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MEMORANDUM

31 October 2017 File No. 129800-002

SUBJECT: CCR History of Construction Basin A and Basin B Dynegy Miami Fort, LLC Miami Fort Power Station North Bend, Ohio

Haley & Aldrich, Inc. (Haley & Aldrich) has assisted Dynegy Miami Fort, LLC (Dynegy) with compiling the history of construction (revised) for Basin A and Basin B at the Miami Fort Power Station.¹ This work was performed in accordance with the U.S. Environmental Protection Agency's Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals (CCR) from Electric Utilities, 40 CFR Part 257, Subpart D, specifically §257.73(c)(1).

To the extent feasible, Dynegy has provided documentation supporting the history of construction. Information provided herein is based on the available data. Actual conditions may vary from those represented by the available data at the time data were obtained, despite the use of due care. Information concerning the history of construction of Basin A and Basin B is presented in the following sections and in the appendices within which specific supporting historic, design & construction documentation has been compiled.

<u>§257.73(c)(1)(i)</u>: The name and address of the person(s) owning or operating the CCR unit; the name associated with the CCR unit; and the identification number of the CCR unit if one has been assigned by the state.

Owner: Dynegy Miami Fort, LLC 1500 Eastport Plaza Drive Collinsville, IL 62234 Name of CCR Unit: Basin A Basin B ODNR Number: Basin A - 9046-001 Basin B - 9046-002

¹ This revised history of construction replaces the initial history of construction dated October 2016.

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<u>§257.73(c)(1)(ii)</u>: The location of the CCR unit identified on the most recent U.S. Geological Survey (USGS) 7 ½ minute or 15-minute topographic quadrangle map or a topographic map of equivalent scale if a USGS map is not available.

A general facility location map including the locations of Basin A and Basin B is provided in **Appendix A**.

<u>§257.73(c)(1)(iii):</u> A statement of the purpose for which the CCR unit is being used.

Basin A is used to store and dispose of sluiced bottom ash and fly ash. CCR is reclaimed from Basin A for beneficial use.

Basin B is used to store and dispose of bottom ash, fly ash, and non-CCR waste and to clarify water prior to discharge in accordance with NPDES Permit No. OH0009873.

<u>§257.73(c)(1)(iv):</u> The name and size in acres of the watershed within which the CCR unit is located.

- Watershed Name: Basin A and Basin B are located within the Garrison Creek-Ohio River Watershed (Hydrologic Unit Code [HUC] 050902030204).
- Watershed Area: The entire area of the Garrison Creek-Ohio River Watershed is 16,583 acres (USGS, 2016).

<u>§257.73(c)(1)(v)</u>: A description of the physical and engineering properties of the foundation and abutment materials on which the CCR unit is constructed.

The foundation materials for Basin A and Basin B consist of alluvial clays, alluvial silts and silty clays, and sands and gravels.

A detailed description of the physical and engineering properties of the foundation soils on which Basins A and B are constructed is presented on Table 17 within a report entitled, "Geotechnical Report, Miami Fort Power Station, Basin A and Basin B," by AECOM dated October 7, 2016. Pertinent pages from the report are included in **Appendix B**.

<u>§257.73(c)(1)(vi)</u>: A statement of the type, size, range, and physical and engineering properties of the materials used in constructing each zone or stage of the CCR unit; the method of site preparation and construction of each zone of the CCR unit; and the approximate dates of construction of each successive stage of construction of the CCR unit.

The original embankments of Basin A were constructed prior to 1959 from soils described as medium stiff to very stiff, lean clay with varying amounts of sand. In approximately 1976, the Basin A embankments were raised by approximately 10 ft using compacted bottom ash and fly ash



excavated from within the existing basin. Within limited areas, compacted cohesive soils were used to raise the embankments.

Basin B was constructed over three seasons between 1979 and 1982. The Basin B embankments were constructed using compacted bottom ash and fly ash which was covered by a 5-foot thick clay cover.

A description of the physical engineering properties of the materials used in constructing the embankments is presented on Table 17 within a report entitled, "Geotechnical Report, Miami Fort Power Station, Basin A and Basin B," by AECOM dated October 7, 2016. Pertinent pages from the report are included in **Appendix B**.

Information on the method of site preparation and construction for the original construction of the Basin A and Basin B embankments is not available. It is understood that the Basin A embankment raise constructed in 1976 was completed in accordance with the specifications included within Appendix III of the report entitled, "Report on Geotechnical Investigation, Ash Pit Dike Modifications, Miami Fort Station" by H.C. Nutting Company dated May 17, 1976, provided in **Appendix F**.

<u>§257.73(c)(1)(vii)</u>: At a scale that details engineering structures and appurtenances relevant to the design, construction, operation and maintenance of the CCR unit, detailed dimensional drawings of the CCR unit, including a plan view and cross sections of the length and width of the CCR unit, showing all zones, foundation improvements, drainage provisions, spillways, diversion ditches, outlets, instrument locations, and slope protection, in addition to the normal operating pool surface elevation and the maximum pool surface elevation following peak discharge from the inflow design flood, the expected maximum depth of CCR within the CCR surface impoundment, and any identifiable natural or manmade features that could adversely affect operation of the CCR unit due to malfunction or mis-operation.

Design drawings providing available information from the list above for Basin A and Basin B, are included in **Appendix C**. Information identified in 257.73(c)(1)(vii) not included in Appendix C, particularly with respect to foundation improvements, diversion ditches, slope protection, normal and maximum operating pool elevations is assumed to be unavailable.

Based on the review of the drawings listed above, no natural or manmade features that could adversely affect operation of these CCR units due to malfunction or mis-operation were identified.

*§*257.73(*c*)(1)(*viii*): A description of the type, purpose, and location of existing instrumentation.

A total of eight piezometers exist in Basin A and Basin B. Six vibrating wire piezometers were installed during the 2011 field investigation by S&ME. The piezometers were installed in borings B-B-1103, B-B-1104, B-B-1105, B-B-1106, B-A-1111, and B-A-1112 at the locations shown on Plate 2 in **Appendix D**. Two standpipe piezometers were installed by AECOM during their 2015



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investigation, the locations of which are shown in Figure 2A in Appendix D. The purpose of the piezometers is to measure piezometric levels within and in the vicinity of the basin embankments.

<u>§257.73(c)(1)(ix)</u>: Area-capacity curves for the CCR unit.

Area-capacity curves for Basin A and Basin B are not available.

<u>§257.73(c)(1)(x):</u> A description of each spillway and diversion design features and capacities and calculations used in their determination.

The primary spillway of Basin A consists of a 36-in. diameter high-density polyethylene (HDPE) morning glory spillway. The spillway drains to a 42-in. diameter secondary corrugated metal pipe (CMP) that flows to the primary 42-in. CMP discharge pipe by a wye connection. Water from Basin A flows into Basin B through a 48-in. CMP culvert that penetrates the common berm between the two basins. The 48-in. CMP has been slip lined with a 40-in. diameter HDPE pipe for a length of approximately 73 ft at the upstream end of the pipe.

The primary spillway of Basin B consists of a 36-in. diameter ductile iron pipe (DIP) morning glory spillway. The Basin B spillway connects to a 42-in. CMP that discharges into the Ohio River through a NPDES outfall.

In 2016, the discharge capacity of Basins A and B was evaluated by AECOM using HydroCAD 10 software modeling a 1,000-year, 24-hour rainfall event. A description of the spillways and associated results of the peak flow analysis were presented in a report entitled, "Hydrologic and Hydraulic Summary Report, Miami Fort Power Station, Basin A and Basin B" by AECOM dated October 7, 2016. Pertinent pages from the report are included in **Appendix E**.

<u>\$257.73(c)(1)(xi)</u>: The construction specifications and provisions for surveillance, maintenance, and repair of the CCR unit.

The construction specifications for the original Basin A and Basin B construction are not available. The construction specifications for the Basin A embankment raise are located in a report entitled, "Report on Geotechnical Investigation, Ash Pit Dike Modifications, Miami Fort Station" by H.C. Nutting Company dated May 17, 1976. Pertinent pages from the report are included in **Appendix F**.

Provisions for surveillance, maintenance, and repair of Basin A and Basin B are included in a document entitled, "Miami Fort Ash Pond A & B, Operation Maintenance Manual and Emergency Action Plan" which is included in **Appendix G**.

<u>§257.73(c)(1)(xii)</u>: Any record or knowledge of structural instability of the CCR unit.

There are no records or knowledge of any structural instability of Basin A or Basin B at Miami Fort Power Station.



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List of Appendices:

Appendix A – Project Locus

Appendix B – Physical and Engineering Properties of Foundation and Embankment Materials

Appendix C – Available Design Drawings

Appendix D– Instrumentation

Appendix E – Pages from AECOM Hydrologic and Hydraulic Summary Report

Appendix F – Basin A Embankment Raise Construction Specifications

Appendix G - Operation Maintenance Manual and Emergency Action Plan



Appendix A

Project Locus



Appendix B

Physical and Engineering Properties of Foundation and Embankment Materials

Previous subsurface investigations were performed in May of 2011 by S&ME Inc. and in March of 1976 by H.C. Nutting Company. The S&ME and H.C. Nutting Company investigations included 14 and 34 borings, respectively, around and within Basins A and B. This data was not the primary source of data for AECOM, but was used to supplement AECOM's data. A previous survey was done in September of 2014 by ESP Associates but did not encompass the entire downstream slopes of the dikes; therefore, supplemental surveys were performed at the critical cross sections by Ellison Surveying Inc. in 2015.

3. SUMMARY OF SITE-SPECIFIC SUBSURFACE CONDITIONS

Based upon current and previous laboratory testing results, as well as field observations during the drilling exploration, the on-site materials at Miami Fort Basins A and B were classified into 11 representative material horizons. The horizons are discussed in detail in Section 3.1.

3.1. <u>Site Stratigraphy</u>

Natural Foundation Soils

Alluvial Clays: The predominant materials immediately underlying the dike embankment materials consisted of low to moderate plasticity clays. Index testing classified these soils as lean clays (CL) to occasional silty clays (CL-ML), each with varying amounts of sand. These materials were typically underlain by higher permeability alluvial silts and silty clays (described below) throughout much of the site, except for the northernmost portions of the Basin dikes where the clays were underlain by sand and gravel deposits. Thicknesses of the alluvial clays ranged from approximately 11.5 to 25 feet underneath the Basin B dike and approximately 6 to 24 feet underneath the Basin A dike. These materials ranged from very soft to very stiff and were typically medium stiff, with uncorrected SPT N-values ranging from 2 to 15 blows per foot (bpf).

Alluvial Silts and Silty Clays: Typically, the alluvial silts and silty clays were observed under the alluvial clays horizon with measured thicknesses ranging from approximately 4 to 29.9 feet under the Basin B dikes and approximately 4.5 to 22 feet underneath the Basin A Dikes. The average thickness, when encountered, was about 16 feet. Index testing typically resulted in classifications of silt (ML) and silty clay (CL-ML). One sample subject to gradation testing received a classification of silty sand (SM), indicating there were some zones with significant amounts of fine sand in layers or lenses. Materials were observed to be medium brown to gray, low to very low in plasticity, and often saturated. The alluvial silts and silty clays horizon appeared to become thicker moving south and west approaching the Ohio and Great Miami Rivers. Materials were observed to be very soft to very stiff and were typically medium stiff, with uncorrected SPT N-values ranging from 2 to 17 bpf.

Sand and Gravel: A layer of sand and gravel underlies the entire site. This material has been estimated to extend to bedrock near an elevation of approximately 350 feet (S&ME, 2011). For this exploration, auger borings were terminated upon encountering this horizon, but several CPT soundings were advanced up to 30 feet into this horizon to estimate its relative density and hydraulic properties. Significantly higher tip resistance values (relative to overlying clays/silts) were measured in the CPT soundings. The top of this horizon was typically higher in elevation on the northern portions of the site (above EL 450 feet) and tended to grade lower in elevation to the south and west moving toward the confluence of the Ohio and Great Miami Rivers. Historic reports were reviewed for data on the sand and gravel layer. The H.C. Nutting report dated January 26, 1978 depicts borings that penetrated into this horizon. Materials were observed to be medium dense to dense, although typically medium dense, with uncorrected SPT N-values ranging from 13 to 37 bpf.

General Classification	Material	Moist Unit Weight	Effective (drained) Shear Strength Parameters		Total (undrained) Shear Strength Parameters ⁵		
		(pct)	c' (psf)	Φ' (°)	c (psf)	Φ (°)	
	Basin A Original Dike ¹	127	0	30	200	20	
	Basin A Raised Dike ¹	133	200	30	600	17	
	Basin A Bottom Ash Blanket ²	117	0	35	0	35	
Basin A Fill Materials	Rubble Fill ³	120	0	30	0	30	
	Compacted Bottom /Fly Ash Based on a note from drawing 7-3605-S2, the middle portion of the dike cross section was described as "compacted bottom ash and fly ash" and the same index properties as the Basin B						
	Basin B Dike Clay Cover ¹	130	200	26	600	17	
Basin B Fill Materials	Basin B Compacted Ash ¹	110	0	33	0	33	
Materials	Basin B Blanket Drain ²	115	0	32	0	32	
Ponded CCR	Sluiced Ash ⁴	95	0	28	0	28	
Materials	Filled-in Bottom Ash ⁴	110	0	34	0	34	
Natural	Alluvial Clays ¹	126	150	29	400	18	
Foundation	Alluvial Silts and Silty Clays ¹	126	200	28	525	17	
Soils	Sand and Gravel ³	120	0	31	0	31	

Table 17.	Static	Strength	Parameters	Summary	v
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Notes:

1. Strengths determined from current triaxial test data (combined with recent triaxial data when available).

2. Strengths determined from current direct shear data.

- 3. Strengths determined from review of historical data/reports.
- 4. Strengths determined from typical values in literature.

5. Corresponds to undrained shear strength based on effective stress, or a "R-envelope" shear strength as presented in Duncan and Wright, 2005.

AECOM performed engineering interpretation of triaxial shear strength data obtained from testing of various fine-grained fill materials and natural soils across the site; the results presented in the table above reflect this interpretation. As a result of having multiple laboratory CU tests performed on selected materials, failure envelopes were defined by plotting the failure points on a Modified Mohr-Coulomb plot (also referred to as p-q and p'-q plots), as described in Appendix D of the United States Corps of Engineers (USACE) EM-1110-2-1902 Slope Stability Engineer Manual.

In analyzing the test results, a number of definitions of failure were considered, including the point of peak deviator stress during the test, the deviator stress corresponding to an axial strain of 15%, and the point of the test with the maximum effective principle stress ratio (obliquity) from the tabulated CU test data. For both effective and total strength conditions, the failure point was selected to coincide with the point of maximum deviator stress at or below 15% axial strain, which resulted in a conservative interpretation of strength parameters.

The resulting p-q plots from this procedure are given in **Attachment D**. In fitting strength parameters to multiple test results, shear strength parameters were selected such that about two thirds of the total tests are above the selected failure envelope, consistent with USACE recommendations.

Appendix C

Available Design Drawings













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#3	13:0"	8:0"	4'-0"	4'-0"	8:0"	8'-0"		
#4	13'-5"	10'.4"	6'3"	4'-1"	8'0"	8'-0"		
#5	12'0"	11-0"	6'-9"	4'-3"	8'0"	8'-0"		

<u>REFERENCES</u>: 7-3661-524 ASH PIT"B" OVERFLOW PIPE DETS. SH. 2 7-3661-525 " " ACCESS PLATFORM DETS.

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Appendix D

Instrumentation



The borings were performed with either a truck-mounted drill rig or a track-mounted drill rig and were advanced between sampling attempts using 3¹/₄-inch I.D. hollow-stem augers. Disturbed, but representative samples were obtained by lowering a 2-inch O.D. split-barrel sampler to the bottom of the hole and driving it into the soil by blows from a 140-pound hammer freely falling 30 inches (Standard Penetration Test, ASTM D1586). SPT sampling was generally performed continuously through embankment fill layers and at 2¹/₂-foot intervals once natural soils were encountered. Split barrel samples were examined immediately after recovery and representative portions of each sample were placed in air tight jars and retained for subsequent laboratory testing.

In addition to the disturbed samples, thin-walled press tube samples were also attempted at various depths in order to obtain relatively undisturbed soil samples for strength testing. The samples were collected by hydraulically pressing a 3-inch diameter thin-walled steel (Shelby) tube at the end of the drill rod stem. The samples were preserved inside the Shelby tube sampler and sealed with wax. The sample collection was completed in accordance with ASTM D 1587 Method for Thin-Walled Tube Geotechnical Sampling of Soils. In all, 14 Shelby Tube samples were attempted during drilling and returned to the lab for evaluation.

In the field, the following procedures and specific duties were performed by a Staff Engineering Technician from our office:

- examined all samples recovered from the borings;
- cleaned soil samples of cuttings and preserved representative portions in airtight glass jars;
- made seepage observations and measured the water levels in the borings;
- prepared a log of each boring;
- made hand-penetrometer measurements in soil samples exhibiting cohesion; and,
- provided liaison between the field personnel and the Project Manager so that the field investigation could be modified in the event that unexpected subsurface conditions were encountered.

Upon completion of drilling, water levels were measured and Borings B-B-1101, 1102, B-A-1107, 1108, 1109, 1110, 1113 and 1114 were backfilled with cement-bentonite grout. Vibrating wire (VW) piezometers were installed in the remaining borings. The installation of the VW piezometers is discussed in the following section of this report. Additionally, the mid-slope bench cut to facilitate drilling Borings B-A-1112 was regraded to the approximate original grade and seeded immediately following the completion of the boring.

Vibrating Wire Piezometer Installation

Vibrating wire piezometers were installed at selected depths within the crest of Ponds B and A (Borings B-B-1103, 1105 and B-A-1111), intermediate benches of Pond B (B-B-1104 and 1106) and mid-slope of Pond A (B-A-1112) as part of this investigation. A summary of VW piezometer installations is provided in Table 1. The VW piezometers were grouted in-place with a cement-bentonite grout mixture recommended by the

manufacturer (Durham Geo Slope Indicator). The VW piezometer cables are connected to data loggers that are programmed to record pore pressure readings every 6 hours. The data loggers continue to collect data and are downloaded periodically to monitor the long term pore pressures within the embankments. The collection of continuous data in conjunction with precipitation and river stage data can be used to determine if there is a correlation with surface infiltration and pore pressures within the embankment near the surface. The precipitation and river stage data is not available at the plant itself; therefore information from the river gauge stations (USGS No. 03255000) located in Cincinnati and National Weather Service data for Cincinnati was utilized.

The readings were downloaded and reduced to provide water levels at specific locations within the embankments. The results of the piezometer readings obtained through November 7, 2011 are submitted in Appendix C. This information was used in conjunction with finite element analyses to develop a design phreatic surface for use with the stability analyses. This is further discussed in subsequent sections of this report.

Piezometer/Boring Number	ezometer/Boring Cross- Number Section Date Location		Depth (feet)	Tip Elevation	
MFS #1/B-B-1103		5/12/2011	Center of Crest	41	468.2
MFS #2/B-B-1104	1	5/11/2011	Outboard Slope – Intermediate Bench	20	462.0
MFS #3/B-A-1105		5/6/2011	Center of Crest	31	478.3
MFS#4/B-A-1106	2	5/6/2011	Outboard Slope – Intermediate Bench	20	470.0
MFS#5/B-A-1111		5/5/2011	Center of Crest	39	470.0
MFS#6/B-A-1112	3	5/10/2011	Outboard Slope – Cut Bench	31	466.0

Table 1: Summary of Piezometer Installation

Notes: Elevations in Feet above mean sea level.

Elevations of Mid-slope piezometers were estimated from available topographic information

LABORATORY TESTING

Index Testing

Laboratory testing was performed on selected representative soil samples obtained during the field investigations to determine natural moisture content (ASTM D2216), liquid and plastic limits (ASTM D4318), and grain size analyses (ASTM D422). The results of these and other tests permit an evaluation of the strength, compressibility and permeability characteristics of the soils encountered at this site.

The results of the moisture content testing and of the liquid and plastic limits are graphically displayed on the individual boring logs presented as Plates 4 through 28 in Appendix A. A summary of all S&ME laboratory test results are presented as Plates 1







Appendix E

Pages from AECOM Hydrologic and Hydraulic Summary Report

1. INTRODUCTION

1.1. Purpose Of This Memorandum

This report presents the results of the hydrologic and hydraulic analysis prepared by AECOM for the Miami Fort Power Station¹ Basin A and Basin B Coal Combustion Residuals (CCR) units, located in North Bend, Ohio in Hamilton County (See Attachment A for Location Map). This analysis was completed in accordance with the Environmental Protection Agency (EPA) 40 CFR Part §257, subpart D, regulations for the disposal of CCR. As required by §257.82(a), by October 17, 2016 owners and operators of existing CCR surface impoundments must develop an Inflow Design Flood Control Plan that documents how the inflow design flood control system had been designed and constructed to meet the following requirements:

- (40 CFR §257.82, (a)(1) The inflow design flood control system must adequately manage flow into the CCR unit during and following the peak discharge of the inflow design flood.
- (40 CFR §257.82, (a)(2) The inflow design flood control system must adequately manage flow from the CCR unit to collect and control the peak discharge resulting from the inflow design flood.

Basin A and Basin B have a significant hazard potential based on the initial hazard potential classification assessment performed by Stantec in 2016 in accordance with §257.73(a)(2). The "Significant Hazard" category indicates that the inflow design flood is the 1,000-year storm event. This event is the basis for AECOM's certification.

1.2. Brief Description of Impoundments

Basin A and Basin B are utilized for managing CCR waste materials generated by the Miami Fort Power Station. The ponds are located to the west of the power generating station and consist of four-sided above-ground earthen embankments. The ponds share a separator dike and are surrounded by an earthen embankment. The ponds are hydraulically connected with a 48-inch CMP culvert sliplined with a 40-inch HDPE pipe that runs through the shared dike. Basin A was put into service in 1959 and Basin B was added in 1982. A plan view of the Miami Fort Power Station is included in Attachment A.

The ponds are hydraulically connected and work in series; Basin A discharges into Basin B and the ultimate outfall structure to the Ohio River is in Basin B. Therefore, a concurrent hydraulic evaluation of both ponds is warranted. The ponds currently receive process flows from ash transport water and other miscellaneous waste streams from the Miami Fort Power Station. Basin A receives the site's process flows as determined by the site water balance chart provided by DMF.

¹ Dynegy Administrative Services Company (Dynegy) contracted AECOM to develop this Hydrologic and Hydraulic Summary Report on behalf of the Miami Fort Power Station. Therefore, "Dynegy" is referenced in materials attached to this hydrologic and hydraulic report.

The normal water surface elevation (WSE²) of Basin A is 501.5 feet (NAVD88 vertical datum applies to all elevations in this report) as determined by sunny day hydraulic analysis. A sunny day hydraulic analysis uses plant process flows to estimate the stabilized water surface elevation in the basin, prior to a rainfall event occurring. Basin A's surface area is approximately 30 acres. Normal pool elevation in Basin B is 499.4 feet, which is based on the surveyed WSE from the 2014 ESP Associates survey. Basin B is approximately 20 acres and discharges to the Ohio River through NPDES permitted Outfall 002.

2. POND CAPACITY / IMPOUNDMENT COMPUTATIONS

The elevation/areas for Basins A and B were determined using AutoCAD analysis of a 2014 topographic and bathymetric survey, completed by ESP Associates. Refer to Attachment B for further details.

3. HYDROLOGIC AND HYDRAULIC ANALYSIS OF MIAMI FORT PONDS

3.1. Rainfall Data

The rainfall information used in the HydroCAD modeling was based on the National Oceanic and Atmospheric Administration (NOAA) Atlas 14, Volume 2, Version 3 which provides rainfall data for storm events with average recurrence intervals ranging from 1 to 1,000 years and durations ranging from 5 minutes to 60 days. The design storm rainfall depth, obtained from NOAA website, is 7.81 in for the 24-hour, 1,000-year storm. The Soil Conservation Service (SCS) Type II storm used by AECOM is appropriate to use for storms up to the 1,000-year flood at the project site.

3.2. <u>Runoff Computations</u>

To assess the capacity of the ponds to store and convey the storm flows, a hydraulic model was created in HydroCAD 10.00-12. HydroCAD has the capability to evaluate each pond within the network, to respond to variable tailwater, and reversing flows. HydroCAD routing calculations reevaluate the pond systems' discharge capability at each time increment, making the program an efficient and dynamic tool for this evaluation. Runoff was calculated using the SCS Curve Number Method, where curve numbers were assigned to each subcatchment based on the type of land cover and soil type present.

3.3. <u>Ohio River Tailwater</u>

The Ohio River acts as an outfall for Basins A and B, and therefore the pool level in the Ohio River may affect the corresponding pool levels in Basins A and B. The Ohio River surface water elevation obtained from the Federal Emergency Management Agency Flood Insurance Rate Maps. The 100-year/24-hour flood elevation in the Ohio River is at 490 feet.

Please refer to Attachment B for further details and modeling results.

² Available surveyed WSEs (ESP Associates, 2014) were compared to sunny day analysis WSEs for both basins. The higher elevation in each basin was used for the normal WSE to be conservative.

4. CONCLUSIONS

• The inflow design flood control system of the Miami Fort Basin A and Basin B adequately manages flow into and out of the ponds during and following the peak discharge of the 1,000-year storm event inflow design flood. Results of the model are summarized in Table 4.1.

1,000-Year, 24-Hour Storm							
			Crest				
CCR Unit	Beginning WSE ¹ (ft)	Peak WSE (ft)	Elevation (ft)				
Basin A	501.5	502.6	507				
Basin B	499.4	500.0	506				

 Table 4.1

 Miami Fort Summary of Hydrologic and Hydraulic Analysis,

 1 000-Year
 24-Hour Storm

¹WSE = Water Surface Elevation

- The H&H evaluation under the described scenario indicates that neither pond will overtop during the 1,000-year storm event while the Ohio River is experiencing a 100-yr flood.
- Additionally, no overland flow outside of the ponds will overtop the pond embankments.
- Basin A and Basin B meet the hydraulic requirements for certification, per §257.82(a).

5. LIMITATIONS

Background information, design basis, and other data which AECOM has used in preparing this report have been furnished to AECOM by the Miami Fort Power Station. AECOM has relied on this information as furnished, and is not responsible for the accuracy of this information. Our recommendations are based on available information from previous and current investigations. These recommendations may be updated as future investigations are performed.

The conclusions presented in this report are intended only for the purpose, site location, and project indicated. The recommendations presented in this report should not be used for other projects or purposes. Conclusions or recommendations made from these data by others are their responsibility. The conclusions and recommendations are based on AECOM's understanding of current plant operations, maintenance, stormwater handling, and ash handling procedures at the station, as provided by the Miami Fort Power Station. Changes in any of these operations or procedures may invalidate the findings in this report until AECOM has had the opportunity to review the changes, and revise the report if necessary.

This hydrologic and hydraulic analysis was performed in accordance with the standard of care commonly used as state-of-practice in our profession. Specifically, our services have been performed in accordance with accepted principles and practices of the engineering profession. The conclusions presented in this report are professional opinions based on the indicated project criteria and data available at the time this report was prepared. Our services were provided in a manner consistent with the level of care and skill ordinarily exercised by other professional consultants under similar circumstances. No other representation is intended. Attachment F

Basin A Embankment Raise Construction Specifications

BY THE H. C. NUTTING COMPANY CINCINNATI, OHIO

14

FOR THE THE CINCINNATI GAS & ELECTRIC COMPANY 1976

REPORT OF GEOTECHNICAL INVESTIGATION ASH PIT DIKE MODIFICATIONS MIAMI FORT STATION A-2

1997 - 1997 - 1997 - 19



May 17, 1976

Order No. 373.175 bj

The Cincinnati Gas & Electric Company P.O. Box 960 Cincinnati, Ohio 45201

Attn: Mr. R. J. VanVeen, Principal Structural Engineer General Engineering Department

> Re: Ash Pit Dike Modifications Miami Fort Station Job E-6850 Order No. M-21170

Gentlemen:

Submitted herewith is our report of the investigation made for the reference project to establish geotechnical design requirements covering the grading needed to increase the top of the existing dike to a finished elevation of 510, an additional height of 10 ft. All work was accomplished in accordance with the above purchase order and included a series of conventional soil borings at mutually selected locations, laboratory tests, appropriate analysis and preparation of this report with findings and design recommendations. Specifications presenting recommended technical criteria is included in the appendix.

Our contract also included four borings along the bank of the Great Miami River, as preliminary exploration of a future ash pit dike location. Our comments and recommendations for the design investigation are also included.

All findings have been discussed with your Messrs. O. C. Brewer and Emmary Rader and are confirmed herein. In brief resume, our investigation has indicated suitable conditions to allow construction of the proposed embankment needed to increase the elevation of the existing dike, utilizing a composite section composed of bottom ash obtained from the existing lagoon and a surface cap of cohesive soil obtained from the

adjacent future ash pit area. Due to the low shear strength of the foundation materials nearest the river and a greater exposure to future erosion, ash has been excluded from this portion of embankment.

We appreciate this opportunity of consultation and we have experienced field personnel who can provide the quality assurance necessary during the future construction. In the event of question concerning our findings, the writer would be pleased to call upon you at your office to discuss the details presented herein.

Respectfully submitted,

THE H. C. NUTTING COMPANY

Merle F. Netherd, P.E. Geotechnical Engineer

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TEST	BORIN	IG RE	EPORTS			:	HOLES	1-14,	5A

APPENDIX II

LABORATORY TEST DATA

- R.

APPENDIX III

GRADING SPECIFICATIONS

APPENDIX III

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GRADING SPECIFICATIONS

GRADING SPECIFICATIONS ASH PIT DIKE MODIFICATIONS MIAMI FORT STATION THE CINCINNATI GAS & ELECTRIC COMPANY

1. SCOPE

This specification describes the preliminary foundation preparation measures, selection and placement of borrow materials, methods of embankment construction, quality assurance requirements and related criteria governing the required grading as detailed in the project drawings and specifications.

2. FILL MATERIAL

All on-site available cohesive soils excluding the organic topsoil development are suitable for use in constructing the required embankment, subject to necessary adjustment in the natural water content prior to compaction. It is not intended that off-site borrow material will be required. The following tabulated data presents the results of laboratory Standard Proctor Moisture-Density Tests previously performed on suitable fill materials used at this station.

Material Description	Maximum Dry Density (PCF)	Optimum Water Content (%)
Brown Silty Clay	111.1	15.5
Brown Sandy Silt	112.9	12.0
Brown Silty Clay Loam	113.1	15.3
Brown Silt	110.2	16.0
Light Brown & Gray		
Sandy Silty Clay	109.7	16.8

Ash materials obtained from within the existing lagoon shall be used in embankment as shown on

Sec. 10

the typical section (Plate D attached) and where indicated on the project drawings. Because of permeability and shear strength requirements, the first 5 ft. of ash (as minimum) shall be coarse textured "bottom ash", as obtained close to the discharge pipe within northeastern sections of the basin. The remaining portions of ash embankment shall be fly ash, bottom ash or combinations thereof, tending to select those materials which are more coarse textured and can be placed and compacted most expediently. Tabulated as follows are the results of Standard Proctor Moisture-Density Tests conducted on the ash obtained from boring 6.

Material Description	Maximum Dry Density (PCF)	Optimum Moisture Content (%)
Bottom Ash	110.6	11.6
Coarse Textured Fly Ash Extreme Coarse Textured	102.2	14.0
Bottom Ash	125.7	9.6
Extreme Fine Textured		
Ash	92.9	19.7

Additional samples of ash will have to be obtained and tested in the laboratory in conjunction with their project use.

3. PREPARATION OF Fill FOUNDATION

Prior to the placement of the first lift of compacted fill, all organic topsoil development must be undercut and removed, generally less than 6". Do not remove the underlying dark brown silt loam. Within northern areas at preliminary boring 14, limited areas of undercutting to a depth of 3 ft. will be required in order to remove soft recent organic sediments. The final limits of additional undercutting will be defined based upon the conditions existing at the time of the work.

Extreme southern areas contain a surface layer of bottom ash fill, placed as roadbed for perimeter

access. Undercutting of the existing ash is not necessary unless it has been placed over wood, organic sediments or debris. Sufficient test pits should be excavated with a small backhoe to establish suitability of the existing foundation materials and define areas of any necessary undercutting and replacement.

In conjunction with stripping all scrub trees growing on the existing dike shall be removed, presumably in conjunction with stripping of topsoil and grubbing of the general dike foundation area.

4. BENCHING

The exposed slope of the existing dike shall receive "nominal" benching in conjunction with lift construction, as the overall embankment increases in height. Nominal benching shall be as shown on the typical section (Plate D attached) and shall involve a maximum of 5 ft. of horizontal existing dike excavation.

Any evidence of seepage from the existing dike as exposed during the grading or benching operations must be carefully evaluated by the project Geotechnical Engineer and supplemental underdrainage measures designed and constructed. Typically, this will consist of additional use of more porous coarse textured bottom ash fill as a drainage blanket.

5. FILL PLACEMENT

Following preparation and approval of the fill foundation, approximate 8" thick lifts of coarse textured bottom ash shall be placed and compacted. Within the non-riverside areas of dike, the bottom 5 ft. as minimum shall consist of compacted lifts of coarse textured bottom ash. Within the designated areas nearest the river, only cohesive fill materials may be used which are placed in 8" thick compacted lifts. Where the transition in section occurs, the ash should increase in thickness in a northwesterly direction rather than utilizing an abrupt change.

6. COMPACTION

Each lift of fill shall be compacted until the minimum field density as established by conventional test methods is 98% of Standard Proctor Laboratory Moisture-Density, ASTM D 698. A sheepsfoot compactor, minimum 20 ton, either pulled or self-propelled shall be used for compacting all lifts of cohesive fill. Compaction of ash shall be accomplished with vibratory rollers, the size and vibrating frequency selected by the contractor as being most expedient for the rate of placement and moisture conditions involved.

7. MOISTURE CONTROL

The moisture content of the fill material at the time of compaction shall be within the "optimum" moisture range, generally taken as within 2% of laboratory optimum. Natural water content of the available cohesive borrow materials are generally 5 to 8% in excess of laboratory optimum indicating drying will be required.

The ash borrow materials will be obtained from within the existing basin. Ideally, the outlet level should be lowered at the earliest possible date to allow drainage to occur. Procedures must be worked out between the contractor and the owner whereby the initially desired bottom ash and subsequently mixtures of fly ash and bottom ash can be removed, placed on the fill area, stockpiled or otherwise handled. It is essential that drying be induced and expedited as much as possible.

In the event rainfaill or excess natural moisture produces a moisture content beyond the optimum range, drying by discing shall be achieved in advance of compaction.

8. SEASONAL LIMITS

No fill material shall be placed, spread or compacted during unfavorable weather. When the work is interrupted by rain, fill operations shall not be resumed until the owner's representative indicates that the moisture content and

density of the previously placed fill are as specified. In the event winter construction is involved, no fill shall be placed during freezing or thawing conditions.

9. QUALITY ASSURANCE INSPECTION AND TESTS

Full-time inspection will be provided by the owner's representative beginning with the initial stripping of the foundation to receive fill and terminating following completion of final grade. It shall be the technician's responsibility to determine whether the materials, procedures and moisture conditions fulfill the requirements of these specifications, directing and approving all necessary changes. Sufficient tests shall be made on a given lift of compacted fill to establish compliance. Any areas failing to comply with the specified density shall be reworked and retested as necessary to demonstrate full compliance of the final embankment.

10. CONTROLLED RATE OF FILL PLACEMENT AND MONITORING OF FOUNDATION PERFORMANCE -RIVERSIDE DIKE

> Due to the more critical foundation stability within that portion of cohesion dike nearest the river, the rate of fill placement shall be limited to a maximum of 1 ft. per day or 5 ft. per week, whichever is greater. Prior to placing fill, stakes shall be placed just beyond the toe of embankment on 25 ft. spacing throughout the approximate 300 ft. long section nearest the riverbank. Stakes should project approximately 2 ft. above grade and 30" below, having approximate 1" x 2" dimensions and some convenient reference for monitoring horizontal and vertical movement. Readings shall be recorded weekly by the project surveyor, and at adjusted intervals based upon the results obtained.



Attachment G

Operation Maintenance Manual and Emergency Action Plan

MIAMI FORT ASH POND A & B

OPERATION MAINTENANCE MANUAL AND EMERGENCY ACTION PLAN

(PURSUANT TO OAC RULE 1501:21-21-03)

(A) Operation Plan

Ash Ponds A & B are used as settling ponds for coal ash.

(B) Scheduled Maintenance Program

A regular vegetation management program is followed to ensure that visual inspections can be completed without hindrance. Repairs are completed as needed as part of a regular maintenance program.

(C) Inspection and Monitoring Program

Ash Ponds A & B are visually inspected weekly and monthly by Ash Management personnel and records are made of those inspections. Attached are copies of the inspection forms. Any concerns and remedial actions are also noted on the inspection forms. Inspection forms are kept on file by Ash Management site representatives.

(D) Safe-rate Drawdown Procedure for the Reservoir

Not applicable

(E) Provisions for Periodic Inspection by a Qualified Engineer

Once a year a qualified engineer from the Station and/or Program Engineering will inspect Ash Ponds A & B.

(F) Emergency Action Plan

PURPOSE OF PLAN

The purpose of the Emergency Action Plan is to provide a written plan that personnel at the Miami Fort Station can readily utilize to aid them in determining an appropriate course of action if some degree of a slope failure is visually observed. This document is designed as a guideline for these personnel to use. Immediate decisions for any particular course of actions will be required by personnel based on their observations, experience and knowledge of the site conditions.

OBSERVATION OF CONDITIONS

LEVEL 1 - Tension cracks observed on the dike roadway or slope which were not present during the previous inspection.

- LEVEL 2 Tension cracks in excess of three inches wide observed on the dike roadway or slope which were not present during the previous inspection.
- LEVEL 3 Downward slope movement visually observed on the dike roadway or slope which was not present during the previous inspection.
- LEVEL 4 Volumes of water/material are in transport (i.e. piping). Visual observations indicate that slope failure may be imminent.

COURSE OF ACTION

- LEVEL 1 1. Notify Ash Management site representative
- LEVEL 2 1. Notify Ash Management site representative as soon as possible
 - 2. The tension cracks should be clearly marked with spray paint and/or staked and the slope should be monitored at least once a day for any further movement.
- LEVEL 3 1. Notify Ash Management site representative as soon as possible
 - 2. The downward movement of the slope should be clearly marked with spray paint and/or staked
 - 3. Markers should be installed and surveyed as soon as possible. The slope should be monitored at least twice a day for any further movement.
- LEVEL 4 1. Notify the Production Supervisor immediately that a slope failure may be imminent and request immediate evacuation of all personnel from the affected area as well as any adjacent areas that may be affected by a dam breach. No personnel shall enter the embankment area until visual observations indicate slope failure will not occur in the near future, the downward slope movement has ceased and the area appears secured.
 - 2. Notify Ash Management site representative.
 - 3. Notify Environmental, Health and Safety representative.

LEVEL 4 NOTIFICATION

CONTACT THE GENERAL Production Supervisor IMMEDIATELY AT 513-287-5042

PRODUCTION SUPERVISOR SHALL CONTACT ALL THE FOLLOWING PEOPLE



DUKE ENERGY SPILL/RELEASE CONTACTS – OHIO & KENTUCKY 11/3/2010

1. Environmental Staff

The following contact list should be used by Duke Energy facilities in Ohio and Kentucky to notify corporate Environmental staff in the event of a reportable oil or chemical release to the environment.

If a reportable release occurs, please contact a member of the Environmental staff, regardless of the time of day, using the following call list. Start at the top of the list and continue calling until you have reached one of the people listed below. DO NOT leave a message.

Office	Home	Mobile
513-287-3424	859-363-1767	513-543-0249
513-287-2268	513-877-2122	513-509-0040
513-287-3234	859-261-1678	513-260-1679
513-287-2208	513-738-0203	513-659-9198
513-287-2414	513-385-1235	513-673-4738
317-838-6218	317-539-7529	317-431-5488
317-838-1711	317-796-6572 (cell)	317-796-6572
317-838-1729	317-272-0803	317-670-5038
317-838-1194	317-745-4428	317-430-2764
317-838-1957	765-653-6542	765-720-2077
	Office 513-287-3424 513-287-2268 513-287-3234 513-287-2208 513-287-2414 317-838-6218 317-838-1711 317-838-1729 317-838-1194 317-838-1957	OfficeHome513-287-3424859-363-1767513-287-2268513-877-2122513-287-3234859-261-1678513-287-2208513-738-0203513-287-2414513-385-1235317-838-6218317-539-7529317-838-1711317-796-6572 (cell)317-838-1729317-272-0803317-838-1194317-745-4428317-838-1957765-653-6542

2. Corporate Communications

If the release could cause concern to the public or involve the news media, Duke Energy's media relations staff should be contacted as soon as possible, regardless of the time of day.

Call: 888-266-3853 (DUKE) or 704-382-9152

You will be asked to leave a voicemail message with the following information:

- Your name
- A telephone number where you can be reached
- A brief description of the event.

Someone from media relations will return your call within 30 minutes. If your call is not returned within 30 minutes, please call 980-373-6040 and have them page the corporate communication duty person.

DUKE ENERGY MONTHLY DAM INSPECTION CHECKLIST

NAME OF STATION: INSPECTOR: WEATHER: COUNTY, ST: INSPECTION DATE: AMT OF RAINFALL IN LAST 24 HOURS:

Pool Level

Primary Pond Level:

Interior Slope	Yes	No	N/A	Monitor	Repair	Evaluate			
Are there any cracks, slides or erosion?									
Are there any rodent burrows or depressions?									
Is there vegetation or sediment in the riprap?									
Is there vegetation greater than 2 inch diameter?									
Comments:									
Crest	Yes	No	N/A	Monitor	Repair	Evaluate			
Are there large cracks?									
Are there low areas or potholes?									
Is there vegetation greater than 2 inch diameter?									
Comments:									
Exterior Slope	Yes	No	N/A	Monitor	Repair	Evaluate			
Are there cracks, slides or erosion?									
Are there rodent burrows or depressions?									
Is the grass cover in good condition?									
Are there areas of seepage?									
Is there vegetation greater than 2 inch diameter?									
Comments:									
Outlet Structure (Discharge Tower)	Yes	No	N/A	Monitor	Repair	Evaluate			
Are the valves and operators in good condition?									
Is the system operable?									
Is the outlet structural material in good						_			
condition?									
Is the walkway to the outlet in good condition?									
Comments:									
Emergency Spillway (If applicable)	Yes	No	N/A	Monitor	Repair	Evaluate			
Are there cracks or slides in the spillway?									
Are there any points of erosion around or along the spillway?									
Piezometers	Yes	No	N/A		Monit	or			
Are all Piezometers working properly?									
Comments:									
Monitoring Wells	Yes	No	N/A		Monit	or			

Are all monitoring wells working properly?						\boxtimes
Comments:		_				
Drains			Yes	No	N/A	Monitor
Are all drains working properly	?					\square
Comments:						
Survey Monuments			Yes	No	N/A	Monitor
Are all survey monuments in place?						\square
Comments:						
2" Rainfall Inspection	Yes/No	Date(s)	Con	nment	s	
Has a 2" rain event occurred						
during the month						

Post Pictures Here:

SIGNATURE _	
DATE	

I hereby certify that I have reviewed the following checklist and have taken the appropriate action(s) to remediate any areas that may cause harm to the structural integrity of the dam.

REVIEWED BY ______

ANNUAL DAM INSPECTION CHECKLIST Duke Energy Program Engineering						
NAME OF FACILITY: LOCATION: Municipality: CLASSIFICATION DATA:	Size:		County: Hazard	:		
PHYSICAL DATA: Type of Dam:	Height of D	Dam:	Normal	Pool Storage Capacity:		
OPERATOR: ADDRESS: PHONE: () F	'AX NO.: (_)	E-MAIL ADDRESS:			
PERSONS PRESENT AT INS <u>Name</u>	SPECTION: <u>Title/P</u>	osition		<u>Representing</u>		
DATE OF INSPECTION:	 / /					
WEATHER:						
TEMPERATURE:		This is to certify following are th	y that the above dam he results of this insp	n has been inspected and the pection.		
	_			Date		

NAME OF DAM:

ITEM	CONDITION	COMMENTS	MONTOR	REPAIR	Evaluate				
	EMBANKMENT: CREST								
1	Surface Cracking								
2	Sinkhole, Animal Burrow								
3	Low Area(s)								
4	Horizontal Alignment								
5	Ruts and/or Puddles								
6	Vegetation Condition								
7	Warning Signs								
8									
Addi	tional Comments (Refer to iter	m number if applicable):							
	EN	MBANKMENT: UPSTREAM FACE							
10	Slide, Slough, Scarp								
11	Slope Protection								
12	Sinkhole, Animal Burrow								
13	EmbAbut. Contact								
14	Erosion								
15	Vegetation Condition								
17									
Addi	tional Comments (Refer to iter	m number if applicable):							
	EM	BANKMENT: DOWNSTREAM FACE							
18	Wet Area(s) (No Flow)								
19	Seepage								
20	Slide, Slough, Scarp								
21	Emb Abut. Contact								
22	Sinkhole, Animal Burrow								
23	Erosion								
24	Unusual Movement								
25	Vegetation Control								
26									
27									
Addi	tional Comments (Refer to iter	m number if applicable):							

ITEM	CONDITION	COMMENTS	MONTOR	Repair	Evaluate			
EMBANKMENT: INSTRUMENTATION								
28	Piezometers/Observ. Wells							
29	Staff Gauge and Recorder							
30	Weirs							
31	Survey Monuments							
32	Drains							
33	Low Flow Release							
34	Frequency of Readings							
35	Location of Records							
36								
37								
Addi	tional Comments (Refer to ite	m number if applicable):						
		DOWNSTREAM AREA						
38	Abutment Leakage							
39	Foundation Seepage							
40	Slide, Slough, Scarp							
41	Drainage System							
42	Boils							
43	Wet Areas							
44	Reservoir Slopes							
45	Access Roads							
46	Security Devices							
47	Signs and Buoys							
48								
49								
Addi	tional Comments (Refer to ite	m number if applicable):						
	SP	PILLWAYS: ERODABLE CHANNEL						
50	Slide, Slough, Scarp							
51	Erosion							
52	Vegetation Condition							
53	Debris							
54								
55								
Addi	tional Comments (Refer to ite	m number if applicable):						

NAME O	F DAM:
--------	--------

ITEM	CONDITION	COMMENTS	MONTOR	REPAIR	Evaluate			
SPILLWAYS: NON-ERODABLE CHANNEL								
56	Sidewalls							
57	Channel Floor							
58	Unusual Movement							
59	Approach Area							
60	Weir or Control							
61	Discharge Channel							
62	Boils or Bimps							
63								
64								
Addi	tional Comments (Refer to iter	n number if applicable):						
		SPILLWAYS: DROP INLET						
65	Intake Structure							
66	Trashrack							
67	Stilling Basin							
68								
69								
Addi	tional Comments (Refer to iter	n number if applicable):						
		OUTLET						
70	Intake Structure							
71	Trash rack							
72	Stilling Basin							
73	Primary Closure			╞╞╝				
74	Secondary Closure							
75	Control Mechanism							
76	Outlet Pipe							
77	Outlet Tower							
78	Outlet Structure							
79	Seepage							
80	Unusual Movement							
Addi	tional Comments (Refer to iter	n number if applicable):						

NAME OF DAM:

MƏLI	CONDITION	COMMENTS	MONTOR	REPAIR	EVALUATE
	-	RESERVOIR AREA			
81	Sedimentation				
82	Slope Stability				
83	Sinkholes				
84	Fractures				
85	Unwanted Growth				
86	Storage Gage				
Add	itional Comments (Refer to iten	n number if applicable):			
Fin	al Comments:				

DAM Inspection CHECKLIST Duke Energy Program Engineering

NAME OF DAM:

This is to certify that both the Downstream Hazard Description is accurate and the Posted Notice locations listed below have been inspected and the following are the results of these inspections.

Name of Dam Owner

Signature of Dam Owner

Date

This Dam Owners Notice Checklist is to accompany the Inspection Checklist filed by the Engineer.

EMERGENCY ACTION PLAN

Date of Last Update of Emergency Plan:

Downstream Hazard Description, additionally, specify any new developments, structures, etc. downstream within the inundation area:

Action Items						
ITEM #	DATE INSPECTED	LOCATION	COMMENTS	EXISTING	MISSING	REPLACED
Additional Comments (Refer to item number if applicable):						