

GREDELL Engineering Resources, Inc.

ENVIRONMENTAL ENGINEERING

LAND - AIR - WATER

Offices in Jefferson City, Kansas City Metro and Springfield, Missouri

August 28, 2020

Mr. Ryan Bennett
Associated Electric Cooperative, Inc.
Thomas Hill Energy Center – Power Division
5693 Highway F
Clifton Hill, Missouri 65244-9778

Re: Pond 001, Cell 4 Professional Engineering Annual Inspection of CCR Impoundment

Dear Mr. Bennett:

GREDELL Engineering Resources, Inc. (Gredell Engineering) conducted the annual inspection by a qualified professional engineer of Pond 001, Cell 4 at Associated Electric Cooperative's (AECI) Thomas Hill Energy Center (THEC), as required by 40 CFR 257.83 (b) to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards. This letter is the inspection report required by 40 CFR 257.83 (b) (2). Zachary Troesser, P.E., Geotechnical Engineer with Gredell Engineering, conducted an inspection of Pond 001, Cell 4 (Cell 4) between August 21 and 28, 2020. The inspection consists of a review of available information, on-site observation of the facility, and preparation of this report.

REVIEW OF AVAILABLE INFORMATION

Per 40 CFR 257.83 (b) (1), this inspection included:

- (i) *A review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (e.g., CCR unit design and construction information required by §§ 257.73(c)(1) and 257.74(c)(1), previous periodic structural stability assessments required under §§ 257.73(d) and 257.74(d), the results of inspections by a qualified person, and results of previous annual inspections).*

Gredell Engineering reviewed the following documents as part of this inspection:

- Pond 001, Cell 4 Professional Engineering Annual Inspection of CCR Impoundment dated August 30, 2019 by Gredell Engineering,
- Initial Periodic Structural Stability Assessment Pond 001 - Cell 004 dated 17 October 2016 by Haley & Aldrich of Cleveland, Ohio (Haley & Aldrich),
- Initial Safety Factor Assessment Pond 001 - Cell 004 dated 17 October 2016 by Haley & Aldrich,
- Inflow Design Flood Control System Plan Pond 001 - Cell 004 dated 16 October 2016 by Haley & Aldrich,
- Site Plan Drawing Y6, Revision 2 dated December 1, 1978 by Burns & McDonnell of Kansas City, Missouri,
- weekly inspection reports for 2019 and 2020 provided by AECI THEC,
- "CELL 002 EAST AND WEST IMPROVEMENTS" dated June 2020 by Haley & Aldrich, Cleveland, Ohio, and
- Embankment Failure Discharge 001-Lower Ash Pond SY.TO.1700 Memorandum, November 27, 1991 by AECI.

ON-SITE OBSERVATIONS

Per 40 CFR 257.83 (b) (1), this inspection included:

- (ii) *A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit and appurtenant structures;*

There were no visually discernible signs of distress or malfunction of Cell 4 or its appurtenant structures at the time of this inspection.

- (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.*

The reinforced concrete principal spillway inlet structure of Cell 4 appeared to be intact, stable, and properly aligned. Direct observation of the principal spillway discharge pipe will require confined space entry protocols and was not attempted during this inspection. The discharge end of the spillway is a reinforced concrete headwall with a concrete armored flume immediately downstream. These structures displayed no signs of concrete spalling or cracking that would impair structural integrity, there was no visible exposed reinforcing steel, and the structures appeared to be in functional vertical and horizontal alignment. The emergency spillway crosses the berm and top-of-berm roadway just east of the principal spillway and was observed to be in good condition.

Per 40 CFR 257.83 (b) (2), the following observations are noted:

- (i) *Any changes in geometry of the impounding structure since the previous annual inspection;*

The embankment crest and slopes were of uniform line and grade. There was no discernible sag, slumping, bulging or other geometric indications of adverse embankment or embankment foundation performance. The drainage channel and the toe of the east embankment of Cell 4 are in the process of being regraded as part of the work described by construction documents titled "Cell 002 East and West Improvements", dated June 2020, by Haley & Aldrich, Cleveland, Ohio. The remainder of these observations are consistent with our annual inspection report dated August 30, 2019.

- (ii) *The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection;*

There is no instrumentation of Cell 4.

- (iii) *The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection;*

Gredell Engineering is not aware of any minimum and maximum water level and CCR records for Cell 4. The water level in Cell 4 was approximately elevation 701.1 feet, NAVD 29. CCR was submerged and no indication of CCR depth could be determined.

(iv) The storage capacity of the impounding structure at the time of the inspection;

Based on analysis of the original Cell 4 embankment construction drawings dated December 1978 by Burns & McDonnell of Kansas City, Missouri, the total impoundment volume of Cell 4 to the emergency spillway elevation of 703 feet is approximately 110 acre-feet.

(v) The approximate volume of the impounded water and CCR at the time of the inspection;

Based on analysis of the original Cell 4 embankment construction drawings dated December 1978 by Burns & McDonnell of Kansas City, Missouri, the total impoundment volume of Cell 4 to elevation 701.1 feet is approximately 95 acre-feet. CCR was submerged and no indication of CCR volume could be determined. Based on sedimentation rates observed at immediately upstream Cell 3, CCR volume in Cell 4 is expected to be minimal.

(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 and appurtenant structures;

There were no appearances of actual or potential structural weakness of the Cell 4 structures, nor any observed existing conditions disrupting or having the potential to disrupt the operation and safety of Cell 4 and its appurtenant structures.

(vii) Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.

Drainage improvements along the toe of the east embankment uncovered two groundwater relief wells in July, 2020. The relief wells were reportedly installed in 1991 and the embankment geometry has not been noted to change in any of the past annual inspections. It is beyond the scope of this report to evaluate potential impacts of the in-progress construction.

Per 40 CFR 257.83 (b) (5):

If a deficiency or release is identified during an inspection, the owner or operator must remedy the deficiency or release as soon as feasible and prepare documentation detailing the corrective measures taken.

No visual evidence of a deficiency or release was identified during the course of this inspection.

GENERAL COMMENTS and RECOMMENDATIONS

AECI THEC routinely notes seepage approximately 250 feet north of the primary spillway, along the south approximate 1/3 of the east embankment, and along the east approximate 1/4 of the south embankment in the weekly inspection reports. Standing water was observed in each of these areas during this inspection. The water was shallow, clear, and appeared static, and there was no evidence of erosion or soil piping. Weekly monitoring should continue to evaluate seepage conditions in these areas.

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A minor crack in the concrete armored flume immediately downstream of the reinforced concrete discharge structure noted in our past Annual Inspection Reports did not appear to change in the past year. However, we recommend continuing to monitor the concrete flume during weekly inspections.

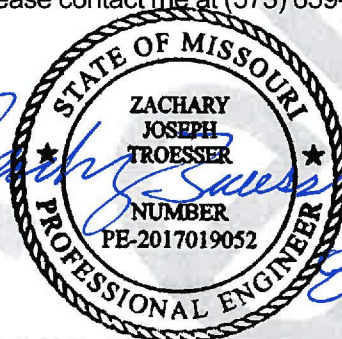
The downstream face of the embankment steepens in the vicinity of the southeast corner of Cell 4. Mowing in this area is typically performed using a boom-mounted mowing attachment. While there's currently no evidence to suggest the embankment should be flattened for safety or stability reasons, flattening the embankment in this area could facilitate more convenient mowing. It is noted that the available area to flatten the slope beyond the toe of the embankment at this location is limited by the proximity of the adjacent haul road. Detailed study would be required to evaluate the practicality of flattening the slopes by extending the toe of the embankment.

Cell 4 currently has no instrumentation for determining water elevation. We understand that AECEI has recently purchased a staff gauge for monitoring the water elevation within Cell 4 and anticipate the instrumentation will be installed soon.

This concludes the 2020 annual inspection by a qualified professional engineer of Pond 001, Cell 4 at Associated Electric Cooperative's Thomas Hill Energy Center, as required by 40 CFR 257.83 (b). Gredell Engineering appreciates this opportunity to serve AECEI THEC. If you have any questions or require additional information, please contact me at (573) 659-9078.

Sincerely,

Zachary Troesser, P.E.
Geotechnical Engineer



C: Thomas R. Gredell, P.E., President