



# ANNUAL CCR FUGITIVE DUST CONTROL REPORT

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

*Prepared for:*

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**Reporting Year: 4<sup>th</sup> Quarter 2020 through 3<sup>rd</sup> 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:

<b>CCR Activity</b>	<b>Actions Taken to Control CCR Fugitive Dust</b>
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: West Ash Pond Complex**

**SITE INFORMATION**

Site Name & Address	Former Wood River Power Station Madison County, Illinois 62017
Date of Inspection	2021 Annual Summary Report
Operator Name/ Address	CTI Development, LLC 2275 Cassens Drive, Suite 118 Fenton, MO 63026
CCR Unit	West Ash Pond 1, Pond 2W, & Pond 2E

**ANNUAL CONSOLIDATED REPORT 35 IAC §845.550**

**SUBMITTAL YEAR: 2021**

(a)(1) Annual CCR Fugitive Dust Control report (see section 845.500(c))	Attached in separate Report
<p>(a)(2)(a) Annual Hazard Potential Classification Certification (Section 845.440(b)).</p> <p><i>The owner or operator of the CCR surface impoundment must conduct an initial and annual hazard potential classification assessment of the CCR surface impoundment. The owner or operator must document the hazard potential classification of each CCR surface impoundment as either a Class 1 or Class 2 CCR surface impoundment. The owner or operator must also document the basis for each hazard potential classification.</i></p>	<p>Under CCR Rule §257.53, West Ash Pond was indicated to have a Significant hazard potential due to environmental damage cause by potential releases from a breach to Pond 1 and 2E. The probable loss of human life was found to be not present.</p> <p>Under the 845.440, West Ash Pond is identified as Class I based on a probable loss of human life potential from intermittently manned stations on and adjacent to the site.</p>
<p>(a)(2)(b) Annual Structural Stability Assessment Certification (Section 845.450).</p> <p><i>The owner or operator of a CCR surface impoundment must conduct initial and annual structural stability assessments and document whether the design, construction, operation, and maintenance of the CCR surface impoundment is consistent with recognized and generally accepted engineering practices for the maximum volume of CCR and CCR wastewater that can be impounded in the CCR surface impoundment.</i></p>	<p>Based on review of the geotechnical analysis and assessment of the West Ash Pond Complex during the development of the closure design, the static and seismic factors of safety outline in 845.450 have been exceeded or minimally equaled.</p> <p>Inspection of the construction documents, geotechnical sampling of the impoundments, and the current observations of the diked cells indicate they were constructed and maintained with consistent or accepted general engineering practices.</p> <p>No change to this Classification based on site inspection and observations.</p>

<p><b>(a)(2)(c) Annual Safety Factor Assessment Certification (Section 845.460).</b></p> <p><i>The owner or operator of a CCR surface impoundment must conduct an initial and annual safety factor assessment for each CCR surface impoundment and document whether the calculated factors of safety for each CCR surface impoundment achieve the minimum safety factors specified in this Section for the critical cross-section of the embankment. The critical cross-section is the cross section anticipated to be the most susceptible of all cross-sections to structural failure based on appropriate engineering considerations, including loading conditions. The safety factor assessments must be supported by appropriate engineering calculations.</i></p>	<p>Based on review of the geotechnical analysis and assessment of the West Ash Pond Complex during the development of the closure design, the static and seismic factors of safety outline in 845.450 have been exceeded or minimally equaled.</p> <p>No change to this Classification based on site inspection and observations.</p>
<p><b>(a)(2)(d) Inflow Design Flood Control System Plan Certification (Section 846.510(c)).</b></p> <p><i>Content of the Plan. The owner or operator must prepare initial and annual inflow design flood control system plans for the CCR surface impoundment. These plans must document how the inflow design flood control system has been designed and constructed to meet the requirements of this Section. Each plan must be supported by appropriate engineering calculations.</i></p>	<p>Based on review on the hydrologic assessments of the West Ash Pond Complex during the development of the closure design, the overtopping of Ponds is not expected and the outfall structures in Pond 2E and Pond 3 can adequately manage peak discharge during a 24-hr probable maximum flood.</p> <p>No change to this Classification based on site inspection and observations.</p>
<p><b>(a)(3) Annual Groundwater Monitoring and Corrective Action Report (Section 845.610(e))</b></p>	<p>Attached in separate Report</p>