



ANNUAL CCR FUGITIVE DUST CONTROL REPORT

CTI DEVELOPMENT, LLC
(FORMER WOOD RIVER SITE)
#1 CHESSEN LANE
ALTON, IL 62002

Prepared for:

**CTI Development, LLC.
PO Box 1636
Canovanas, Puerto Rico 00729**

Prepared by:

**Gemini Engineering
2275 Cassens Drive, Suite 118
Fenton, MO 63026**

March 2022



Reporting Year: 4th Quarter 2020 through 3rd Quarter 2021

This Annual CCR Fugitive Dust Control Report has been prepared for CTI Development (the former Wood River site), as required by 40 CFR 257.80(c). Section 1 provides a description of available actions that can be taken, if necessary, to control CCR fugitive dust at the facility during the reporting year. Section 2 provides a record of citizen complaints received concerning CCR fugitive dust at the facility during the reporting year and a summary of any corrective measures taken.

SECTION 1 ACTIONS TAKEN TO CONTROL CCR FUGITIVE DUST

In accordance with CTI Development’s CCR Fugitive Dust Control Plan (Plan), the following measures would be implemented to control CCR fugitive dust from becoming airborne at the facility during the reporting year, if necessary:

CCR Activity	Actions Taken to Control CCR Fugitive Dust
Management of CCR in the facility’s CCR units	Wet management of CCR materials in CCR surface impoundments.
	Water areas of exposed CCR in CCR units.
	Naturally occurring grass vegetation in areas of exposed CCR in CCR surface impoundments.
Handling of CCR at the facility	CCR handled during closure activities of CCR surface impoundments remains conditioned during handling.
	Good housekeeping measures, such as sweeping or wetting, as needed.

During the reporting year, the former power plant demolition was completed. Excavation of the East Ash Pond and relocating the material to the West Ash Pond was continued. The Coal Yard was 95% cleaned, and the remaining area will be cleaned during final grading of West Ash Pond. Based on a review of the Plan and inspections associated with CCR fugitive dust control performed in the reporting year, and necessary control measures implemented at the facility, the site effectively minimized CCR from becoming airborne. No revisions or additions to control measures were needed to control CCR fugitive dust.

The Wood River Site, now owned by CTI Development, was permanently retired on May 31, 2016. Once decommissioning activities are completed, the Plan will be amended to



remove CCR fugitive dust control measures associated with CCR activities/ systems that are no longer occurring/ in operation.

SECTION 2 RECORD OF CITIZEN COMPLAINTS

No citizen complaints were received regarding CCR fugitive dust at the CTI Development site in the reporting year.

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

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	09/11/2021
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: 9/11/2021

(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 on page 2.
(b)(2)(iii) The approximate minimum, maximum, and present depth and elevation of impounded water and CCR since the previous annual inspection.	See on page 2.
(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 impounded water and CCR contained in the unit at the time of the inspection	Approximately 123.5 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)(2)(ii)		
Instrument ID#	Type	Maximum recorded reading since previous annual inspection (ft)
P001	Piezometer	426.7
P002	Piezometer	420.8
P003	Piezometer	423.7
P004	Piezometer	426.1
P005	Piezometer	424.4
P006	Piezometer	416.3

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		435.5			0.5	
CCR	435		448	0		13

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

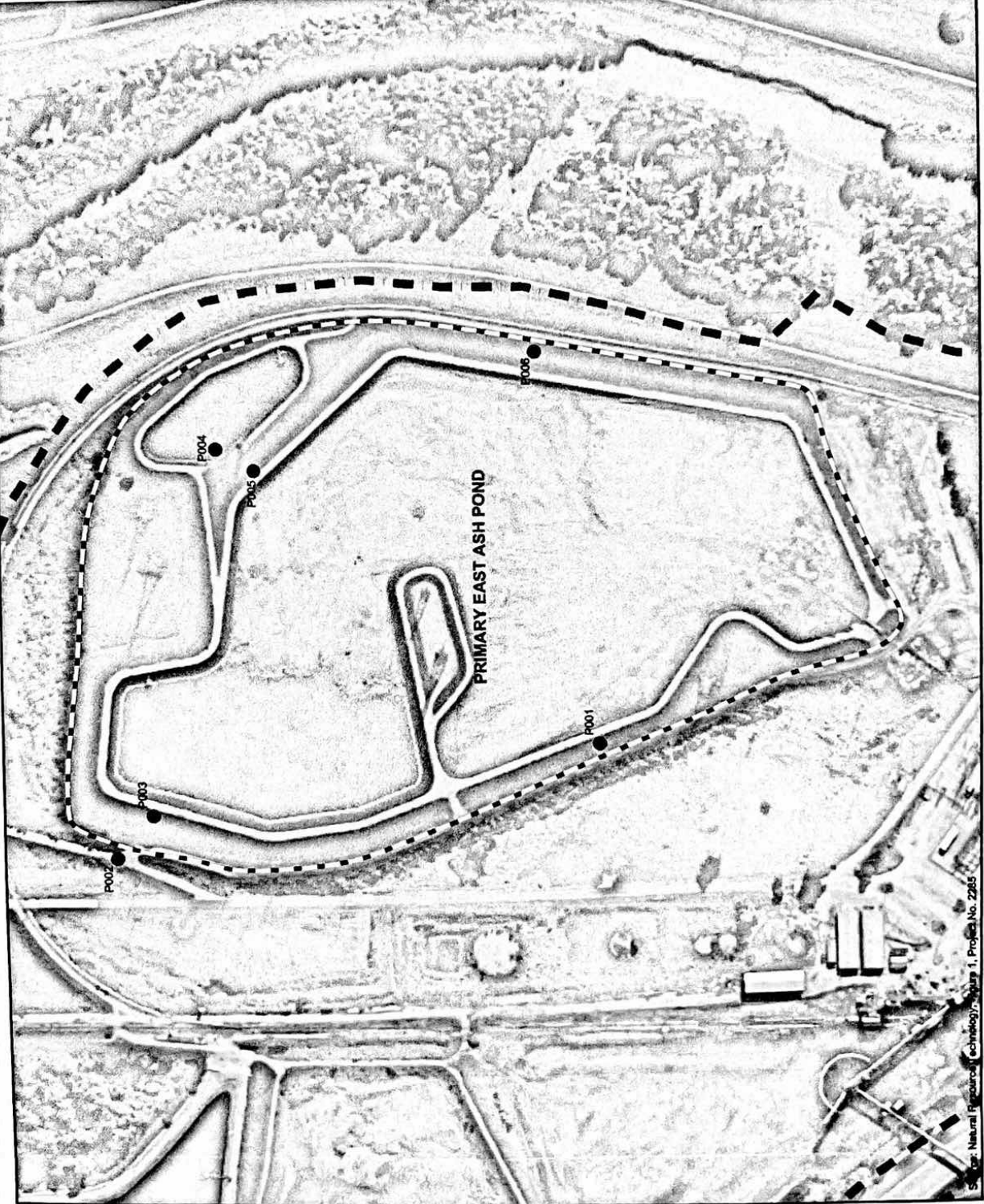
I, Adam Peetz, P.E., certify under penalty of law that the information submitted in this report was prepared by me and I am a Registered Professional Engineer under the laws of the State of Illinois. The information submitted, is to the best of my knowledge and belief, true, accurate, and complete. Based 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~~ 11/30/23

Date: 9/30/22



- LEGEND**
- PIEZOMETER LOCATION
 - PRIMARY EAST ASH POND
 - - - PROPERTY BOUNDARY

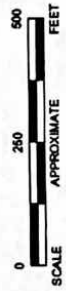


FIGURE
 PRIMARY EAST ASH POND PIEZOMETER MAP
 WOOD RIVER, FORMER D'INEGY
 ALTON, IL

DESIGN RAC	DRAWN LMC	CHRD: RAC
DATE: 09/20/27	SCALE: AS SHOWN	REV: 01
PROJECT: ATOMWOOD RIVER PRIMARY EAST ASH POND PIEZOMETER MAP		