



# ANNUAL CCR FUGITIVE DUST CONTROL REPORT

FINCH DEVELOPMENT, LLC  
(FORMER HAVANA POWER STATION - EAST ASH SYSTEM)  
15260 IL STATE ROUTE 78  
HAVANA, IL 62644

*Prepared for:*

**Finch 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: 4<sup>th</sup> Quarter 2020 through 3<sup>rd</sup> Quarter 2021**

This Annual CCR Fugitive Dust Control Report has been prepared for Finch Development (the former Havana Power Station – East Ash System), 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 materials were not handled during closure this duration, while waiting for Closure Plan approval.
	Good housekeeping measures during stormwater runoff management.

During the reporting year, the main site actions relate to stormwater runoff collection and management at the site. Remedial actions are pending Closure Plan approval. 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 former Havana Power Station – East Ash System, now owned by Finch Development, was permanently retired on November 1, 2019. 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 Finch Development site in the reporting year.

**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.

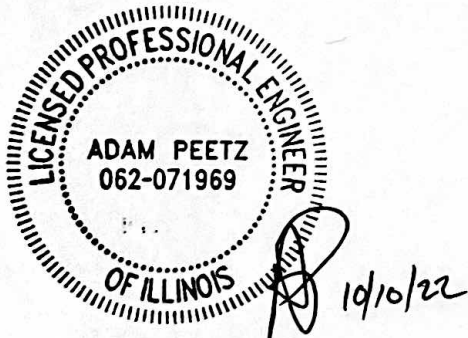
SITE INFORMATION	
Site Name & Address	Former Havana Power Plant 15260 IL State Route 78 Havana, Illinois 62644 Mason County
Date of Inspection	07/22/2022
Operator Name/ Address	Finch Development, LLC PO Box 1636 Canovanas, Puerto Rico 00729
CCR Unit	East Ash Pond System

INSPECTION REPORT 40 CFR § 257.83(B)(2)	
DATE OF INSPECTION: 07/22/2022	
(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 4,200 acre-feet

(b)(2)(v) The approximate volume of impounded water and CCR contained in the unit at the time of the inspection	Approximately 3,700 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 11/30/23

Date: 10/10/22

**SITE NAME:** Finch Development, LLC (Formerly Havana Power Station)  
**CCR UNIT:** East Ash Pond System

**40 CFR § 257.83(b)(2)(ii)**

Instrument ID#	Type	Maximum recorded reading since previous annual inspection
No Instrumentation		

**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		477			8	
CCR	475		491	25		40

**SITE NAME: Finch Development, LLC (Formerly Havana Power Station)**  
**CCR UNIT: East Ash Pond System**

**SITE INFORMATION**

Site Name & Address	Former Havana Power Station 15260 IL State Route 78 Havana, Illinois 62644 Madison County
Date of Inspection	2022 Annual Report
Operator Name/ Address	Finch Development, LLC PO Box 1636 Canovanas, Puerto Rico 00729
CCR Unit	East Ash Pond 1, 2, 3, & 4

**ANNUAL CONSOLIDATED REPORT 35 IAC §845.550**  
**SUBMITTAL YEAR: 2022**

(a)(1) Annual CCR Fugitive Dust Control report (see section 845.500(c))	Attached in separate Report
(a)(2)(a) Annual Hazard Potential Classification Certification (Section 845.440(b)).  <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>	Under CCR Rule §257.53, East Ash Pond System was indicated to have a High hazard potential due to probable loss of human life along the Highway 78 corridor and residences to the north/northeast.  Under the 845.440, West Ash Pond is identified as Class I based on a probable loss of human life in the same adjacent areas to the site.
(a)(2)(b) Annual Structural Stability Assessment Certification (Section 845.450).  <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>	Gemini reviewed the initial stability and structural assessment of the East Ash Pond system during the development of the closure alternatives design.  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.  No change to this Classification based on site inspection and observations.

<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>Gemini reviewed the initial safety factor assessment of the East Ash Pond System during the development of the closure alternatives 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>Gemini reviewed the initial inflow design flood control assessment of the East Ash Pond System during the development of the closure alternatives design. The overtopping of ponds is not expected and the outfall structures in the East Ash Pond System can adequately manage peak discharge during a 24-hr probable maximum flood.</p> <p>Dewatering of Cell 3 during 2022 has only increased the storage capacity for larger rainfall events.</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>