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Revision 0

Initial Hazard Potential Classification Assessment
EPA Final CCR Rule
West Ash Ponds 1 and 2E
Wood River Power Station
Madison County, Illinois

1.0 PURPOSE

This report documents Stantec's certification of the initial hazard potential classification assessment for Wood River Power Station West Ash Ponds 1 and 2E.

40 CFR 257.73(a)(2) provides for the owner or operator of an existing CCR surface impoundment to conduct an initial hazard potential classification assessment and document the hazard potential classification, and the basis for the classification, of the CCR unit as either a high hazard potential CCR surface impoundment, a significant hazard potential CCR surface impoundment, or a low hazard potential CCR surface impoundment.

2.0 FINDINGS

A volume transfer breach analysis was performed in September 2016 to evaluate potential hazards associated with a failure of West Ash Ponds 1 and 2E's perimeter containment dike. The analysis involved transferring stored volumes within the ponds at various selected breach locations to evaluate potential impacts to downstream areas. Breaches were evaluated using calculated storage volumes corresponding to a pond level equal to the perimeter dike crest elevation.

Results from the analysis indicate that the breach volumes will be contained in nearby downstream areas that are located just west of and on the Wood River Power Station Property. Power station structures, access roads, and railroad are located within breach inundation extents and therefore have the potential to be impacted. The potentially impacted structures and access roads are typically intermittently used by Wood River Power Station personnel and the at-risk populations are considered transient. In accordance with Federal guidelines, loss of life is not considered probable for scenarios where persons are only temporarily in the potential inundation area. It was concluded that a breach failure of these impoundments does not present probable loss of human life. However, a breach of these impoundments perimeter dike has potential to release stored CCR material and cause environmental damage.

40 CFR 257.53 defines a "significant hazard potential CCR surface impoundment" as a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.



Based on the results of the analysis summarized above and the relevant definitions in 40 CFR 257.53, the West Ash Ponds 1 and 2E were assigned a significant hazard potential classification.

3.0 QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

I, Matthew Hoy, being a Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief that;

1. the information contained in this report and the underlying data in the operating record was prepared in accordance with the accepted practice of engineering and is accurate as of the date of my signature below; and
2. the initial hazard potential classification assessment for Wood River Power Station West Ash Ponds 1 and 2E was conducted in accordance with the requirements specified in 40 CFR 257.73.

SIGNATURE



DATE

2/2/17

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Design with community in mind