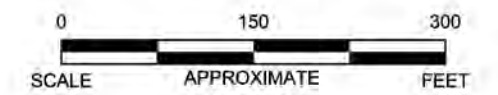
**40 CFR § 257.83(b)(2)(iii)**

Since Previous Inspection	Approximate Elevation & Depth					
	Elevation (ft)			Depth (ft)		
	Minimum	Present	Maximum	Minimum	Present	Maximum
Impounded Water		N/A			N/A	
CCR	420		431	6		17



**LEGEND**

- PIEZOMETER LOCATION
- WEST ASH POND 2W
- PROPERTY BOUNDARY



**ATON**

FIGURE  
WEST POND 2W PIEZOMETER MAP  
WOOD RIVER, FORMER DYNEGY  
Alton, IL

DESIGN: RAC	DRAWN: LMC	CHKD.: RAC
DATE: 02/02/21	SCALE: AS SHOWN	REV.: 01
W.O.NO.: ATONWOOD RIVER, WEST POND 2W PIEZOMETER MAP		