2021 Annual Groundwater Monitoring and Corrective Action Report

FOR WEST ASH POND COMPLEX

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WOOD RIVER SITE/ FORMER WOOD RIVER POWER PLANT
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1.0 INTRODUCTION

In accordance with Illinois JCAR Administrative Code requirements under Illinois Title 35, Subtitle G, Chapter I, Subchapter J - Part 845.610(e), Gemini Engineering LLC (Gemini) has prepared this report on behalf of CTI Development LLC (CTI) for the 2021 Wood River West Ash Pond Complex in Alton, Illinois. CTI took possession of the power station property on August 30, 2019 from Luminant/Dynegy Midwest Generation, LLC (DMG).

The owner or operator of an existing Coal Combustion Residuals (CCR) unit shall prepare an annual groundwater monitoring and corrective action report, for the preceding calendar year, that documents the status of the groundwater monitoring and corrective action program for the CCR unit. The report should summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and key activities for the upcoming year per Part 845.610(e). The annual report will minimally cover the following site-specific information:

1. A drawing or diagram showing the CCR unit, the designated background (or upgradient) monitoring wells, and the designated downgradient monitoring wells.

2. Identification and discussion of any monitoring wells that were installed or decommissioned during the preceding year.

3. A Potentiometric surface map for groundwater elevations at the time of each sampling event.

4. Provide a summary of groundwater samples taken for the West Ash Pond Complex, including the number of groundwater samples collected for analysis at each of the designated background and downgradient wells, the dates collected, whether the sample was required by the detection monitoring or assessment monitoring programs, and the groundwater monitoring data.

5. A discussion of the groundwater monitoring program including:

    a. Statistical analysis of groundwater data to identify constituents detected at a statistically significant increase over background levels.
    b. The transition from detection groundwater monitoring to assessment monitoring of constituents identified in the statistical assessment.

6. Other information required to be included in the annual report as specified in Part 845.610(e).

2.0 MONITORING & CORRECTIVE ACTION PROGRAM STATUS

As referenced in the 2018 Annual Groundwater Monitoring and Corrective Action Report (NRT/OGB 2019), the West Ash Pond Complex has been in an Assessment Monitoring Program in accordance with 40 CFR 257.94(e)(2). DMG placed the required notification on April 9, 2019.

Assessment monitoring sampling was continued in 2021 during the quarterly sampling events under the direction of CTI and Gemini. Samples were collected from each of the West Ash Pond Complex designated upgradient and downgradient wells and analyzed for the Appendix III and Appendix IV parameters. The analytical data was evaluated in accordance with the Statistical Analysis Plan (NRT/OBG 2017) provisions to determine if any statistically significant increases (SSIs) of the Appendix III parameters were above the background concentrations and if statistically significant levels (SSLs) of Appendix IV parameters were above the Groundwater Protections Standards (GWPSs).

In 2019, the West Ash Pond Complex entered into the quarterly sampling schedule as outlined with the Groundwater Monitoring Plan (NRT/OBG Oct. 2016) and Closure Plan (AECOM Nov. 2016). Quarterly sampling events were completed by Teklab Inc. on the following dates during 2021:

Q1 Sample Date	Q2 Sample Date	Q3 Sample Date	Q4 Sample Date
2/23/2021	5/29/2021	8/26/2021	11/30/2021

Assessment Monitoring Program Summary
November 2017 – November 2021

Well ID	Appendix III - SSIs		Appendix IV - SSLs	
	Trend	UCL Value	Trend	UCL Value
02	All Trends Decreasing or Statistically Insignificant	Boron Above Background	None	N/A
04	All Trends Decreasing or Statistically Insignificant	No Parameters Above Background or	None	N/A
32R	Increasing for Sulfate Only, Remaining are Statistically Insignificant	Boron Above Background	None	N/A

34	All Trends Decreasing or Statistically Insignificant	Boron Above Background & Fluoride at Background	None	N/A

The Statistical Background Values for the SSIs evaluation from Appendix III are summarized in Table A. The GWPSs for the SSLs evaluation from Appendix IV are summarized in Table B.

Table A - Statistical Background Values

Parameter	Statistical Background Value
Appendix III	
Boron (mg/L)	1.17
Calcium (mg/L	667.381
Chloride (mg/L)	3,316
Fluoride (mg/L)	0.4
pH (S.U.)	6.4 / 7.4
Sulfate (mg/L)	279
TDS (mg/L)	7629

Notes:
mg/L = milligrams per liter
S.U. = Standard Units
TDS = Total Dissolved Solids

Table B - Groundwater Protection Standards

Parameter	Groundwater Protection Standard
Appendix IV	
Antimony (mg/L)	0.006
Arsenic (mg/L)	0.010
Barium (mg/L)	2
Beryllium (mg/L)	0.004
Cadmium (mg/L)	0.005
Chromium (mg/L)	0.10
Cobalt (mg/L)	0.006
Fluoride (mg/L)	4
Lead (mg/L)	0.015
Lithium (mg/L)	0.171
Mercury (mg/L)	0.002
Molybdenum (mg/L)	0.10
Selenium (mg/L)	0.05
Thallium (mg/L)	0.002

Radium 226+228 (pCi/L)	5

Notes:
mg/L = milligrams per liter
pCi/L = picoCuries per liter

3.0 ACTIONS COMPLETED IN 2021

As previously noted, a quarterly groundwater sampling event was completed for the West Ash Pond Complex in 2021 under the Assessment Monitoring Program. A summary of the analytical data and statistical analyses are found in Appendix B - Tables 1 and 2.

Appendix A - Figure 1 displays the designated groundwater well system for the West Ash Pond Complex.

4.0 PROBLEMS ENCOUNTERED & CORRECTIVE ACTIONS

Performance and assessment of the designated groundwater well system for the West Ash Pond Complex encountered no issues during 2021. Guidelines in the Sampling and Analysis Plan (NRT/OGB, 2017) were followed during the collection and analysis of the representative samples.

5.0 2022 PLANNED ACTIONS

The following actions are planned for 2022:

- The continuation of Assessment Monitoring Program of the West Ash Pond Complex with quarterly sampling events.
- The continuation of statistical evaluation of the collected analytical data from the designated groundwater well system to determine if any SSLs for Appendix IV parameters has occurred.
- If an SSL has been identified, an assessment of "potential alternative sources" will be completed. A "potential alternative source" is one other than the referenced CCR unit that could have caused the SSL or the SSL resulted from an error in one of the following processes: sample collection, sample analysis, statistical evaluation, or a possible variation/change in the groundwater systems quality.

- If an alternative source is causing the SSL, a documented demonstration will be completed within 90 days after the SSL discovery and included in the Groundwater Monitoring and Corrective Action report for that year.
- If an alternative source is not the cause of the SSL, the procedure and requirements in 40 CFR 257.94 - 257.98 as applicable will be met. This also includes completion of the appropriate notifications required by 40 CFR 257.105 - 257.108.

6.0 REFERENCES

AECOM, November 28, 2016. Closure and Post-Closure Care Plan for the Wood River West Ash Complex at Dynegy Midwest Generation, LLC., Wood River Power Station.

Natural Resource Technology, Inc. (NRT), October 19, 2016. Groundwater Monitoring Plan, West Ash Pond Complex, Wood River Power Station, Alton, Illinois.

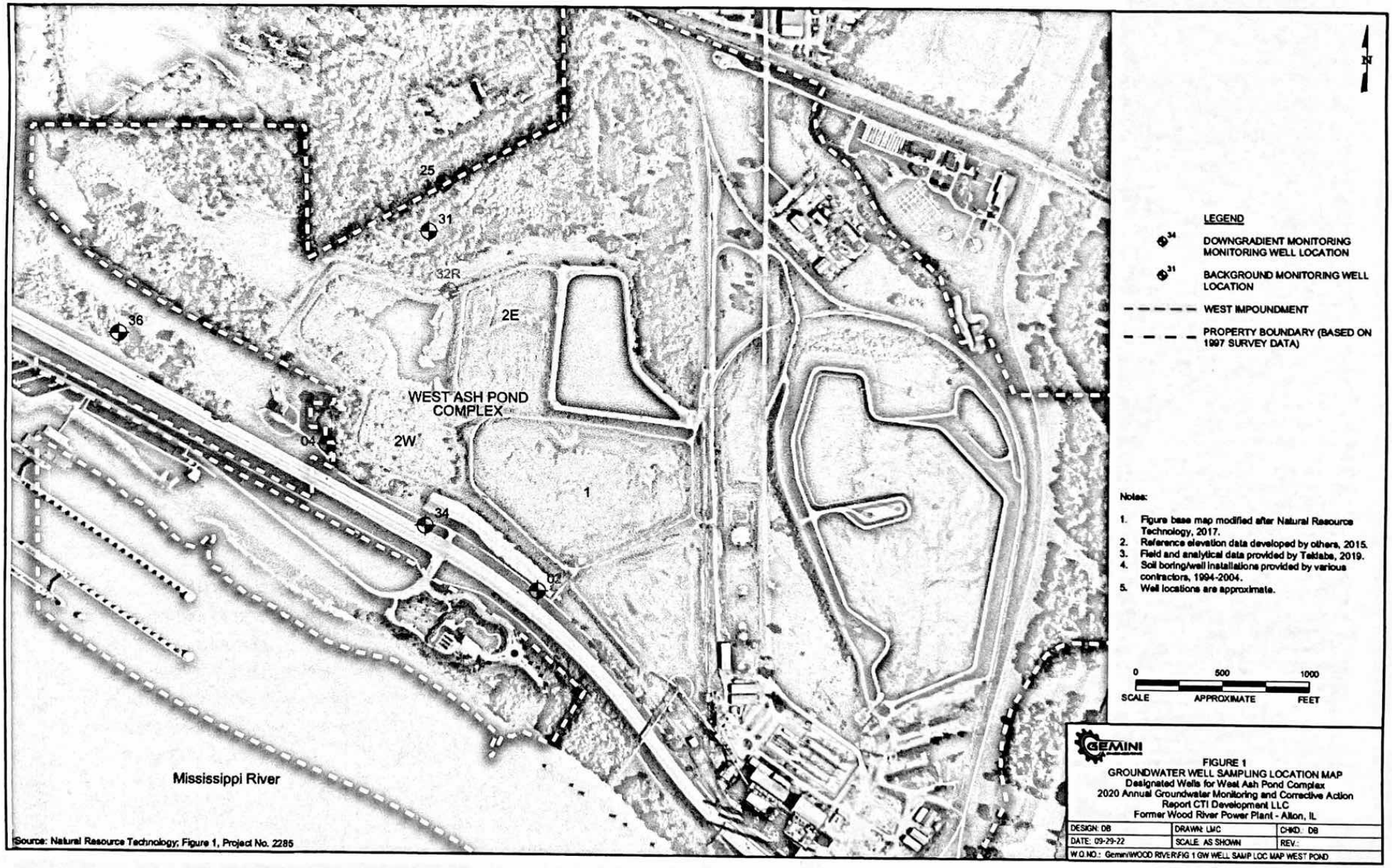
NRT/OBG, October 17, 2017. Sampling and Analysis Plan, West Ash Pond Complex, Wood River Power Station, Alton, Illinois.

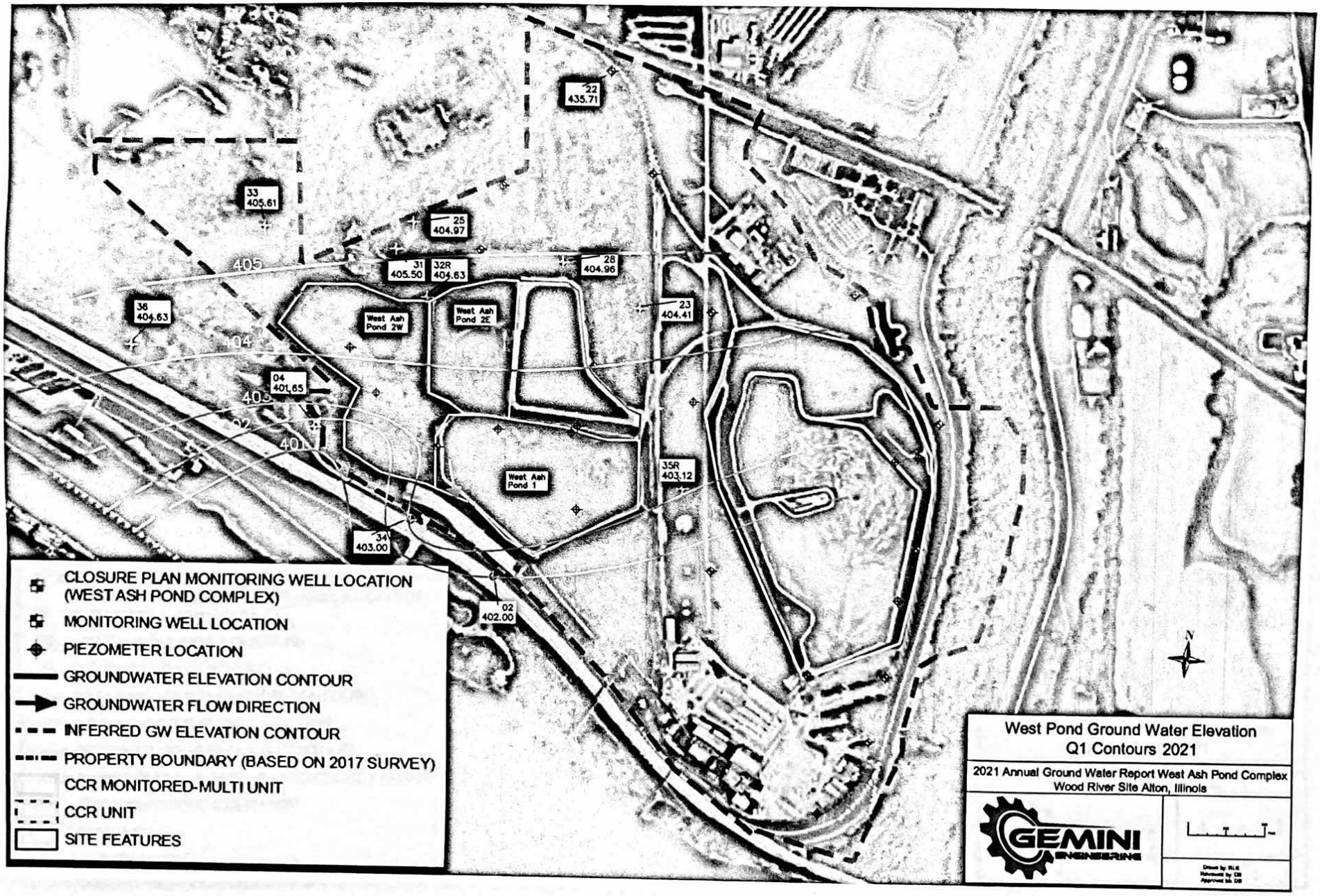
NRT/OBG, October 17, 2017. Statistical Analysis Plan, Wood River Power Station, Alton, Illinois.

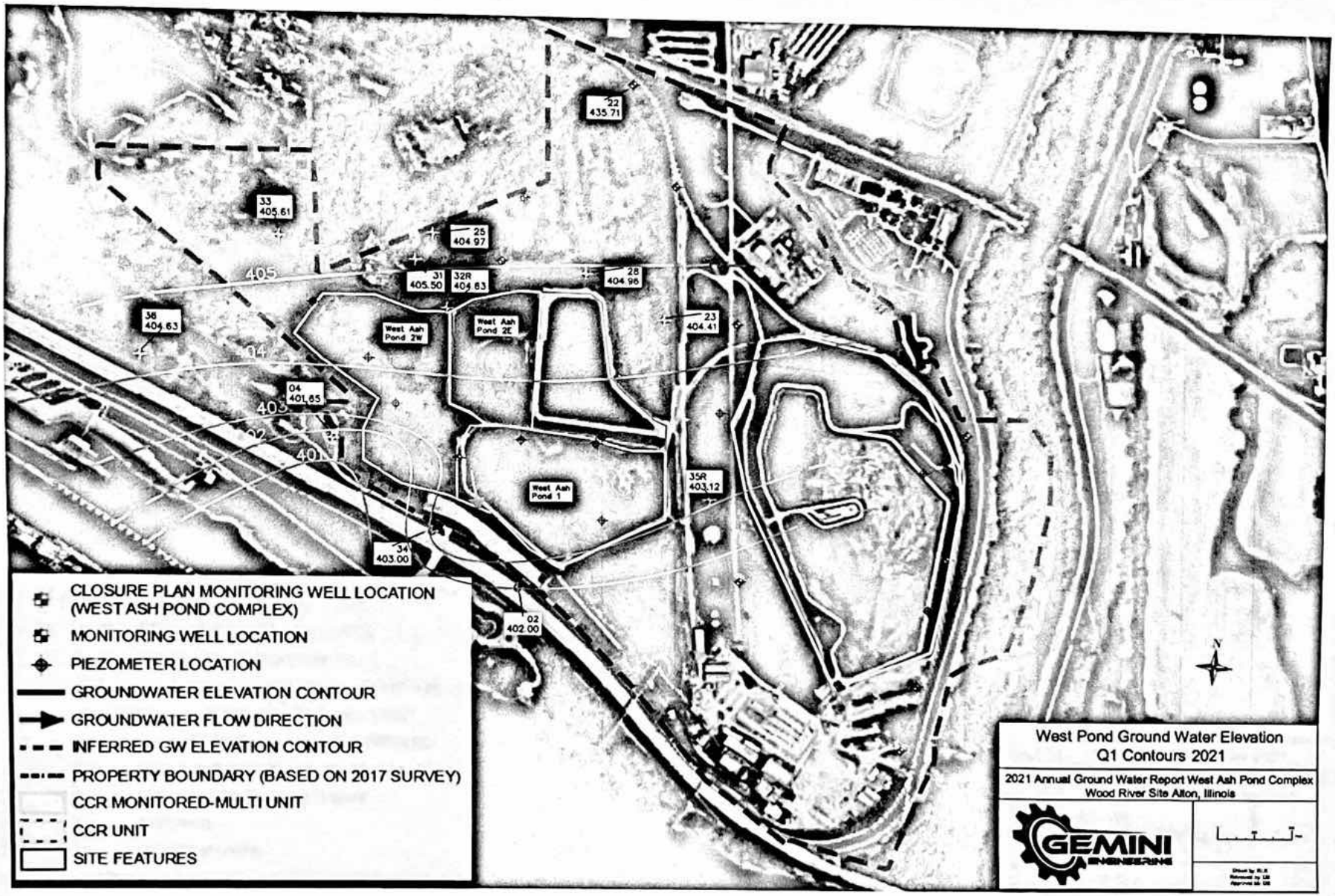
USEPA, April 17, 2015. 40 CFR Parts 257 and 261. Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule.

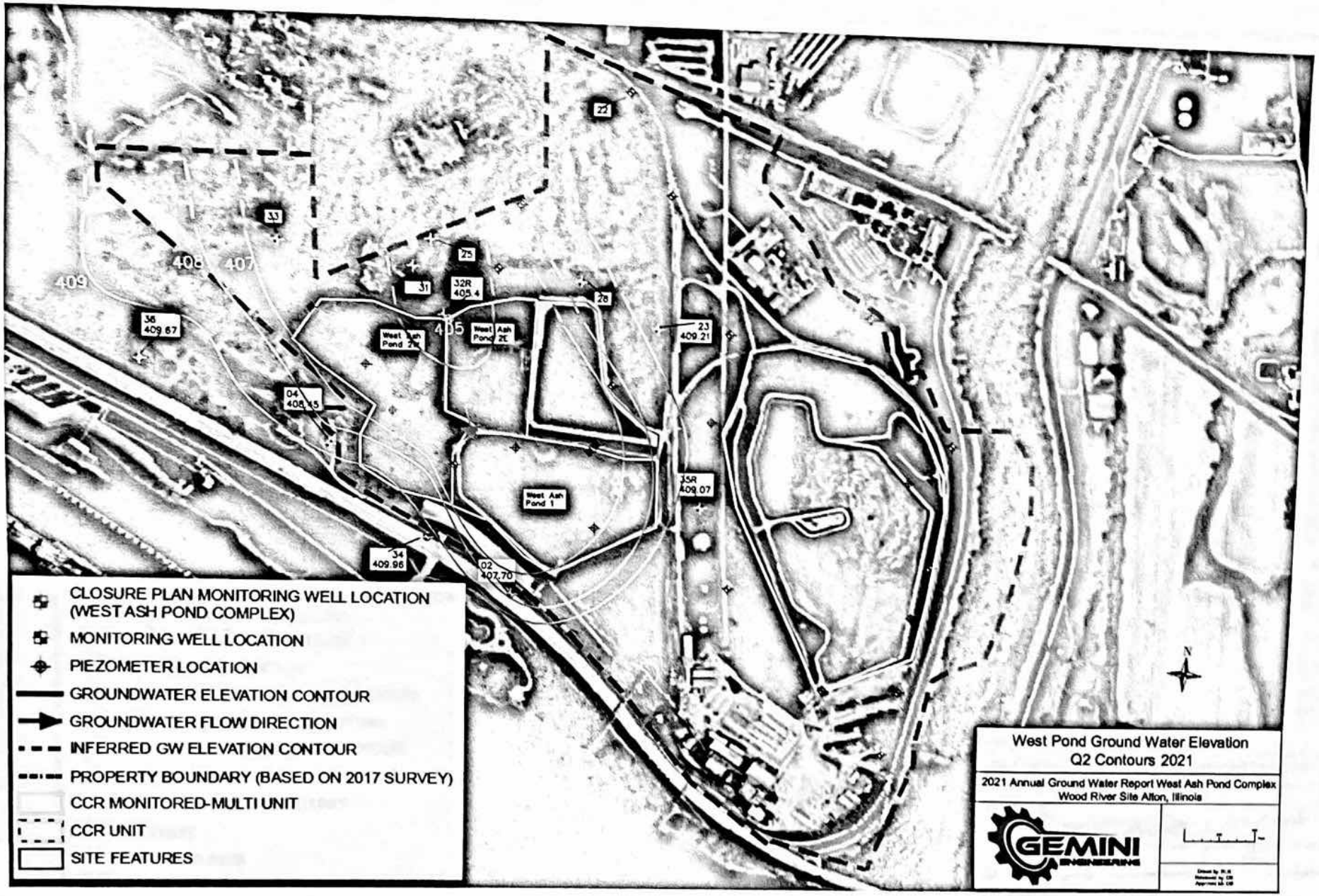
APPENDIX A

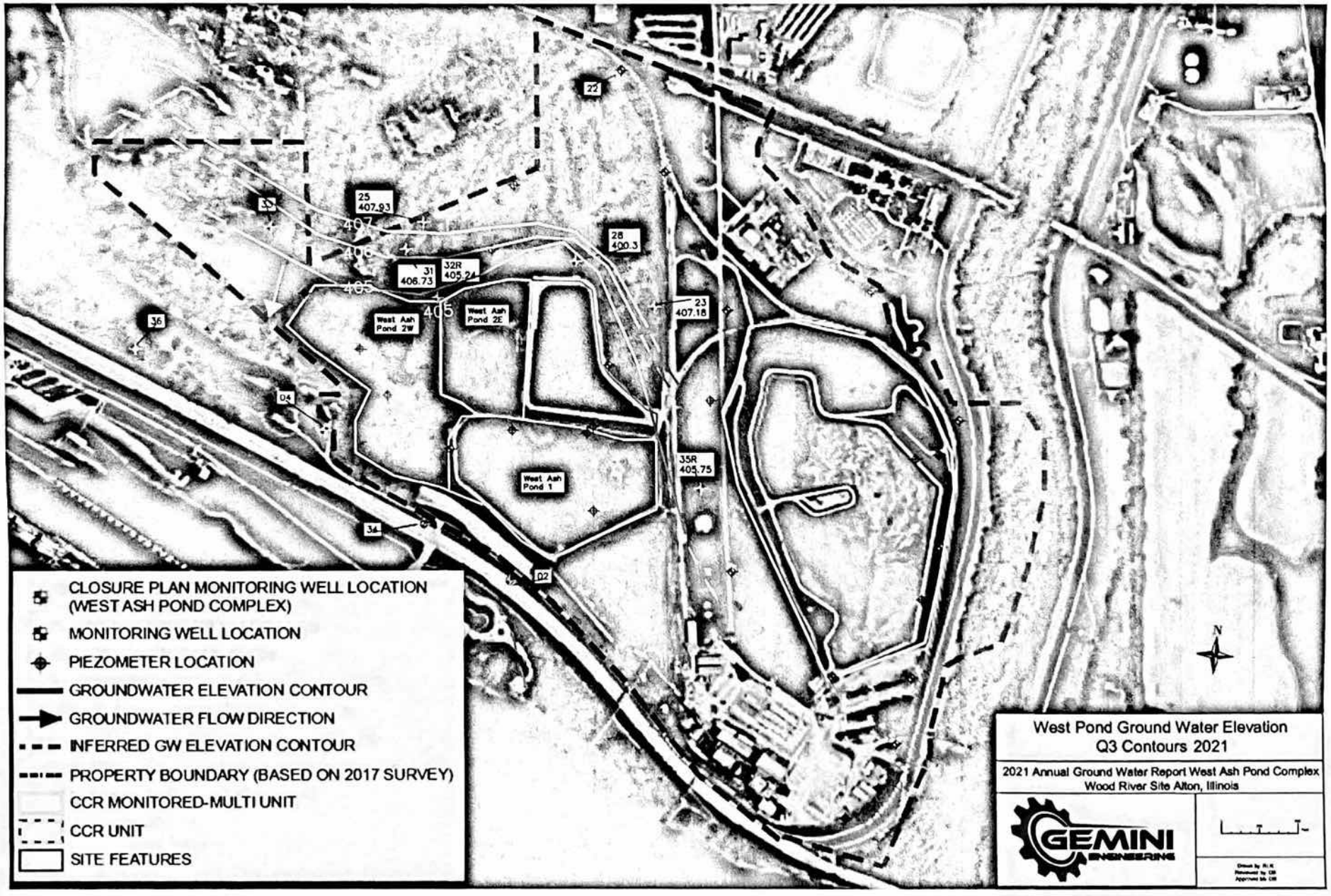
FIGURES

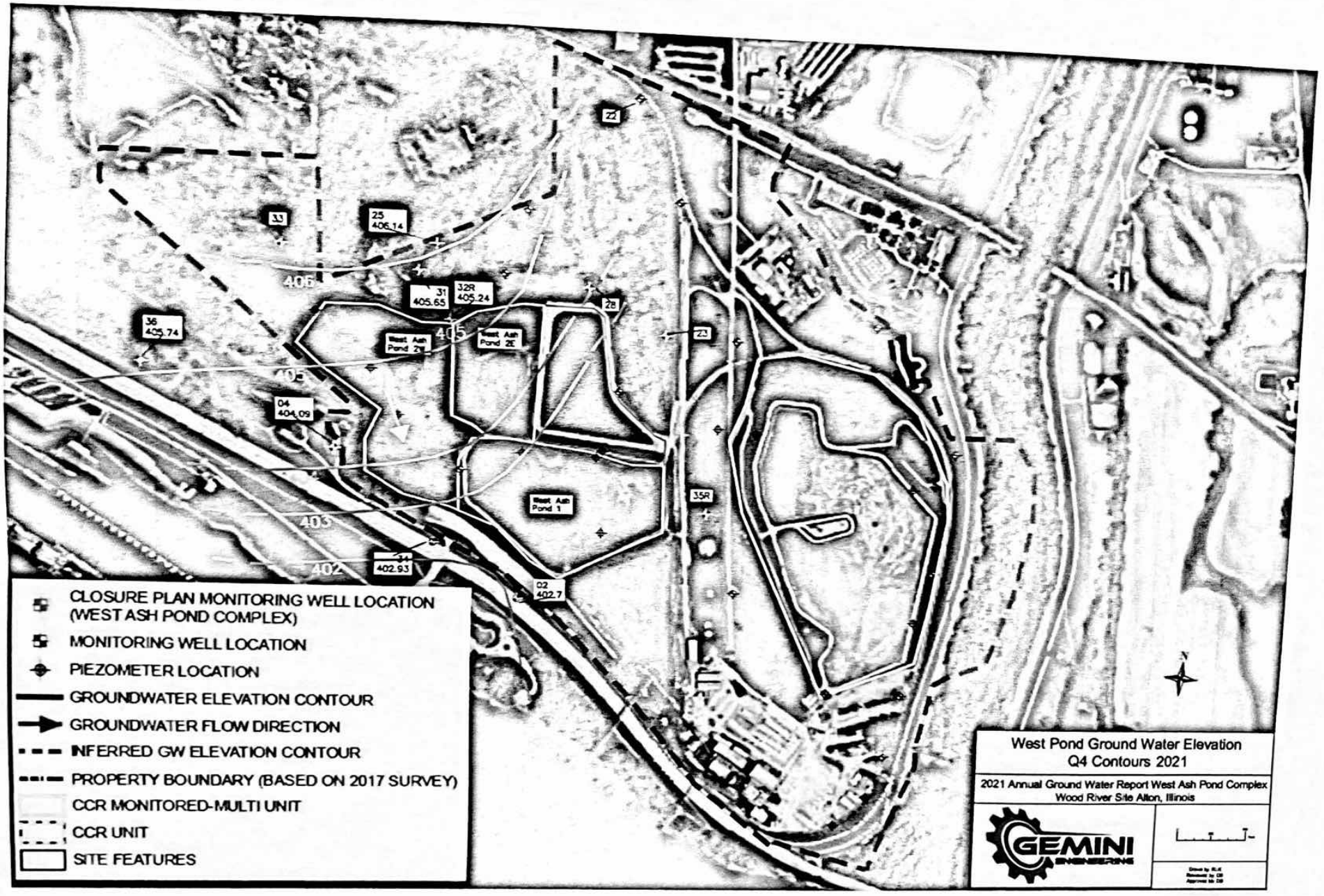

25
31
32R
2E
36
WEST ASH POND
COMPLEX
04
2W
1
34
02
Mississippi River
N
LEGEND
DOWNGRADIENT MONITORING MONITORING WELL LOCATION
BACKGROUND MONITORING WELL LOCATION
WEST IMPOUNDMENT
PROPERTY BOUNDARY (BASED ON 1997 SURVEY DATA)
Notes:
1. Figure base map modified after Natural Resource Technology, 2017.
2. Reference elevation data developed by others, 2015.
3. Field and analytical data provided by Teklabs, 2019.
4. Soil boring/well installations provided by various contractors, 1994-2004.
5. Well locations are approximate.
0
500
1000
SCALE
APPROXIMATE
FEET
GEMINI
FIGURE 1
GROUNDWATER WELL SAMPLING LOCATION MAP
Designated Wells for West Ash Pond Complex
2020 Annual Groundwater Monitoring and Corrective Action
Report CTI Development LLC
Former Wood River Power Plant - Alton, IL
DESIGN: DB
DRAWN: LMC
CHKD.: DB
DATE: 09-29-22
SCALE: AS SHOWN
REV.:
W.O.NO.: Gemini\WOOD RIVER\FIG 1 GW WELL SAMP LOC MAP WEST POND
Source: Natural Resource Technology; Figure 1, Project No. 2285


22
435.71
33
405.61
25
404.97
31
405.50
32R
404.63
28
404.96
36
404.63
West Ash
Pond 2W
West Ash
Pond 2E
23
404.41
04
401.65
West Ash
Pond 1
35R
403.12
34
403.00
02
402.00
405
404
403
402
401
8
N
CLOSURE PLAN MONITORING WELL LOCATION
(WEST ASH POND COMPLEX)
MONITORING WELL LOCATION
PIEZOMETER LOCATION
GROUNDWATER ELEVATION CONTOUR
GROUNDWATER FLOW DIRECTION
INFERRED GW ELEVATION CONTOUR
PROPERTY BOUNDARY (BASED ON 2017 SURVEY)
CCR MONITORED-MULTI UNIT
CCR UNIT
SITE FEATURES
West Pond Ground Water Elevation
Q1 Contours 2021
2021 Annual Ground Water Report West Ash Pond Complex
Wood River Site Alton, Illinois
GEMINI
ENGINEERING


22
435.71
33
405.61
25
404.97
31
405.50
32R
404.63
28
404.96
23
404.41
38
404.63
West Ash Pond 2W
West Ash Pond 2E
04
401.65
West Ash Pond 1
35R
403.12
34
403.00
02
402.00
405
404
403
402
401
CLOSURE PLAN MONITORING WELL LOCATION (WEST ASH POND COMPLEX)
MONITORING WELL LOCATION
PIEZOMETER LOCATION
GROUNDWATER ELEVATION CONTOUR
GROUNDWATER FLOW DIRECTION
INFERRED GW ELEVATION CONTOUR
PROPERTY BOUNDARY (BASED ON 2017 SURVEY)
CCR MONITORED-MULTI UNIT
CCR UNIT
SITE FEATURES
N
West Pond Ground Water Elevation
Q1 Contours 2021
2021 Annual Ground Water Report West Ash Pond Complex
Wood River Site Alton, Illinois
GEMINI ENGINEERING


CLOSURE PLAN MONITORING WELL LOCATION (WEST ASH POND COMPLEX)
MONITORING WELL LOCATION
PIEZOMETER LOCATION
GROUNDWATER ELEVATION CONTOUR
GROUNDWATER FLOW DIRECTION
INFERRED GW ELEVATION CONTOUR
PROPERTY BOUNDARY (BASED ON 2017 SURVEY)
CCR MONITORED-MULTI UNIT
CCR UNIT
SITE FEATURES
West Pond Ground Water Elevation
Q2 Contours 2021
2021 Annual Ground Water Report West Ash Pond Complex
Wood River Site Alton, Illinois
GEMINI ENGINEERING
N
West Ash Pond 1
West Ash Pond 2E
West Ash Pond 2W
32R 405.4
35R 409.07
23 409.21
38 409.67
34 409.96
02 407.70
04 408.15
406
407
409
405


25
407.93
28
400.3
31
406.73
32R
405.24
23
407.18
35R
405.75
West Ash Pond 2W
West Ash Pond 2E
West Ash Pond 1
22
36
04
34
02
405
406
407
CLOSURE PLAN MONITORING WELL LOCATION (WEST ASH POND COMPLEX)
MONITORING WELL LOCATION
PIEZOMETER LOCATION
GROUNDWATER ELEVATION CONTOUR
GROUNDWATER FLOW DIRECTION
INFERRED GW ELEVATION CONTOUR
PROPERTY BOUNDARY (BASED ON 2017 SURVEY)
CCR MONITORED-MULTI UNIT
CCR UNIT
SITE FEATURES
N
West Pond Ground Water Elevation
Q3 Contours 2021
2021 Annual Ground Water Report West Ash Pond Complex
Wood River Site Alton, Illinois
GEMINI
ENGINEERING


CLOSURE PLAN MONITORING WELL LOCATION (WEST ASH POND COMPLEX)
MONITORING WELL LOCATION
PIEZOMETER LOCATION
GROUNDWATER ELEVATION CONTOUR
GROUNDWATER FLOW DIRECTION
INFERRED GW ELEVATION CONTOUR
PROPERTY BOUNDARY (BASED ON 2017 SURVEY)
CCR MONITORED-MULTI UNIT
CCR UNIT
SITE FEATURES
West Pond Ground Water Elevation
Q4 Contours 2021
2021 Annual Ground Water Report West Ash Pond Complex
Wood River Site Alton, Illinois
GEMINI ENGINEERING
N

APPENDIX B

TABLES

TABLE 1
Summary of Analytical Analyses - Appendix III
West Ash Pond Complex

Sample Location	Date Sampled	Boron (mg/L)	Calcium (mg/L)	Chloride (mg/L)	Fluoride (mg/L)	pH (S.U.)	Sulfate (mg/L)	TDS (mg/L)
	Background values	**1.17**	**667.381**	**3316**	**0.4**	**6.4 / 7.4**	**279**	**7829**
Background / Upgradient Monitoring Wells								
25	11/2/2017	0.676	283	129	0.36	7.3	227	1300
	5/2/2018	0.41	177	148	0.41	6.70	130	906
	8/1/2018	0.46	186	148	0.43	6.90	137	998
	2/19/2019	0.37	133	97	0.43	6.98	72	716
	5/29/2019	0.32	131	99	0.45	6.97	63	668
	9/20/2019	0.43	165	100	0.46	6.78	79	858
	11/19/2019	0.49	176	142	0.43	6.83	122	912
	02/06/2020	0.418	172	102	0.42	6.87	95	896
	02/06/2020 (Dup)	0.412	167	96	0.41	6.87	91	906
	04/22/2020	0.853	220	103	0.48	6.7	195	1230
	04/22/2020 (Dup)	0.821	217	106	0.49	6.7	197	1200
	08/12/2020	0.544	248	83	0.4	6.93	153	1030
	08/12/2020 (Dup)	0.472	226	81	0.38	6.93	142	1030
	11/05/2020	0.643	225	82	0.36	6.94	164	972
	11/05/2020 (Dup)	0.634	215	82	0.35	6.94	160	976
	2/23/2021	0.549	234	123	0.36	7.06	198	1050
	2/23/21 (Dup)	0.547	233	128	0.36	7.06	198	1070
	5/29/2021	0.212	110	55	0.5	6.81	55	558
	5/29/21 (Dup)	0.221	111	53	0.49	6.81	54	554
	8/26/2021	0.474	181	56	0.34	6.64	121	794
	8/26/21 (Dup)	0.503	186	61	0.34	6.64	122	816
	11/30/2021	0.539	204	77	0.34	6.71	148	884
	11/30/21 (Dup)	0.567	218	74	0.33	6.71	152	900
31	11/2/2017	0.885	224	1090	0.28	7.5	190	3120
	5/2/2018	0.74	331	1320	0.33	6.70	287	3720
	8/1/2018	0.62	246	1150	0.32	7.00	244	3460
	2/19/2019	1.12	220	572	0.29	7.00	176	2460
	5/29/2019	0.99	256	910	0.30	6.87	178	2960
	9/20/2019	1.11	311	1020	0.28	6.54	174	3600
	11/19/2019	1.09	353	1300	0.25	6.72	192	3690
	02/06/2020	0.989	385	1680	0.24	6.82	225	4320
	04/22/2020	1.82	372	1730	0.26	6.59	243	5070
	08/12/2020	0.889	409	1650	0.27	6.91	238	4170
	11/05/2020	0.967	218	723	0.33	7.1	149	2170
	2/23/2021	0.773	143	569	0.42	7.31	163	2000
	5/29/2021	0.881	227	1070	0.35	6.76	197	2980
	8/26/2021	0.929	192	625	0.33	6.82	160	2130
	11/30/2021	1.08	137	330	0.4	7.01	178	1980
36	11/2/2017	0.107	75.2	45	0.24	7.4	<10	370
	5/2/2018	0.14	99	48	0.24	6.20	7	392
	7/31/2018	0.12	75	50	0.24	7.00	10	384
	2/19/2019	0.11	77	46	0.26	7.09	13	372
	9/20/2019	0.09	66	40	0.28	7.08	11	334
	11/19/2019	0.11	66.4	40	0.26	7.18	15	316
	02/07/2020	0.0825	64.2	41	0.27	7.12	16	352
	04/22/2020	0.0799	59.8	41	0.28	7	23	304
	08/12/2020	0.0905	68.2	43	0.28	7.36	17	338
	11/05/2020	0.0945	69.1	43	0.25	7.09	16	336
	2/23/2021	0.113	76.1	42	0.28	7.27	12	362
	5/29/2021	0.0746	67.4	42	0.31	6.91	15	326
	8/23/2021	0.0989	74	41	0.42	7.02	13	328
	11/30/2021	0.0941	68.1	51	0.27	7.02	14	350
Downgradient Monitoring Wells								
2	11/2/2017	4.47	196	78	0.17	7.5	230	982
	5/2/2018	5.53	221	53	0.15	6.20	212	968
	8/1/2018	4.13	192	62	0.15	6.70	231	982
	2/19/2019	3.76	202	69	0.15	6.80	229	992
	5/29/2019	2.64	176	67	0.17	6.74	177	828
	9/20/2019	1.75	147	60	0.17	6.58	134	786
	11/19/2019	1.67	153	66	0.15	6.74	134	786
	2/7/2020	1.56	144	66	0.16	6.73	132	750
	4/22/2020	1.56	146	71	0.16	6.65	133	716
	8/12/2020	1.44	142	62	0.17	7	134	692
	11/5/2020	2.28	155	64	0.14	6.91	195	806
	2/23/2021	2.43	176	66	0.17	6.97	234	910
	5/29/2021	2.08	162	63	0.18	6	218	832
	8/23/2021	2.16	169	63	0.25	6.57	202	852
	11/30/2021	2.95	165	60	0.15	6.71	232	866
4	11/2/2017	0.40	199	61	0.16	7.4	<10	788
	5/2/2018	0.39	226	59	0.18	6.20	10	782
	7/31/2018	0.35	194	46	0.18	6.90	<10	818
	2/19/2019	0.33	197	35	0.21	6.92	10	778
	5/29/2019	0.36	199	35	0.18	6.85	7	772
	9/20/2019	0.36	182	37	0.19	6.72	<50	748
	11/19/2019	0.35	171	51	0.20	6.87	6	702
	2/7/2020	0.328	162	67	0.2	6.85	<10	702
	4/22/2020	0.321	165	74	0.21	6.73	7	732
	8/12/2020	0.321	178	63	0.21	7.12	9	692
	11/5/2020	0.39	170	44	0.16	6.9	<10	685
	2/23/2021	0.42	187	53	0.16	7	7	944
	5/29/2021	0.301	169	51	0.22	6.77	<10	672
	8/23/2021	0.33	184	48	0.32	6.82	7	710
	11/30/2021	0.43	196	38	0.18	6.78	<10	635
32R	11/2/2017	0.72	100	91	0.35	7.5	76	624
	5/2/2018	1.71	204	226	0.36	6.50	108	1,190
	8/1/2018	1.30	135	132	0.33	6.80	95	826
	2/19/2019	2.29	140	85	0.27	6.92	105	748
	5/29/2019	1.70	99.5	66	0.35	6.91	76	610
	9/19/2019	3.61	117	29	0.21	6.71	93	588
	11/19/2019	3.41	104	61	0.24	6.72	102	600
	2/7/2020	6.22	107	14	0.16	6.86	105	516
	4/22/2020	6.29	82	8	0.17	6.89	91	400
	8/12/2020	3.33	119	83	0.2	7.03	110	614
	11/5/2020	1.86	149	117	0.27	7.04	153	878
	2/23/2021	1.55	156	121	0.3	7.12	126	900
	5/29/2021	4.28	131	66	0.27	6.89	108	656
	8/23/2021	2.13	156	97	0.45	6.7	124	782
	11/30/2021	1.83	162	147	0.31	6.84	153	966
34	11/2/2017	1.51	254	152	0.52	7.4	<10	1,060
	5/2/2018	2.33	191	182	0.69	6.20	10	946
	7/31/2018	2.36	200	178	0.67	6.80	<10	972
	2/19/2019	2.21	221	179	0.67	6.86	<10	1,000
	5/29/2019	1.63	206	108	0.52	6.89	9	762
	9/20/2019	0.79	151	69	0.41	6.76	<50	662
	11/19/2019	0.86	168	87	0.42	6.90	6	722
	2/7/2020	0.681	159	97	0.44	6.87	<10	710
	4/22/2020	0.799	165	98	0.44	6.75	<10	728
	8/12/2020	0.588	156	103	0.41	7.1	8	668
	11/5/2020	0.765	182	112	0.29	6.88	<10	750
	2/23/2021	2.31	193	126	0.42	7.04	6 J	824
	5/29/2021	1.67	193	146	0.48	6.62	<10	838
	8/23/2021	1.68	179	126	0.8	6.74	6 J	848
	11/30/2021	4.17	183	113	0.45	6.79	<10	820

TABLE 2
Summary of Analytical Analyses - Appendix IV
West Ash Pond Complex

Sample Location	Date Sampled	Sb, total	As, total	Ba, total	Be, total	Cd, total	Cr, total	Co, total	F, total	Pb, total	Li, total	Hg, total	Mo, total	Ra 226/228 Combined	Se, total	Tl, total
		(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(pCi/L)	(mg/L)	(mg/L)
	GWPS	0.006	0.0574	2	0.004	0.005	0.1	0.006	4	0.015	0.171	0.002	0.1	5	0.05	0.002
Background / Upgradient Monitoring Wells																
25	5/2/2018	0.001	0.0339	0.212	<0.001	0.0023	0.0015	0.0024	0.41	0.0024	0.036	<0.0002	0.0027	0.54	0.0012	<0.002
	8/1/2018	<0.001	0.0038	0.132	NA	<0.001	<0.0015	0.0012	0.43	<0.001	0.0385	NA	0.003	0.73	<0.001	NA
	2/19/2019	<0.001	0.004	0.102	<0.001	<0.001	<0.002	0.002	0.43	<0.001	0.029	<0.0002	0.005	0.19	<0.001	<0.002
	5/29/2019	0.0005	0.0048	0.106	<0.001	0.0017	<0.0015	0.0019	0.45	0.0011	0.0281	<0.0002	0.0047	0.38	<0.001	<0.002
	9/20/2019	<0.001	0.0029	0.124	<0.001	<0.001	<0.0015	<0.001	0.46	<0.001	0.034	<0.0002	0.0055	0.14	<0.001	<0.002
	11/19/2019	<0.001	0.005	0.133	<0.001	<0.001	<0.0015	0.0012	0.43	<0.001	0.039	<0.0002	0.0048	0.27	<0.001	<0.002
	02/06/2020	<0.001	0.0047	0.136	<0.001	0.0004	<0.0015	0.0013	0.42	<0.001	0.0339	0.0002	0.0046	NA	<0.001	<0.002
	02/06/2020 (Dup)	<0.001	0.0037	0.126	<0.001	0.0003	<0.0015	0.0014	0.41	<0.001	0.033	<0.0002	0.0045	NA	<0.001	<0.002
	04/22/2020	0.0005	0.0048	0.15	<0.001	0.0018	<0.0015	0.0009	0.48	<0.001	0.0455	<0.0002	0.005	NA	0.0042	<0.002
	04/22/2020 (Dup)	0.0006	0.0044	0.144	<0.001	0.0016	0.0007	0.0009	0.49	<0.001	0.0444	<0.0002	0.0049	NA	0.004	<0.002
	08/12/2020	<0.001	0.005	0.145	<0.001	<0.001	<0.0015	0.001	0.4	<0.001	0.0449	<0.0002	0.0041	NA	<0.001	<0.002
	08/12/2020 (Dup)	<0.001	0.0069	0.152	<0.001	0.0002	<0.0015	0.0011	0.38	<0.001	0.042	<0.0002	0.004	NA	<0.001	<0.002
	11/05/2020	0.0007	0.0213	0.167	<0.001	0.0015	0.0012	0.0023	0.36	0.0013	0.0505	<0.0002	0.0047	NA	0.0012	<0.002
	11/05/2020 (Dup)	0.0005	0.0138	0.154	<0.001	0.0012	<0.0015	0.0013	0.35	0.0009	0.0496	<0.0002	0.0043	NA	0.0009	<0.002
	2/23/2021	0.0005	0.0133	0.164	<0.001	0.0006	<0.0015	0.0024	0.36	0.0012	0.0452	<0.0002	0.0034	NA	0.0014	<0.002
	2/23/21 (Dup)	0.0005	0.0114	0.162	<0.001	0.0005	<0.0015	0.0021	0.36	0.0011	0.0443	<0.0002	0.0035	NA	0.0014	<0.002
	5/29/2021	<0.001	0.0065	0.0962	<0.001	0.0005	<0.0015	0.0023	0.5	0.0006	0.0287	<0.0002	0.0033	NA	<0.001	0.0011
	5/29/2021 (Dup)	<0.001	0.0071	0.0961	<0.001	0.0006	<0.0015	0.0017	0.49	0.0009	0.0311	<0.0002	0.0034	NA	<0.001	<0.002
	8/26/2021	<0.001	0.0055	0.118	<0.001	0.0002	<0.0015	0.0007	0.34	<0.001	0.0352	<0.0002	0.0018	NA	<0.001	<0.002
	8/26/21 (Dup)	<0.001	0.0053	0.12	<0.001	0.0002	<0.0015	0.0007	0.34	<0.001	0.0357	<0.0002	0.0019	NA	<0.001	0.0001
	11/30/2021	<0.001	0.0038	0.121	<0.001	0.0002	<0.0015	0.0014	0.34	<0.001	0.0409	<0.0002	0.0017	NA	<0.001	0.0001
	11/30/21 (Dup)	<0.001	0.0041	0.13	<0.001	<0.001	0.0021	0.0014	0.33	<0.001	0.0438	<0.0002	0.0019	NA	<0.001	<0.002
31	5/2/2018	0.001	0.0022	0.181	<0.001	0.001	<0.0015	0.001	0.33	<0.001	0.1	<0.0002	0.0063	2.86	0.0217	<0.002
	8/1/2018	<0.001	0.0023	0.182	NA	<0.001	0.0039	<0.001	0.32	<0.001	0.0903	NA	0.0066	1.43	0.0256	NA
	2/19/2019	<0.001	0.002	0.162	<0.001	<0.001	<0.002	<0.001	0.29	<0.001	0.059	<0.0002	0.006	1.28	0.036	<0.002
	5/29/2019	0.0005	0.0015	0.145	<0.001	0.0002	<0.0015	0.0002	0.3	<0.001	0.081	<0.0002	0.0048	0.00123	0.0252	<0.002
	9/20/2019	<0.001	0.0012	0.14	<0.001	<0.001	<0.0015	<0.001	0.28	<0.001	0.0921	<0.0002	0.0036	0.74	0.03	<0.002
	11/19/2019	<0.001	0.0009	0.158	<0.001	0.0005	<0.0015	0.0002	0.25	<0.001	0.102	<0.0002	0.0035	2.88	0.0262	<0.002
	02/06/2020	<0.001	0.0008	0.165	<0.001	0.0006	<0.0015	0.0003	0.24	<0.001	0.0922	<0.0002	0.0029	NA	0.027	<0.002
	04/22/2020	<0.001	0.0013	0.115	<0.001	0.0007	0.031	0.0006	0.26	<0.001	0.0932	<0.0002	0.0039	NA	0.0472	<0.002
	08/12/2020	0.0005	0.0013	0.174	<0.001	0.0006	<0.0015	0.0007	0.27	<0.001	0.118	<0.0002	0.0036	NA	0.0361	<0.002
	11/05/2020	0.0006	0.0024	0.143	<0.001	0.0004	<0.0015	0.0004	0.33	<0.001	0.0801	<0.0002	0.0045	NA	0.0326	<0.002
	2/23/2021	0.0007	0.003	0.124	<0.001	0.0004	0.0013 J	0.0029	0.42	0.0018	0.0568	<0.0002	0.0059	NA	0.0245	<0.002
	5/29/2021	0.0008	0.002	0.138	<0.001	0.0004	0.0013 J	0.002	0.35	<0.001	0.0818	<0.0002	0.0059	NA	0.029	<0.002
	8/26/2021	0.0008	0.0022	0.154	<0.001	0.0002	<0.0015	0.0005	0.33	<0.001	0.0522	<0.0002	0.0047	NA	0.0255	0.0031
	11/30/2021	<0.001	0.0025	0.116	<0.001	0.0002	<0.0015	<0.001	0.4	<0.001	0.057	<0.0002	0.0066	NA	0.0372	<0.002
36	5/2/2018	<0.001	0.0028	0.343	<0.001	<0.001	<0.0015	0.001	0.24	<0.001	0.0042	<0.0002	<0.0015	2.41	<0.001	<0.002
	7/31/2018	<0.001	0.0023	0.3	NA	<0.001	<0.0015	<0.001	0.24	<0.001	0.004	NA	<0.0015	0.8	<0.001	NA
	2/19/2019	<0.001	0.003	0.35	<0.001	<0.001	<0.002	<0.001	0.26	<0.001	0.004	<0.0002	0.002	0.82	<0.001	<0.002
	9/20/2019	<0.001	0.0017	0.227	<0.001	<0.001	<0.0015	<0.001	0.28	<0.001	0.0039	<0.0002	<0.0015	0.81	<0.001	<0.002
	11/19/2019	<0.001	0.0021	0.242	<0.001	<0.001	<0.0015	0.0001	0.26	<0.001	0.0039	<0.0002	<0.0015	0.85	<0.001	<0.002
	02/07/2020	<0.001	0.0018	0.231	<0.001	<0.001	<0.0015	0.0001	0.27	<0.001	0.0041	<0.0002	<0.0015	NA	<0.001	<0.002
	04/22/2020	<0.001	0.0021	0.231	<0.001	<0.001	<0.0015	0.0001	0.28	<0.001	0.0035	<0.0002	<0.0015	NA	<0.001	<0.002
	08/12/2020	<0.001	0.0021	0.264	<0.001	<0.001	<0.0015	0.0002	0.28	<0.001	0.0034	<0.0002	<0.0015	NA	<0.001	<0.002
	11/05/2020	<0.001	0.0024	0.259	<0.001	<0.001	<0.0015	0.0002	0.25	<0.001	0.0042	<0.0002	<0.0015	NA	<0.001	<0.002
	2/23/2021	<0.001	0.0022	0.277	<0.001	<0.001	<0.0015	0.0005 J	0.26	<0.001	0.0032	<0.0002	<0.0015	NA	<0.001	<0.002
	5/29/2021	<0.001	0.002	0.252	<0.001	<0.001	<0.0015	0.0002 J	0.31	<0.001	0.0041	<0.0002	<0.0015	NA	<0.001	<0.002
	8/23/2021	<0.001	0.0019	0.246	<0.001	<0.001	<0.0015	0.0002 J	0.42	<0.001	0.0033	<0.0002	<0.0015	NA	<0.001	<0.002
	11/30/2021	<0.001	0.0022	0.257	<0.001	<0.001	<0.0015	<0.001	0.27	<0.001	0.0034	<0.0002	<0.0015	NA	<0.001	<0.002
Downgradient Monitoring Wells																
2	5/2/2018	<0.001	0.0025	0.111	<0.001	<0.001	<0.0015	0.002	0.15	<0.001	0.0292	<0.0002	0.0015	0.42	<0.001	<0.002
	8/1/2018	<0.001	0.0021	0.0927	NA	<0.001	<0.0015	0.0017	0.15	<0.001	0.0235	NA	<0.0015	0.53	<0.001	NA
	2/19/2019	<0.001	0.002	0.097	<0.001	<0.001	<0.002	<0.001	0.15	<0.001	0.025	<0.0002	<0.002	0.13	<0.001	<0.002
	5/29/2019	<0.001	0.0016	0.103	<0.001	<0.001	<0.0015	0.0031	0.17	<0.001	0.0221	<0.0002	0.0009	0.34	<0.001	<0.002
	9/20/2019	<0.001	0.0018	0.0649	<0.001	<0.001	<0.0015	0.0021	0.17	<0.001	0.0204	<0.0002	<0.0015	0.09	<0.001	<0.002
	11/19/2019	<0.001	0.0013	0.0618	<0.001	<0.001	<0.0015	0.0017	0.15	<0.001	20.7	<0.0002	0.0007	0.76	<0.001	<0.002
	02/07/2020	<0.001	0.0015	0.0593	<0.001	<0.001	<0.0015	0.0015	0.16	<0.001	0.0176	<0.0002	0.0007	NA	<0.001	<0.002
	04/22/2020	<0.001	0.0015	0.0598	<0.001	<0.001	<0.0015	0.0016	0.16	<0.001	0.0187	<0.0002	0.0007	NA	<0.001	<0.002
	08/12/2020	<0.001	0.0016	0.0636	<0.001	<0.001	<0.0015	0.0015	0.17	<0.001	0.0201	<0.0002	0.0007	NA	<0.001	<0.002
	11/05/2020	<0.001	0.002	0.0632	<0.001	<0.001	<0.0015	0.0017	0.14	<0.001	0.0246	<0.0002	0.0007	NA	<0.001	<0.002
	2/23/2021	<0.001	0.0016	0.0699	<0.001	<0.001	<0.0015	0.0016	0.17	<0.001	0.0198	<0.0002	0.0008	NA	<0.001	<0.002
	5/29/2021	<0.001	0.0019	0.0693	<0.001	<0.001	<0.0015	0.0017	0.18	<0.001	0.0231	<0.0002	0.0006	NA	<0.001	<0.002
	8/23/2021	<0.001	0.0025	0.0641	<0.001	<0.001	<0.0015	0.0015	0.25	<0.001	0.0208	<0.0002	<0.0015	NA	<0.001	0.0011
	11/30/2021	<0.001	0.0023	0.0734	<0.001	<0.001	<0.0015	0.002	0.15	<0.001	0.0226	<0.0002	<0.0015	NA	<0.001	<0.002
4	5/2/2018	<0.001	0.0321	0.33	<0.001	<0.001	<0.0015	0.001	0.18	<0.001	0.0026	<0.0002	0.0015	0.57	0.001	<0.002
	7/31/2018	<0.001	0.0283	0.279	NA	<0.001	<0.0015	<0.001	0.18	<0.001	0.0028	NA	<0.0015	0.29	<0.001	NA
	2/19/2019	<0.001	0.039	0.333	<0.001	<0.001	<0.002	<0.001	0.21	<0.001	0.003	<0.0002	<0.002	0.4	<0.001	<0.002
	5/29/2019	<0.001	0.0215	0.28	<0.001	<0.001	<0.0015	0.0005	0.18	<0.001	0.003	<0.0002	0.0008	1.41	<0.001	<0.002
	9/20/2019	<0.001	0.0292	0.306	<0.001	<0.001	<0.0015	<0.001	0.19	<0.001	<0.003	<0.0002	<0.0015	0.58	<0.001	<0.002
	11/19/2019	<0.001	0.0345	0.309	<0.001	<0.001	<0.0015	0.0004	0.2	<0.001	0.0027	<0.0002	0.0008	1.3	<0.001	<0.002
	02/07/2020	<0.001	0.0265	0.267	<0.001	<0.001	<0.0015	0.0003	0.2	<0.001	0.0022	0.0002	0.0007	NA	<0.001	<0.002
	04/22/2020	<0.001	0.0243	0.281	<0.001	<0.001	<0.0015	0.0004	0.21	<0.001	0.0023	<0.0002	<0.0015	NA	<0.001	<0.002
	08/12/2020	<0.001	0.0339	0.345	<0.001	<0.001	<0.0015	0.0005	0.21	<0.001	0.0023	<0.0002	<0.0015	NA	<0.001	<0.002
	11/05/2020	<0.001	0.0267	0.296	<0.001	<0.001	<0.0015	0.0004	0.16	<0.001	0.003	<0.0002	0.0006	NA	<0.001	<0.002
	2/23/2021	0.0011	0.0217	0.337	<0.001	<0.001	<0.0015	0.0013	0.16	0.0012	0.0035	<0.0002	0.0139	NA	0.0013	<0.002
	5/29/2021	<0.001	0.0246	0.273	<0.001	<0.001	<0.0015	0.0004	0.22	<0.001	0.0027	<0.0002	<0.0015	NA	<0.001	<0.002
	8/23/2021	<0.001	0.0332	0.285	<0.001	<0.001	<0.0015	0.0002	0.32	<0.001	0.0023	<0.0002	<0.0015	NA	<0.001	<0.002
	11/30/2021	<0.001	0.0228	0.302	<0.002	<0.001	<0.0015	<0.002	0.16	<0.001	<0.006	<0.0002	<0.0015	NA	<0.001	<0.002
32R	5/2/2018	0.001	0.001	0.314	<0.001	<0.001	<0.0015	0.001	0.36	<0.001	0.0271	<0.0002	0.0225	1.77	0.0287	<0.002
	8/1/2018	<0.001	<0.001	0.182	NA	<0.001	<0.0015	<0.001	0.33	<0.001	0.021	NA	0.0158	1.42	0.0158	NA
	2/19/2019	<0.001	<0.001	0.174	<0.001	<0.001	<0.002	<0.001	0.27	<0.001	0.02	<0.0002	0.012	1.19	0.007	<0.002
	5/29/2019	0.0005	0.0008	0.155	<0.001	<0.001	<0.0015	<0.001	0.35	<0.001	0.0164	<0.0002	0.0172	0.86	0.0057	<0.002
	9/19/2019	<0.001	<0.001	0.132	<0.001	<0.001	<0.0015	<0.001	0.21	<0.001	0.0149	<0.0002	0.0055	0.49	0.0015	<0.002
	11/19/2019	<0.001	0.0007	0.156	<0.001	<0.001	<0.0015	0.0002	0.24	<0.001	0.0184	<0.0002	0.0103	1.48	0.0011	<0.002
	02/06/2020	<0.001	0.0008	0.0913	<0.001	<0.001	<0.0015	<0.001	0.16	<0.001	0.0107	<0.0002	0.0024	NA	<0.001	<0.002
	04/22/2020	<0.001	0.0011	0.068	<0.001	<0.001	<0.0015	<0.001	0.17	<0.001	0.0063	<0.0002	0.0012	NA	<0.001	<0.002
	08/12/2020	<0.001	0.001	0.112	<0.001	0.0002	<0.0015	0.0001	0.2	<0.001	0.0165	<0.0002	0.0116	NA	0.0025	<0.002
	11/05/2020	<0.001	0.001	0.254	<0.001	0.0002	<0.0015	0.0012	0.27	<0.001	0.0271	<0.0002	0.0178	NA	0.0008	<0.002
	2/23/2021	0.0005	0.0008	0.251	<0.001	0.0002	<0.0015	0.0004	0.3	<0.001	0.0235	<0.0002	0.0143	NA	0.0064	<0.002
	5/29/2021	0.0006	0.0009	0.184	<0.001	<0.001	<0.0015	0.0001	0.27	<0.001	0.0196	<0.0002	0.0116	NA	0.0054	<0.002
	8/23/2021	<0.001	0.0008	0.231	<0.001	<0.001	<0.0015	0.0002	0.45	<0.001	0.0243	<0.0002	0.0138	NA	0.0031	<0.002
	11/30/2021	<0.001	<0.001	0.186	<0.001	<0.001	<0.0015	<0.001	0.31	<0.001	0.0257	<0.0002	0.0153	NA	0.004	<0.002
34	5/2/2018	<0.001	0.0153	0.356	<0.001	<0.001	<0.0015	0.001	0.69	<0.001	0.0022	<0.0002	0.0015	1.46	<0.001	<0.002
	7/31/2018	<0.001	0.0156	0.347	NA	<0.001	<0.0015	<0.001	0.67	<0.001	0.0028	NA	<0.0015	0.9	<0.001	NA
	2/19/2019	<0.001	0.015	0.389	<0.001	<0.001	<0.002	<0.001	0.67	<0.001	0.003	<0.0002	<0.002	0.66	<0.001	<0.002
	5/29/2019	<0.001	0.0692	0.355	<0.001	<0.001	<0.0015	0.0004	0.52	<0.001	0.0024	<0.0002	0.0024	2.0	<0.001	<0.002
	9/20/2019	<0.001	0.0307	0.278	<0.001	<0.001	<0.0015	<0.001	0.41	<0.001	<0.003	<0.0002	<0.0015	0.21	<0.001	<0.002
	11/19/2019	<0.001	0.0437	0.3	<0.001	<0.001	<0.0015	0.0003	0.42	<0.001	0.0021	<0.0002	0.0012	0.71	<0.001	<0.002
	02/07/2020	<0.001	0.0267	0.278	<0.001	<0.001	<0.0015	0.0003	0.44	<0.001	0.0019	<0.0002	0.001	NA	<0.001	<0.002
	04/22/2020	<0.001	0.044	0.3	<0.001	<0.001	<0.0015	0.0003	0.44	<0.001	0.0021	<0.0002	0.0012	NA	<0.001	<0.002
	08/12/2020	<0.001	0.0247	0.3	<0.001	<0.001	<0.0015	0.0003	0.41	<0.001	0.0022	<0.0002	0.0009	NA	<0.001	<0.002
	11/05/2020	<0.001	0.0279	0.348	<0.001	<0.001	<0.0015	0.0003	0.29	<0.001	0.003	<0.0002	0.0013	NA	<0.001	<0.002
	2/23/2021	<0.001	0.0229	0.357	<0.001	<0.001	<0.0015	0.0003	0.42	<0.001	0.0022	<0.0002	0.0023	NA	<0.001	<0.002
	5/29/2021	<0.001	0.0225	0.338	<0.001	<0.001	<0.0015	0.0002	0.48	<0.001	0.0028	<0.0002	0.002	NA	<0.001	<0.002
	8/23/2021	<0.002	0.0185	0.305	<0.001	<0.001	<0.0015	0.0002	0.6	<0.001	0.0023	<0.0002	0.0009	NA	<0.001	<0.002
	11/30/2021	<0.001	0.0177	0.28	<0.002	<0.001	<0.003	<0.0002	0.45	<0.001	<0.006	<0.0002	<0.0015	NA	<0.001	<0.002

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

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, bit not limited , files available in the operating record(e.g., CCR unit design and construction information required by §257.73(d) and §275.74(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 Date of Inspection	Former Wood River Power Station Madison County, Illinois 62017 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 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)(2)(ii)

Instrument ID#	Type	Maximum recorded reading since previous annual inspection (ft)
P016	Piezometer	N/A
P020	Piezometer	443.5
P025	Piezometer	431.1
P026	Piezometer	431.2

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

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

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 , files available in the operating record(e.g., CCR unit design and construction information required by §257.73(d) and §275.74(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 2E

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 4.
(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 4.

(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection.	Approximately 355 acre-feet
(b)(2)(v) The approximate volume of impounded water and CCR contained in the unit at the time of the inspection	Approximately 289 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)
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	431.6		436.38	17.6		22.38

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

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, bit not limited , files available in the operating record(e.g., CCR unit design and construction information required by §257.73(d) and §275.74(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 Date of Inspection	Former Wood River Power Station Madison County, Illinois 62017 09/11/2021
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: 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 6.
(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 6.
(b)(2)(iv) The storage capacity of the impounding structure at the time of the inspection.	Approximately 240 acre-feet

(b)(2)(v) The approximate volume of impounded water and CCR contained in the unit at the time of the inspection	Approximately 308 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)
P008	Piezometer	409.9
P021	Piezometer	410.4
P024	Piezometer	407.3

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		N/A			N/A	
CCR	425		433.2	11		19.2

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

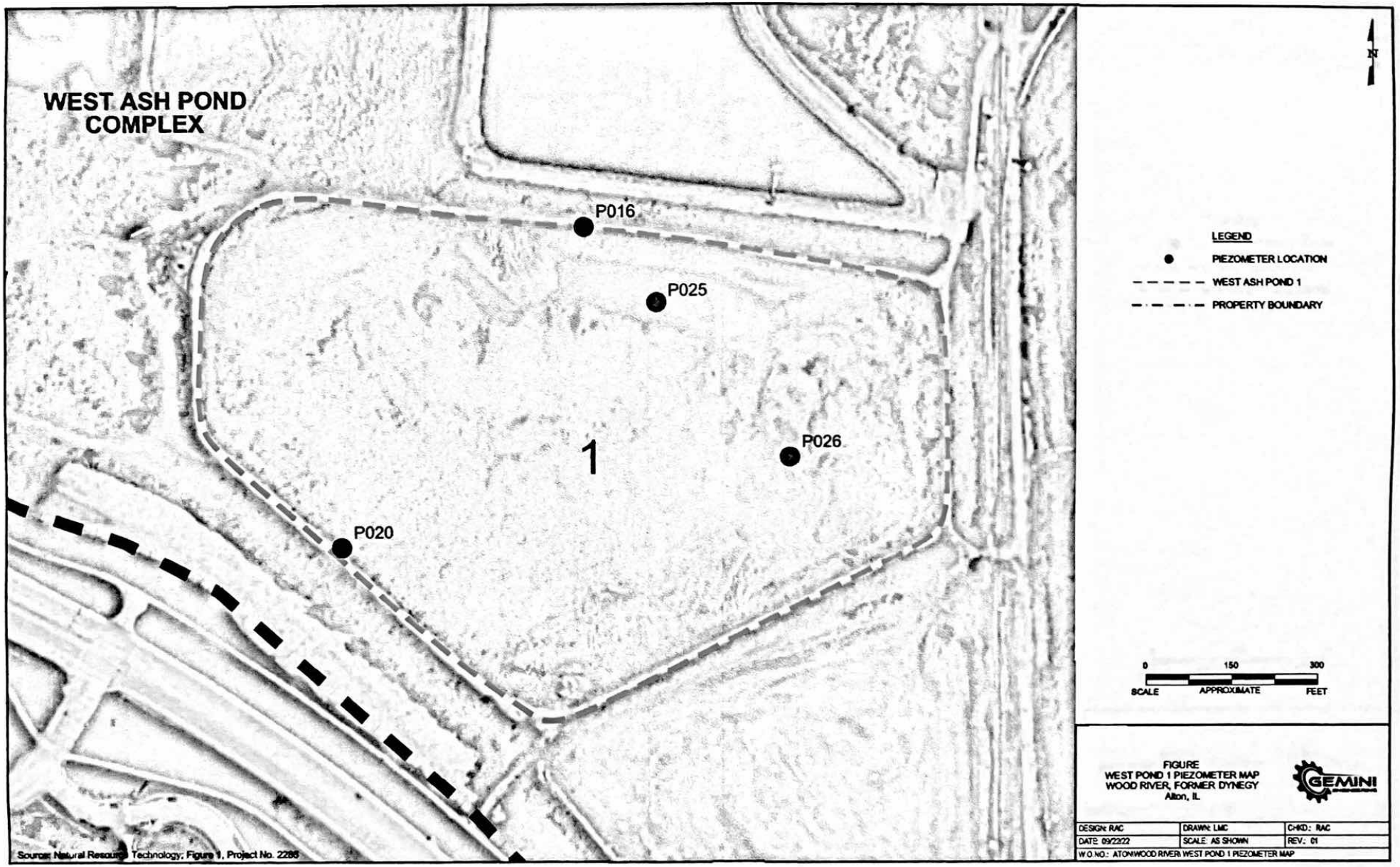


FIGURE
WEST POND 1 PIEZOMETER MAP
WOOD RIVER, FORMER DYNEGY
Alton, IL

GEMINI

DESIGN: RAC	DRAWN: LMC	CHKD.: RAC
DATE: 09/22/22	SCALE: AS SHOWN	REV.: 01

W.O. NO.: ATON\WOOD RIVER\ WEST POND 1 PIEZOMETER MAP

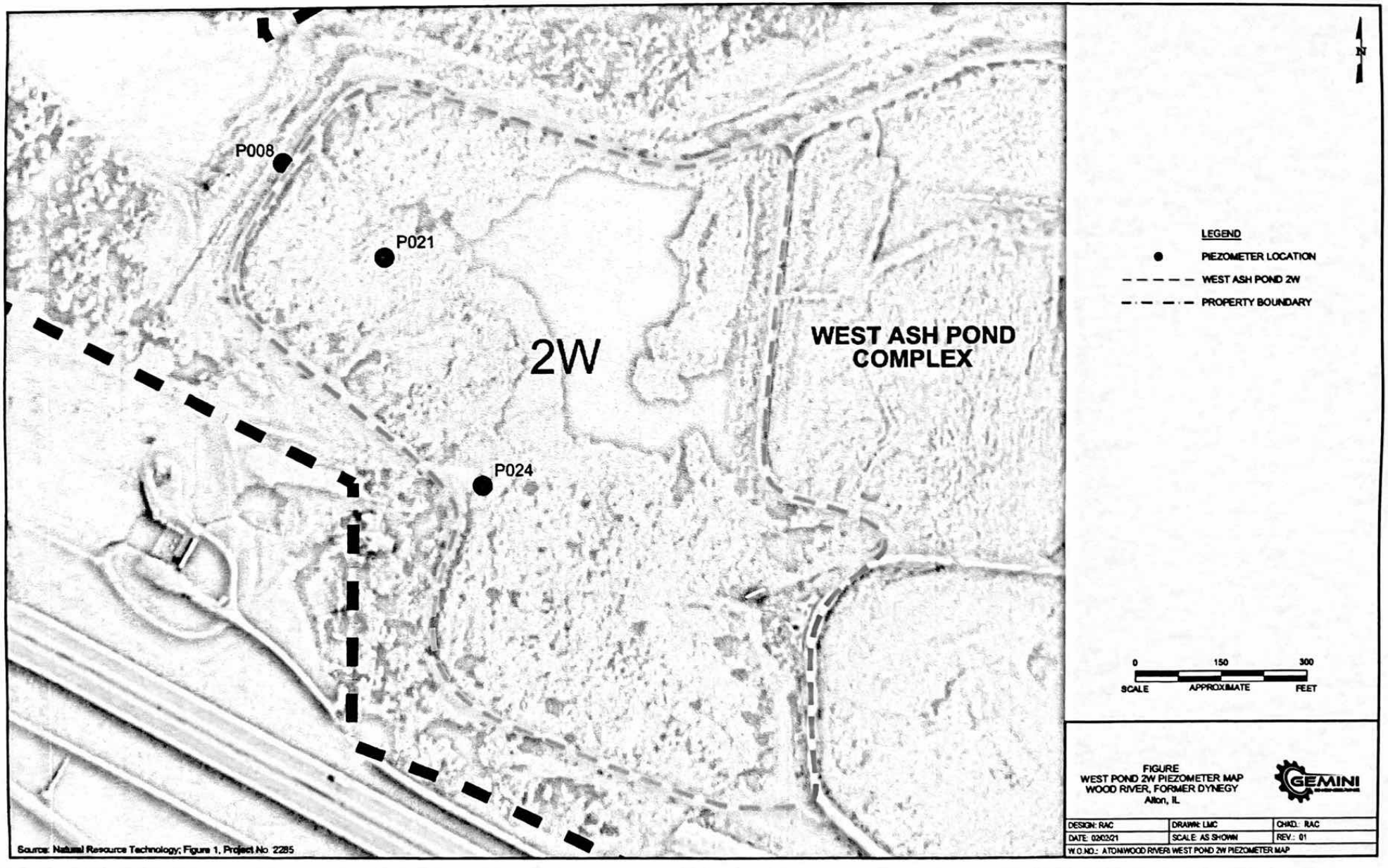


FIGURE
WEST POND 2W PIEZOMETER MAP
WOOD RIVER, FORMER DYNEGY
Alton, IL

GEMINI

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