US ERA ARCHIVE DOCUMENT

Coal Combustion Waste Impoundment Round 6 - Dam Assessment Report

East Bend Station Coal Combustion Surface Impoundment Duke Energy Boone County, KY

Prepared for:

United States Environmental Protection Agency Office of Resource Conservation and Recovery

Prepared by:

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Under Contract Number: EP-09W001727

March 2011

Revised: May 2011

INTRODUCTION, SUMMARY CONCLUSIONS AND RECOMMENDATIONS

The release of over five million cubic yards from the Tennessee Valley Authority's Kingston, Tennessee facility in December 2008, which flooded more than 300 acres of land, damaging homes and property. In response, the U.S. Environmental Protection Agency (EPA) is assessing the stability and functionality of the ash impoundments and other units, then quickly take any needed corrective measures.

This assessment of the stability and functionality of the East Bend Station Coal Combustion Surface Impoundment management unit is based on a review of available documents and on the site assessment conducted by Dewberry personnel on Thursday, August 5, 2010. We found the supporting documentation lacking critical information (Section 1.1.3). Sections 1.2.1 and 1.2.3 provide a recommendation for providing critical technical documentation required to upgrade the coal combustion waste surface impoundment embankment from POOR to SATISFACTORY. Section 1.2.6 provides four recommendations based on field observations that may help to maintain a safe and trouble-free operation.

In summary, the East Bend Coal Combustion Surface Impoundment Dam is POOR for continued safe and reliable operation, with no recognized existing or potential management unity safety deficiencies.

PURPOSE AND SCOPE

The U.S. Environmental Protection Agency (EPA) is embarking on an initiative to investigate the potential for catastrophic failure of Coal Combustion Surface Impoundments (i.e., management unit) from occurring at electric utilities in an effort to protect lives and property from the consequences of a dam failure or the improper release of impounded slurry. The EPA initiative is intended to identify conditions that may adversely affect the structural stability and functionality of a management unit and its appurtenant structures (if present); to note the extent of deterioration (if present), status of maintenance and/or a need for immediate repair; to evaluate conformity with current design and construction practices; and to determine the hazard potential classification for units not currently classified by the management unit owner or by a state or federal agency. The initiative will address management units that are classified as having a Less-than-Low, Low, Significant or High Hazard Potential ranking. (For Classification, see pp. 3-8 of the 2004 Federal Guidelines for Dam Safety).

In early 2009, the EPA sent its first wave of letters to coal-fired electric utilities seeking information on the safety of surface impoundments and similar facilities that receive liquid-borne material that store or dispose of coal combustion waste. This letter was issued under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act

(CERCLA) Section 104(e), to assist the Agency in assessing the structural stability and functionality of such management units, including which facilities should be visited to perform a safety assessment of the berms, dikes, and dams used in the construction of these impoundments.

EPA requested that utility companies identify all management units including surface impoundments or similar diked or bermed management units or management units designated as landfills that receive liquid-borne material used for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. Utility companies provided information on the size, design, age and the amount of material placed in the units. The EPA used the information received from the utilities to determine preliminarily which management units had or potentially could have High Hazard Potential ranking.

The purpose of this report is to evaluate the structural integrity of the East Bend Coal Combustion Waste Impoundment. This evaluation included a site visit. Prior to conducting the site visit, a two-person team reviewed the information submitted to EPA, reviewed any relevant publicly available information from state or federal agencies regarding the unit hazard potential classification (if any) and accepted information provided via telephone communication with the management unit owner. Also, after the field visit additional information was received by Dewberry & Davis LLC about the East Bend Coal Combustion Waste Impoundment that was reviewed and used in preparation of this report.

Factors considered in determining the hazard potential classification of the management units(s) included the age and size of the impoundment, the quantity of coal combustion residuals or by-products that were stored or disposed of in these impoundments, its past operating history, and its geographic location relative to down gradient population centers and/or sensitive environmental systems.

This report presents the opinion of the assessment team as to the potential of catastrophic failure and reports on the condition of the management unit(s).

LIMITATIONS

The assessment of dam safety reported herein is based on field observations and review of readily available information provided by the owner/operator of the subject coal combustion waste management unit(s). Qualified Dewberry engineering personnel performed the field observations and review and made the assessment in conformance with the required scope of work and in accordance with reasonable and acceptable engineering practices. No other warranty, either written or implied, is made with regard to our assessment of dam safety.



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1.0 CONCLUSIONS AND RECOMMENDATIONS

1.1 CONCLUSIONS

Conclusions are based on visual observations from a one-day site visit, conducted on August 5, 2010, and review of technical documentation provided by Duke Energy.

1.1.1 Conclusions Regarding the Structural Soundness of the Management Unit(s)

Although visual observations of the embankments suggest that the impoundment is performing in an acceptable manner, in accordance with USEPA criteria, the structural soundness must be rated POOR as a design report in not available corroborating embankment stability for anticipated loading conditions.

1.1.2 Conclusions Regarding the Hydrologic/Hydraulic Safety of the Management Unit(s)

Hydrologic and hydraulic data provided to Dewberry indicate adequate impoundment capacity to contain the 1-percent probability 6 hour/13.5 inch design event without overtopping the dike.

1.1.3 Conclusions Regarding the Adequacy of Supporting Technical Documentation

The supporting technical documentation is inadequate. The technical documentation lacks critical engineering analyses of dike slope stability.

1.1.4 Conclusions Regarding the Description of the Management Unit(s)

The description of the management unit provided by Duke Energy was an accurate representation of what Dewberry observed in the field.

1.1.5 Conclusions Regarding the Field Observations

Dewberry staff was provided access to all areas in the vicinity of the management unit required to conduct a thorough field observation. The visible parts of the embankment dikes and outlet structures were observed to have no signs of overstress, significant settlement, shear failure, or other signs of instability. However, visual observations were hampered by the presence of thick vegetation and mowing residuals in some areas. Embankments appear structurally sound. There are no apparent indications of unsafe conditions or conditions needing remedial action.

1.1.6 Conclusions Regarding the Adequacy of Maintenance and Methods of Operation

The current maintenance and methods of operations appear to be adequate for the coal combustion waste management unit. There was no evidence of significant repairs or prior releases observed during the field inspection.

1.1.7 Conclusions Regarding the Adequacy of the Surveillance and Monitoring Program

The surveillance program appears to be adequate. The management unit dikes are not instrumented. Based on the size of the dikes, the portion of the impoundment currently used to store wet coal combustion waste and stormwater, the history of satisfactory performance and current inspection program, installation of a dike monitoring program is not needed at this time.

1.1.8 Classification Regarding Suitability for Continued Safe and Reliable Operation

The facility classification is POOR for continued safe and reliable operation. The classification is due to the lack of critical technical documentation of engineering analyses verifying slope stability safety factors of the management unit dikes.

1.2 RECOMMENDATIONS

1.2.1 Recommendations Regarding the Structural Stability

Although observations made during the site visit do not indicate signs of overstress, significant settlement, shear failure, or other signs of instability, the structural stability cannot be evaluated without reviewing the results of engineering analyses of the slope stability factors of safety under various load conditions. It is recommended that if the original design analyses cannot be located, a new geotechnical engineering evaluation be conducted. The new geotechnical engineering evaluation should be based on current standards, including seismic loading conditions.

1.2.2 Recommendations Regarding the Supporting Technical Documentation

Continued efforts to locate the original slope stability design documentation are recommended. If the original documentation cannot be located within a reasonable period of time, a geotechnical engineering evaluation is recommended (see Section 1.2.1 above).

1.2.3 Recommendations Regarding the Maintenance and Methods of Operation

Although the maintenance program appears to be adequate, several recommendations have been made to improve maintenance and ensure trouble-free operation:

- Add rip rap armoring to toe of embankment up-gradient slope in areas susceptible to erosion caused by wave action
- Grade depressed traffic tracks along the crest to prevent water ponding and reduce erosion rills
- Repair erosion rills on both the up-gradient and down-gradient slopes
- Increase frequency of mowing dike embankments to improve effectiveness of daily observations and monthly inspections.

1.3 PARTICIPANTS AND ACKNOWLEDGEMENT

1.3.1 List of Participants

Randy L. Clark – Duke Energy
J. R. Wood – Duke Energy
James J. Stieritz – Duke Energy
Tammy Jett – Duke Energy
Adam Deller – Duke Energy
Kenneth M. Zak – Duke Energy
Sheri Campbell – Duke Energy
Rhonda Herzog – Duke Energy
Jenny Bulach – Duke Energy
Ron Ehlers – Duke Energy
Hugh Ward, P.E. – Dewberry
Joseph P. Klein, III, P.E. - Dewberry

1.3.2 Acknowledgement and Signature

We acknowledge that the management unit referenced herein has been assessed on August 5, 2010.

Hugh A. Ward, PE (KY # 7164)

Joseph P. Klein, III, P.E., Geotechnical Engineer

2.0 DESCRIPTION OF THE COAL COMBUSTION WASTE MANAGEMENT UNIT(S)

2.1 LOCATION AND GENERAL DESCRIPTION

The East Bend Generating Station is located along the north bank of an eastward bend on the Ohio River in west-central Boone County, Kentucky, approximately 2.5 miles south of Rabbit Hash, KY. The plant is operated by Duke Energy. The coal combustion waste impoundment is located adjacent to the Ohio River on the east side of the main plant.

The coal ash pond dike was designed in the mid-1970s by Sargent & Lundy Engineers. The coal combustion waste pond dike is a compacted granular fill embankment with a compacted clay core. The coal combustion waste impoundment dike is a "U" shape configuration with the main section parallel to the river and short sections on the east and west ends abutting natural soils on the north side.

Table 2.1: Summary of Dam Dimensions and Size ¹		
	East Bend Station Ash Pond	
Dam Height (ft)	50	
Crest Width (ft)	12	
Length (ft)	4200	
Side Slopes (upstream) H:V	2:1	
Side Slopes (downstream) H:V	2:1	

Based on design data on original construction drawings (Appendix A -Doc. 3)

The impoundment area is approximately 53.4 acres and has a total storage capacity of 2,975,000 cubic yards (1,844 acre-feet). An aerial photograph of the impoundment is provided in Appendix A – Document 4.



The coal combustion waste impoundment is divided into two cells by an internal bottom ash berm. The western cell operates as a primary ash settling basin. The eastern cell operates as a secondary clarifier basin. The cells are hydraulically connected by a corrugated metal pipe through the ash dike. Normal pool of water in the western cell is approximately 490.1. Normal pool in the eastern cell is approximately 485.5

Construction drawings indicate the source of material for the embankment was plant area earthwork from and within the pond area if additional material was required (See Appendix A – Doc 03).

The East Bend Generating Station has two small FGD temporary holding ponds, identified on the construction drawings as Sludge Pond A and Sludge Pond B (See Appendix A – Doc 03). The FGD temporary holding ponds have a surface area of about 2.5 and 2.3 acres respectively. The FGD temporary holding ponds are located adjacent to the southwest corner of the coal combustion waste surface impoundment. The FGD temporary holding ponds are not connected to the coal combustion impoundment. The FGD temporary holding ponds are not included in this assessment.

2.2 SIZE AND HAZARD CLASSIFICATION

The classification for size, based on the height of the embankment and the impoundment storage capacity is "Intermediate" with the USACE Recommended Guidelines for Safety Inspection of Dams ER 1110-2106 criteria summarized in Table 2.2.a.

Table 2.2a: USACE ER 1110-2-106 Size Classification		
	Impoundment	
Category	Storage (Ac-ft)	Height (ft)
Small	50 and < 1,000	25 and < 40
Intermediate	1,000 and < 50,000	40 and < 100
Large	> 50,000	> 100

Dewberry conducted a qualitative hazard classification based on the Federal Guidelines for Dam Safety, dated April, 2004. The hazard assessment classifications are summarized in Table 2.2.b.

Table 2.2b: FEMA Federal Guidelines for Dam Safety Hazard Classification			
	Loss of Human Life	Economic, Environmental, Lifeline Losses	
Low	None Expected	Low and generally limited to owner	
Significant	None Expected	Yes	
High	Probable. One or more expected	Yes (but not necessary for classification)	

There are no residences for several miles down gradient of the coal combustion waste impoundment on either the Kentucky or Indiana side of the Ohio River. Therefore, loss of human life is not probable in the event of a catastrophic dike failure. A catastrophic dike failure is likely to result is a release of coal combustion waste slurry into the Ohio River resulting in economic and environmental losses. Therefore, Dewberry evaluated the coal combustion waste impoundment embankment as "significant hazard potential".

2.3 AMOUNT AND TYPE OF RESIDUALS CURRENTLY CONTAINED IN THE UNIT(S) AND MAXIMUM CAPACITY

Table 2.3: Maximum Capacity of Unit		
Ash Pond Name: East Bend Station		
Surface Area (acre) ¹	53.4	
Current Storage Capacity (cubic yards) ¹	2,975,000	
Current Storage Capacity (acre-feet)	1,844	
Total Storage Capacity (cubic yards) ¹	734,100	
Total Storage Capacity (acre-feet)	455	
Crest Elevation (feet)	520	
Normal Pond Level (feet)	490.1	

¹ Data taken from *Dam Construction Permit Application Sheet* (See Appendix A – Doc. 03)

2.4 PRINCIPAL PROJECT STRUCTURES

2.4.1 Earth Embankment

The approximately 4,200 foot long, ash pond dike is composed of controlled compacted granular soil fill over a controlled compacted clay core. The crest width is 12 feet with grass and gravel surface to provide vehicle access. Both up-gradient and down-gradient slopes are 2H:1V. The slopes are vegetated with various species of grasses.

2.4.2 Outlet Structures

The impoundment primary outlet consists of a corrugated metal riser with an invert elevation of 485.5. The original construction included a 48-inch

diameter corrugation metal riser pipe and a 36-inch diameter outlet barrel. In the 1990s, a 40-inch diameter metal liner was installed in the riser pipe and a 28-inch diameter metal pipe liner installed in the outlet barrel. The primary spillway outlet barrel is located in natural ground beneath the embankment and extends approximately 60 feet into the Ohio River at normal river pool elevation. There are two vent stacks along the primary spillway outlet barrel between the toe of the embankment and the bank of the Ohio River.

The impoundment emergency spill way is a concrete lined, rectangular open channel that crosses the top of the embankment near the southeast corner of the impoundment. The 12-foot-wide and 1-foot deep emergency spillway has an invert elevation of 518.4. The emergency spillway discharges into a paved open channel ditch at the toe of the embankment.

2.5 CRITICAL INFRASTRUCTURE WITHIN FIVE MILES DOWN GRADIENT

A critical infrastructure inventory survey was not provided to Dewberry for review.

Based on available are topographic maps, surface drainage in the vicinity of the coal combustion waste impoundment is to the south-southeast toward the Ohio River. An eastward flowing bend in the Ohio River at the East Bend Plant site intercepts surface runoff approximately 800 feet south of the impoundment. Based on available aerial photographs and a brief driving tour of the area Dewberry did not identify critical infrastructure assets within 5 miles down-gradient of the coal combustion waste impoundment.

3.0 SUMMARY OF RELEVANT REPORTS, PERMITS, AND INCIDENTS

Duke Energy provided reports of two dam safety inspection; one conducted by the Kentucky Department for Environmental Protection, Division of Water on March 24, 2009, and the other, a third party inspection conducted by, BBCM on July 21, (See Appendix A – Doc 05 and Doc 06 respectively).

The 2009 Kentucky Department for Environmental Protection, Division of Water report concluded that the embankment was constructed in accordance with approved plans and specifications. The inspection report identified certain technical documentation required to bring the dam into conformance with state law. The required documentation included:

- Flood routing analysis
- Survey information on the Elevation-Area-Capacity curves and data calculations
- Dam construction and design data sheet
- Survey elevation of survey marker at the crest near the primary spillway.

The flood routing analysis, Elevation-Area-Capacity curves and data calculations, and the dam construction and design data sheet were provided to the Kentucky Division of Water as part of the "Dam Construction Permit Application Sheet" dated May 19, 2009 prepared by BBCM (See Appendix A Doc 03).

The BBCM inspection concluded that based on observations made during a site visit and information reviewed, the East Bend Ash Pond is in Satisfactory condition. The report included several maintenance recommendations including:

- Grading areas around light poles located on the embankment crest to direct stormwater away from the pole foundations
- Monitor shoreline erosion along the up-gradient embankment toe in areas without rip-rap armoring
- Repair low area along the crest to prevent ponding
- Clear excess vegetation from areas within 15 feet of the down-gradient embankment toe
- Grade observed wet areas along the toe of the east embankment to promote positive drainage, and monitor areas after re-grading
- Remove scrap pipe along toe of east embankment
- Clean out vegetation from the concrete ditch along the down-gradient toe of the embankment and the emergency spillway
- Fill erosion channels on the up-gradient slopes with rip rap.
- Monitor ash divider dike for seepage and instability
- Re-grade low lying area on down-gradient west embankment slope adjacent to the crest
- Continue regular moving of embankments and down-gradient areas.

3.1 SUMMARY OF LOCAL, STATE, AND FEDERAL ENVIRONMENTAL PERMITS.

The East Bend coal ash pond embankment is regulated by the Kentucky Department for Environmental Protection, Division of Water and has been issued the identification number of KYDW ID 1215. The dam was inspected by the Kentucky Division of Water in 2009 and is scheduled for another State inspection in 2011.

Discharge from the impoundment is regulated by the Kentucky Department for Environmental Protection, Division of Water and the impoundment has been issued a National Pollutant Discharge Elimination System Permit, Permit No. KY 040444. The NPDES permit was issued on April 1, 2004 and expired July 31, 2007. A permit renewal application is pending.

3.2 SUMMARY OF SPILL/RELEASE INCIDENTS

Data reviewed by Dewberry did not indicate any spills, unpermitted releases, or other performance problems with the embankment over the last 10 years.

4.0 SUMMARY OF HISTORY OF CONSTRUCTION AND OPERATION

4.1 SUMMARY OF CONSTRUCTION HISTORY

4.1.1 Original Construction

The East Bend Station coal combustion waste impoundment was designed in the mid 1970s by Sargent and Lundy Engineers. The embankment was constructed to its final design crest elevation of 520. The primary spillway riser pipe was constructed to a Phase 1 elevation 485.5. The design included provisions to extend the primary riser to elevation 517.5 for construction of a second unit at the generating station. The second unit has not been constructed, and the primary spillway riser elevation remains at 485.5. (See Appendix A – Doc. 03)

4.1.2 Significant Changes/Modifications in Design since Original Construction

The dike has not been significantly changed or modified since the original construction.

The primary spillway has been modified since the original construction. A 40-inch diameter liner pipe was installed inside the 48-inch diameter primary spillway riser pipe, and a 28-inch diameter liner pipe was installed inside the 36-inch diameter primary spillway outlet pipe. The liner pipes were added in the early 1990s.

4.1.3 Significant Repairs/Rehabilitation since Original Construction

No information was provided regarding major repairs or rehabilitation to the embankment or outlet structures. No evidence of prior releases, failures or patchwork was observed on the earthen dike during Dewberry's visual assessment that indicates prior release or failures have occurred.

4.2 SUMMARY OF OPERATIONAL PROCEDURES

4.2.1 Original Operational Procedures

The impoundment was designed and operated for coal combustion waste sedimentation and control, and for storage of stormwater runoff, cooling tower overboard water and miscellaneous plant drains.

Coal ash is transported by slurry to the west end of the impoundment for primary sedimentation. A coal ash dike separates the west and east ends of the impoundment. Water flow from the west to east sections of the impoundment is by gravity via a pipe through the ash dike. The impoundment area in the east side of the ash dike is used to secondary treatment.

4.2.2 Significant Changes in Operational Procedures and Original Startup

No significant changes in operational procedures have been made to the ash pond since the original startup

4.2.3 Current Operational Procedures

Current operational procedures, including maintenance and emergency action response actions are outlined in the "East Bend Operation Maintenance Manual and Emergency Action Plan" (See Appendix A – Doc 07).

4.2.4 Other Notable Events since Original Startup

No additional information was provided to Dewberry of other notable events impacting the operation of the impoundment.

5.0 FIELD OBSERVATIONS

5.1 PROJECT OVERVIEW AND SIGNIFICANT FINDINGS

Dewberry personnel Hugh Ward, P.E. and Joseph P. Klein, III, P.E. performed a site visit on Thursday August 5, 2010 in company with the participants.

The site visit began at 8:30 AM. The weather was warm and cloudy. A strong rain shower occurred immediately prior to the site visits. Photographs were taken by Dewberry personnel of conditions observed during the site visit. Selected photographs are included in this report. A Dam Inspection Checklist was prepared at the conclusion of the site visit. The Dam Inspection Checklist is including in Appendix B.

Based on the observations during the site visit no significant findings were noted and the embankment appears to be performing in accordance with design expectations.

5.2 EARTH EMBANKMENT

5.2.1 Crest

The crest of the embankment had no signs of significant depressions, tension cracks or other indications of settlement or shear failure. Figure 5.2.1-1 shows the typical crest conditions.



Figure 5.2.1-1: Photograph of Impoundment Dike Crest View to East

In scattered areas vehicle traffic along the crest has caused depressions in the gravel tracks allowing water to pond. Overflow from the small ponding areas is causing small erosion rills on both the up-gradient and down-gradient slopes of the embankment. Figure 5.2.1-2 shows a small area of ponding in the gravel travel track along the embankment crest.



Figure 5.2.1-2: Water Ponding in Small Depression in Gravel Travel Track along Embankment Crest.

5.2.2 Upstream/Inside Slope

The up-gradient slope of the embankment is vegetated with various species of tall grass and weeds. There were no observed scarps, sloughs, bulging, cracks, depressions or other indications of slope instability. Figure 5.2.2-1 shows a representative section of the up-gradient slope of the embankment.



Figure 5.2.2-1: Photo of Embankment Up-gradient Slope View to East

Small areas of sloughing or erosion were observed along the up-gradient slope as evidence of animal burrows. Figures 5.2.2-2 and 5.2.2-3 show the conditions observed.



Figure 5.2.2-2: Photo of Small Erosion Rill on Up-gradient Slope



Figure 5.2.2-3: Evidence of Animal Burrow on Up-Gradient Slope

Areas of erosion repairs to the up-gradient slope were observed. The largest of the repairs were near the coal conveyor crossing. Storm water from broken gutters on the coal conveyor crossing caused areas of erosion beneath the conveyor. Figure 5.2.3-4 shows a typical repair area.



Figure 5.2.2-4: Erosion Repairs beneath Coal Conveyor Structure

A section of up-gradient embankment toe along the eastern edge of the impoundment has been armored with rip rap to protect against erosion. Figure 5.2.2-5 shows the protected toe area.



Figure 5.2.2-5: Rip Rap Armoring to Protect against Wave Erosion

Observations at the site indicate other areas of wave erosion that warrant armoring, including the areas adjacent to the previously installed rip rap. Figure 5.2.2-6 shows an area of wave erosion near the primary spillway riser.



Figure 5.2.2-6: Up-gradient Embankment Toe Wave Erosion near Primary Spillway Structure

5.2.3 Downstream/Outside Slope and Toe

The down-gradient slope of the embankment is vegetated with various species of tall grass and weeds. No major scarps, sloughs, bulging, cracks, depressions or other indications of slope instability or signs of uncontrolled seepage were observed. Figure 5.2.3-1 shows a representative section of the up-gradient slope of the embankment.



Figure 5.2.3-1: Photo of Embankment Down-gradient Slope View to East

The bottom portion near the east end of the down-gradient embankment is armored with rip rap as protection from erosion during flooding of the Ohio River. Figure 5.2.3-2 shows the rip rap armoring. The observed armoring is indicated on the drawings as part of the original design (See Appendix $A - Doc\ 03$)



Figure 5.2.3-2: Rip-Rap Protection at Bottom of Down-gradient Slope

Small areas of sloughing and small erosion rills were observed along the down-gradient embankment slope. Figures 5.2.3-2 shows a slough area.



Figure 5.2.3-2: Photo of Local Slough Area on Down-gradient Slope

Evidence of animal burrows was observed along the down-gradient slope. The activity on the down-gradient slope appeared to be higher than on the up-gradient slope. Figure 5.2.3-3 shows twin burrows observed on the down-gradient slope.



Figure 5.2.3-3: Photo of Adjacent Animal Burrows on the Down-gradient Slope

No areas of seepage or soft soils were observed along the toe of the down-gradient slope. There is a concrete lined ditch and adjacent paved roadway along the down-gradient toe of the main embankment section. Figure 5.2.3-4 shows a section of the down-gradient embankment toe.



Figure 5.2.3-4: Photo of Down-gradient Embankment Toe with Drainage Ditch and Adjacent Pavement

5.2.4 Abutments and Groin Areas

Neither erosion nor uncontrolled seepage was observed along the groins or abutments. Groin slopes and abutments are protected with the same vegetative cover as the adjoining slopes. Figures 5.2.4-1 and 5.2.4-2 show typical conditions observed at the groins and abutments.



Figure 5.2.4-1: Photo of Interior Groin at Southwest Corner of Impoundment



Figure 5.2.4-1: Photo of Embankment Crest at Northeast Corner Abutment

5.3 OUTLET STRUCTURES

5.3.1 Overflow Structure

The impoundment overflow structure is located in the southeast corner of the impoundment. The original overflow structure consists of a 48-inch diameter corrugated metal riser protected by a timber frame. In the early 1990s a 40-inch diameter liner was installed in the original riser. The riser invert elevation is 485.5 ft. Access to the riser is provided by a fixed

walkway. Outlet flow can be controlled by a manually-operated valve. Figure 5.3.1-1 shows the primary spillway riser structure and Figure 5.3.1-2 shows the riser invert.



Figure 5.3.1-1: Photo of Primary Spillway Riser Structure



Figure 5.3.2-2: Photo of Primary Spillway Pipe Invert

5.3.2 Outlet Conduit

The original outfall pipe is a 36-inch diameter corrugated metal pipe. As part of the early 1990s work, a 28-inch diameter liner was installed in the outfall pipe. The outfall pipe is located in natural ground beneath the embankment. The outfall pipe remains below ground until discharging into the Ohio River. The outfall invert elevation is 441.6 ft which is

approximately 12.6-ft. below the Ohio River normal pool elevation of 454.25 ft. There are two vent risers along the spillway outfall pipe between the toe of the embankment and the Ohio River. Observations in the vent pipes showed water to be flowing clear and unobstructed. Figure 5.3.2-1 shows outlet pipe vent pipe locations.



Figure 5.3.2-1: Photo of Primary Spillway Outlet Pipe Vents

5.3.3 Emergency Spillway

The emergency spillway consists of a 12 ft. wide, 1 ft. deep, concrete-lined open channel crossing the embankment crest near the southeast corner of the impoundment. The invert elevation of the emergency spillway is 518.15. The emergency spillway discharges into

the concrete-lined drainage ditch at the toe of the embankment. Figure 5.3.3-1 shows the emergency spillway invert.



Figure 5.3.3-1: Photo of Emergency Spillway Invert.

Figure 5.3.3-2 shows the emergency spillway along the down-gradient slope of the embankment.



Figure 5.3.3-2: Photo of Emergency Spillway on Down-gradient Slope of Embankment

5.3.4 Low Level Outlet

The East Bend coal combustion waste impoundment does not have a low level outlet.

6.0 HYDROLOGIC/HYDRAULIC SAFETY

6.1 SUPPORTING TECHNICAL DOCUMENTATION

6.1.1 Flood of Record

No documentation has been provided about the flood of record.

6.1.2 Inflow Design Flood

BBCM conducted a hydrologic and hydraulic analysis of the capacity of the coal combustion waste impoundment to store water from the design storm event (See Appendix A – Doc 3). The design storm was a 100-year (1% probability in a given year), 6-hour event with an intensity of 13.5 inches. The report estimates that the 1 percent probability storm can be retained in the coal ash pond, raising the water elevation to about 490.1, leaving a freeboard of about 29.9 feet.

6.1.3 Spillway Rating

The BBCM analyses (See Appendix A – Doc 3) includes a primary spillway discharge of 74.4 cubic feet per second for the design storm event.

6.1.4 Downstream Flood Analysis

No downstream flood analysis data were provided to Dewberry for review.

6.2 ADEQUACY OF SUPPORTING TECHNICAL DOCUMENTATION

Supporting documentation reviewed by Dewberry is adequate to assess the hydrologic/hydraulic safety of the coal combustion waste impoundment.

6.3 ASSESSMENT OF HYDROLOGIC/HYDRAULIC SAFETY

Based on the calculations provided in the hydrologic and hydraulic analyses (See Appendix A –Doc. 3) the coal combustion waste impoundment can retain the 1 percent probability storm event with a freeboard of approximately 29.9 feet. Hence the dike failure by overtopping seems improbable.

7.0 STRUCTURAL STABILITY

7.1 SUPPORTING TECHNICAL DOCUMENTATION

7.1.1 Stability Analyses and Load Cases Analyzed

No stability analyses were provided to Dewberry for review.

7.1.2 Design Parameters and Dam Materials

No data pertaining to embankment design parameters were provided to Dewberry for review.

Construction drawings provided for review (See Appendix A –Doc 3) indicate the embankment design is a compacted granular fill with a compacted clay core. Construction drawings indicate material for the embankment came from plant area earthwork, and from within the impoundment if required. The construction drawings are signed and sealed by a registered engineer licensed in the State of Kentucky.

7.1.3 Uplift and/or Phreatic Surface Assumptions

No documentation of uplift calculations or phreatic surface assumptions was provided to Dewberry for review.

7.1.4 Factors of Safety and Base Stresses

No documentation of embankment slope stability factors of safety or base stresses was provided to Dewberry for review.

7.1.5 Liquefaction Potential

No documentation of soil liquefaction analyses was provided to Dewberry for review.

7.1.6 Critical Geological Conditions

Documentation provided to Dewberry for review (See Appendix A – Doc 3) indicates the East Bend coal combustion waste impoundment is located within the flood plain of the Ohio River. The embankment abuts a terrace of the ancestral Ohio River flood plain. The soil types and bedrock contact contours in the Ohio River Valley are generally the result of flow and meander of the river during and after periods of glaciation. The coal combustion waste impoundment embankment is located on a post-glaciation terrace of the upper terrace into which the embankment abuts.

Soils encountered near the embankment generally consist of:

- Approximately 10 feet of medium stiff to stiff silty clay
- Approximately 20 to 30 feet of loose fine and clayey fine sand,
- Medium dense to dense fine to course sand. The thickness of this stratum is approximately 80 to 90 feet and extends to bedrock.

7.2 ADEQUACY OF SUPPORTING TECHNICAL DOCUMENTATION

The technical documentation provided to Dewberry lacks the critical engineering analyses data required to assess the structural stability of the coal combustion waste impoundment embankment. If the original slope stability design calculations cannot be located new geotechnical engineering analyses should be conducted to verify the existing slope stability safety factors meet or exceed acceptable criteria.

7.3 ASSESSMENT OF STRUCTURAL STABILITY

Based on the lack of technical documentation, the structural stability of the coal combustion waste impoundment embankment is rated as POOR.

8.0 ADEQUACY OF MAINTENANCE AND METHODS OF OPERATION

8.1 OPERATING PROCEDURES

The facility is operated for the storage of wet coal combustion waste as well as water from other plant sources including storm runoff from plant landfill and coal pile, cooling tower overboard water, and water from miscellaneous plant drains. Coal combustion waste process water discharges into the west side of the impoundment which is separated from the east section by a coal combustion waste dike. The west side of the impoundment is the primary sedimentation area. Decant water flows by gravity to the east section of the impoundment through a pipe in the coal ash dike. Figure 8.1-1 shows the coal combustion waste dike and drain pipe.



Figure 8.1-1: Photo of Decant Water from West to East Sections of Impoundment

Water from the east section of the impoundment is discharged through the primary spillway.

8.2 MAINTENANCE OF THE DAM AND PROJECT FACILITIES

The "East Bend Ash Pond Operation Maintenance Manual and Emergency Action Plan" (See Appendix A – Doc 07) establishes general inspection and maintenance requirements for the impoundment dike. The required procedures include:

- A regular vegetative management program to facilitate visual inspections
- Repairs conducted as part of a regular maintenance program
- Daily "drive by" visits by plant laboratory personnel to supplement formal monthly inspections (See Appendix A –Doc. 4)

8.3 ASSESSMENT OF MAINTENANCE AND METHODS OF OPERATIONS

8.3.1 Adequacy of Operating Procedures

Based on the assessments of this report, operating procedures appear to be adequate.

8.3.2 Adequacy of Maintenance

The dam inspection report, including the Kentucky Division of Water "Inspection of East Bend Ash Pond Dam" dated October 9, 2009 and the BBCM "Annual Dam Inspection 2010", dated August 4, 2010 (See Appendix A – Docs. 4 and 6 respectively) and the Dam Inspection Checklist on August 5, 2010 by Dewberry (See Appendix C – Doc 09) reported no major maintenance issues. The 2010 BBCM report includes several maintenance recommendations, but none that are considered critical or imminent. This indicates that the current maintenance plan is probably followed in practice and that adequate maintenance is provided for the dike and project facilities.

Although the maintenance program appears to be adequate, several recommendations have been made to improve the maintenance and ensure trouble free operation:

- Add rip rap armoring to toe of embankment up-gradient slope in areas susceptible to erosion caused by wave action
- Grade depressed traffic tracks along the crest to prevent water ponding and reduce erosion rills
- Repair erosion rills on both the up-gradient and down-gradient slopes
- Increase frequency of mowing dike embankments to improve effectiveness of daily observations and monthly inspections.

9.0 ADEQUACY OF SURVEILLANCE AND MONITORING PROGRAM

9.1 SURVEILLANCE PROCEDURES

Surveillance procedures are specified in the Duke Energy "Fossil Impoundment Dam Inspection Program", dated July 1, 2010. The program requirements include:

- Monthly Inspections: conducted by plant personnel and documented using checklists. Inspection findings are submitted to the Duke Energy Program Engineering Group for review.
 - Supplemental inspections are required after a rain event of 2-inches or greater in a 24-hour period.
- Annual Inspection: conducted by the Duke Energy Program Engineering Group. Checklists are used to document the inspection, conduct an engineering review and develop recommendations, if appropriate.
- Regulatory and Third Party Inspections: conducted on a two- to five-year basis by an official regulatory agency. Duke Energy Program Engineering is responsible for scheduling and assisting governmental agencies with regulatory or third party inspections.

9.2 INSTRUMENTATION MONITORING

The East Bend coal combustion waste impoundment embankment does not have an instrumentation monitoring system.

9.3 ASSESSMENT OF SURVEILLANCE AND MONITORING PROGRAM

9.3.1 Adequacy of Inspection Program

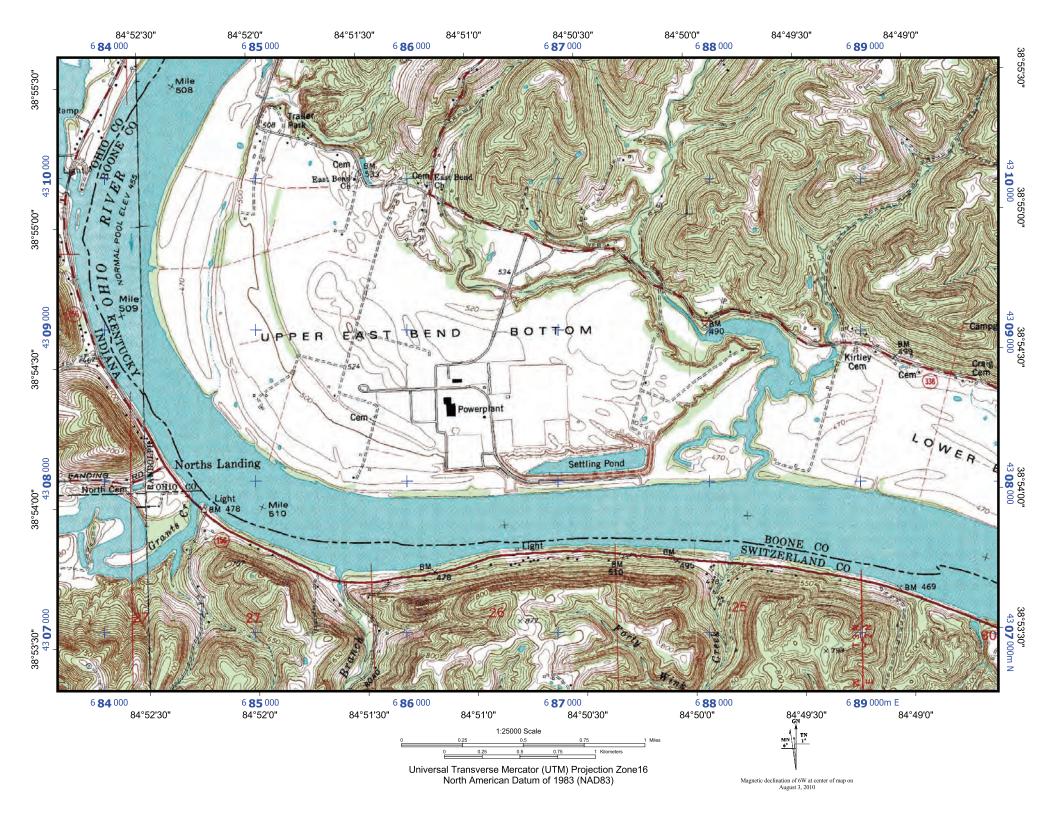
Based on the data reviewed by Dewberry, including observations during the site visit, the inspection program is adequate.

9.3.2 Adequacy of Instrumentation Monitoring Program

No instrumentation is present at the East Bend Station coal combustion waste impoundment embankment.

Based on the size of the embankment, the current inspection program, and the observations made during this site visit, an embankment monitoring program is not needed at this time.





May 19, 2009 011-09323-012



Mr. Jim Stieritz
Duke Energy
139 East Fourth Street
Cincinnati, Ohio 45201

Re:

Ash Pond Reservoir Characterization

East Bend Station

Boone County, Kentucky

Mr. Stieritz:

In accordance with your request, BBCM has completed the Dam Construction Permit Application Data Sheet required by the Energy and Environment Cabinet, Division of Water. The required flood routing analysis and Elevation-Area-Capacity curves and data calculations are included as appendices to the Dam Data Sheet.

Our analyses were performed based on requirements for a Moderate Hazard dam, for which the design storm is a 13.5" rainfall event over 6 hours.

If you have any questions, do not hesitate to contact this office.

Respectfully submitted,

BBC&M ENGINEERING, INC.

Stephen J. Loskota, P.E. Senior Project Engineer

Christopher K. Hall, P.G.

Senior Geologist

Submitted: via electronic mail

Attachments: Dam Construction Permit Application Data Sheet w/appendices

14 Reilly Rd Frankfort, Ky 40601

5/18/09

Date:___

DAM CONSTRUCTION PERMIT APPLICATION DATA SHEET

general plans, sections and specificati	cription of the design, including the various factors in ions. Included in the drawings are vicinity maps and ms not pertinent to this project are deleted.	
LOCATION AND PURPOSE:		
1. County		
Boone 2. Stream		
Off-stream, Ohio River		
3. Latitude 38° 54' 07"	Longitude -84° 50' 28"	
4. Purpose Ash Storage		
5. Topographic Map (7 ½ Quadrangt See Appendix A	le) Name (Attach Copy)	
SUMMARY OF DESIGN:	176 Acres 0.275	0.10
Drainage Area Standard Grandita	Tiones	Sq.Miles
2. Storage Capacity	1,844	Acre Feet
3. Maximum Height Of Dam	60	Feet
4. Spillway Capacity	222	C.F.S.
5. Top Of Dam Elevation	520	Feet, MSL
6. Normal Water Surface	485.5	Feet, MSL
7. Maximum Water Surface	490.1	Feet, MSL
8. Minimum Water Surface	484	Feet, MSL
9. Freeboard Above Maximum Water	29.9	Feet
10. Power Capacity		Feet
11. General Plans and Sections	See Appendix A (Attach I Copy)	
DESIGN DATA:		
1. Geological Report, Author and Dat	sa See Appendix B (Attach Copy)	
2. Log Of Test Pits and Drill Holes	See Appendix B (Attach Copy)	
Hydraulic Data, Capacities and requ	uirements	
and by whom established	See Appendix C, Moderate Hazard Da	am KYDFP
a. Storage (Irrigation, Flood Etc.)	• •	
b. Spillway	At Top of Embankment = 222 cfs	

14 Reilly Rd Frankfort, Ky 40601

DAM CONSTRUCTION PERMIT APPLICATION DATA SHEET

c. Outlet	N/A
d. Diversion	N/A
e. Area-Storage Capacity Curves	For Various
Elevations Of Water Surface	See Appendix C
4. Hydrologic Data	
a. Hydrographs	See Appendix C for inflow & outflow hydrographs
b. Maximum Recorded Runoff	None recorded
c. Maximum Anticipated	12.0 in.
d. Discharges (100 Yr., Etc.)	Inflow max = 1238 cfs Outflow max = 74 cfs
e. Design Values & Method	13.5" in 6 hours SCS Type II Storm
5. Right Of Way Information	Dam entirely on Duke Energy Property
RESERVOIR:	
1. General Dimensions:	
Rectangular (3400' x 650')	
2. Existing Structures:	
Principal Spillway & Emergency	Spillway
3. Proposed Structures:	
None	
4. Nature Of Land Flooded and Cleari	
Agricultural land, minimal clearir	ng
5. House Elevations and Distance From	m Structure OR Proposed Site
N/A	
6. Relocations Required (Railroad, Highw	vay, Telephone, Power, Pipeline, Etc.)
None	
7. Geology	
See Annendiy R	

14 Reilly Rd Frankfort, Ky 40601

a. General Formations See Appendix B
b. Factors Relating To Reservoir Losses N/A
c. Contributing Springs None
d. Deleterious Mineral and Salt Deposits None
DAM SITE:
Geological Features, Formations: See Appendix B
Nature Of Stream Bed and Abutments: Alluvium
 Interpretation of Test Pits and Drill Holes: See Appendix B
4. Percolation Tests, Ground Water:
No percolation tests performed; groundwater level consistent with river level.
DAM:
1. Features Governing Design:
Topography, location of plant, Ohio River.
2. Water Surface Elevation, Storage Capacities, Freeboard, Etc.:
See Summary of Design
3. Grouting Requirements: None
SPILLWAY:
1. Requirements:
Pass design storm without overtopping dam. The modeled design storm is 13.5" in 6 hours.
a. Factors Governing Design and Location: Storage Capacity
b. Maximum Spillway Velocity P. Spillway: Approx. 25 ft/s
3. Type: Principal Spillway: 40-inch diameter steel riser pipe and 28-inch diameter steel outlet barrel.

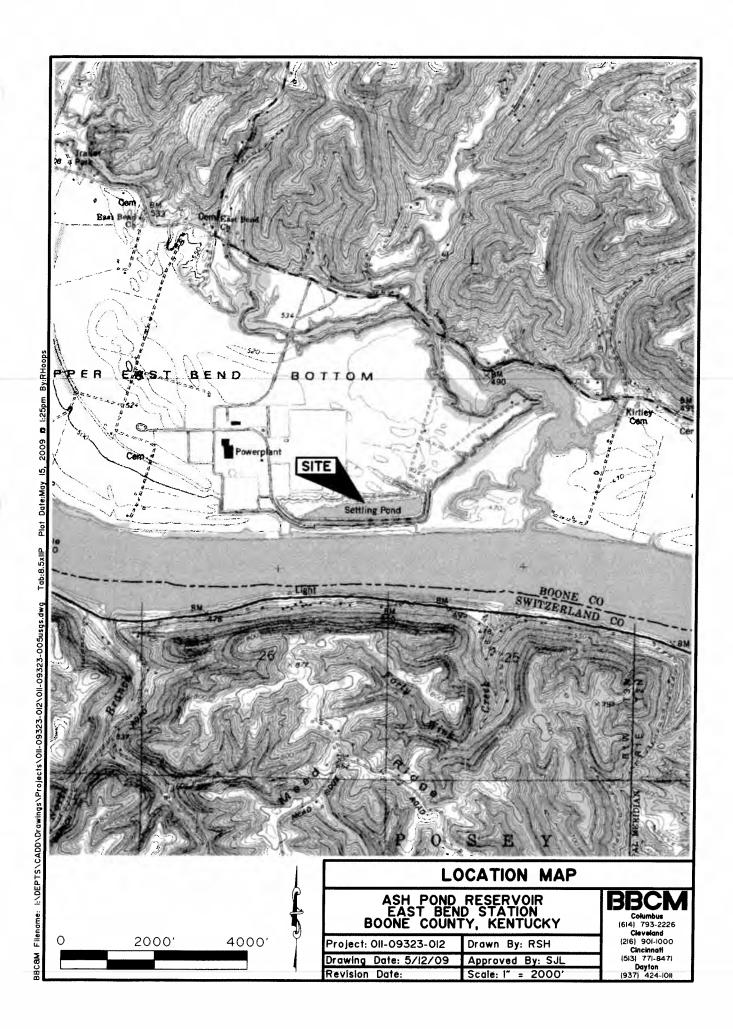
Emergency Spillway: 12-foot wide by 1.5' deep concrete channel with 12:1 side slopes.

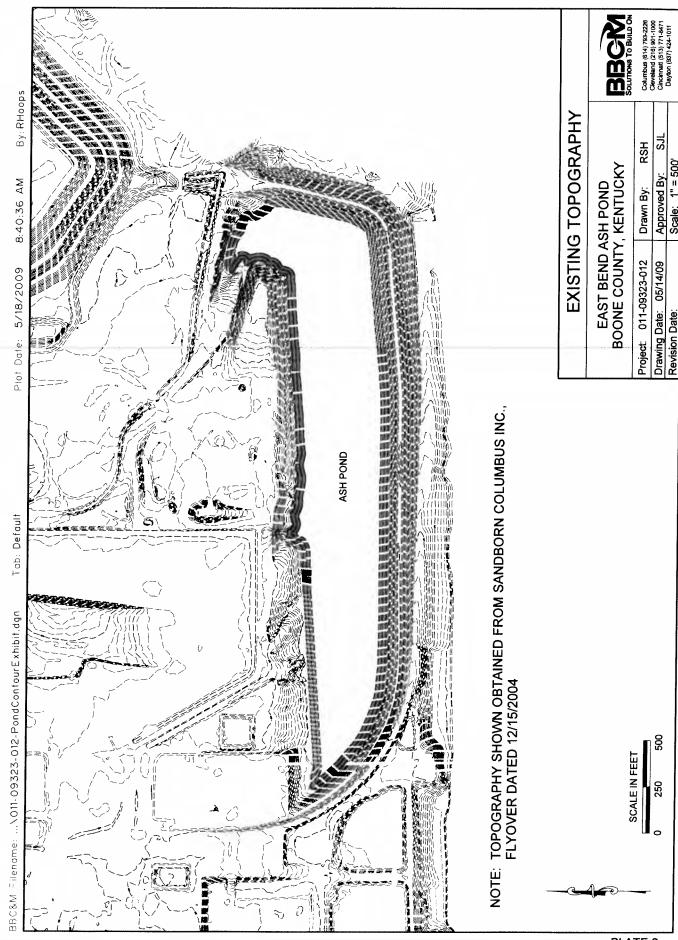
14 Reilly Rd Frankfort, Ky 40601

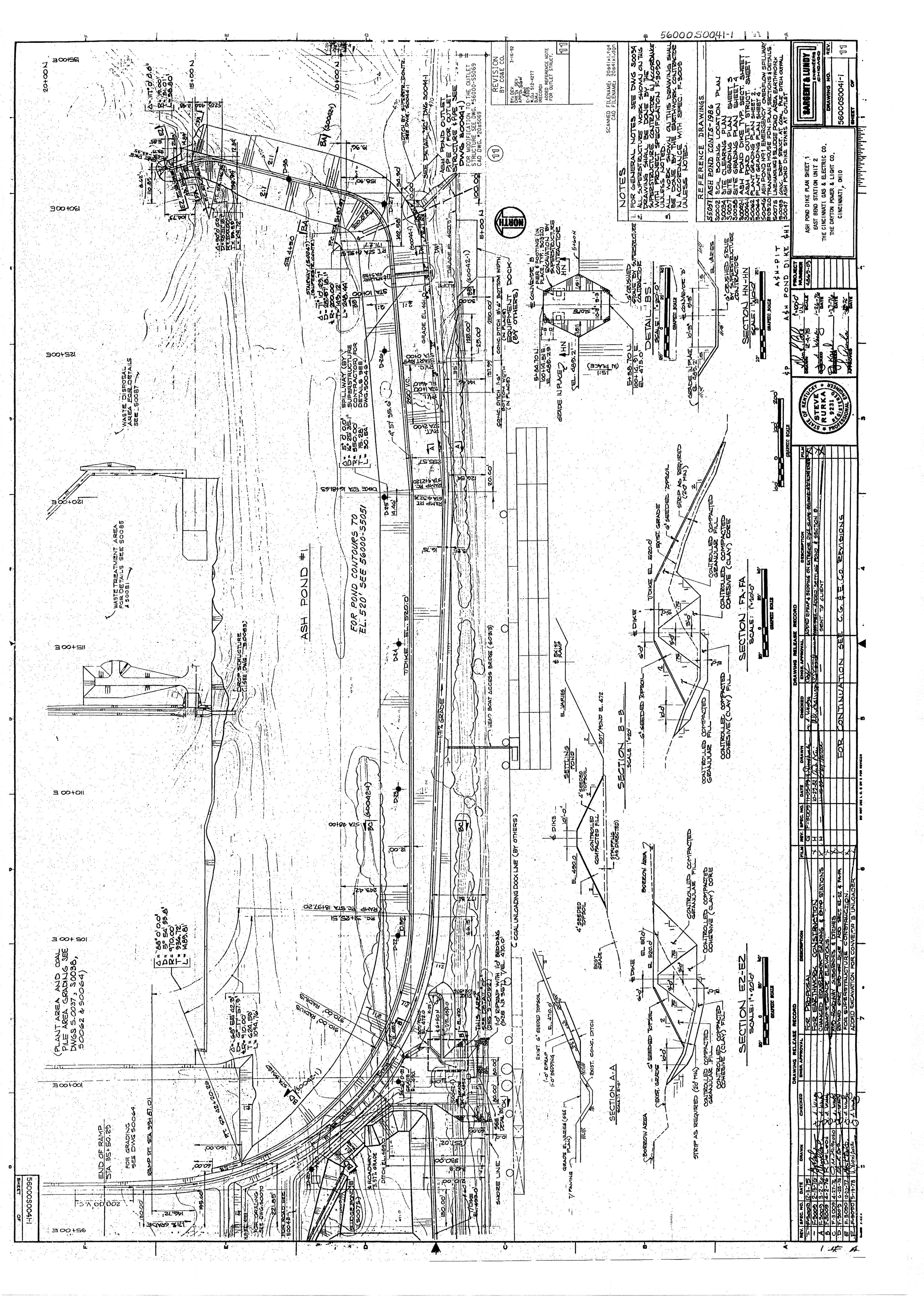
DAM CONSTRUCTION PERMIT APPLICATION DATA SHEET Controlled Or Uncontrolled Uncontrolled

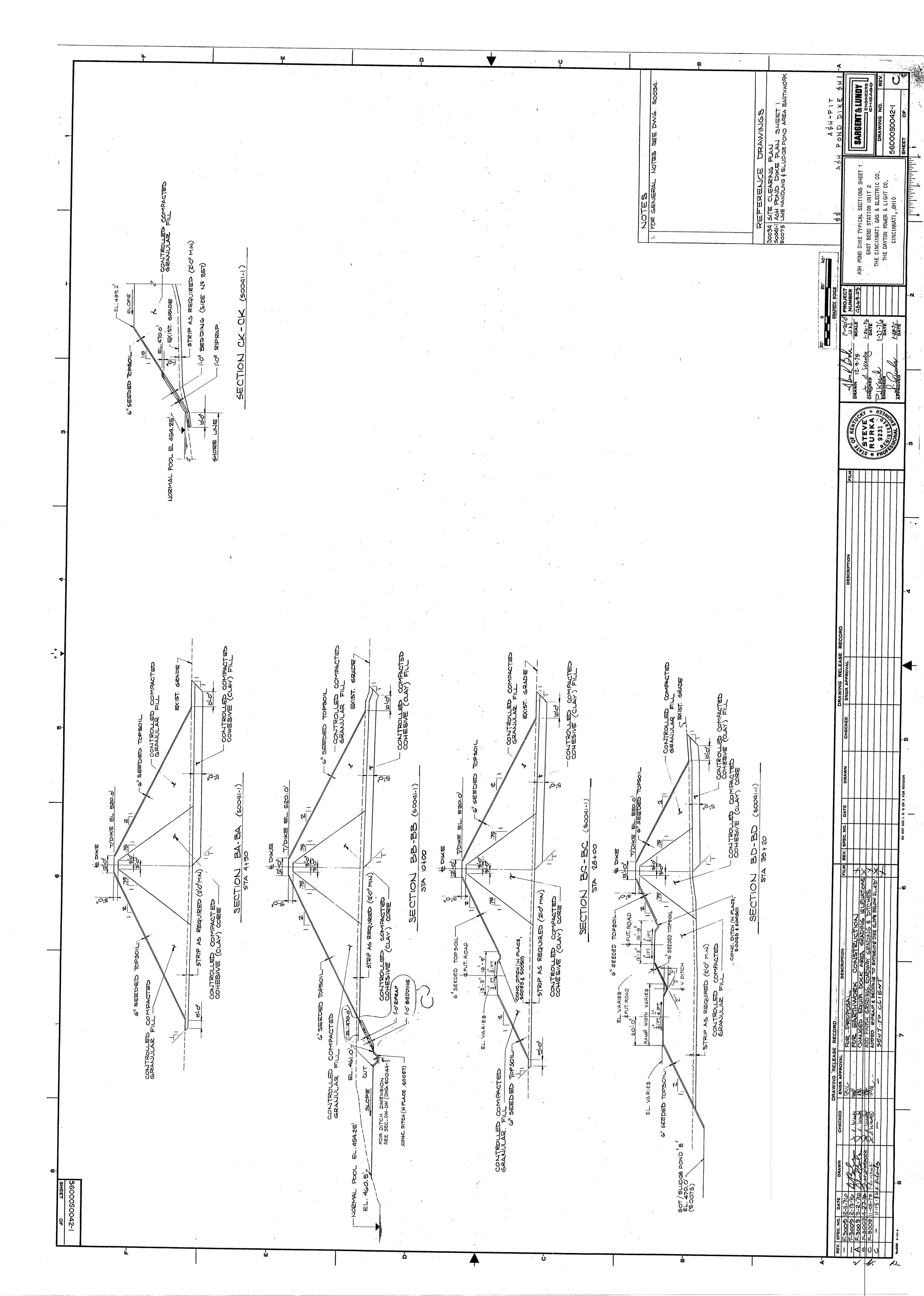
Commonwealth Of Kentucky NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET DIVISION OF WATER 14 Reilly Rd Frankfort, Ky 40601 DAM CONSTRUCTION PERMIT APPLICATION DATA SHEET

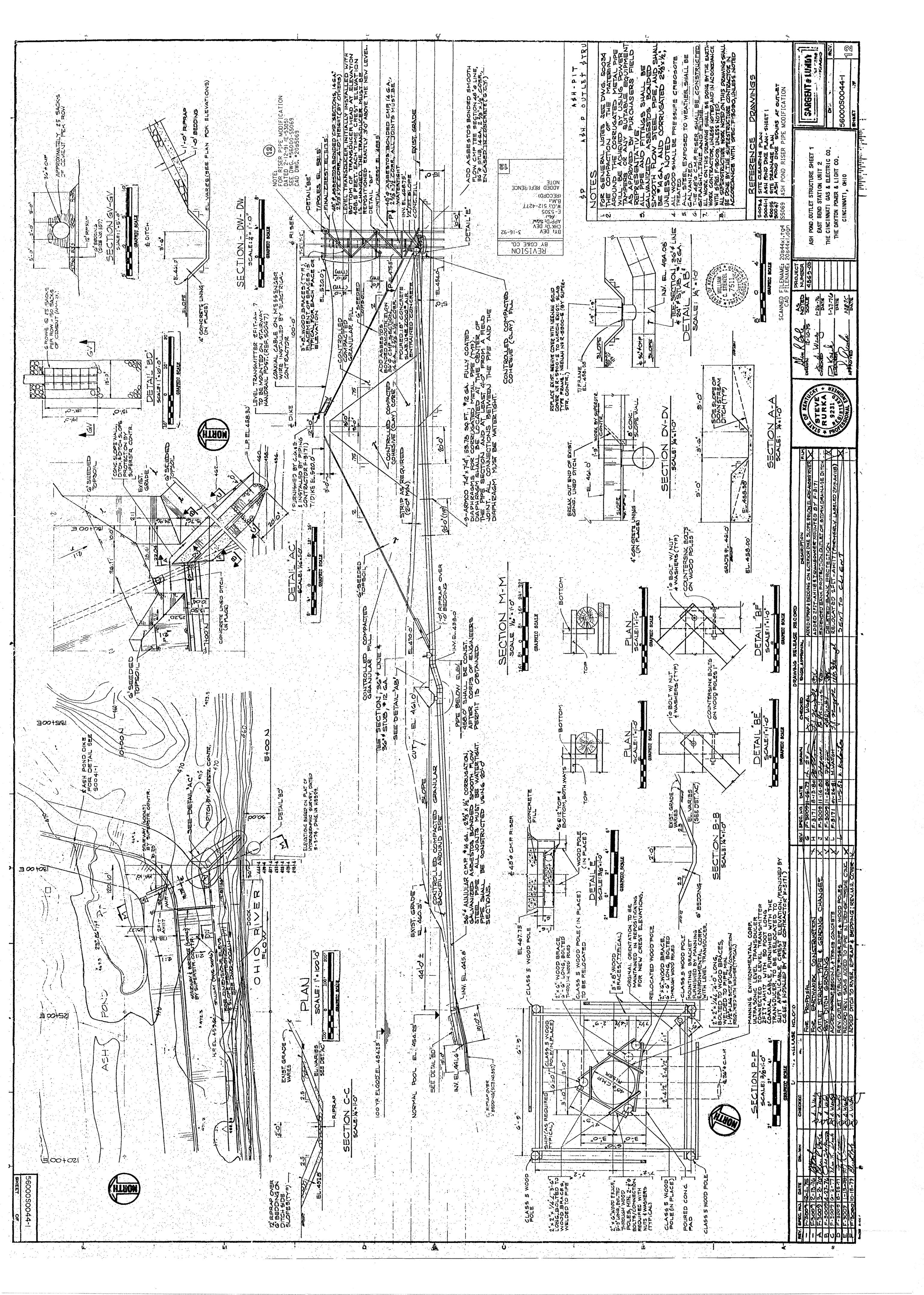
APPENDIX A LOCATION MAP / DESIGN PLANS

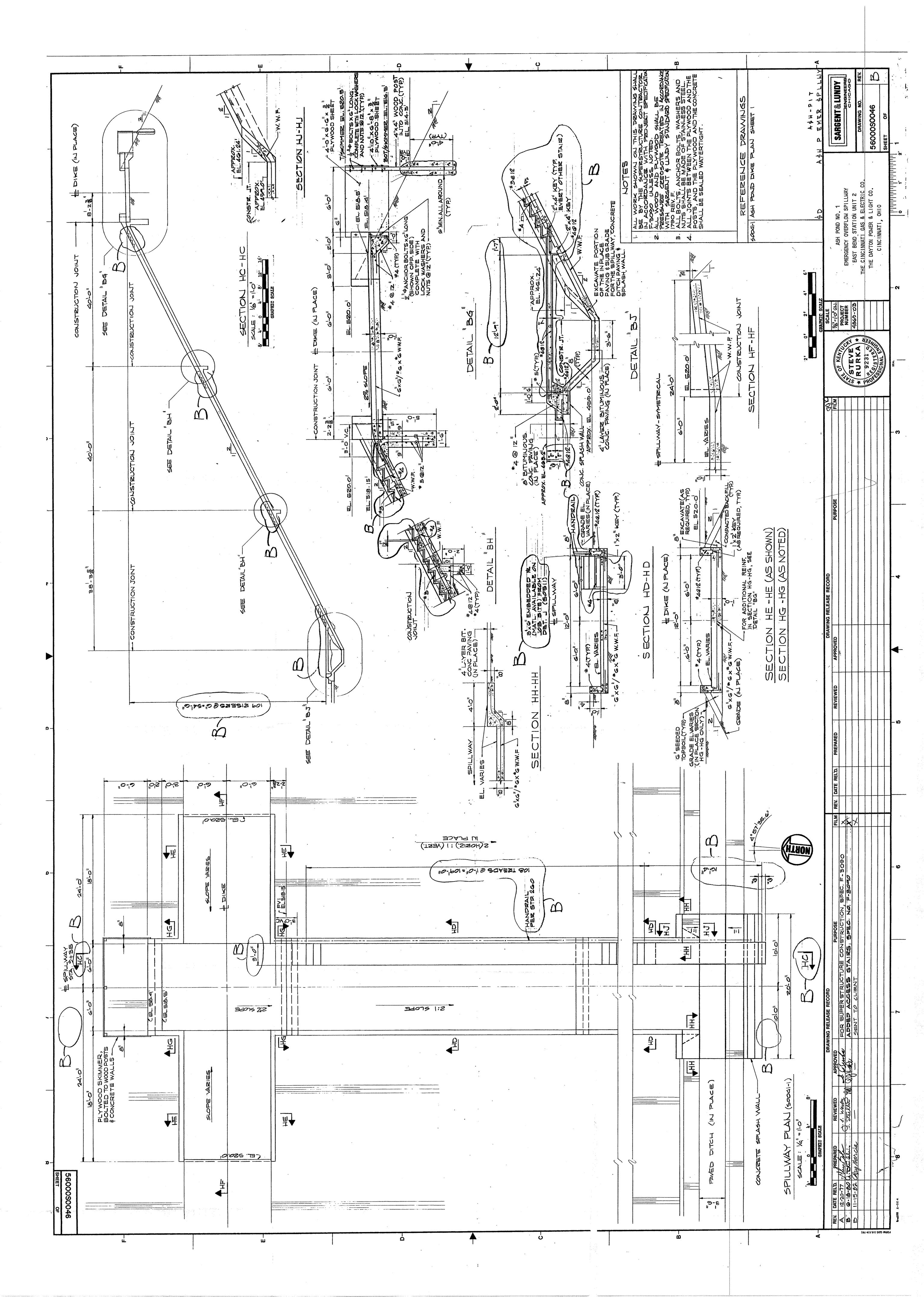












APPENDIX B GEOLOGIC CONDITIONS

Geologic Conditions Ash Pond Embankment East Bend Station

The embankment for the ash pond at the East Bend Station is constructed within the flood plain of the Ohio River. The embankment abuts into a terrace within the ancestral floodplain of the Ohio River. The soil types and contours of the bedrock surface within the Ohio River Valley are largely the result of the flow and meander of the Ohio River during and after Pleistocene Continental Glaciation. The terraces present at the site are believed to be glacially derived. The lower terrace, on which the embankment is constructed, is the result of post glacial erosion by the Ohio River of the upper terrace, into which the embankment abuts.

Prior to continental glaciation, the Ohio River did not exist (at the East Bend site). Geologic literature indicates that the pre-glacial Kentucky River generally flowed northeast near the current location of the Ohio River Valley. Geologic mapping indicates that the Kentucky River flowed north (up) the current valley for Gunpowder Creek, then westward to the headwaters of the valley for Lick Creek, then southwest within Lick Creek Valley and across the East Bend Site, before turning to the northeast and flowing toward Rabbit Hash within the valley for the present day Ohio River. The generally northward flow of the Kentucky River was blocked by pre-Illinoisan ice sheets in Ohio, which caused a glacial lake to form within the Kentucky River Valley. Ultimately, a breach in the drainage divide caused the lake to drain to the southwest establishing the current Ohio River drainage-way. Meltwater from the pre-Illinoisan and subsequent ice sheets further eroded the breach, eroded the bedrock surface within the current Ohio River Valley, and deposited the majority of the soils currently present within the valley.

Soils in the upland area beyond the Ohio River Valley consist primarily of thin cohesive residual and colluvial deposits with relatively small isolated areas of glacial drift. Relatively minor quantities of alluvial, fluvial, and lacustrine deposits associated with of filled ancestral drainage ways can also be found in the upland areas. Soils within the Ohio River Valley bottom are primarily thick glacial outwash deposits, which generally consist of sand and gravel materials. Due to multiple glacial advances, thin discontinuous layers of glacial till and lacustrine deposits can be present within the outwash. Relatively thin recent alluvial and fluvial deposits are present near the ground surface as a result of the inter- and post-glacial meandering of the Ohio River and erosion of the adjacent upland areas.

Bedrock in the region is composed of alternating layers of limestone and shale of Ordovician Age. In the upland areas, the bedrock includes the Bull Fork Formation at the ridge tops overlying the Bellevue Tongue, Fairview, and Kope Formations. The bedrock beneath the unconsolidated deposits within the Ohio River Valley includes the Kope Formation overlying the Point Pleasant and Lexington Formations, which overlie the Black River Group. In the immediate vicinity of the site, it is estimated that the contacts between the bedrock units are as follows:

Fairview Formation

Elevation 650 feet MSL

Kope Formation

Elevation 435 feet MSL

Point Pleasant Formation

Elevation 285 feet MSL

Lexington Formation

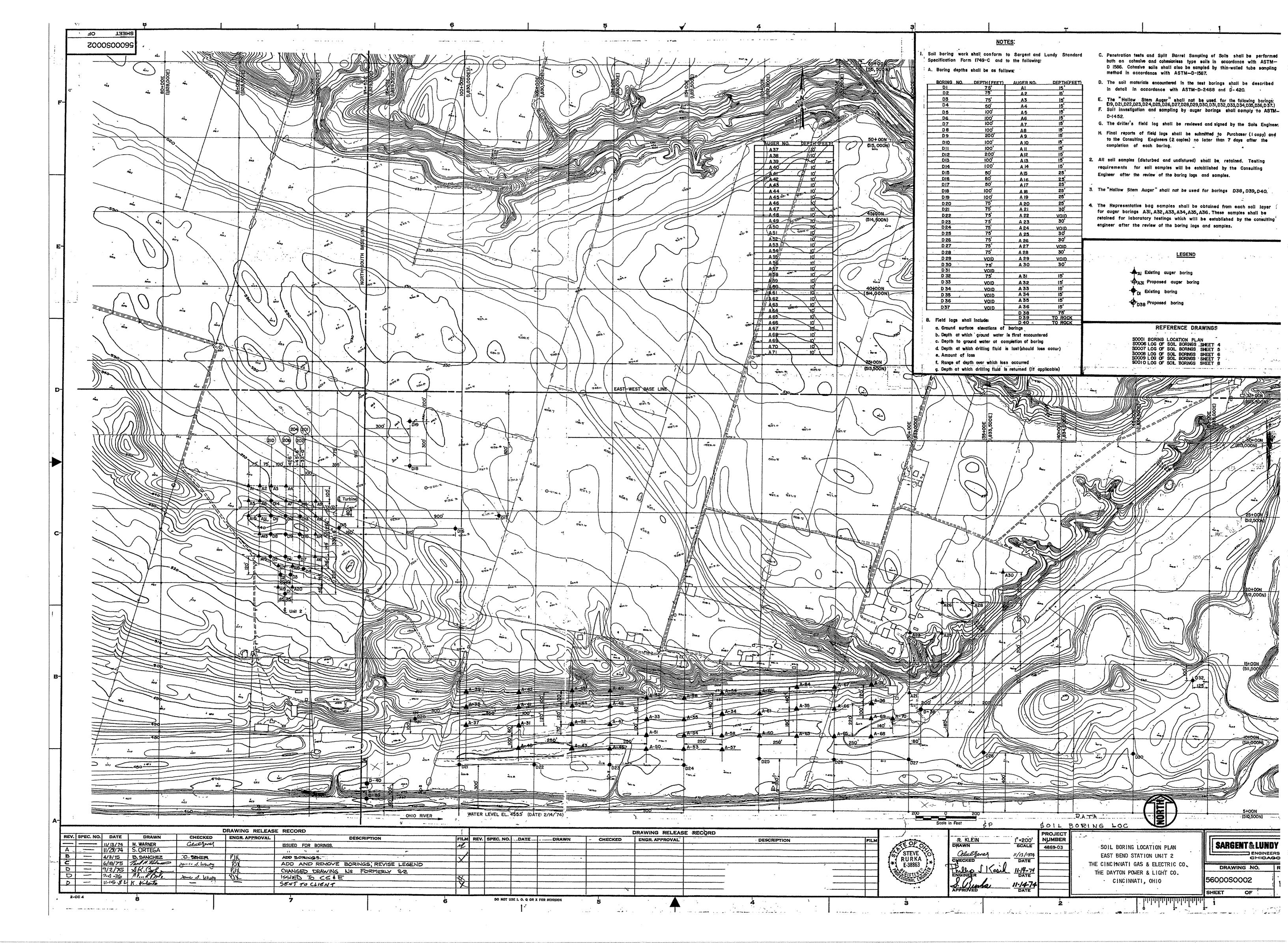
The uppermost bedrock beneath the Ohio River and along the majority of the buried valley wall beneath the site is believed to be the Point Pleasant Formation. The Point Pleasant Formation typically consists of 50 percent shale, which occurs in beds 10 to 24 inches thick, and 50 percent limestone, which occurs in beds up to about 10 inches thick.

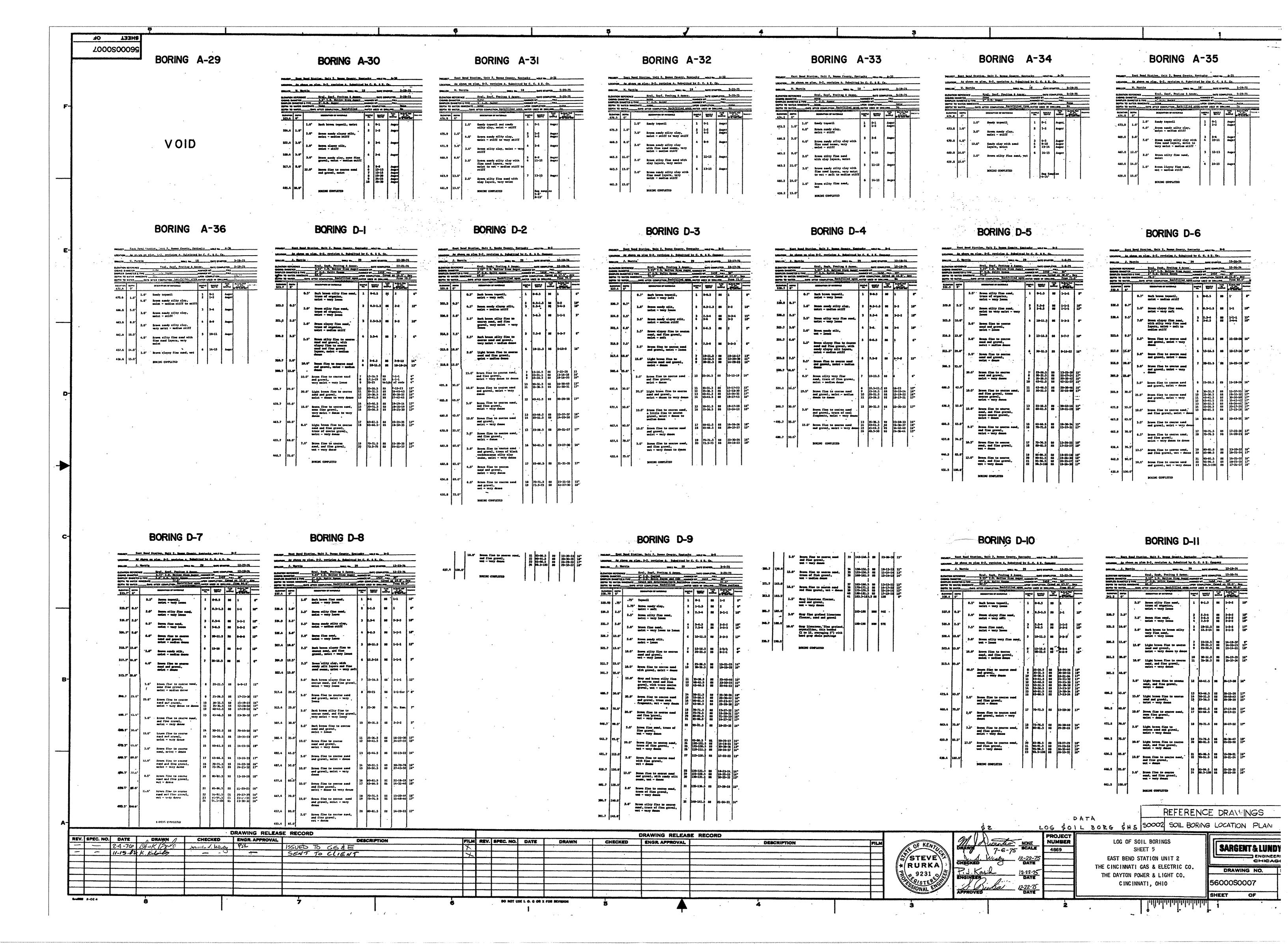
The locations of explorations and logs of the explorations near the embankment location are depicted on the following attached sheets:

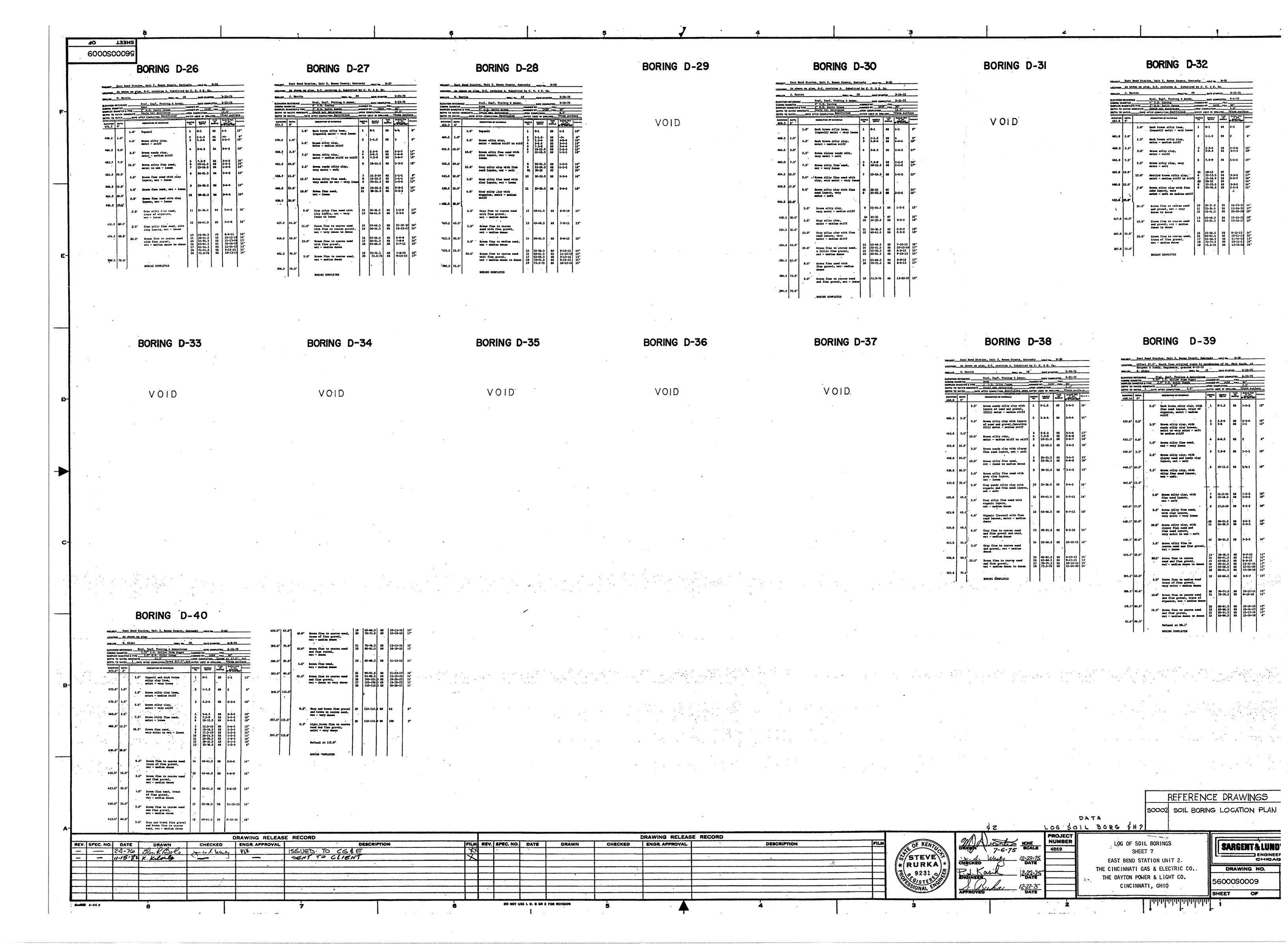
56000S002 - Overall Plan of Explorations w/ summaries of types and depths of explorations; 56000S0041-1 - Plan of Borings near embankment (see Appendix A); and 056000S007, 8, 9, and 10 - Logs of Explorations.

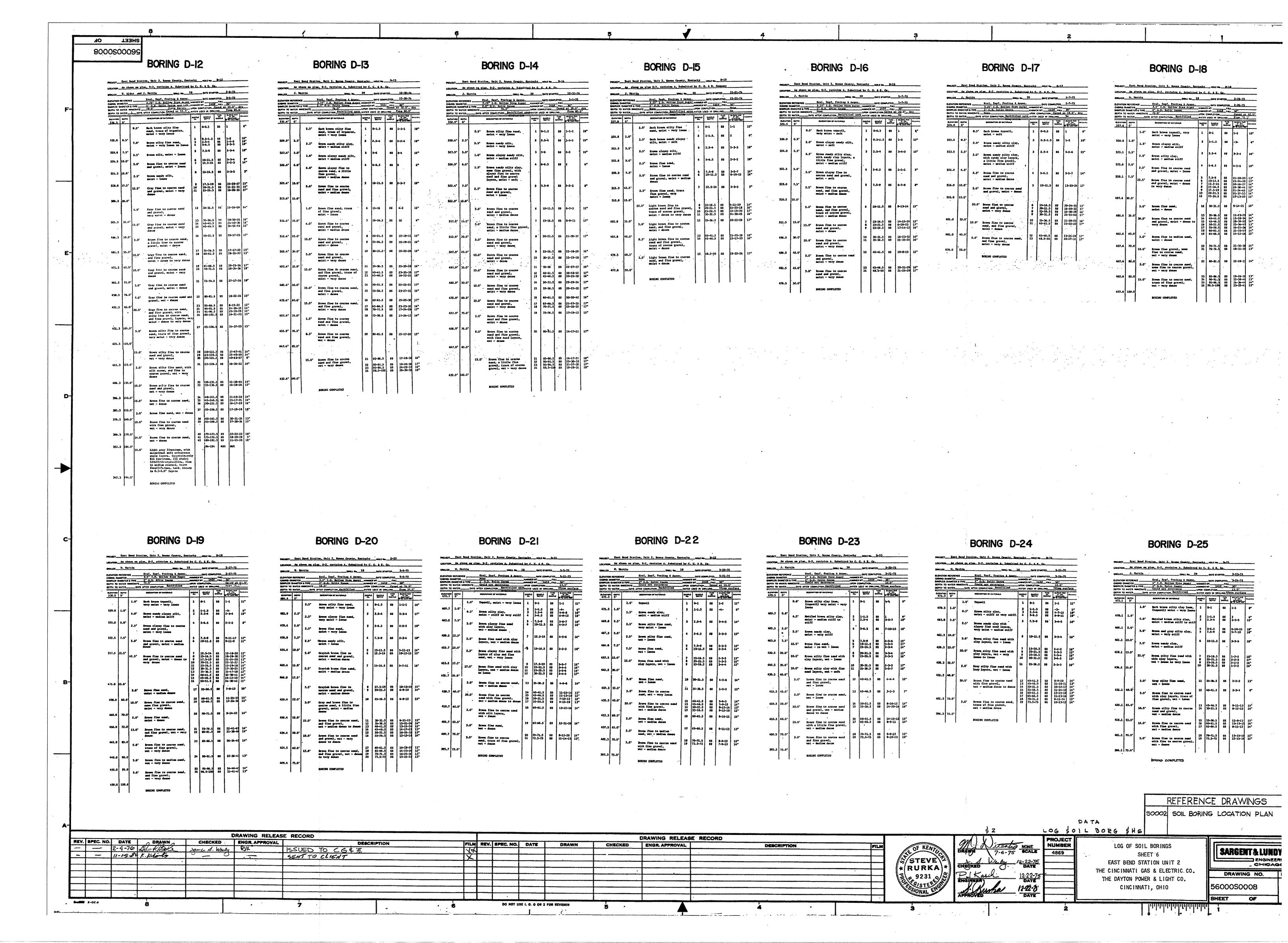
The full descriptions of the stratigraphy encountered at each exploration are included on the logs of the explorations. The soils encountered near the embankment can be divided into 3 general stratigraphic units. The uppermost unit typically consists of medium-stiff to stiff silty clay which extends from the ground surface to a depth of about 10 feet. Underlying the silty clay is a unit of primarily of loose "dirty" fine sand which is typically about 20 to 30 feet thick. Medium-dense to dense fine to coarse sand underlies the fine sand deposit. The coarse sand is about 80 to 90 feet thick and extends to the bedrock surface. The bedrock surface is present near Elevation 350 to 360 feet MSL; the bedrock consists of limestone with shale layers.

Christopher K. Hall Senior Geologist, BBCM KY PG-2447









0100800099 BORING A-37 BORING A-38 A-39 BORING A - 40BORING PROMET ROSE Send Station, Unit 2, Scoon County, Kontucky MOLENS. A-37 LOCATION As should on plan DOANGE As shown so drawing No. S-2, Rev. "C", Submitted by Sargent & Londy, Engineers evation reference Kral, Zopf, Fruitag & Assoc.

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WATER USED IN DEALING BO ER DIAMETER & TYPE . 4" O.D. Pliebt Augur DEPTH TO WATER MALCATE BOSE BEPTH TO WATER DAYS AFTER COMPLETION BOOM WATER USED IN DEXLENO. NOWATER USED IN DIDLETING..... ___WATER USED IN DRILLING____ THE PART OF THE PA STATE PARTY STATE SAMPLE SAMPLE SAMPLE OF STREET RESOMPTION OF MATERIALS STATE smare state smare 2.5° Brown milty fine send, moint 1 0-1.3 Augur 1.5' Cray milty fine sand, waty moist 1.5' Brown sandy silty loam, elightly moist 0-1.5 Auger Brown milty fine send, moiet 1.0' Srown sendy allay leas day 0-1.5 Anger 2.5-4 Auget 5-7.5 Auger 7-9 Auger 9-10 Auger 1-2.5 Augus 2.5-5 Augus 2.5' Stown elayey fine sand, maint - ooft to medium stiff Gray milty clay, moint - medium stiff to stiff Brown easely silty clay, moist - medium stiff 5.5-7.5 Auger 7.5-8.5 Auger 8.5-10 Auger 4.5' Frown sandy silty clay, moist - stiff BOKING COMPLETED BORING **BORING** A-45 **BORING** BORING **BORING** BORING A-47 A-46 BORING A-49 **A-50** BLENATION REFERENCE DATE COMPLETED 7-12CASHING DIAMETER DOSE
BANKER DIAMETER STYPE 4 C.D. FLISCH SUPER HAMMER WT. FALL
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DEPTH TO WATER MANDUATE DOSE
DEPTH TO WATER DAYS AFTER COMPLETION EXCELLIBLE WATER USED IN ONLINE. NO. SAMPLEN COMPETER & TYPE & O.D. Flight August
DEFIN TO MATTER IMMEDIATE ROOM
DEFIN TO WATER & DAYS AFTER COMPLETION BOOK CHRICK CHARACTER & TOTO HAMBER WT FALL TO FALL MANUEL CHARTER & TWE 4.0" O.D. Flight August CHEMIC DAMMETER STOPE 6° O.D. FRIGHT AMPRES HAMMER WY. FALL
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SAMPLER DAMETER AS THE STOP OF D. PLICE AUGUSTS HARRIES WY. FALL
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WATER USED IN DRELLING. NO ELEVATION REPERENCE
CHINGS CHARTTEN ROSE
SMAYLER DEMETER & TYPE 4" D. D. F.1902 Avery ELEVATION REPERENCE
CASHIDE COMMETTE ATTYPE 4" O.D. FLISTE AUGST
DEPTH TO WATTH MEMORATE - ACOM
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DEPTH TO WATTH OF OWNER ATTER COMPLETION BACKISSIAN THE CONTROL REPEACHER LAND CONTROL CON menn): Dimmeter ______ Bore Manifr: Dimmeter & Type ___ &" C.D. Flight Augus CASSIC CALASTER FORE 4.0 O.D. F.150t AUGUST SAMPLE CAMETER A TYPE 4.0 O.D. F.150t AUGUST DEFIN TO WAITE MINESAFE FORE DEFIN TO WAITE SAMPLE COMPACTION SCORE NEWO: DIAMETER STYPE & D.D. Filshe Amer. DEPTH TO WATER DIMEDIATE NOTE DEPTH TO WATER O DAYS AFTER COMPLETION BACKFILLED DEPTH TO WATER DATE AFTER DOMPLETION KODE WATER USED IN DRILLING EPTH TO WATER APPENDING MODE COMPLETION RESERVE WATER LAST IN COLUMN NO. NO. Source Street Street Street Street SAME SAME SAME SAME CERCANTION OF MATERIALS SAMPLE SAMPLE SAMPLE PROPERTY STATE STATE STATE STATES SAMPLE SA COMPANY STATES STREET STREETS SCOCRAFTION OF MATERIALS Brows sandy milt, mlightly 1 0-1.5 Auger 2.01 Brown sandy milty loss, dry | 1 0-1 2.53 Storm study silt, trace of fine gravel, moint 1.0' Brown fine sandy silty loss, .1 0-1 0-0.5 0.51 Brown silty loom, dry 0,5° Brown silty loss, dry to 1 0-1 elightly moist 0.5-1.5 Auger 2.5' Ecown clayey sendy silt, very soist 5.5' Brown stity fine send, moist 2.0° Scown sandy silty clay, slightly moist - medium stiff 2 1-2.5 Augus Gray to brown and gray stity 4 7-8.5 August August oxide 2.0' Brown clayey's andy silt, . wot - eoft . 6.01 Brown eleysy fine send, moist - soft to median stiff 4.0° Rown silty fine send, 8.5-10 Auger 6 6.5-8 Amer 7 8-10 Amer 1.5* Brown easily elley, moist - soft 3.5° Brown eleyey fine send, wary moist 2.0' Gray samely stilty clay, wary sociat - soft BORING BORING A-59 A-60 A-62 A-58 A-61 A-64 PROJECT East Bend Station, Unit 2, Boome County, Esstucky HOLE No. A-6-CORPIN DIAMETER TIPE 4 0.0. Flight August OLFIN TO WATER DOWNERS OF DAYS AFTER COMPLETION EPERSISSES CARRIE CAMPETER STOPE \$4.0° CLD. FLIGHT AVERTS MAGNET WT. 1400 YML 50° CAMPETE DEMETER STOPE \$4.0° CLD. FLIGHT AVERTS MAGNET WT. 1400 YML 50° CAMPET WATER MAGNET TO BOTH TO WATER MAGNET TO THE DOMESTION STOPE WATER USED IN COLUMN SO CASHN: CHANGE HE & TYPE 4.0" Q.D. Flight Agency W. ANAMER WY.
SAFFIE CHANGE HE & TYPE 4.0" Q.D. Flight Agency HASANE WY.
DEPTH TO WATER SMEEDLE 8.000. 1000 COMPLETE HANNER WT. FALL
HANNER WT. FALL
UPON COMPLETION BOSS
WATER USED IN DRILLING 32 MARKET WYNT THAT STORE S UPON COMPLETION NOTICE TO SOBRE DEPTH TO WATCH SAMEDIATE EVOS
DEPTH TO WATCH I DAYS AFTER COMPLETION ROOM DEPTH TO WATER MINEDIATE MOTHER COMPLETION NOS MATER USED IN DRILLING NO DEPTH TO WATER 1 DAYS AFTER COMPLETION DONS SAFER USED IN DRIVING. TO SECOND THE BEAUTY OF THE BEAUTY Service Servic MATER USED IN DIRECTION ... NO.

STATE STATE TO DIRECTION OF THE BEAUTY AMERICAN STREET STREET STREET senice senice course sections SESONATION OF MATERIALS 1.5' Brown sendy milty loam, 2.0' Brown silty clay, moist - medium stiff 1.0' Brown silty less, dry 1.5' Brown fine sondy silty loss, dry 1.5' Light brown sandy silty loam, alightly moist 1.0° From sandy silt, dry 3.5' Brown sandy silty loss, dry 1. 0-3.5 1.04 Brown eilty fine eand, moiet 1.5-2.5 Augus 1.5' Brown sandy milt, moist 1.0' Broom sandy sile, elightly 4.0' Cray and brown cilty clay, 8.5° Brown sandy milt, maint 7.51 Brown clayer fine sand, 3 4-6.5 Augur stiff 4 6.5-8 Augur 5 8-10 Augur 5.0° Brown clayey fine send, soist - soft to medium stiff 4.0' Erron mandy silty clay, with fine eand lenses, maint - medium stiff to stiff 3.5' Brown clayey fine sand, with sandy wilt lenses, 3.0' Brown stity fine said, woist BORING CONSTRUCTED BOADIC COMPLETED A-65 A-67 A-68 BORING A-70 A-69 A-71 ELEVATION REFERENCE BODE CATE COMPLETED 7-13CASHING DALLETER BODE CATE COMPLETED 7-13EARPLE CAMBER NY FALL
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| Social Conference | Social C COMMITTEE BODE HAMMER WT. FALL
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DEPTH TO WATER OF A PER COMPLETION BACKFAILED WATER USED OF CREATER
NO. NO. DESCRIPTION OF STREET ATTENDED TO STREET STR DEFIN TO WATER OAVE AFTER COMPLETION BACKETILED WATER USED IN DRILLING. OUTH TO MATER COMPLETION SOCKSSILLED WATER VESS IN CHILING SO MATTH CHIED IN DESIGNED. 59 SAMPLE SAMPLE TOP SAMPLE PROPERTY SAMPLE SAM Prince Strains organs Strains or annual by SHAPE SHOPE SAFFLE PRESIDENCE SHOPLE SHOPLE SHOPLE STREET STATES STATES STATES STATES STATES SAMPLE SAMPLE SAMPLE SAMPLE SAMPLES DESCRIPTION OF MATERIALS 1.0' Brown silty sandy losm, melat 1 0-2.5 1.5° Brown sendy silty loss, trace 1 0-1.5 of fine gravel, slightly moist 1.5' Brown fine easily silty 1.0' Brown sandy silty loss, slightly moist 1.5' Brown seady silty loss, moist 6.0' Brown sandy silt, dry to slightly moist Brown clayey silt, alighty moist - medium stiff 3.0° Brown milty clay, moist - medium stiff to stiff Brown elaysy silt, slightly 2 1.5-2.3 Ampet moist - soft to medium stiff 3 2.5-5 Ampet 5.5 Srown cilty fine mand, moiet to vary moiet 3.5' Brown clayey sendy silt, . wary moist Prove eleyey eilt, trace of fine gravel, elightly moist 2.0° Brown milty fine sand, molet 2.0° Brown clayey fine sand, moist - moft REFERENCE DRAWINGS DATA LOG SOIL BORG \$ 48 SOOOZ SOIL BORING LOCATION PLAN DRAWING RELEASE RECORD DRAWING RELEASE RECORD **PROJECT** LOG OF SOIL BORINGS REV. SPEC. NO. DATE DRAWN, CHECKED NUMBER CHECKED ENGR. APPROVAL DESCRIPTION SARGENT& LUND - 24-76 Allen & Books June A. Wester · · · SHEET 8 - 11.15-82 K Kelaita SENT TO CLIENT === ENGINEER EAST BEND STATION UNIT 2 STEVE * RURKA THE CINCINNATI GAS & ELECTRIC CO. DRAWING NO. B 9231 THE DAYTON POWER & LIGHT CO. CINCINNATI, OHIO 5600080010 SHEET OF Smille 2-004 DO NOT USE I. O. Q OR X FOR REVISION

SHEEL

APPENDIX C HYDRAULIC & HYDROLOGIC DATA

Hydraulic & Hydrologic Calculations Summary

The ash pond at East Bend Station is currently classified as a Moderate Hazard Dam. These structures must pass a design storm consisting of a 13.5-inches, 6-hour storm event per the Kentucky Energy and Environmental Cabinet, Department for Environmental Protection, Division of Water (DOW). Calculations and data for the analyses of the ash pond are contained in this appendix.

The drainage area to the pond was outlined and measured. Runoff coefficients were assigned based on SCS Curve numbers. A curve numbers of 88 was used based on land use and soil type. The land use was classified as "Industrial" and the hydrologic soil group was "B" (silt loam). Time of concentration and lag times for the drainage area was calculated following the guidelines in Part 630 Hydrology of the National Engineering Handbook and Technical Release 55 (TR-55): Urban Hydrology for Small Watersheds. Influent to the pond from the plant (6 cfs) was negligible compared to the design storm inflow.

Hydrologic reservoir routing through the pond was calculated using TR-55 and the HEC-1 computer program developed by the U.S. Army Corps of Engineers, with user inputs for drainage area, runoff coefficient, storage and outflow ratings, and time of concentration or lag time. A detailed HEC-1 output file is contained in this appendix.

Spillway capacity calculations were performed using equations for orifice flow, weir flow, and full pipe flow. These calculations are contained on the following pages.

Based on the results of the analyses, a normal pool water level at El. 485.5 will reach El. 490.1 based on the design storm. This is below the top of embankment (El. 520).

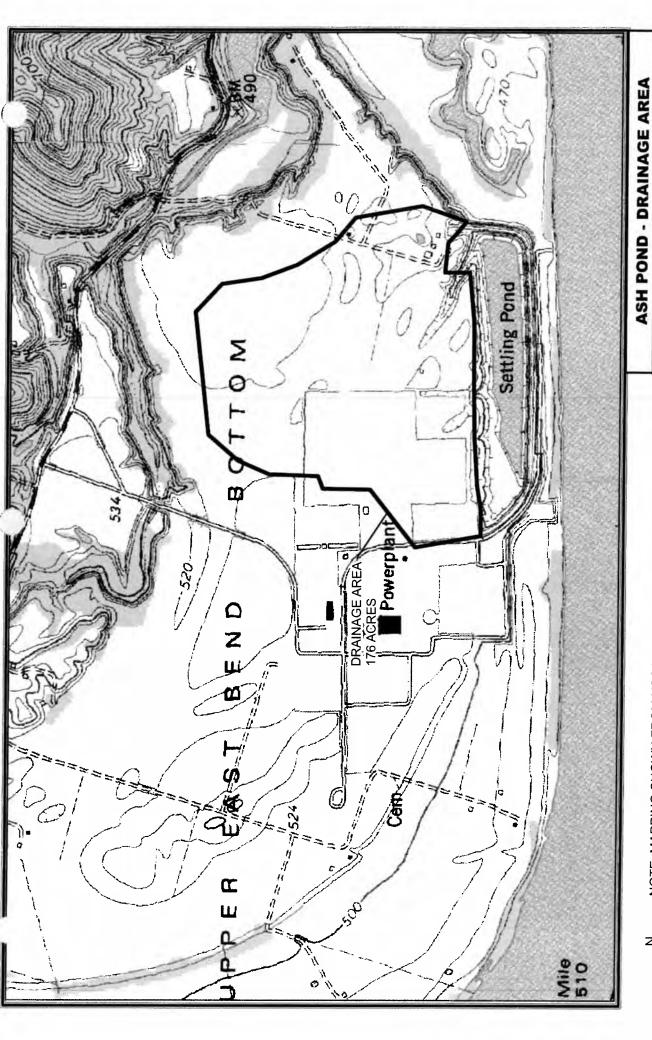
Bottom

2,000 1,800 20 1,600 ----Surface Area (acres) 1,400 Ash Pond Elevation-Area-Capacity Curve 40 Storage Capacity (acre-feet) 1,200 Surface Area (acres) 1,000 ---- Storage Capacity (acre-feet) 30 20 ф 600 400 9 200 0 510 460 530 520 500 490 480 470

9

Note: Areas taken from topography obtained from Sandborn Columbus Inc., flyover dated 12/15/2004.

Crest



Columbus (614) 793-2226 Cleveland (216) 901-1000 Cincinnat (513) 771-8471 Dayton (937) 424-1011 Boone County, Kentucky **East Bend Station** Drawn By: AJS Project: 011-09323-012

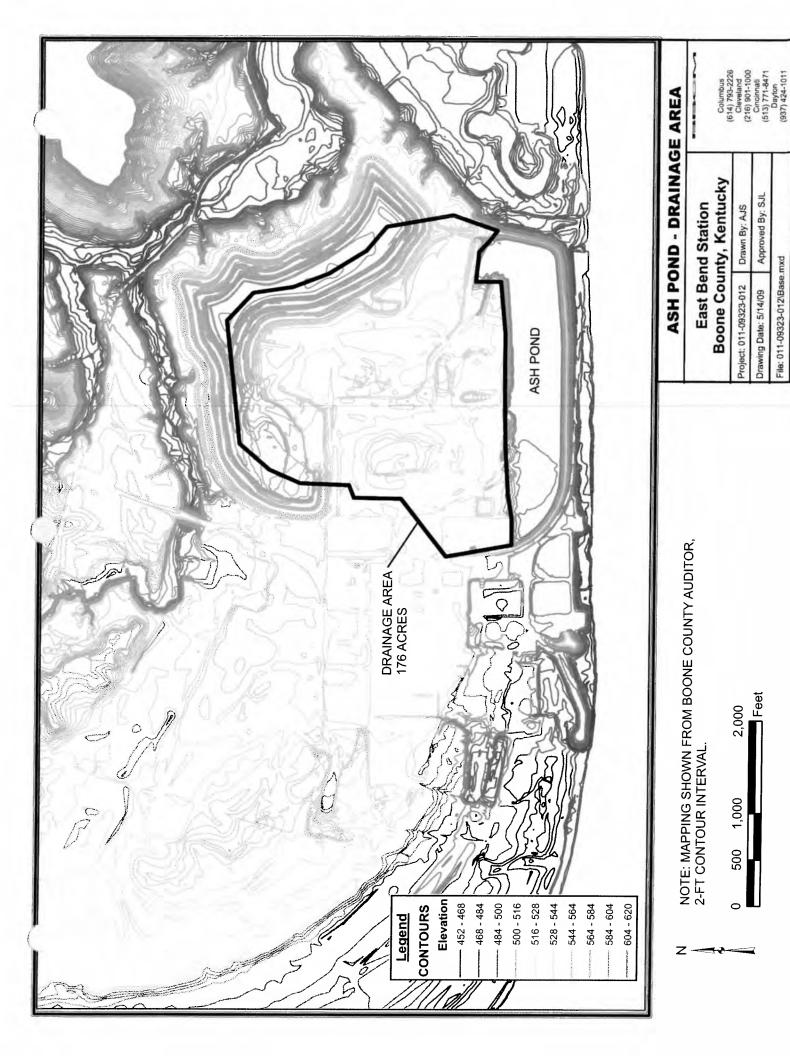
Approved By: SJL

Drawing Date: 5/14/09

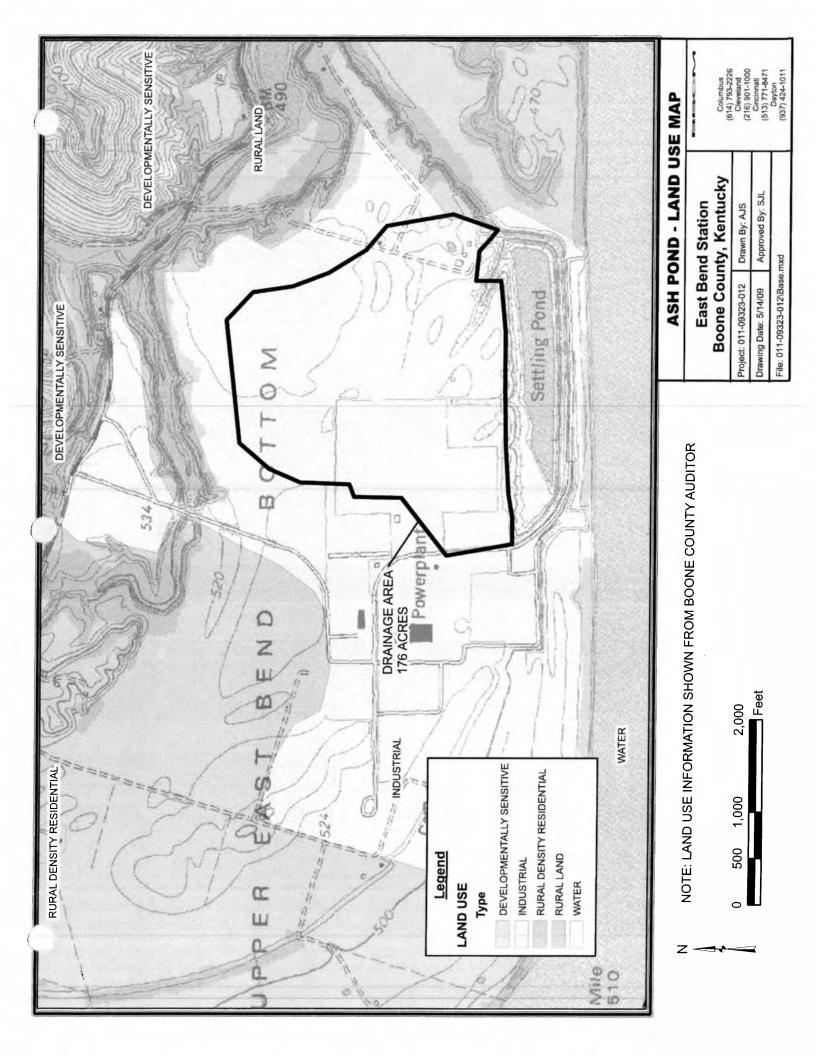
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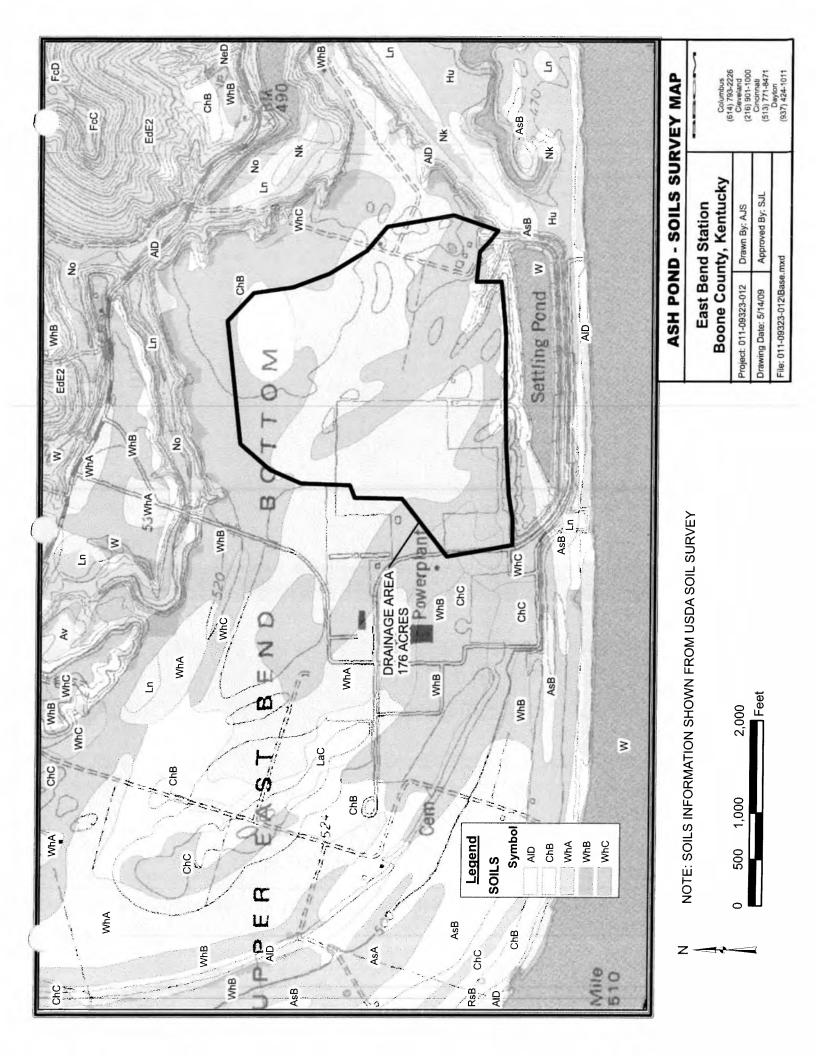
	2,000	Feet
)	1,000	
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NOTE: MAPPING SHOWN FROM USGS QUADRANGLE, RISING SUN, KENTUCKY	
<i>N</i> N FROM USGS	2,000
PING SHOV	500 1,000
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Project:	011 09323.012	Ву:	AJS	Date:	14-May-09
Location:	East Bend Ash Pond, Boone County, KY	Checked:		Date:	

PIPE 1 - CALCULATE T_c AND T_L

Based off of Worksheet 3 in Appendix D of 210-VI-TR-55, Second Ed., June 1986

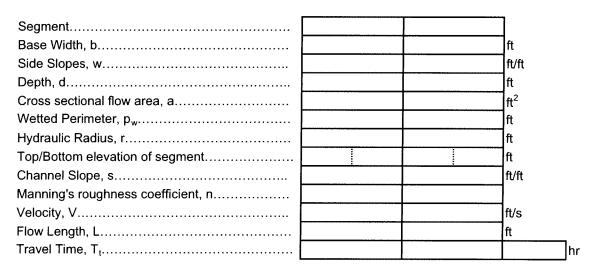
Overland (Sheet) Flow

Segment	1	
Surface Description	Grass-Short]
Manning's roughness coefficient, n	0.15	
Flow Length, L	300	 T ft
2-year, 24-hour rainfall, P ₂	3.00]in
Top/Bottom elevation of segment	612 570	T ft
Land Slope, s	0.14	ft/ft
Travel Time, T _t	0.186	0.186 hr

$$T_t = \frac{0.007(nL)^{0.8}}{P_0^{0.5}s^{0.4}}$$
 Shallow Concentrated Flow

Segment	2		1
Surface Description (Paved or Unpaved)	Unpaved		1
Flow Length, L	2700		T ft
Top/Bottom elevation of segment	570 520]ft
Watercourse slope, s	0.0185		ft/ft
Average velocity, V (equation in Appendix F)	2.19		ft/s
Travel Time, T _t	0.342	-	0.342 hr

$T_t = \frac{L}{3600 \ V}$ Channel Flow



	Area Time of Concentration, T _c	0.528	hr
$T_{I} = 0.6T_{c}$	Area Lag Time, T _L	0.32	hr
L	Area Lag Time, T _L	19.008	min

Runoff to Ash Pond SCS runoff curve number method

S=<u>1000</u> -10

CN

6-hour design storm

Type II Storm

Initial abstraction:

I_a=0.2S

P = 13.5 in.

for Moderate Hazard Dam

per KYDEP DOW

Runoff depth,

 $Q = (P-0.2S)^2$ P+0.8S

CN = 88

<u>0.2S</u>

<u>0.8S</u>

For CN = 88

S = 1.363636 0.3

1.1

Q = 12.0 in.

Runoff Volume in Acre-feet, V

Area =

176 acres

Runoff CN=88 Volume in Acre-feet

V = 175.9

acity	Total	Outflow	cfs	0.0	0.0	0.0	0.0	0.0	12.2	50.2	64.8	73.4	74.4	79.5	84.2	88.7	93.0	97.0	0.66	222.0
Total Ash Pond Outflow Capacity	Emergency	Spillway	cfs																0	121
Ash Pond	Principal	Spillway	cfs	0.0	0.0	0.0	0.0	0.0	12.2	50.2	64.8	73.4	74.4	79.5	84.2	88.7	93.0	97.0	0.66	101.0
Total	Pond	Elevation	feet	470.00	475.00	480.00	485.00	485.50	486.00	487.00	488.00	489.00	490.00	495.00	500.00	505.00	510.00	515.00	518.50	520.00
485.5		Control Type		Riser Weir	Riser Orifice	Riser Orifice	Pressure Pipe Flow													
rmal Pool El.	Control	Flow	cfs	0.0	0.0	0.0	0.0	0.0	12.2	50.2	64.8	73.4	74.4	79.5	84.2	88.7	93.0	97.0	99.0	101.0
Spillway @ Normal Pool El. 485.5	Pressure	Pipe Flow	cfs	49.4	26.7	63.2	0.69	9.69	70.2	71.3	72.3	73.4	74.4	79.5	84.2	88.7	93.0	0.76	0.66	101.0
	Pipe Inlet	Flow	cfs	0.0	49.6	9.99	80.0	81.2	82.4	84.8	87.1	89.3	91.5	101.7	111.0	119.5	127.5	135.0	138.6	142.1
Ash Pond Capacity - Principal	Riser	Orifice	cfs	0.0	0.0	0.0	0.0	0.0	29.0	50.2	64.8	9.92	6.98	126.2	156.0	180.9	202.7	222.5	235.3	240.6
Ash Pon	Riser Weir		cfs	0.0	0.0	0.0	0.0	0.0	12.2	63.3	136.1	225.5	328.7	1008.3	1901.3	2965.3	4176.0	5517.5	6528.0	6978.1
	Pond	Elevation	feet	470.00	475.00	480.00	485.00	485.50	486.00	487.00	488.00	489.00	490.00	495.00	500.00	505.00	510.00	515.00	518.50	520.00

Ash Pond 40" Riser Pipe Rating Riser Weir Flow - Normal Pool

$$Q = C_{SCW} L H^{\frac{3}{2}}$$

$$C_{SCW} = 3.27 + 0.4 \left(\frac{H}{H_c}\right)$$

for $H/H_c \leq 0.3,\, C_{SCW}$ becomes 3.33

Inside D= 39.500 in

Inside D= 3.2917 ft

,.

Crest Elevation= 45

Elevation	H	Q
485.50	0.00	0.0
486.00	0.50	12.2
487.00	1.50	63.3
488.00	2.50	136.1
489.00	3.50	225.5
490.00	4.50	328.7
495.00	9.50	1008.3
500.00	14.50	1901.3
505.00	19.50	2965.3
510.00	24.50	4176.0
515.00	29.50	5517.5
518.50	33.00	6528.0
520.00	34.50	6978.1

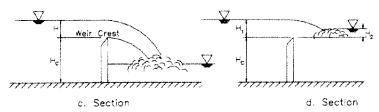


Figure 8-13. Sharp crested weirs.

Reference: FHWA-SA-96-078 Urban Drainage Design Manual Hydraulic Engineering Circular 22 November, 1996

Ash Pond 40" Riser Pipe Rating Orifice Control - Normal Pool

$$Q = CA\sqrt{2gh_1}$$

for C=0.6 orifice equation becomes:

$$Q = 3.78 D^2 \sqrt{h_1}$$

d= 39.500

INCHES

Orifice Elevation = 485.5

		1.69	
Headwater	Orifice		
Elevation	Discharge	Velocity	
(ft.)	(cfs)	(ft/s)	
485.50	0.0	0.0	
486.00	29.0	3.4	
487.00	50.2	5.9	
488.00	64.8	7.6	
489.00	76.6	9.0	
490.00	86.9	10.2	
495.00	126.2	14.8	
500.00	156.0	18.3	
505.00	180.9	21.3	
510.00	202.7	23.8	
515.00	222.5	26.2	
518.50	235.3	27.7	
520.00	240.6	28.3	
	···		

Reference: FHWA-SA-96-078 Urban Drainage Design Manual Hydraulic Engineering Circular 22 November, 1996

Ash Pond 28" Barrel Pipe Rating Pipe Inlet Control

$$Q=CA\sqrt{2gh_{_1}}$$

for C=0.6 orifice equation becomes:

$$Q = 3.78 D^2 \sqrt{h_1}$$

d= 27.500

INCHES

Orifice Elevation = 468.75

Headwater	Orifice	
Elevation	Discharge	Velocity
(ft.)	(cfs)	(ft/s)
470.00	0.0	0.0
475.00	49.6	12.0
480.00	66.6	16.2
485.00	80.0	19.4
485.50	81.2	19.7
486.00	82.4	20.0
487.00	84.8	20.6
488.00	87.1	21.1
489.00	89.3	21.7
490.00	91.5	22.2
495.00	101.7	24.7
500.00	111.0	26.9
505.00	119.5	29.0
510.00	127.5	30.9
515.00	135.0	32.7
517.50	138.6	33.6
518.00	139.3	33.8
518.50	140.0	34.0
519.00	140.7	34.1
519.50	141.4	34.3
520.00	142.1	34.5

Reference: FHWA-SA-96-078 Urban Drainage Design Manual Hydraulic Engineering Circular 22 November, 1996

28" Pressure Pipe Flow Computed with the Energy Equation

Manning's n= 0.012 Inlet Invert: 468.75

Inlet Centroid: 469.90

Outlet Invert (z₂): 441.6

OutletCentroid (z₂): 442.75

Entrance Coefficent K_e= 0.5

Outlet Coefficent K_o= 1.0

Bend Coefficent K_b= 0.6

Pipe Diameter in inches= 27.500

Pipe Diameter in feet (D)= 2.29

Pipe Length in feet (L)= 450

Darcy-Weisbach f= 0.020

Assuming tailwater at OH River Normal Pool El: 454.25

Headwater	Outlet	Outlet
Elevation (z ₁)	Velocity	Flow Rate
(ft)	(ft/s)	(ft³/s)
470.00	11.98	49.41
475.00	13.75	56.72
480.00	15.32	63.18
485.00	16.74	69.04
485.50	16.87	69.60
486.00	17.01	70.16
487.00	17.27	71.25
488.00	17.54	72.33
489.00	17.79	73.40
490.00	18.05	74.44
495.00	19.27	79.48
500.00	20.42	84.22
505.00	21.50	88.70
510.00	22.54	92.96
515.00	23.53	97.04
517.50	24.01	99.02
518.00	24.10	99.41
518.50	24.20	99.80
519.00	24.29	100.19
519.50	24.38	100.57
520.00	24.48	100.96

The Darcy-Weisbach friction factor is related to Manning's n through the following equation:

(3 bends)
$$f = \frac{185 n^2}{D^{\frac{1}{3}}}$$

The Energy Equation is:

$$\frac{p_1}{\gamma} + \frac{v_1^2}{2g} + z_1 = \frac{p_2}{\gamma} + \frac{v_2^2}{2g} + z_2 + \sum h_L$$

Where:

$$\sum h_L = \frac{v^2}{2g} \left(f \frac{L}{D} + K_e + K_o + K_b \right)$$

Because p_1 , v_1 and p_2 all are equal to 0 the energy equation becomes:

$$z_1 - z_2 = \frac{v^2}{2g} + \frac{v^2}{2g} \left(f \frac{L}{D} + K_e + K_o + K_b \right)$$

Solving for v gives:

$$v = \sqrt{\frac{2g(z_1 - z_2)}{\left(1 + \left(f\frac{L}{D} + K_e + K_o + K_b\right)\right)}}$$

Determine flow rate Q by:

$$Q = VA$$

$$Q_2 = C_D (Ty_c + my_c^2) [2g(H_1 - y_c)]_{\frac{1}{2}}$$

Definition of Critical Depth:

 \geq

Ε

$$y_c = \left(\frac{Q_1^2}{b^2 g}\right)^{\frac{1}{3}}$$

Solve for Q:

$$Q_1 = b\sqrt{g\,y_c^2}$$

Determine weir flow by equating Q_1 to Q_2 by varying y_c .

	Ω ₁ -Ω ₂	(cts)	` O	3.5945E-05	0.00018892	0.00046436
0.85	ď	(cts)	0.0	20.4	63.8	120.9
C _D =	Ç	ີວ	0.85	0.85	0.85	0.85
12 518.5	-	(L	12	24	36	48
b= 12 m= Veir Crest Elevation=	ą	(cts)	0.0	20.4	63.8	120.9
b= 12 Weir Crest El	×̈́	Œ	0.00	0.45	96.0	1.47
b= Weir	ĭ	Œ	0.00	0.50	1.00	1.50
Input:	Headwater	Elevation	518.50	519.00	519.50	520.00

Cofs) 0 20 121

FLOOD HYDROGRAPH PACKAGE (HEC-1)

JUN 1998

VERSION 4.1

RUN DATE 15MAY09 TIME 16:59:30

U.S. ARMY CORPS OF ENGINEERS

HYDROLOGIC ENGINEERING CENTER

609 SECOND STREET

DAVIS, CALIFORNIA 95616

(916) 756-1104

*

THIS PROGRAM REPLACES ALL PREVIOUS VERSIONS OF HEC-1 KNOWN AS HEC1 (JAN 73), HEC1GS, HEC1DB, AND HEC1KW.

THE DEFINITIONS OF VARIABLES -RTIMP- AND -RTIOR- HAVE CHANGED FROM THOSE USED WITH THE 1973-STYLE INPUT STRUCTURE. THE DEFINITION OF -AMSKK- ON RM-CARD WAS CHANGED WITH REVISIONS DATED 28 SEP 81. THIS IS THE FORTRAN77 VERSION NEW OPTIONS: DAMBERAK OUTFLOW SUBMERGENCE, SINGLE EVENT DAMAGE CALCULATION, DSS:WRITE STAGE FREQUENCY, DSS:READ TIME SERIES AT DESIRED CALCULATION INTERVAL LOSS RATE:GREEN AND AMPT INFILTRATION KINEMATIC WAVE: NEW FINITE DIFFERENCE ALGORITHM

HEC-1 INPUT PAGE 1 LINE ID.....1.....2.....3.....4......5......6......7.....8......9.....10 *** FREE *** EAST BEND ASH POND BBCGM JOSH 011 09323.012

MODERATE HAZARD DAM - DESIGN STORM = 13.5IN.

COMPUTER GENERATED HYDROGRAPH SCS 6-HOUR DISTRIBUTION
FILE: Ash Fond Normal Fool ID ID ID 15 2 200 İΤ 0 8 TN 1.2 KK COMPUTERUNOFF FROM ASH POND DRAINAGE AREA 11 PC .0130 .027 .042 .059 .078 .099 122 .147 .38 PC PC .53 .875 .764 .836 13 .8931 .9103 .9423 .9719 .9267 .9573 . 9861 1.0 ва 0.275 88 15 LS 0.32 16 UD ROUTEFLOW THROUGH PIKE LAKE DAM 1 ELEV 485.5 0 109.8 224.9 345.2 1039.6 1120.1 1202.8 1287.5 17 18 KK RS sv sv 470.9 1374.4 602.4 1463.4 811.7 1648.2 19 740.3 20 1039.6 1554.6 1843.7 1744.1 21 22 SE 470 502 474 478 506 482 486 510 490 512 494 514 496 498 SE 504 508 516 518 520 SQ SQ 12.2 50.2 23 n 0 0 0 73.4 97.0 93.0 25 SE 470 475 480 485 485.5 486 487 488 489 490 500 505 510 515 518.5 520 27 ST 520 ******** FLOOD HYDROGRAPH PACKAGE (HEC-1) U.S. ARMY CORPS OF ENGINEERS JUN 1998 HYDROLOGIC ENGINEERING CENTER VERSION 4.1 609 SECOND STREET DAVIS, CALIFORNIA 95616 RUN DATE 15MAY09 TIME 16:59:30 (916) 756-1104

EAST BEND ASH POND BBC&M Job# 011 09323.012 MODERATE HAZARD DAM - DESIGN STORM = 13.5IN. COMPUTER GENERATED HYDROGRAPH SCS 6-HOUR DISTRIBUTION FILE: Ash Pond Normal Pool

7 10 OUTPUT CONTROL VARIABLES

2 PRINT CONTROL
0 PLOT CONTROL
0. HYDROGRAPH PLOT SCALE IPRNT IPLOT

OSCAL

IT

HYDROGRAPH TIME DATA

NMIN 15 MINUTES IN COMPUTATION INTERVAL

IDATE 1 0 STARTING DATE

ITIME 0000 STARTING TIME

200 NUMBER OF HYDROGRAPH ORDINATES

200 NUMBER OF HYDROGRAPH ORDINATES
3 0 ENDING DATE
0145 ENDING TIME NDDATE

NDTIME ICENT 19 CENTURY MARK

COMPUTATION INTERVAL .25 HOURS TOTAL TIME BASE 49.75 HOURS

ENGLISH UNITS

DRAINAGE AREA SQUARE MILES INCHES

PRECIPITATION DEPTH LENGTH, ELEVATION FEET

FLOW CUBIC FEET PER SECOND

STORAGE VOLUME ACRE-FEET ACRES

SURFACE AREA

DEGREES FAHRENHEIT TEMPERATURE

*** ***

COMPUTE * RUNOFF FROM ASH POND DRAINAGE AREA

8 IN TIME DATA FOR INPUT TIME SERIES

12 TIME INTERVAL IN MINUTES
1 0 STARTING DATE
0 STARTING TIME JXMIN JXDATE JXTIME

SUBBASIN RUNOFF DATA

14 BA SUBBASIN CHARACTERISTICS

TAREA .28 SUBBASIN AREA

PRECIPITATION DATA

STORM 10 PB 13.50 BASIN TOTAL PRECIPITATION

11 PT INCREMENTAL PRECIPITATION PATTERN

.03 .02 .03 .02 .02 .02 .05 .09 . 04 .03 .03 .02 .02

15 LS SCS LOSS RATE

STRTL CRVNBR .27 INITIAL ABSTRACTION 38.00 CURVE NUMBER
.00 PERCENT IMPERVIOUS AREA 88.00 RTIMP

16 UD SCS DIMENSIONLESS UNITGRAPH

UNIT HYDROGRAPH 8 END-OF-PERIOD ORDINATES 177. 294. 143. 58.

HYDROGRAPH AT STATION COMPUTE

DA MON HRMN ORD RAIN LOSS EXCESS COMP Q DA MON HRMN ORD RAIN LOSS EXCESS COMP Q

-

2330 2345 95 96 0030 .00 .00 .00 0. 0. 0. 0045 196 .00 .00 .00 97 98 0000 .00 .00 .00 0100 .00 .00 0015 .00 .00 0. 3 0115 198 .00 .00 .00 0. 0030 .00 .00 .00 100 0045 .00 .00 .00 0. 0145 200 .00 .00 .00 0. TOTAL RAINFALL = 13.50, TOTAL LOSS = 1.51, TOTAL EXCESS = 11.99 PEAK FLOW TIME MAXIMUM AVERAGE FLOW 6-HR 24-BR 72-HR 49.75-HR

(CFS) (HR) (CES) 1238. 2,50 353. 89. 11.991 (INCHES) 11.941 11.991 11.991

CUMULATIVE AREA = .28 SQ MI

*** ***

......

ROUTE * FLOW THROUGH PIKE LAKE DAM

HYDROGRAPH ROUTING DATA

18 RS STORAGE ROUTING NUMBER OF SUBREACHES NSTPS ELEV TYPE OF INITIAL CONDITION INITIAL CONDITION RSVRIC 485.50 .00 WORKING R AND D COEFFICIENT 19 SV STORAGE .0 109.8 224.9 345.2 470.9 602.4 740.3 811.7 885.2 961.3 1039.6 1120.1 1202.8 1287.5 1374.4 1463.4 1554.6 1648.2 1744.1 1843.7 21 SE ELEVATION 478.00 482.00 470.00 474.00 486.00 490.00 494.00 496.00 498.00 500.00 502.00 504.00 506.00 508.00 510.00 512.00 514.00 516.00 518.00 520.00 23 SQ DISCHARGE 0. 0. 0. 0. 0. 12. 50. 65. 73 74. 80. 84. 89. 93. 97. 99. 222. 25 SE ELEVATION 470.00 475.00 485.00 480.00 485,50 486.00 487.00 488.00 489.00 490.00 495.00 500.00 505.00 510.00 515.00 518.50 520.00 27 ST TOP OF DAM TOPEL 520.00 ELEVATION AT TOP OF DAM DAMWID .00 DAM WIDTH WEIR COEFFICIENT COOD .00 EXPONENT OF HEAD EXPD .00

*** COMPUTED STORAGE-OUTFLOW-ELEVATION DATA

(INCLUDING FLOW OVER DAM)

STORAGE .00 109.80 138.57 224,90 285.05 345.20 439.48 455.19 470.90 OUTFLOW .00 485.50 12.20 486.00 .00 .00 .00 .00 .00 .00 .00 50.20 474.00 475.00 478.00 482.00 485.00 ELEVATION 470.00 480.00 536.65 64.80 569.53 73.40 602.40 74.40 776.00 79.50 STORAGE 740.30 811.70 885.20 961.30 1039,60 1120.10 OUTFLOW 78.48 80.44 82.32 84.20 86.00 87.80 ELEVATION 488.00 489.00 490.00 494.00 495.00 496.00 498.00 500.00 1161.45 88.70 STORAGE 1202,80 1287.50 1374.40 1463.40 1554.60 1601.40 1648.20 1744.10 1769.00 OUTFLOW 89.56 91.28 94.60 98.71 518.00 93.00 96.20 97.00 97.57 99.00 ELEVATION 505.00 506.00 508.00 510.00 512.00 514.00 515.00 516.00 518.50 STORAGE 1843.70

OUTFLOW ELEVATION 520.00

DA MO TAGE	N HRMN	ORD	OUTFLOW	STORAGE	STAGE *	DA	MON HRMIN O	RD QUTI	FLOW	STORAGE	STAGE	* D	A MON HRMN	ORD OUT	FLOW	STORAGE
1	0000	1	0.	455.2	485.5 *	1	1645	68	67.	543.7	488.2	*	2 0930	135	22.	479.6
86.3	0015	2	0.	455.2	485.5 *	1	1700	69	66.	542.4	488.2	*	2 0945	136	22.	479.2
86.3	0030	3	0.	455.3	485.5 *	1	1715	70	66.	541.0	488.1	*	2 1000	137	21.	478.7
86.2 1 86.2	0045	4	0.	455.6	485.5 *	1	1730	71	66.	539.6	488.1	* .	2 1015	138	21.	478.3
1	0100	5	1.	456.8	485.5 *	1	1745	72	65.	538.3	488.0	*	2 1030	139	20.	477.9
86.2 1	0115	6	3.	458.8	485.6 *	1	1800	73	65.	536.9	488.0	* :	1045	140	20.	477.4
86.2 1 86.2	0130	7	5.	462.0	485.7 *	1	1815	74	64.	535.6	488.0	* :	1100	141	19.	477.0
1 86.2	0145	8	9.	466.6	485.9 *	1	1830 7	75	64.	534.3	487.9	* :	2 1115	142	19.	476.6
1	0200	9	18.	475.6	486.1 *	1	1845 7	76	63.	533.0	487.9	* 2	1130	143	18.	476.3
86.2	0215	10	38.	493.1	486.7 *	1	1900 7	77	63.	531.7	487.8	* 2	1145	144	18.	475.9
86.2	0230	11	56.	516.6	487.4 *	1	1915 7	78	62.	530.4	487.8	* 2	1200	145	18.	475.5
86.1	0245	12	65.	537.9	488.0 *	1	1930 7	79	61.	529.1	487.8	* 2	1215	146	17.	475.2
86.1	0300	13	69.	553.1	488.5 *	1	1945 8	30	61.	527.8	487.7	* 2	1230	147	17.	474.8
86.1 1	0315	14	72.	563.4	488.8 *	1	2000 8	31	60.	526.6	487.7	* 2	1245	148	16.	474.5
86.1 1	0330	15	73.	570.8	489.0 *	1	2015 8	32	60.	525.3	487.7	. 2	1300 1	149	16.	474.1
86.1 1	0345	16	74.	576.7	489.2 *	1	2030 8	33	59.	524.1	487.6	- 2	1315 1	150	16.	473.8
86.1 1	0400	17	74.	581.5	489.4 *	1	2045 8	3 4	59.	522.9	487.6	2	1330 1	151	15.	473.5
86.1 1	0415	18	74.	585.6	489.5 *	1	2100 8	35	58.	521.7	487.5	2	1345 1	L52	15.	473.2
36.1 1	0430	19	74.	589.2	489.6 *	1	2115 8	16	58.	520.5	487.5	2	1400 1	153	14.	472.9
36.1 1	0445	20	74.	592.4	489.7 *	1	2130 8	:7	57.	519.3	487.5 *	. 2	1415 1		14.	472.6
1	0500	21	74.	595.2	489.8 *	1	2145 8		57.	518.1	487.4 *				14,	472.3
36.0 1		22	74.	597.8		1	2200 8		56.	517.0	487.4 *		1445 1		13.	472.0
6.0		23	74.	600.2	489.9 *	1	2215 9		56.	515.8	487.4 *		1500 1		13.	471.7
6.0		24	74.	602.4	490.0 *	1	2230 9		55.	514.7	487.3 *		1515 1		13.	471.5
6.0	0600	25	74.	604.1	490.0 *	1	2245 9.		55.	513.5	487.3 *		1530 1		13.	471.2
1		26	74.	604.7	490.1 *	1	2300 9		54.	512.4	487.3 *		1545 1		12.	470.9
16.0		27	74.	604.2	490.1 *		2315 9		54.	511.3	487.2 *		1600 1		12.	470.7
16.0		28	74.	603.1	490.0 *	1	2330 9		53.	510.2	487.2 *					
6.0		29											1615 1		12.	470.5
6.0			74.	601.8	490.0 *	1	2345 9		53.	509.1	487.2 *		1630 1		12.	470.2
16.0		30	74.	600.3	489.9 *	2	0000 9		52.	508.0	487.1 *		1645 1		11.	470.0
6.0		31	74.	598.8	489.9 *	2	0015 98		52.	507.0	487.1 *		1700 1		11.	469.7
6.0		32	74.	597.2	489.8 *	2	0030 99		51.	505.9	487.1 *		1715 1		11.	469.5
1 5,9	0800		74.	595.7	489.8 *		0045 100		1.	504.9	487.0 *		1730 1		11.	469.3
1 5.9	0815		74.	594.2	489.7 *	2	0100 101		0.	503.8	487.0 *		1745 1		11.	469.1
1 5.9	0830		74.	592.6	489.7 *	2	0115 102		9.	502.8	487.0 *	2	1800 1	69	11.	468.9
1 5.9	0845	36	74.	591.1	489.7 *	2	0130 103	3 4	8.	501.8	486.9 *	2	1815 1	70	10.	468.7
1 5.9	0900	37	74.	589.6	489.6 *	2	0145 104	4 4	7.	500.8	486.9 *	2	1830 1	71 :	10.	468.5
1 5.9	0915	38	74.	588.1	489.6 *	2	0200 105	5 4	6.	499.8	486.9 *	2	1845 17	72	.0.	468.3
1	0930	39	74.	586.5	489.5 *	2	0215 106	5 4	5.	498.9	486.9 *	2	1900 1	73 1	.0.	468.1
1 5.9	0945	40	74.	585.0	489.5 *	2	0230 107	7 4	3.	498.0	486.8 *	2	1915 17	7.4 1	0.	467.9
1	1000	41	74.	583.5	489.4 *	2	0245 108	3 4	2.	497.1	486.8 *	2	1930 17	75 1	0.	467.7
1	1015	42	74.	582.0	489.4 *	2	0300 109	4	1.	496.2	486.8 *	2	1945 17	76 1	0.	467.5
5.9 1	1030	43	74.	580.4	489.3 *	2	0315 110		0.	495.4	486.7 *	-	2000 17		9.	467.3

,

1 485.9	1045	44	74.	578.9	489.3 *	2	0330 111	40.	494.5	486.7 *	2	2015 178	9.	467.1
1	1100	45	74.	577.4	489.2 *	2	0345 112	39.	493.7	486.7 *	2	2030 179	9.	466.9
485.9	1115	46	74.	575.9	489.2 *	2	0400 113	38.	492,9	486.7 *	2	2045 180	9.	466.7
485.9 1	1130	47	74.	574.4	489.1 *	2	0415 114	37.	492.2	486.6 *	2	2100 181	9.	466.6
485.9 1	1145	48	74.	572.8	489.1 *	2	0430 115	36.	491.4	486.6 *	2	2115 182	9.	466.4
485.9 1	1200	49	73.	571.3	489,1 *	2	0445 116	35.	490.7	486.6 *	2	2130 183	9.	466.2
485.9 1	1215	50	73.	569.8	489.0 *	2	0500 117	34.	490.0	486.6 *	2	2145 184	8.	466.0
485.8 1	1230	51	73.	568.3	489.0 *		0515 118	33.	489.3	486.6 *		2200 185	8.	465.9
485.8 1	1245		73.	566.8	488.9 *		0530 119	33.	488.6	486,5 *				
485.8												2215 186	8.	465.7
1 485.8	1300		72.	565.3	488.9 *		0545 120	32.	487.9	486.5 *		2230 187	8.	465.5
1 485.8	1315	54	72.	563.8	488.8 *	2	0600 121	31.	487.3	486.5 *	2	2245 188	8.	465.4
1 485.8	1330	55	72.	562.3	488.8 *	2	0615 122	30.	486.6	486.5 *	2	2300 189	8.	465.2
1 485.8	1345	56	71.	560.8	488.7 *	2	0630 123	30.	486.0	486.5 *	2	2315 190	8.	465.1
1 485.8	1400	57	71.	559.4	488.7 *	2	0645 124	29.	485.4	486.4 *	2	2330 191	8.	464.9
1	1415	58	70.	557.9	488.6 *	2	0700 125	28.	484.8	486.4 *	2	2345 192	7.	464.8
1 485.8	1430	59	70.	556.4	488.6 *	2	0715 126	28.	484.2	486.4 *	3	0000 193	7.	464.6
1	1445	60	70.	555.0	488.6 *	2	0730 127	27.	483.7	486.4 *	3	0015 194	7.	464.5
485.8 1	1500	61	69.	553.6	488.5 *	2	0745 128	26.	483.1	486.4 *	3	0030 195	7.	464.3
485.8 1	1515	62	69.	552.1	488.5 *	2	0800 129	26.	482.6	486.4 *	3	0045 196	7.	464.2
485.8 1	1530	63	68.	550.7	488.4 *	2	0815 130	25,	482.1	486.3 *	3	0100 197	7.	464.1
485.8 1	1545	64	68.	549.3	488.4 *	2	0830 131	24.	481.5	486.3 *	3	0115 198	7.	463.9
485.8 1	1600	65	68.	547.9	488.3 *	2	0845 132	24.	481.0	486.3 *	3	0130 199	7.	463.8
485.8	1615	66	67.	546.5	488,3 *		0900 133	23.	480.5	486.3 *		0145 200	7.	463.6
485.8 1	1630	67	67.	545.1	488.3 *		0915 134	23.	480.1	486.3 *	,	0143 200		403.0
1	1630	07	67.	343.1	*	4	0312 134	23.	400.1	400.3 *				
******	*****	****	******	******	*****	****	*******	*****	******	*******	****	*******	*****	******
PEAK O	UTFLOW	IS	74. AT	TIME	6.25 HOUR	S								

PEAK FLO	OW TIME			MAXIMUM AVE	RAGE FLOW	
			6-HR	24-HR	72-HR	49.75-HR
+ (CFS)	(HR)					
		(CFS)				
+ 74.	6.25		74.	66.	41.	41.
		(INCHES)	2,508	8,926	11.420	11.420
		(AC-FT)	37.	131.	167.	167.
		(110 + 1)	57.	101.	107.	101.
PEAK STOR	STORAGE TIME MAXIMUM A				AGE STORAGE	
			6-HR	24-HR	72-HR	49.75-HR
+ (AC-FT)	(HR)					
605.			595.	553.	512.	512.
	****					ore.
PEAK STA	GE TIME			MAXIMUM AVE	RAGE STAGE	
			6-HR	24-HR	72-HR	49.75~HR
+ (FEET)	(HR)					
490.07			489.78	488.50	487,26	487.26
150101	0.25		.0			.57.20
		CUMULATIV	E AREA =	.28 SQ MI		

RUNOFF SUMMARY
FLOW IN CUBIC FEET PER SECOND
TIME IN HOURS, AREA IN SQUARE MILES

	OPERATION	STATION	PEAK FLOW	TIME OF PEAK	AVERAGE FI	LOW FOR MAXIM	UM PERIOD	BASIN AREA	MAXIMUM STAGE	TIME OF
+	OI EIGHT TON	SIMITON			6-HOUR	24-HOUR	72-HOUR	AREA	STAGE	MAX STAGE
+	HYDROGRAPH AT	COMPUTE	1238.	2.50	353.	89.	43.	.28		
+ + 1	ROUTED TO					66. ANALYSIS FO		.28 ROUTE	490.07	6.25
		(PEAKS	SHOWN AR	E FOR INTE	RNAL TIME STE	P USED DURI	NG BREACH F	ORMATION)		

PLAN	1		INITIAL	. VALUE	SPILLWAY CR	EST TOP	OF DAM	
		ELEVATION	485	.50	520.00		520.00	
		STORAGE	4	155.	1844.		1844.	
		OUTFLOW		0.	222.		222.	
	RATIO	MAXIMUM	MAXIMUM	MAXIMUM	MAXIMUM	DURATION	TIME OF	TIME OF
	OF	RESERVOIR	DEPTH	STORAGE	OUTFLOW	OVER TOP	MAX OUTFLOW	FAILURE
	PMF	W.S.ELEV	OVER DAM	AC-FT	CFS	HOURS	HOURS	HOURS
	1.00	490.07	.00	605.	74.	.00	6.25	.00

^{***} NORMAL END OF HEC-1 ***



STEVEN L. BESHEAR GOVERNOR LEONARD K. PETERS SECRETARY

ENERGY AND ENVIRONMENT CABINET

DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WATER
200 FAIR OAKS LANE
FRANKFORT, KENTUCKY 40601
www.kentucky.gov

October 9, 2009

Mr. James J. Stieritz Duke Energy Corporation 139 E. 4th Street, Room 552-A Cincinnati, OH 45202

RE: Inspection of East Bend Ash Pond Dam

AI 176

KY 1215 in Boone County

Class: Moderate Hazard, Class B

Dear Mr. Stieritz:

We have reviewed the as-built plans and information submitted by your engineers for the above referenced structure. Based on our review and an on-site inspection on March 24, 2009, we have determined that this structure has been constructed in accordance with the approved plans and specifications.

This dam is in the Division of Water's active inventory as a moderate hazard structure and has been assigned inventory number KY 1215. Moderate hazard structures are presently being inspected every two years. Periodic inspections are deemed necessary for the activities of this class of operation.

Kentucky Revised Statutes Chapter 151 (KRS 151) and associated regulations establish minimum maintenance and design criteria for dams. KRS 151.125 gives the Division of Water authority to require any measures necessary to bring the dam into compliance with statutes and regulations. As the owner you are required to maintain the dam to assure public safety.

Should you have any questions concerning this matter, please contact me at (502) 564-3410.

Sincerely,

Gary Wells, PE

Dam Safety and Floodplain Compliance

Day Wells

Division of Water



STEVEN L. BESHEAR
GOVERNOR

LEONARD K. PETERS
SECRETARY

Ferend 4/8/09

ENERGY AND ENVIRONMENT CABINET

DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WATER
200 FAIR OAKS LANE
FRANKFORT, KENTUCKY 40601
www.kentucky.gov

March 25, 2009

Mr. James J. Stieritz Duke Energy Corporation 139 East Fourth St, Room 552-A Cincinnati, OH 45202

Re: Scheduled Inspection

East Bend Power Plant

Boone County, KY.

Hazard Class: MODERATE

Dear Duke Energy Corporation:

On March 24, 2009, personnel from the Energy and Environment Cabinet, Division of Water, inspected the above referenced structure. A copy of the inspection report is enclosed. The Division of Water is responsible for performing safety inspections of dams in Kentucky.

Kentucky Revised Statutes Chapter 151 (KRS 151) and associated regulations establish minimum maintenance and design criteria for dams. KRS 151.125 gives the Division of Water authority to require any measures necessary to bring the dam into compliance with statutes and regulations. As the owner you are required to maintain the dam to assure public safety. The following information must be provided to us to bring the dam into compliance with state law.

- 1) This structure has been classified as a Moderate Hazard dam because, in the event of failure, the plant could no longer operate to supply power to customers, especially to facilities requiring emergency care such as to hospitals. If you wish to reclassify this structure as a Low Hazard Dam, you must demonstrate and provide evidence to Division of Water of an alternate power source for customers when the plant is offline.
- 2) A flood routing analysis required by the hydraulic capacity requirements for each dam per KRS 151.293 must be performed. The Division of Water will upon request, assist the engineering in preparing the flood routing. However, the information below in item #3 must be submitted for the analysis.
- 3) Provide survey information on the Elevation-Area-Capacity curves and data calculations per "Design Criteria For Dams & Associated Structures Engineering Memo. No. 5". The area must be in acres and the capacity storage in acre-ft. The data must be to the top of the dam elevation (see enclosed format example).
- 4) Provide Dam Construction Design Data Sheet that can be downloaded off the website: http://www.water.ky.gov/permitting, click on the link that says "Dam Construction". Next, click on the link that says 'Download Page' and select 'Dam Data Sheet Application (.pdf format). This should be filled out completely and submitted.
- 5) Provide the survey elevation of the survey marker found on the crest near the principal spillway tower.



Submit this information within thirty (30) days from the date of this letter or contact us directly. All plans are to be prepared and submitted by a registered professional engineer licensed to practice in Kentucky. If you need more time to comply with providing the above information stated in this letter, you must make a request in writing to the Division of Water. Failure to comply and/or to reply to any of the above measures could result in enforcement action and the assessment of penalties. Your cooperation and attention to this matter is appreciated. If you have any questions or need additional information, please contact me at (502) 564-3410, Ext. 4595.

Sincerely,

Gary Wells, PE, Engineer

Dam Safety and Floodplain Compliance

Day Wells

Division of Water

Enclosure



STEVEN L. BESHEAR GOVERNOR

LEONARD K. PETERS SECRETARY

ENERGY AND ENVIRONMENT CABINET

DEPARTMENT FOR ENVIRONMENTAL PROTECTION DIVISION OF WATER 200 FAIR OAKS LANE, 4TH FLOOR FRANKFORT, KENTUCKY 40601 www.kentucky.gov

CERTIFICATE OF INSPECTION FOR DAM AND APPURTENANT WORKS

Note: The Division of Water does not intend this report to be taken as an assurance that no other problems exist at this site or that this dam is safe. The reports sole intent is to provide you a factual account of the conditions observed at the site during the inspection. If you have questions, write this office at the above listed address or call (502) 564-3410.

ID of Dam: Name of Dam:

HUC #11:

Weather:

pending

East Bend Power Plant

Agency Interest:

pending

05090203150 Boone

County: Inspection Date:

March 24, 2009

60 Deg, Cloudy

Zip:

Phone:

City:

State:

Owner:

Address:

45202

OH

Hazard Class: Moderate

Cincinnati

513-287-2269

James Stieritz

Inspection Type:

Persons Present at Inspection: Gary Wells, Mortaza Rabiee, James Stieritz, Rhonda Herzog, Tammy Jett.

Height of Dam:

59 feet

Latitude Dec Deg: 38.901038 Longitude Dec Deg: -84:84262

Normal Pool Elevation (MSL): 485.5'

Duke Energy Corporation

139 East Fourth St, Room 552-A

Current Pool Elevation (MSL): 486.0' Emer. Spillway Elevation (MSL): 518.5'

Type of Dam: EARTHFILL EMBANKMENT WITH CLAY CORE ABOUT 4000 FT. LONG. WITH A TOP WIDTH

OF 12 FT. NO BERMS. SIDESLOPES ARE BOTH 2:1

Upstream Slope of Dam: The upstream slope has a grass and a thick weed/brush cover. No signs of slides, sloughs, or animal burrows were found. Irregular shape slopes due to erosion were found around concrete piers of the coal removal tipple.

Crest of Dam: The crest has a gravel road with grass sides. A few potholes were noted. There are no signs of slides, sloughs, trees, or animal burrows.

Downstream Slope of Dam: The downstream slope has a grass and a thick weed/brush cover. There are no signs of slides, slumps, sloughs, trees, or animal burrows. There was no seepage found at the toe.

Toe Drains: N/A



CERTIFICATE OF INSPECTION FOR

KY ID: pending

Principal Spillway: 48" DIA CMP SET BELOW A WOODEN MOUNTED TOWER SPILLWAY THAT MAINTAINS POOL AT ELEVATION 485.5' (THIS ELEVATION IS SHOWN ON PLAN DRAWING). A 36" DIA. CMP. IS OUTLET PIPE THAT DISCHARGES INTO THE OHIO RIVER. A 36" BLOW-OFF VALVE IS LOCATED AT TOE.

Principal Spillway Comment: Inlet pipe was clear of debris and water was discharging. The outlet pipe is in Ohio River and could not be seen. When plant is offline, the Ohio River will deposit sediment at the outlet opening. Clean and clear away any sediment from the outlet opening.

Stilling Basin: N/A

Emergency Spillway: CONCRETE LINED 12 FT. WIDE AND 1:0 FT. DEEP WITH A CREST AT 518.5'. OUTLET SLOPE IS 2:1.

Emergency Spillway Comments: The channel is a concrete lined configuration and cascades downstream to the Ohio River. The inlet and outlet are clear.

Drawdown System: None

Does Hazard Classification need to be Reevaluated? This structure has been classified as a Moderate Hazard dam because, in the event of failure, the plant could no longer operate to supply power to customers, especially to facilities requiring emergency care such as to hospitals. If you wish to reclassify this structure as a Low Hazard Dam, you must demonstrate and provide evidence to Division of Water of an alternate power source for customers when the plant is offline. Being that this is the only source of power supply for customers requires a higher standard of care be taken to preserve such an important public utility.

Were Photographs Taken? Yes

General Comments and Recommendations:

Hydrologic reservoir routing methods must be used to determine the resulting maximum pool elevation in the reservoir from the freeboard hydrograph. DOW requires that the maximum pool resulting from hydrologic routing of the freeboard hydrograph not exceed the settled elevation of the top of embankment. Overtopping is not permitted for earth embankments, because flow over the dam can result in erosion of the embankment material and rapid loss of pool. A hydrologic analysis <u>must be performed</u> to verify that the existing spillway is adequate to prevent overtopping of the dam for the freeboard hydrograph. The moderate hazard structure must provide the storage necessary to contain the entire storm runoff without probable damage to the structure or creating an unacceptable hazard to life or property. This Moderate Hazard Dam must have the capacity to pass a freeboard hydrograph design storm of 13.5" rainfall in a 6-hour duration without overtopping the dam. The Division of Water will upon request, assist the engineering in preparing the flood routing. However, the information for the elevation-area-capacity and data must be submitted for the analysis.

Inspector: Gary Wells, PE Reviewer: Gary Wells, PE

Date: March 25, 2009

STAGE-STORAGE DATA:

ELEV (ft)	AREA (acres)	DEPTH (ft)	STORAGE (ac-ft)	CUMULATIVE (ac-ft)
540	0.29	*	0.000	n
545	1.85	5	5.347	5.347
550	4.53	5	15.982	21.309
554	5.04	4	18,149	40.45 8

WATERSHED DATA:

Droinage Area = 122 ac

Flow Path Information

length(ft)	type	to (hr)	remarks-	
	sheet flow hannel flow	777 <u>7</u> 10	Manning's n=0.15; 2% slope; 2-yr,24hr=2.88° d=3';w=3';1:1sides;slope=2%;n=0.05	
	total tc=	0.35	hr	

Curve Number Information

Description	Area (ac)	T	CN	
meadow residential	2		74	
woods	111		70	

71 = composite CN

ANNUAL DAM INSPECTION 2010 ASH POND

Kentucky Energy and Environmental Cabinet Department for Environmental Protection Division of Water Dam Inventory No. 1215 Class: Moderate Hazard, Class B

EAST BEND STATION 6293 Beaver Road Rabbit Hash, Kentucky 41091



August 4, 2010 013-00442-015



Mr. Adam Deller Duke Energy 139 East Fourth Street Cincinnati, OH 45202

Re:

Inspection of Ash Pond East Bend Power Station Rabbit Hash, Kentucky



Mr. Deller:

BBC&M Engineering, Inc. (BBCM) has completed a visual assessment of the Ash Pond located at the East Bend Power Station in Rabbit Hash, Kentucky. BBCM also reviewed the past inspection report prepared by the Kentucky Department for Environmental Protection. While on site, BBCM observed the general conditions of the impoundment, the ash pond embankments (east, south and west), abutment(s), inlet and outlet structures and spillway(s). Attached is our report with our field observations, recommendations, site plan, photographs and inspection checklist for the East Bend Ash Pond (KY 1215).

We appreciate having been given the opportunity to continue to be of service on this project. Please contact our office with any questions or comments.

Respectfully submitted.

BBC&M ENGINEERING, INC. Cincinnati, Ohio

Benjamin C. Dusina, P.E.

Project Engineer

FOR Joseph M. Troxell, P.E.

Senior Engineer

Submitted:

2 copies via US Mail

1 copy via e-mail – Mr. Adam Deller (<u>Adam.Deller@duke-energy.com</u>)

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1.0 Introduction

BBC&M Engineering, Inc. (BBCM) visited the East Bend Station near Rabbit Hash, Kentucky on July 21, 2010. The site visit was performed by Mr. Joseph Troxell, P.E. and Mr. Benjamin Dusina, P.E. of BBCM. BBCM observed the existing East Bend Ash Pond (KY 1215) on this date. The ash pond is classified as a Moderate Hazard, Class B structure by the Kentucky Department for Environmental Protection (KDEP). The KDEP performed a visual inspection of the ash pond on March 24, 2009.

On the day of the site visit, the temperature varied from 81 to 88 degrees Fahrenheit and there was no precipitation. Between July 14 and July 21, there was precipitation on two of the days that totaled approximately 0.5 inches. Weather information was obtained from the Waterloo, Burlington, Kentucky weather station operated by Weather Underground (www.wunderground.com). A history of weather data for the month prior to July 21, 2010 is included as Plate 2 of the Appendix.

2.0 Summary of Visual Inspection Terms

The summary of the visual observations uses terms to describe the general appearance or condition of an observed item, activity or structure. The meaning of these terms is as follows:

Good	A condition or activity that is generally better or slightly better than what is minimally expected or anticipated from a design or maintenance point of view.				
Fair or Satisfactory	A condition or activity that generally meets what is minimally expected or anticipated from a design or maintenance point of view.				
Poor	A condition or activity that is generally below what is minimally expected or anticipated from a design or maintenance point of view.				
Minor	A reference to an observed item (e.g., erosion, seepage, vegetation, etc.) where the current maintenance condition is below what is normal or desired, but which is not currently causing concern from a structure safety or stability point of view.				
Excessive	A reference to an observed item (e.g., erosion, seepage, vegetation, etc.) where the current maintenance condition is above or worse than what is normal or desired, and which may have affected the ability of the observer to properly evaluate the structure or particular area being observed or which may be a concern from a structure safety or stability point of view.				



3.0 Observations

The ash pond was built into an existing, natural hillside which forms the north side of the pond, with constructed embankments making up the east, south and west sides of the pond. The embankments have a clay core with granular zones on the upstream and downstream sides. A bench for an access road runs along the west embankment. It is understood that the ash pond was commissioned in 1980. The crest elevation of the three embankments is approximately El. 520. The crest is covered with a gravel roadway along the alignment. There is an internal divider dike composed of ash running from the north shore to the south embankment within the ash pond. The normal pool elevations are approximately El. 503.7 upstream of the internal ash dike and El. 490.9 downstream of the ash dike. The slopes of the upstream and downstream faces of the three embankments are approximately 2H:1V (horizontal:vertical) and are grass covered.

The influent structures are located along the north side of the impoundment. An additional inlet pipe is located through the internal ash dike, near the south embankment. The primary spillway is located in the southeast corner of the ash pond and consists of a 48-inch CMP pipe riser with a 40-inch steel liner. The riser pipe is connected to a 36-inch outlet pipe with a 28-inch steel liner. It is understood that the pipe liners were installed in 1991. The primary spillway outlets into the Ohio River, and is submerged below the normal pool El. 454.25. The emergency spillway is located on the south embankment and consists of 12-foot wide concrete, open-channel spillway. The emergency spillway outlets into a concrete lined drainage ditch located at the toe of the south embankment. The top of the concrete which forms the control section of the emergency spillway is approximately El. 518.5.

Based on visual observations during our site visit, the embankments appear to be in Satisfactory condition. BBCM noted the following items during our site visit:

- 1. Light poles on downstream slope along the crest of south and west embankments:
- 2. Minor to excessive erosion from wave action was observed along the east and south embankment upstream slopes (see Photos 4, 14 and 18);
- 3. Minor low areas observed in gravel areas on the embankment crest (see Photo 5):
- 4. Approximately 350 linear feet of rip rap placed as wave action armor on upstream slope of the east embankment (see Photo 6):
- 5. Excessive vegetation beyond the toe of the east embankment (see Photo 7) and on the downstream slope below the access road running along the toe of the south embankment (see Photos 16 and 17);
- 6. Marsh area was observed beyond the toe of the east embankment (see Photo 8);
- 7. Scrap pipe located along the toe of the east embankment (see Photo 9):
- 8. Minor vegetation within the concrete drainage channel and emergency spillway (see Photos 24 and 26);
- 9. Excessive vegetation at the mouth of the concrete channel located along the toe of the south embankment (see Photo 27);



- 10. Minor erosion channels were observed on the upstream slopes of the east and south embankments (see Photo 31);
- 11. Inlet channel flowing adjacent to the south embankment (see Photo 33);
- 12. Rip rap placed on upstream slope of the west embankment (see Photos 40, 42 and 45);
- 13. Low area on the downstream slope of the west embankment, adjacent to the crest (see Photo 44).

4.0 Conclusions and Recommendations

Based on observations made during our site visit and review of the information provided to BBCM by Duke Energy, it appears the East Bend Ash Pond (KY 1215) is in Satisfactory condition.

BBCM offers the following recommendations:

- 1. In general, penetrations into an earthen embankment are discouraged since any penetration can introduce a seepage conduit. There are multiple light poles installed along the south and west embankment. It is recommended that, at a minimum, the embankment be graded around the poles to provide positive drainage away from the light poles, even if this requires mounding some earthen materials around the pole and grading to promote drainage.
- 2. Monitor shoreline for erosion since no armor is present over the majority of the upstream slopes. If erosion increases, additional engineering evaluations may be necessary. Rip rap armor should be placed where excessive erosion was observed along the upstream slope due to wave action. Additionally, the area of flowing water, near the inlet pipe located through the interior ash dike, should be monitored. If erosion begins in this area, rip rap armor should be installed.
- 3. Repair low areas on the crest of the embankment to prevent standing water. The low areas, while relatively minor, may serve to collect standing water. It is preferable that positive grades be maintained to promote runoff from the crest into the impoundment.
- 4. Clear excessive vegetation 15 feet beyond the toe of the east embankment and along the 2H:1V slopes below the roadway along the toe of the south embankment. The excessive vegetation hinders visual observations in these areas. These areas should be visually monitored for seepage.
- 5. Re-grade wet areas along the toe of the east embankment to promote positive drainage and continue to monitor these areas. If any wet areas return after being re-graded, they may be related to seepage either under or through the embankment and additional engineering evaluation may be necessary.
- 6. Remove the scrap pipe along the toe of the east embankment.
- 7. Clean out vegetation from within the concrete drainage ditch along the south embankment, the emergency spillway and in the mouth area of the concrete drainage ditch.
- 8. The erosion channels observed on the upstream slopes of the east and south embankments should be filled with rip rap.

- 9. Monitor the ash divider dike for seepage and instability during inspection of embankments.
- 10. Re-grade the low lying area on the downstream slope, adjacent to the crest, on the west embankment.
- 11. Continue regular mowing of the embankments and downstream areas to keep vegetation short and allow for visual observation of the embankments. In areas that are not accessible with a mower, a hand-held trimmer may be used. Regular mowing will prevent woody vegetation from being established.



ATTACHMENTS

CONTIDENTIAL

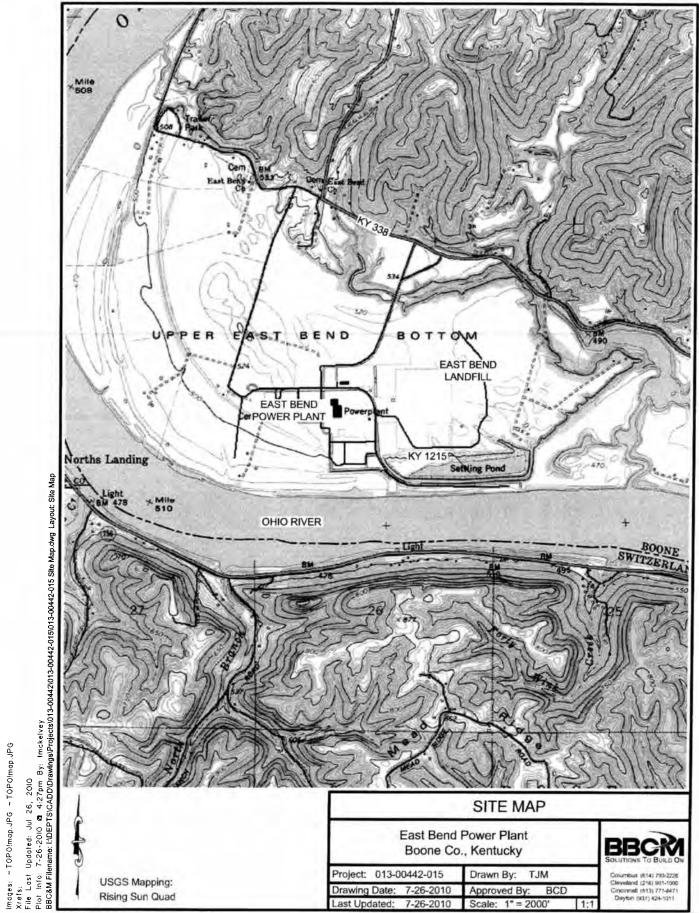
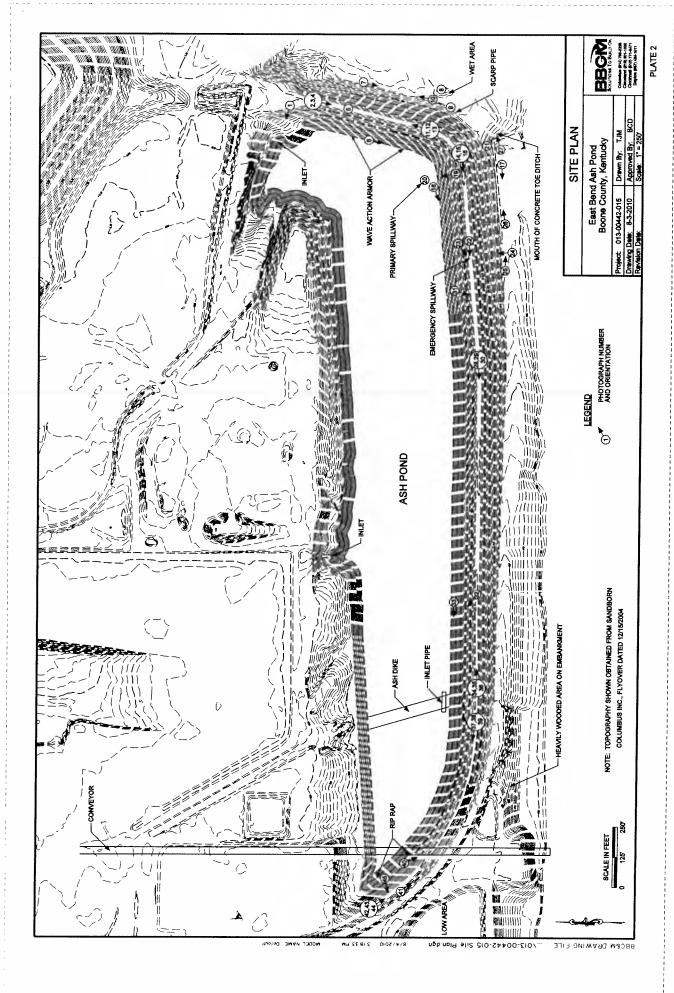


PLATE 1



East Bend Ash Pond - Weather Data June 21 through July 21, 2010

		Temper	ature (°F)		
Month	Day	Max.	Min.	Precipitation (in.)	
	21	89	71	0.99	
	22	86	72	0	
	23	91	78	0 -	
	24	85	72	0	
June	25	85	68	0	
귀	26	88	69	0	
	27	89	74	0.02	
	28	84	73	0.01	
	29	81	65	0	
	30	77	60	0	
	1	78	62	0	
	2	80	57	0	
	2 3 4	86	59	0	
]		88	71	0	
	5	88	73	Q	
	6	91	72	0	
	7	93	72	0	
	8	90	73	0	
	9	84	74	0	
	10	87	71	0	
ylut	11	87	65	0	
	12	85	74	0	
	13	82	73	0.01	
	14	88	72	0	
	15	90	74	0	
	16	90	77	0	
	17	88	73	0.01	
	18	88	73	0	
	19	90	74	0	
	20	85	73	0.48	
	21	88	81	0	

Source: http://www.wunderground.com

Photo 1 South slope of north abutment with landfill runoff inlet structure, photo facing west. Photo 2 Downstream slope of east embankment, photo facing south. Photo 3 Crest of east photo embankment, facing south.

East Bend Ash Pond (013-00442.015) August 2010 – Boone County, Kentucky BBC&M ENGINEERING, INC.

Photo 4 Inboard slope of east photo embankment, facing south. Photo 5 Low area along crest of east embankment. Photo 6 placed Rip rap remediate wave action erosion on the inboard slope of the east embankment, photo facing south.

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Photo 7	
Toe of east embankment, photo facing south.	
Photo 8 Standing water east of downstream slope of east embankment.	
Photo 9 Existing scrap pipe located near toe of the east embankment.	

Photo 10 Toe of east embankment, photo facing north. Photo 11 Downstream slope of east embankment, photo facing north. Photo 12 Crest of south embankment, photo facing east.

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Photo 13 Upstream slope of east embankment, photo facing north.

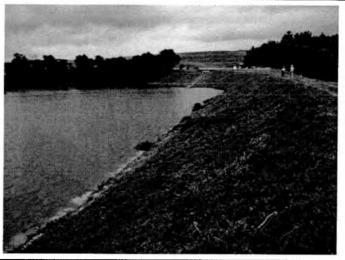


Photo 14
Upstream slope of south embankment, photo facing west.

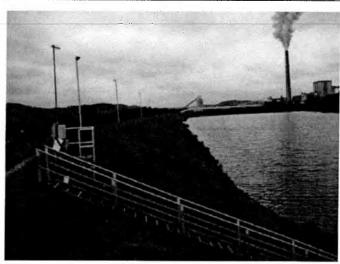


Photo 15

Crest of south embankment, photo facing west.



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Photo 16 Downstream slope of south embankment, photo facing west.

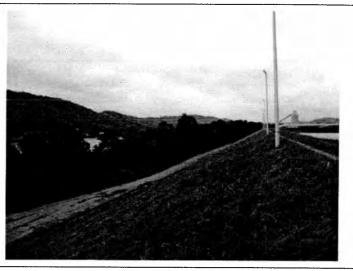


Photo 17
Toe of south embankment, photo facing west.



Photo 18
Wave action erosion on

the upstream slope of the south embankment, photo facing west.

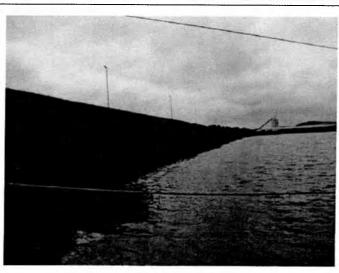


Photo 19 Outlet structure located near southeast corner of ash pond, photo facing north. Photo 20 Outlet structure located near southeast corner of ash pond. Photo 21 Vertical riser in the outlet pipe located beyond and downstream of the toe.

Photo 22

Emergency spillway on crest of south embankment, photo facing west.

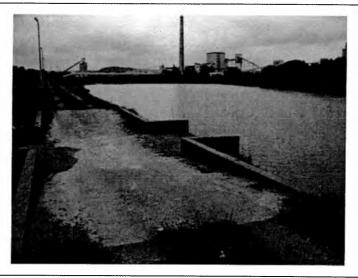


Photo 23

Emergency spillway on crest of south embankment, photo facing west.

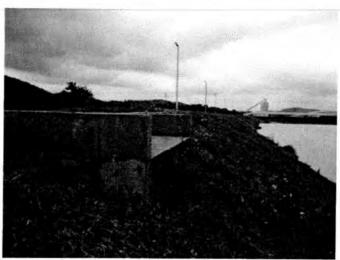


Photo 24

Emergency spillway channel on south embankment, photo facing north.



Photo 25 Emergency spillway channel along toe of south embankment, photo facing east.



Photo 26
Emergency spillway channel along toe of south embankment, photo facing east.

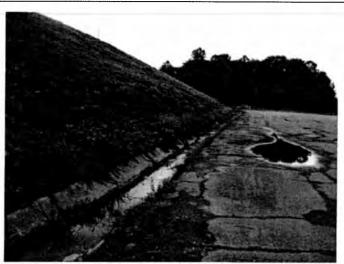
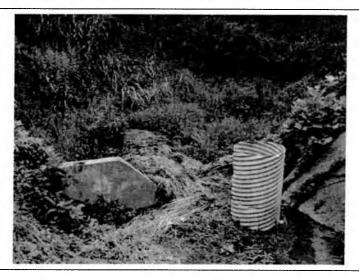


Photo 27

Emergency spillway channel mouth and vertical riser for the outlet pipe along toe of south embankment, photo facing east.



East Bend Ash Pond (013-00442.015) August 2010 – Boone County, Kentucky BBC&M ENGINEERING, INC.

Photo 31 Erosion channel on the upstream slope of the south embankment, photo facing south.



Photo 32 Ash divider dike with

pipe through the ash dike, photo facing west.



Photo 33

Inlet channel flowing through the ash along the south embankment, photo facing west.



East Bend Ash Pond (013-00442.015) August 2010 – Boone County, Kentucky BBC&M ENGINEERING, INC.

Photo 34 Upstream slope of south embankment, west of ash dike, photo facing east.



Photo 35
Crest of south embankment, west of ash dike, photo facing east.



Downstream slope of south embankment, west of ash dike, photo

Photo 36

facing east.



East Bend Ash Pond (013-00442.015) August 2010 – Boone County, Kentucky BBC&M ENGINEERING, INC.

Photo 37

Upstream slope of west embankment, photo facing west.

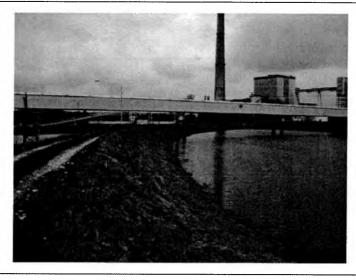


Photo 38

Crest of west embankment, photo facing west.

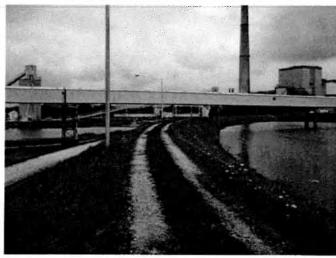


Photo 39

Downstream slope of west embankment, photo facing west.

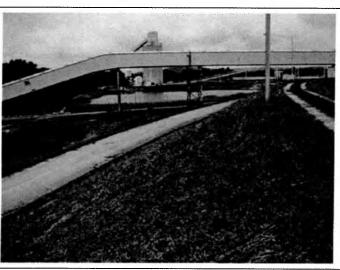


Photo 40

Rip rap placed on the upstream slope below the coal conveyor, photo facing southeast.

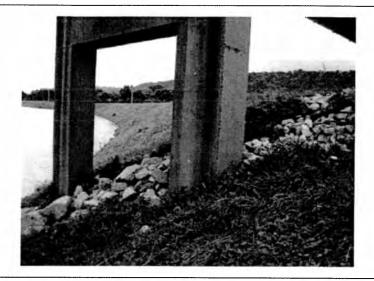


Photo 41

Depression on the downstream slope of the west embankment, photo facing southeast.

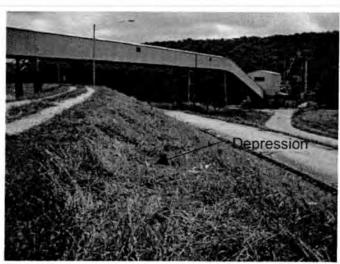


Photo 42

Upstream slope of west embankment, photo facing southeast.



Photo 43 of Crest west embankment, photo facing southeast. Photo 44 Low area on the downstream slope of west embankment, photo facing southeast. Photo 45 Rip rap placed on the upstream slope of the west embankment at the inlet from the structure, wastewater photo facing west.

East Bend Ash Pond (013-00442.015) August 2010 – Boone County, Kentucky BBC&M ENGINEERING, INC.

East Bend Station

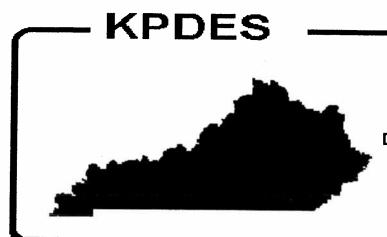
Name: Ash Pond Dam County: Boone Kentucky Inventory Number: 1215

Date: 7/21/10 Inspector(s): JMT, BCD	Temp. & Time:	9:00AM, 82°F
--------------------------------------	---------------	--------------

Pool Level: Normal

Location:		nditio		Comments:
Upstream Slopes:	Good	Fair	Poor	Approximately 2H:1V
Cracks, slides, or erosion	()	(X)	()	Observed several erosion channels
Rodent burrows				None observed
	(X)	()	()	None observed
Condition of Vegetation		(X)	()	Locking ways action aregion along protection
Slope protection		()	(X)	Lacking wave action erosion slope protection
Crest:		()()	7.3	El. 520
Large cracks, ruts, or erosion		(X)		None observed
Low areas, or potholes	()	()	(X)	Observed approximately 12 low areas
Condition of Vegetation	()	(X)	()	
<u>Downstream Slopes:</u>		20		Approximately 2H:1V
Cracks, slides, or erosion	()	(X)	()	None observed
Rodent burrows	(X)	()	()	None observed
Condition of Vegetation	()	(X)	()	Tall grass observed on the southeast corner of
				embankment
Seepage:				
Downstream slope	()	(X)	()	None observed
Saturated or wet areas	()	(X)	()	Wet areas observed beyond the toe of east
				embankment
Low areas or seeps above	()	(X)	()	Low area observed near crest of west
penetrations?	 ` ′	,	` ,	embankment, no seepage observed
Impoundment:				
Pool level	()	(X)	()	Normal pool levels observed to be greater than 10
	` ′	,	` ′	feet below embankment crest(s)
Wave action protection	()	()	(X)	Observed toe erosion along east and south
riare deller protection	` ′	(/	(, ,	embankments
Inlet Structure:				Type: Multiple inlets from the plant and landfill
Structure condition	()	(X)	()	ryper manapro miero nem me piam ama iamam
Debris	(X)	()	()	None observed
Valves		(X)	\sim	Appear to be operating
Outlet Structure:				7,ppour to be operating
Structure condition	()	()	()	Could not observe, structure was below the level
Otractare containon	\ /	()	\	of the Ohio River
Debris	()	(X)	()	None observed, portions under water
Erosion or slides in the outlet channel	()		()	
		(X)		None observed, portions under water
Armor around outlet		()	\mathcal{L}	Could not observe No internal drains observed
Drains:	/ N	(N	1.	no internal drains observed
Condition of drains		11		Time: Disc and riscs stands
Primary Spillway Structure:	()	(\$6)	/ X	Type: Pipe and riser structure
Spillway condition	()	(X)	()	No obstructions observed around inlet pipe.
				Observed flowing water in downstream riser pipes
Emergency Spillway Structure:			l	Type: Concrete lined open-channel spillway, crest
Spillway condition Good – A condition that is generally better than what is r	()	(X)	()	El. 518.5 approximately

Good - A condition that is generally better than what is minimally expected or required Fair/Satisfactory – A condition that generally meets what is minimally expected or required Poor – A condition that is generally below what is minimally expected or required



KENTUCKY POLLUTANT
DISCHARGE ELIMINATION
SYSTEM

PERMIT

PERMIT NO.: KY0040444

AUTHORIZATION TO DISCHARGE UNDER THE KENTUCKY POLLUTANT DISCHARGE ELIMINATION SYSTEM

Pursuant to Authority in KRS 224,

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

is authorized to discharge from a facility located at

The Cincinnati Gas & Electric Company East Bend Station Kentucky Route 338 Rabbit Hash, Boone County, Kentucky

to receiving waters named

Outfalls 001, 003, and 014 are to the Ohio River at mile points 469.9, 470.60, and 470.55, respectively.

Outfalls 007, 008, and 010 are internal outfalls to the Ash Pond (Outfall 001). Outfall 011, the plant intake, is at mile point 470.65 of the Ohio River.

in accordance with effluent limitations, monitoring requirements, and other conditions set forth in PARTS I, II, III, IV, and V hereof. The permit consists of this cover sheet and PART I $\underline{8}$ pages, PART II $\underline{1}$ page, PART III $\underline{1}$ page, PART IV $\underline{2}$ pages, and PART V $\underline{3}$ pages.

This permit shall become effective on APR 1 2004

This permit and the authorization to discharge shall expire at midnight, July 31, 2007.

FEB 5 2004

Date Signed

Jeffrey W. Pratt, Director

Division of Water

Robert W. Logan Commissioner

DEPARTMENT FOR ENVIRONMENTAL PROTECTION
Division of Water, Frankfort Office Park, 14 Reilly Road, Frankfort, Kentucky 40601

PART I

Page I-1 Permit No.: KY0040444

A1. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

flows are: direct storm water runoff to ash pond(0.41, 142 MGD), coal pile runoff(0.11, 39 MGD), scrubber sludge During the period beginning on the effective date of this permit and lasting through the term of this permit, the ignificant contributing landfill runoff(0.51, 176 MGD), bottom ash pyrites and economizer fly ash sluice water(0.27 0.57 MGD), miscellaneous plant drains(1.27, 1.5 MGD), cooling tower overboard(1.43, 143 MGD), sanitary wastewater(0.43, 0.043 permittee is authorized to discharge from Outfall serial number: MGD), and demineralizer regeneration water(0.33, 0.091 MGD)).

Such discharges shall be limited and monitored by the permittee as specified below:

IREMENTS	Sample Type	Recorder Grab Grab Grab Grab
MONITORING REOU	Measurement Frequency	Continuous Recorder 1/Month Grab 1/Month Grab 1/Month Grab 1/Quarter Grab 1/Quarter 1 Grab
MITATIONS	Daily Max.	Report 56 11.5 Report Report 1.00
DISCHARGE LI	Monthly Daily Avg. Max.	Report 30 8.5 Report Report N/A
EFFLUENT CHARACTERISTICS		Flow (MGD) Total Suspended Solids (mg/l) Oil & Grease (mg/l) Hardness (as mg/l) (CaCO ₃) Total Recoverable Metals (mg/l) Acute Toxicity (TU _a)

The pH of the effluent shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored 1/Month by grab sample.

There shall be no discharge of floating solids or visible foam or sheen in other than trace amounts.

following nearest accessible point after final treatment, but prior to actual discharge to or mixing with the Samples taken in compliance with the monitoring requirements specified above shall be taken at the receiving waters or wastestreams from other outfalls.

The abbreviation N/A means Not Applicable.

Copper, Lead, Mercury, Nickel, Selenium, Silver, Thallium, and Zinc. To report the results of the analyses for this parameter, the permittee shall total the results of the analyses for each individual parameter, and report The laboratory bench sheets showing the results for each parameter shall be Cadmium, Chromium, Beryllium, The effluent characteristic "Total Recoverable Metals" means Antimony, Arsenic, that aggregate value on the DMR. attached to the DMR. PART I Page I-2

١

Permit No.: KY0040444

A2. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on the effective date of this permit and lasting through the term of this permit, the heat exchanger by-pass permittee is authorized to discharge from Outfall serial number:

Such discharges shall be limited and monitored by the permittee as specified below:

ITREMENTS	Sample Type	Recorder Recorder
MONITORING REOF	Measurement Sample Frequency Type	Continuous Continuous
MITATIONS	Daily Max.	Report 105
DISCHARGE LI	Monthly Daily Avg. Max.	Report
EFFLUENT CHARACTERISTICS		Flow (MGD) Temperature (°F)

There shall be no discharge of floating solids or visible foam or sheen in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location: nearest accessible point after final treatment, but prior to actual discharge to or mixing with the receiving waters or wastestreams from other outfalls. Parr I
Page I-3
Permit No.: KY004044

A3. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

Outfall 007 is an During the period beginning on the effective date of this permit and lasting through the term of this permit, permittee is authorized to discharge from Outfall serial number: internal outfall to the ash pond (Outfall 001).

Such discharges shall be limited and monitored by the permittee as specified below:

IIREMENTS Sample Type	Instantaneous Grab Grab Grab
MONITORING REQUIREMENTS Measurement Sample Frequency Type	1/Month 1/Month 1/Month 1/Month
AITATIONS Daily Max.	Report 45 45 Report
DISCHARGE LIMITATIONS Monthly Avg. Max.	Report 30 30 0.5
EFFLUENT CHARACTERISTICS	Flow (MGD) Biochemical Oxygen Demand, 5-day (mg/l) Total Suspended Solids (mg/l) Total Residual Chlorine (mg/l)(minimum)

There shall be no discharge of floating solids or visible foam or sheen in other than trace amounts.

nearest accessible point after final treatment, but prior to actual discharge to or mixing with the Samples taken in compliance with the monitoring requirements specified above shall be taken at the receiving waters or wastestreams from other outfalls. location:

certified operator, who must maintain appropriate records to assure compliance with the proper operation and Pursuant to 401 KAR 5:010, Sections 2 and 8, the operation of this wastewater treatment plant requires a Class maintenance requirements of 401 KAR 5:065, Section 1(5). PART I Page I-4 Permit No.: KY0040444

A4. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on the effective date of this permit and lasting through the term of this permit, the Outfall 008 is an permittee is authorized to discharge from Outfall serial number: internal outfall to the ash pond (Outfall 001).

Such discharges shall be limited and monitored by the permittee as specified below:

UIREMENTS	Sample Type	Calculated Grab Grab Grab
MONITORING REO	Measurement Sample Frequency Type	1/Batch 1/Batch 1/Batch 1/Batch
MITATIONS	Monthly Daily Me Avg. F.	Report 1.0 1.0 Report
DISCHARGE LIN	Monthly Avg.	Report 1.0 1.0Report
EFFLUENT CHARACTERISTICS		Flow (MGD) Total Iron (mg/l) Total Copper (mg/l) pH (Standard Units)

location: nearest accessible point after final treatment, but prior to actual discharge to or mixing with the Samples taken in compliance with the monitoring requirements specified above shall be taken at the following receiving waters or wastestreams from other outfalls.

KY0040444 Permit No.: Page I-5 PART I

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

Outfall 010 is an and lasting through the term of this permit, During the period beginning on the effective date of this permit permittee is authorized to discharge from Outfall serial number: internal outfall that discharges to the Ash Pond (Outfall 001).

Such discharges shall be limited and monitored by the permittee as specified below:

DISCHARGE LIMITATIONS EFFLUENT CHARACTERISTICS

	DISCHARGE LIM	TATTONS	MONITORING REO	UIREMENTS
	Monthly Daily	Daily	Measurement Sample	Sample
	Avg.	Max.	Frequency	Type
Flow (MGD)	Report	Beron T	1 /16	
Free Available Chlorine (mg/1))	2 10421	T/MOULU	Instantaneous
metel best designed on the control of the control o	7.0	٥.5	Occurrence	Multiple Grab
Total Residual Chiorine (mg/l)	0.5	0.2	Occurrence	Willtim Och
Total Residual Oxidants (mg/1)	Report	0.0		ייייד פוקדידיייי
Time of Oxidant Addition (Minites/Ass.)	0 10 40 11	7	occurrence	Multiple Grab
	N/A	120	Occurrence	Log
Total Chromium (mg/l)	٥.۶	0.2	Anniellis	ן כ ני זי
Total Zinc (mg/l)	0 -	, ,	tunidat 1	Gran
Dai Cai tee Bolling Car	· ·	O. +	Annually	Grab
Filtricy Follucants (mg/l)	Report	NDA	Annually	Grab
			1	

There shall be no discharge of floating solids or visible foam or sheen in other than trace amounts.

accessible point after final treatment, but prior to actual discharge to or mixing with the receiving waters or mixing with the waters monitoring requirements specified above shall be taken at the following location: Samples taken in compliance with the

calculations shall be totaled and reported as a single concentration on the DMR. The laboratory bench sheets/engineering calculations showing the results for each pollutant shall be attached to the DMR. The term Priority Pollutants means the 126 priority pollutants The term Priority Pollutants means the 126 priority pollutants Priority Pollutants shall be monitored annually by grab sample or by engineering calculations. The results of the analyses/engineering listed in 40 CFR Part 423 Appendix A. See Attachment A - Fact Sheet Addendum for Steam Electric Power Generating Plants.

The term Total Residual Oxidants (TRO) means the value obtained using the amperometric titration or DPD methods for total residual In the event of addition of an oxidant other than chlorine, the permittee shall receive prior approval from the Division of Water permitting staff before the initial use. chlorine described in 40 CFR Part 136.

The measurement frequency "Occurrence" means during periods of chlorination or oxidant addition, but no more frequent than once per

The sample type "Multiple Grab" means grab samples collected at the approximate beginning of oxidant discharge and once every fifteen minutes thereafter until the end of oxidant discharge.

The abbreviation N/A means Not Applicable.

The abbreviation NDA means No Detectable Amount.

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KY0040444

A6. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

the and lasting through the term of this permit, During the period beginning on the effective date of this permit_ permittee is authorized to discharge from Outfall serial number:

Such discharges shall be limited and monitored by the permittee as specified below:

MONITORING REQUIREMENTS Measurement Sample Frequency Type	Continuous Recorder Continuous Recorder 1/Month Grab 1/Month Grab 1/Month Grab
MITATIONS Daily Max.	Report Report Report Report Report
DISCHARGE LIMITATIONS Monthly Daily Avg.	Report Report Report Report Report
EFFLUENT CHARACTERISTICS	Flow (MGD) Temperature (°F) Total Suspended Solids (mg/l) Hardness (as mg/l)(CaCO ₃) pH (Standard Units) Total Recoverable Metals

There shall be no discharge of floating solids or visible foam or sheen in other than trace amounts.

the following Samples taken in compliance with the monitoring requirements specified above shall be taken at location: plant intake, except that temperature may be monitored at the river pumps.

Copper, Lead, Mercury, Nickel, Selenium, Silver, Thallium, and Zinc. To report the results of the analyses for this parameter, the permittee shall total the results of the analyses for each individual parameter and report that The laboratory bench sheets showing the results for each parameter shall be attached Cadmium, Chromium, The effluent characteristic "Total Recoverable Metals" means Antimony, Arsenic, Beryllium, aggregate value on the DMR. to the DMR. PART I Page I-7 Permit No.: KY004044

A7. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

the term of this permit, the from the main During the period beginning on the effective date of this permit and lasting through permittee is authorized to discharge from Outfall serial number: plant area.

Such discharges shall be limited and monitored by the permittee as specified below:

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS	MITATIONS	MONITORING RE	QUIREMENTS
	Monthly Avg.	Daily Max.	Measurement Sample Frequency Type	Sample Type
Flow (MGD)	Report	Report	1/Quarter	Instantaneous
Precipitation (inches)	Report	Report	1/Quarter	Grab
Total Suspended Solids (mg/l)	Report	Report	1/Quarter	Grab
Oil & Grease (mg/l)	Report	Report	1/Quarter	Grab
Hardness (as mg/1) (CaCO ₃)	Report	Report	1/Quarter	Grab
pH (Standard Units)	Report	Report	1/Quarter	Grab
Total Recoverable Metals	N/A	Report	1/Quarter	Grab

There shall be no discharge of floating solids or visible foam or sheen in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following but prior to actual discharge to or missing with the receiving waters or other wastestreams from other location: outfalls.

Copper, Lead, Mercury, Nickel, Selenium, Silver, Thallium, and Zinc. To report the results of the analyses for this parameter, the permittee shall total the results of the analyses for each individual parameter and report that The laboratory bench sheets showing the results for each parameter shall be attached The effluent characteristic "Total Recoverable Metals" means Antimony, Arsenic, Beryllium, Cadmium, Chromium, aggregate value on the DMR.

PART I Page I-8

Permit No.: KY0040444

B. Schedule of Compliance

The permittee shall achieve compliance with all requirements on the effective date of this permit.

C. Cooling Water Additives, FIFRA, and Mollusk Control

The discharge of any product registered under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) in cooling water which ultimately may be released to the waters of the Commonwealth is prohibited, except Herbicides, unless specifically identified and authorized by the KPDES permit. In the event the permittee needs to use a biocide or chemical not previously reported for mollusk control or other purpose the permittee shall submit sufficient information, a minimum of thirty (30) days prior to the commencement of use of said biocides or chemicals, to the Division of Water for review and establishment of appropriate control parameters. Such information requirements shall include:

- 1. Name and general composition of biocide or chemical,
- 2. Any and all aquatic organism toxicity data,
- 3. Quantities to be used,
- 4. Frequencies of use,
- 5. Proposed discharge concentrations, and
- 6. EPA registration number, if applicable.
- D. Polychlorinated Biphenyls

Pursuant to the requirements of 401 KAR 5:065, Section 4(4) (40 CFR Parts 423.12(b)(2) and 423.13(a)), there shall be no discharge from any point source of polychlorinated biphenyl compounds such as those commonly used in transformer fluids. The permittee shall implement this requirement as a specific section of the BMP plan developed for this station.

E. Selective Catalytic Reduction Devices or Systems (SCRs) and Nonselective Catalytic Reduction Devices or Systems (NSCRs)

In response to recent Clean Air Act amendments, the installation of these devices for NOx reduction may become necessary. Associated with the installation and operation of these units, an "ammonia slip" may occur resulting in the discharge of ammonia to the ash pond. The impact of such an occurrence on the performance of the ash pond and any eventual impact on the environment are not known. Therefore, should it become necessary to install these devices, the permittee shall develop and implement an Ammonia Monitoring Plan. The plan shall be submitted to the Division of Water within ninety (90) days of the determination that these devices will be installed, and shall include at a minimum influent and effluent monitoring of each unit on a monthly basis with submission of the data as a quarterly report.

F. Section 311, Clean Water Act Exclusion

The permittee is relieved of the reporting and liability requirements under Section 311 of the Clean Water Act for the following substances, consistent with Exclusion 2, authorized by Section 311(a)(a)(B) and 40 CFR Part 117.12 for: Ammonium Hydroxide, Sodium Hypochlorite, Ethylene Diaminetetracetic Acid (EDTA), Sodium Hydroxide, Sodium Nitrite, Sodium Phosphate (Dibasic), and Sulfuric Acid.

PART II
Page II-1
Permit No.: KY0040444

STANDARD CONDITIONS FOR KPDES PERMIT

The permittee is also advised that all KPDES permit conditions in KPDES Regulation 401 KAR 5:065, Section 1 will apply to all discharges authorized by this permit.

This permit has been issued under the provisions of KRS Chapter 224 and regulations promulgated pursuant thereto. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits or licenses required by this Cabinet and other state, federal, and local agencies.

It is the responsibility of the permittee to demonstrate compliance with permit parameter limitations by utilization of sufficiently sensitive analytical methods.

PART III Page III-1

Permit No.: KY0040444

PART III

OTHER REQUIREMENTS

A. Reporting of Monitoring Results

Monitoring results obtained during each month must be reported on a preprinted Discharge Monitoring Report (DMR) Form, which will be mailed to you. Each month's completed DMR must be sent to the Division of Water at the address listed below (with a copy to the appropriate Regional Office) postmarked no later than the 28th day of the month following the month for which monitoring results were obtained.

Division of Water Florence Regional Office 8020 Veterans Memorial Drive Suite 110 Florence, Kentucky 41042 ATTN: Supervisor

Kentucky Natural Resources and Environmental Protection Cabinet Dept. for Environmental Protection Division of Water/KPDES Branch 14 Reilly Road, Frankfort Office Park Frankfort, Kentucky 40601

B. Reopener Clause

This permit shall be modified, or alternatively revoked and reissued, to comply with any applicable effluent standard or limitation issued or approved under 401 KAR 5:050 through 5:080, if the effluent standard or limitation so issued or approved:

- 1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
- Controls any pollutant not limited in the permit.

The permit as modified or reissued under this paragraph shall also contain any other requirements of KRS Chapter 224 when applicable.

PART IV
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PART IV ACUTE CONCERNS Biomonitoring

In accordance with Part I of this permit, the permittee shall initiate the series of tests described below within 30 days of the effective date of this permit to evaluate wastewater toxicity of the discharge from Outfall 001. If the permittee is using a more sensitive species, the initial four (4) tests shall be conducted using both test species as indicated below to provide confirmation of previously identified most sensitive test organism.

1. Test Requirements

- The permittee shall perform a 48-hour static toxicity test with Ceriodaphnia sp. Tests shall be conducted on one (1) grab. Tests shall be conducted with appropriate replicates of 100% effluent, a control and a minimum of four (4) evenly spaced effluent concentrations. If the permit limit is less than 100% effluent and greater than or equal to 75% effluent, then one (1) concentration should be 100%. If the permit limit is less than 75% effluent, the permit limit concentration shall be bracketed with two (2) concentrations above and two (2) concentrations The selection of the effluent concentrations is subject to below. revision by the Division. Testing of the effluent shall be initiated within 36 hours of each sample collection. Controls shall be conducted concurrently with effluent testing using a synthetic water. The analysis will be deemed reasonable and good only if control survival is 90% or greater in test organisms held in synthetic water. Any test that does not meet the control acceptability criteria shall be repeated as soon as practicable within the monitoring period (i.e. monthly or quarterly). Noncompliance with the toxicity limit will be demonstrated if the LC_{50} is less than 100% effluent.
- B. Tests shall be conducted quarterly or at a frequency to be determined by the permitting authority.

2. Reporting Requirements

Results of all tests conducted with any organism shall be reported according to the most recent format provided by the Division of Water. Test results shall be submitted to the Division of Water with the next regularly scheduled discharge monitoring report.

Due to administrative and regulatory constraints regarding the requirements of Section 3 of this Part, monthly DMRs shall be submitted. Those required to conduct tests on a frequency other than monthly shall submit DMRs with "Not required this monitoring period" typed or written in the parameter row in addition to the DMR reporting the results of the test. All DMRs for biomonitoring shall be submitted monthly regardless of required monitoring frequency.

PART IV
Page IV-2
Permit No.: KY0040444

3. Acute Toxicity

A. If noncompliance with the toxicity limit occurs (the LC_{50} is less than 100% effluent), the permittee must conduct a second test within 10 days of the first failure. This test will be used in evaluating the persistence of the toxic event and the possible need for a toxics reduction evaluation (TRE).

If the second test demonstrates noncompliance with the toxicity limit, the permittee will be required to perform either of the options listed below. The Division must be notified of the option selected within five (5) days of the failure of this second test.

1) Accelerated Testing

Complete four (4) tests within 60 days of selection of this option to evaluate the frequency and degree of toxicity. The results of the two (2) tests specified in Section 3.A and of the four (4) additional tests will be used for purposes of this evaluation.

If results from two (2) of any six (6) tests show a significant noncompliance with the acute limit (≥ 1.2 times the TU_a), or results from four (4) of any six (6) tests show acute toxicity (as defined in 1.A), a Toxicity Reduction Evaluation (TRE) will be required. The Division reserves the right to require a TRE in situations of recurring toxicity.

2) Toxicity Reduction Evaluation (TRE)

If it is determined that a TRE is required, a plan and implementation schedule must be submitted to the Division within 30 days of notification. The TRE shall include appropriate measures such as in-plant controls, additional treatment, or changes in the operation of the wastewater discharge to meet permit conditions. The TRE protocol shall follow that outlined in the most recent edition of EPA's guidance manual for conducting TREs.

B. If a violation of the toxicity limit occurs, different or more stringent monitoring requirements may be imposed in lieu of the normal requirements of this permit for whatever period of time is specified by the Division of Water. The Division reserves the right to require additional testing or a TRE in situations of recurring toxicity.

4. Test Methods

All test organisms, procedures, and quality assurance criteria used shall be in accordance with Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, EPA/600/4-90/027F (4th edition) or the most recently published edition of this publication.

PART V Page V-1

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PART V

BEST MANAGEMENT PRACTICES

SECTION A. GENERAL CONDITIONS

1. Applicability

These conditions apply to all permittees who use, manufacture, store, handle, or discharge any pollutant listed as: (1) toxic under Section 307(a)(1) of the Clean Water Act; (2) oil, as defined in Section 311(a)(1) of the Act; (3) any pollutant listed as hazardous under Section 311 of the Act; or (4) is defined as a pollutant pursuant to KRS 224.01-010(35) and who have ancillary manufacturing operations which could result in (1) the release of a hazardous substance, pollutant, or contaminant, or (2) an environmental emergency, as defined in KRS 224.01-400, as amended, or any regulation promulgated pursuant thereto (hereinafter, the "BMP pollutants"). These operations include material storage areas; plant site runoff; in-plant transfer, process and material handling areas; loading and unloading operations, and sludge and waste disposal areas.

2. BMP Plan

The permittee shall develop and implement a Best Management Practices (BMP) plan consistent with 401 KAR 5:065, Section 2(10) pursuant to KRS 224.70-110, which prevents or minimizes the potential for the release of "BMP pollutants" from ancillary activities through plant site runoff; spillage or leaks, sludge or waste disposal; or drainage from raw material storage. A Best Management Practices (BMP) plan will be prepared by the permittee unless the permittee can demonstrate through the submission of a BMP outline that the elements and intent of the BMP have been fulfilled through the use of existing plans such as the Spill Prevention Control and Countermeasure (SPCC) plans, contingency plans, and other applicable documents.

3. Implementation

If this is the first time for the BMP requirement, then the plan shall be developed and submitted to the Division of Water within 90 days of the effective date of the permit. Implementation shall be within 180 days of that submission. For permit renewals the plan in effect at the time of permit reissuance shall remain in effect. Modifications to the plan as a result of ineffectiveness or plan changes to the facility shall be submitted to the Division of Water and implemented as soon as possible.

4. General Requirements

The BMP plan shall:

- a. Be documented in narrative form, and shall include any necessary plot plans, drawings, or maps.
- b. Establish specific objectives for the control of toxic and hazardous pollutants.
 - (1) Each facility component or system shall be examined for its potential for causing a release of "BMP pollutants" due to equipment failure, improper operation, natural phenomena such as rain or snowfall, etc.

PART V
Page V-2
Permit No.: KY0040444

- (2) Where experience indicates a reasonable potential for equipment failure (e.g., a tank overflow or leakage), natural condition (e.g., precipitation), or other circumstances which could result in a release of "BMP pollutants," the plan should include a prediction of the direction, rate of flow, and total quantity of the pollutants which could be released from the facility as result of each condition or circumstance.
- c. Establish specific Best Management Practices to meet the objectives identified under paragraph b of this section, addressing each component or system capable of causing a release of "BMP pollutants."
- d. Include any special conditions established in part b of this section.
- e. Be reviewed by plant engineering staff and the plant manager.

5. Specific Requirements

The plan shall be consistent with the general guidance contained in the publication entitled "NPDES Best Management Practices Guidance Document," and shall include the following baseline BMPs as a minimum.

- a. BMP Committee
- b. Reporting of BMP Incidents
- c. Risk Identification and Assessment
- d. Employee Training
- e. Inspections and Records
- f. Preventive Maintenance
- g. Good Housekeeping
- h. Materials Compatibility
- i. Security
- j. Materials Inventory

6. SPCC Plans

The BMP plan may reflect requirements for Spill Prevention Control and Countermeasure (SPCC) plans under Section 311 of the Act and 40 CFR Part 151, and may incorporate any part of such plans into the BMP plan by reference.

7. <u>Hazardous Waste Management</u>

The permittee shall assure the proper management of solid and hazardous waste in accordance with the regulations promulgated under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1978 (RCRA) (40 U.S.C. 6901 et seq.) Management practices required under RCRA regulations shall be referenced in the BMP plan.

PART V Page V-3

Permit No.: KY0040444

8. Documentation

The permittee shall maintain a description of the BMP plan at the facility and shall make the plan available upon request to NREPC personnel. Initial copies and modifications thereof shall be sent to the following addresses when required by Section 3:

Division of Water Florence Regional Office 8020 Veterans Memorial Drive Suite 110 Florence, Kentucky 41042 ATTN: Supervisor

Kentucky Natural Resources and Environmental Protection Cabinet Dept. for Environmental Protection Division of Water/KPDES Branch 14 Reilly Road, Frankfort Office Park Frankfort, Kentucky 40601

9. BMP Plan Modification

The permittee shall amend the BMP plan whenever there is a change in the facility or change in the operation of the facility which materially increases the potential for the ancillary activities to result in the release of "BMP pollutants."

10. Modification for Ineffectiveness

If the BMP plan proves to be ineffective in achieving the general objective of preventing the release of "BMP pollutants," then the specific objectives and requirements under paragraphs b and c of Section 4, the permit, and/or the BMP plan shall be subject to modification to incorporate revised BMP requirements. If at any time following the issuance of this permit the BMP plan is found to be inadequate pursuant to a state or federal site inspection or plan review, the plan shall be modified to incorporate such changes necessary to resolve the concerns.

SECTION B. SPECIFIC CONDITIONS

Periodically Discharged Wastewaters Not Specifically Covered By Effluent Conditions
The permittee shall include in this BMP plan procedures and controls necessary for
the handling of periodically discharged wastewaters such as intake screen backwash,
meter calibration, fire protection, hydrostatic testing water, water associated with
demolition projects, etc.



EAST BEND ASH POND

OPERATION MAINTENANCE MANUAL AND EMERGENCY ACTION PLAN (PURSUANT TO 401 KAR 4:030)

(A) Operation Plan

The Ash Pond is used as a settling pond for coal ash (bottom 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

The Ash Pond is visited (drive by) daily by lab personnel and visually inspected monthly by Ash Management personnel and records are made of those drive by/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 the Ash Pond

(F) Emergency Action Plan

PURPOSE OF PLAN

The purpose of the Emergency Action Plan is to provide a written plan that personnel at East Bend 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. Visual observations indicate that slope failure may be imminent.

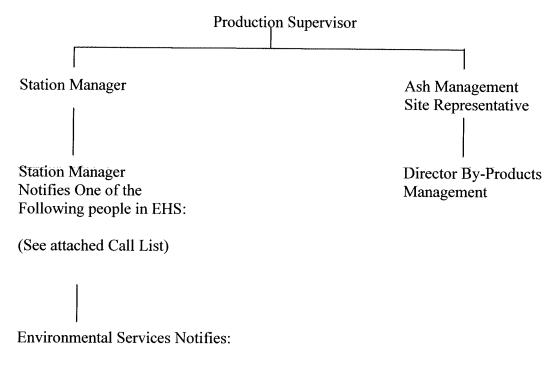
COURSE OF ACTION

- 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 513-467-4733

PRODUCTION SUPERVISOR SHALL CONTACT ALL THE FOLLOWING PEOPLE



Kentucky Department of Environmental Protection Division of Water Dam Safety and Flood Compliance 502-564-3410

DUKE ENERGY SPILL/RELEASE CONTACTS – OHIO & KENTUCKY 8/4/2010

1. Environmental Staff

The following contact list should be used by Duke Midwest 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. If there has been no response to your page within two (2) minutes, continue down the list.

	<u>Office</u>	<u>Home</u>	Cell Phone/Pager
Pat Coyle	513-287-2268	513-877-2122	513-509-0040 (cell)
Randy Born	513-287-3234	859-261-1678	513-260-1679 (cell)
Tammy Jett	513-287-2208	513-738-0203	513-659-9198 (cell)
Jim Stieritz	513-287-2269	859-635-1595	513-260-3298 (cell)
Kerri Buhrlage	513-287-2414	513-385-1235	513-673-4738 (cell)
John Funke	513-287-3821	513-574-6230	513-219-3247 (pager)
John Pike	317-838-6218	317-539-7529	317-431-5488 (cell)
Bill Taylor	317-838-1711	317-796-6572 (cell)	317-796-6572 (cell)
Mike Judd	317-838-1729	317-272-0803	317-670-5038 (cell)
Pat McKee	317-838-1194	317-745-4428	317-430-2764 (cell)
Debbie Nispel	317-838-1957	765-653-6542	765-720-2077 (cell)

2. Duke Energy Ohio and Duke Energy Kentucky Regional Communications

If the release could cause concern to the public or involve the news media, Duke Energy's local media relations staff should be contacted as soon as possible, regardless of the time of day. Start at the top of the list and continue calling until you have reached one of the people listed below.

	<u>Office</u>	<u>Home</u>	Cell Phone/Pager
Johnna Reeder	513-419-5760	859-360-0787	513-256-8411 (cell)
Angeline Protogere	317-838-1338	317-298-3090	317-367-3306 (pager)
Lew Middleton	317-838-1505	317-773-0417	317-474-7448 (cell)

DUKE ENERGY

MONTHLY DAM INSPECTION CHECKLIST

NAME OF STATION: **INSPECTOR: WEATHER:**

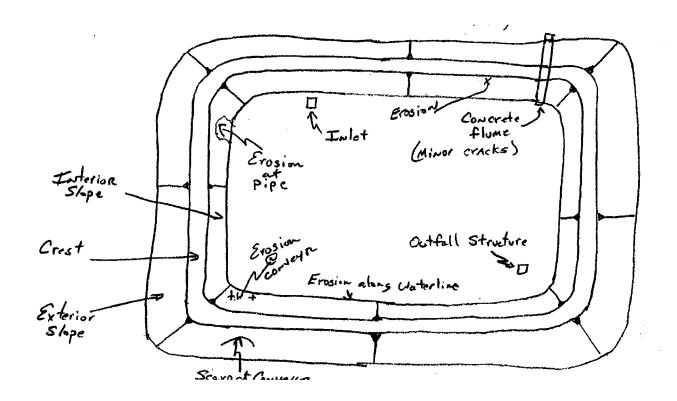
COUNTY, ST: INSPECTION DATE: AMT OF RAINFALL IN LAST 24 HOURS:

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?					Ô	
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		Monito	or
Are all Piezometers working properly?					\boxtimes	
Comments:						

Monitoring Wells				No	N/A	Monitor		
Are all monitoring wells worki	ng properly	?				\boxtimes		
Comments:								
Drains			Yes	No	N/A	Monitor		
Are all drains working properly	/?					\boxtimes		
Comments:								
Survey Monuments				No	N/A	Monitor		
Are all survey monuments in p	lace?							
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	
	that I have reviewed the following checklist and have taken the appropriate ediate 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	-				County		
CLASSIFICATION DAT	A:	Size:			Hazard	<u>:</u>	
PHYSICAL DATA: Type of Dam:	F	leight of	Dam:		_ Normal	Pool Storage Capacity:	
OPERATOR:ADDRESS:PHONE: ()				_ E-MAIL	ADDRESS:		
PERSONS PRESENT AT Name	INSPEC		: Position			Representing	
					•		
DATE OF INSPECTION:							
WEATHER:			<u></u>				
TEMPERATURE:							
			This is to cer following are	-		has been inspected and the ection.	
		-	·····			Date	

NAM	ME OF DAM:	DATE	•					
			1	***				
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								
Add	itional Comments (Refer to iter	n 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 iten	n number if applicable):						
	EMI	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	Additional Comments (Refer to item number if applicable):							

NAI	ME OF DAM:	DATE:			**************************************
ITEM	CONDITION	COMMENTS	Montor	REPAIR	Evaluate
	EMI	BANKMENT: INSTRUMENTATION		<u> </u>	1
28	Piezometers/Observ. Wells				ПП
29	Staff Gauge and Recorder		П	Ħ	tĦ
30	Weirs		Ħ	H	Ħ
31	Survey Monuments		Ħ		Ħ
32	Drains		Ħ	Ħ	H
33	Low Flow Release		Ħ	Ħ	一
34	Frequency of Readings		Ħ	Ħ	一
35	Location of Records		Fil	Ħ	ऻऻ
36			Ħ	Ħ	Ħ
37			Ħ	П	m
Add	itional Comments (Refer to item	number if applicable):	<u></u>	<u> </u>	
		DOWNSTREAM AREA	·		
38	Abutment Leakage		ПП		П
39	Foundation Seepage			Ħ	Ħ
40	Slide, Slough, Scarp		Ħt	Ħ	Ħ
41	Drainage System		M	Ħ	Ħ
42	Boils		M		Ħ
43	Wet Areas			Til	Ħ
44	Reservoir Slopes			M	Ħ
45	Access Roads				ĦI
46	Security Devices				
47	Signs and Buoys		T	而	而
48			Ħ۲	Ħ	一一
49			Ħt	Ħt	퓜
Addi	tional Comments (Refer to item n	number if applicable):			
	SPII	LLWAYS: ERODABLE CHANNEL			
50	Slide, Slough, Scarp		-		\vdash
51	Erosion		$\dashv +$	$\dashv +$	$\exists \exists$
52	Vegetation Condition		$\dashv \vdash$	計	卌
53	Debris		$\dashv \vdash$	計	州
54			計	計十	計
55			7	Ħt	計
Addi	tional Comments (Refer to item no	umber if applicable):		<u> </u>	

NAN	ME OF DAM:	DATE		*				
ITEM	CONDITION	COMMENTS	Monnor	Repair	Evaluate			
	SPIL	LWAYS: NON-ERODABLE CHANNEL		'				
56	Sidewalls							
57	Channel Floor			П				
58	Unusual Movement			Ħ				
59	Approach Area				m			
60	Weir or Control			Ħ				
61	Discharge Channel							
62	Boils or Bimps		Ħ	П				
63								
64								
Add	itional Comments (Refer to iter	m number if applicable):						
		SPILLWAYS: DROP INLET						
65	Intake Structure			П	\Box			
66	Trashrack				Ħ			
67	Stilling Basin			Ħ				
68			Ħ	Ħ				
69			Ħ	Ħ	Ħ			
Add	itional Comments (Refer to iten	n number if applicable):		<u> 1</u>				
		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	Additional Comments (Refer to item number if applicable):							

NAM	IE OF DAM:	DATE			**************************************				
ITEM	CONDITION	COMMENTS	Monnor	REPAIR	EVALUATE				
		RESERVOIR AREA							
81	Sedimentation								
82	Slope Stability								
83	Sinkholes								
84	Fractures								
85	Unwanted Growth								
86	Storage Gage								
Add	Additional Comments (Refer to item number if applicable):								
Fin	Final Comments:								

DAM Inspection CHECKLIST Duke Energy Program Engineering

	Program Engineering									
NA	NAME OF DAM:									
			Downstream Hazard Description is accurate and the Peeen inspected and the following are the results of these							
1	Name of Dam Owner Signature of Dam Owner Date									
Th	is Dam Owners]		to accompany the Inspection Checklist filed by the E	Ingineer	r.					
Dat	te of Last Undate		RGENCY ACTION PLAN							
Do	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	Renaced				
Add	Additional Comments (Refer to item number if applicable):									



DUKE ENERGY FOSSIL HYDRO GENERATION

PROGRAM ENGINEERING PROCEDURE

FHGP-112 Fossil Impoundment Dam Inspection Program

Process/Program Owner: Program Engineering

REVISION NUMBER	ISSUE DATE				
000	06/30/2010				
Fossil-Hydro Generation					

Approved By/Date

Dave Waugh/07/01/2010

Senior Project Director, Program Engineering, Fossil-Hydro Generation

Effective Date:

07/01/2010

Issued By:

David W Arndt / Manager, Process & Sys Integration

Effective Date:

07/01/2010

VERIFICATION OF PROCEDURE

Procedure Title: Fossil Impoundment Dam Inspection Pr	rogram
Procedure Number: FHGP- 112	Revision: 000
The quality of this Procedure has been assured. Signatur originated and approved as noted below:	res certify that the above Procedure was
Prepared By:	Date: 4/30/2010
Checked By: B. H. Tolon	Date: 6/30/10
Approved By:	Date: 6/30/2010

CONTENTS:

- Purpose
- Introduction
- Authorization
- Objectives
- Scope
- Regulatory Requirements
 - o State Jurisdiction Table
- Dam Inspection
 - o Methods
 - o Time Schedule
 - o Responsible Party
 - o Qualified Inspector
 - o Inspection checklist
 - o Final Inspection Report
 - o Responsibilities, Approvals and Distribution
- Record Retention
 - o eTRAC Utilization
 - o How long to retain
- Records Review
 - o Data Collection
 - o General Review schedule
 - o Action to address compliance problem
- Exhibits
 - o Checklists

PURPOSE:

This procedure establishes the guidelines and objectives for the planning, conducting and reporting of Fossil Impoundment Dam and Dike Inspections and planning for maintenance and repairs.

INTRODUCTION:

The past decade has brought an ever increasing amount of attention and environmental awareness to how we as a utility manage our waste streams. Program Engineering has developed this detailed procedure to ensure safety and regulatory compliance of the stations' combustion byproduct and cooling water impoundments.

The program is based upon a three-tiered approach, relying on an examination of existing conditions, third party inspections and periodic reviews. The first level of the program is the Monthly Inspection; this inspection will be conducted by the Station Dam Equipment Owners (plant personnel). The second level is an Annual Inspection; this inspection will be performed by representatives from Program Engineering, Environmental Health and Safety (EH&S), and the Dam Equipment Owners. The third level is an inspection performed every 2 to 5 years by a Federal/State Agency or 3rd party engineering firm; this inspection can be substituted for the Annual Inspection.

The use of the three-tiered program of fossil impoundment dam inspections reinforces the company's commitment to environmental compliance and to conducting its operations with appropriate concern for the structural integrity of its dams.

DEFINITIONS:

<u>Berm</u> - a mound of earth, often linear, to form a boundary, designed to keep flood flows from entering an adjacent area.

<u>Coal Combustion ByProducts (CCP)</u> - generated from burning coal in coal-fired power plants. These byproducts include fly ash, bottom ash, boiler slag, and flue gas desulfurization gypsum.

<u>Dam</u>* - A constructed wall that crosses a stream bed to hold back a body of water.

<u>Dike*</u> – A constructed wall that forms a boundary for a body of water without crossing the main stream bed.

<u>Divider Dike</u> – An intermediate Dike within an ash pond that may be constructed on top of Ash, or constructed largely out of compacted Ash. A Divider Dike failure would in no way jeopardize public safety or result in a release of coal combustion byproducts.

<u>Impoundment</u> – A Body of water created by a dam or dike.

* For the purposes of this procedure, Dam will mean both Dam and Dike.

AUTHORIZATION:

Program Engineering has the responsibility for the development and implementation and management of a companywide Fossil Impoundment Dam Inspection Program and Procedure.

OBJECTIVES:

- To effectively manage, inspect, and maintain the fossil impoundment dams.
- To resolve any potential problems with the existing dams and to ensure compliance with the federal, state and local regulations that govern them.
- To establish a consistent and reliable inspection program throughout the entire Duke Energy Company.

SCOPE:

This procedure applies to any Duke Energy Fossil Impoundment Dams that are not licensed by the Federal Energy Regulatory Commission (FERC). These impoundments include those that contain water or coal combustion byproducts including gypsum, fly ash, bottom ash and boiler slag.

STATE REQUIREMENTS:

Duke Energy has dams in the Midwest and Carolinas regions. The Midwest region includes the states of Indiana, Ohio and Kentucky. The Carolinas region includes North and South Carolina. These five states have separate agencies that regulate dams. Every agency has a different classification system, inspection duration and overall inspection program. It is important that Duke Energy comply with each state's dam regulations. On the following page is the breakdown of the five states and their corresponding regulatory agency.

State Jurisdiction Table

1	Primary				Classification			
	Agency			Hgh	Moderate	worl	General Requirements	Frequency
Indiana	Department of Natural Resources	Division of water	Dam Safety	High hazard (1): A structure the failure of which may cause the loss of life and serious damage to homes, industrial and commercial buildings, public utilities, implor highways, or railroads.	Significant hazard (2): A structure the failure of which may damage isolated homes and highways, or cause the temporary interruption of public utility services.	Low Hazard (3): A structure the failure of which may damage farm buildings, agricultural land or local roads.	Dam Safety Inspection Emergency Action Plans • Operations, Maintenacrice and Inspection Manuals (OM&!)	Owner - Periodically • Spiliway- minimum once per year • High Hzzard- professionally every 2 years
Kentucky	Department of Natural Resources and Environmental Protection	Division of water	Dam Safety	High Hazard (C): Structures located such that failure may cause loss of life or serious damage to houses, industrial or commercial buildings, important public utilities, main highways or major raliroads	Moderate Hazard (B): Structures located such that failure may cause significant damage to property and project operation, but loss of human life is not envisioned.	Low Hazard (A): Structures located such that failure would cause loss of the structure liself but little or no additional damage to other property	Emergency Action Emergency Action Plans *Operations, Maintenacnce and Inspection Manuals (OM&!)	Owner - Periodically + High and Moderatre-hazard dams every 2 years Low Hazard dams - every 5 years
Ohio	Department of Natural Rasources	Division of water	Dam Safety	Class I: Dams >5,000 acre-feet max storage volume or >60 feet high. A dam shall be placed in class I when sudden is failure of the dam would result in one of the following conditions. (a) Probable loss of human life. (b) Structural is collapse of at least one residence or one	Class II: Dams . 500 acre-feet max storage volume or > 40 feet high. A dam shall be placed in class II when sudden failure of the dam would result in significant property damage, but loss of human life is not probable.	Class III. Dams >SO acre-feet max storage volume or >25 feet high. A dam shall be placed in class III when sudden failure of the dam would result in significant property damage, but loss of human III is not probable or Class Wr. Dams & So acte-feet max storge volume or 5 25 feet high. When sudden failure of the dam would result in property losses restricted mainly to the dam and rural lands, and loss of human III if is not probable.	Dam Safety Inspection Emergency Action Plans Operations, Maintenance and Inspection Manuals (OMB)	• Owner - Periodically • Yearly- Engineer/Owner • ODNR - Engineer's Safety Inspection 3 to 5 years
				commercial or industrial business.		Class IV: Dams 550 arte-feet max storge volume or 525 feet high. When sudden failure of the dam would result in property losses restricted mainly to the dam and rural lands, and loss of human life is not probable.		
North Carolina	Department of Environmental and Nautral Resources	Division of Land Resources	Dam Safety	High (C): Loss of human life - Probable loss of 1 or more human lives, Probable loss of human life due to breached roadway or bridge on or below the dam - 250 or more vehicles per day, Economit damage - Nore than \$200,000	Intermediate (B): Damage to highways, interruption of service - 25 to less than 250 volvides per day, Economic damage -530,000 to less than \$20,000	Low (A): Interruption of road service, Jow Volume roads: Less than 25 vehicles per day, Economic damage - Less than 530,000.	• Dam Safety inspection • Emergency Action Plans • Operations, Maintenance and Inspection Manuals (OM&I)	• Class A and B dams once every 5 years
South Carolina	Department of Heath and Environmental Control	Division of water	Dam and Reservoirs Safety Programs	High Hazard (Class I): Dams located where failure will likely cruel oss of life or serious damage to homes(s). Industrial and commercial facilities, main highway(s) or railroads.	Significant Hazard (Class II): Dams located where failure will not likely cause loss of life but may damage home(s), industrial and commercial facilities, secondary highway(s) or railroad(s) or cause interruption of use or service of relatively important public utilities	Low Hazard (Class III): Dams located where failure may cause minimal property damage to others. Loss of life is not expected.	• Dam Safety Inspection • Emergency Action Plans • Operations, Maintenacroce and Inspection Manuals (OM&I)	• Class i - each 2 years • Class II - each 3 years • Class III - each 6 years upon renewal of certificate

Indiana

Under the Indiana Department of Natural Resources.

Information Maintained by the Office of Code Revision Indiana Legislative Services Agency -

Frequency of inspection:

- Owner Periodically
- Spillway minimum of one per year
- High Hazard professionally every two (2) years

Kentucky

- Under the Kentucky Department of Natural Resources and Environmental Protection.
- KRS 151293, Section 6, authorizes the Energy and Environment Cabinet to inspect existing structures that meet the definition of a dam. The Dam Safety and Floodplain Compliance Section of the Water Infrastructure Branch maintain a list of these structures in an inventory database.
- High and moderate hazard dams are inspected every two years. Low hazard dams are inspected at least every five years.
- Items of general maintenance of a dam shall include provisions for at least the following: dams shall be mowed regularly; dams shall be free of trees and brush; animal burrows shall not be allowed on dams; slides, erosion and cracks that could pose problems to dams shall be properly repaired; action shall be taken to alleviate excessive wetness and abnormal seepage; appurtenances that are necessary for the proper operation and maintenance of the dam shall be kept in proper working condition.

North Carolina

- Under North Carolina Department of Environmental and Natural Resources (NCDENR) effective January 1, 2010.
- The rules and regulations contained in the Dam Safety Law of 1967, as expressed in G.S. 143-215.24 authorizes the implementation of a dam inspection and certification program in the interest of public health, safety and welfare.
- The NC Dam Safety Law of 1967 states that the Department may at any time inspect any dam, including a dam that is otherwise exempt from this Law, upon receipt of a written request of any affected person or agency, or upon a motion of the Environmental Management Commission. Within the limits of available funds the Department shall endeavor to provide for inspection of all dams at intervals of approximately five years.

- All class A (Low) and B (Intermediate) dams shall be inspected at least once every five years.
- Class C (High) dams shall be inspected at least once every two years.
- At any time an inspection indicates that a dam may not perform satisfactorily or that the hazard classification has changed, the Director of Dam Safety may require a detailed investigation at the owner's expense to determine the required remedial action, if any.

Ohio

- Under the Ohio Department of Natural Resources (ODNR)
- All dams should be inspected periodically by the chief engineer, except for classes of dams that are required to be inspected by a Professional Engineer (PE) approved by the chief engineer. Inspection shall ensure that continued operation does not constitute a hazard to life, health, or property.
- Exempted dams don't require inspections by the chief engineer.
- Inspection intervals are determined by the chief engineer (not exceeding 5 years).
- The owner shall maintain and operate the structure in accordance with rules, permit conditions, and requirements under 1521.06.
- Before repair or improvements can be made approval from the division is required. Emergency repairs are exempt from approval.

South Carolina

Under the South Carolina Department of Health and Environmental Control (SCDHEC).

Lee Station NPDES Permit- certify that the ash pond(s) provide(s) the necessary minimum wet weather detention volume, and annually survey all ash pond dikes and toe areas to determine if the structural integrity has been compromised. The permittee shall notify SCDHEC within five (5) days of becoming aware of any abnormalities and provide a proposed course corrective action and implementation schedule.

DAM INSPECTIONS:

Monthly Internal Inspection:

A Monthly Internal Inspection provides a method by which the Station will survey existing conditions on their impoundment dams and assess compliance activities with respect to applicable permits, environmental and dam regulations.

The Internal Inspection will be performed monthly on all of the fossil impoundment dams.

Each facility is responsible for implementing and carrying out the internal Inspections.

The Internal Inspections shall be performed by the Station Dam Equipment Owner and/or the site's Environmental Coordinator.

In the event that a Regulatory/Third Party inspection takes place during the month when the monthly inspection has yet to be performed, then the monthly inspection can be performed during the third party's inspection.

Checklists used to perform the Monthly Internal Inspection will be furnished by Program Engineering. The checklist will be station specific and will include monthly monitoring programs and may also include federal/state agencies and/or third party recommendations.

A copy of the completed checklists, sketches, notes, areas of concern and action items shall be forwarded to the Program Engineering Group. In the Midwest, the completed checklists will be sent to Adam Deller. In the Carolinas, the completed checklists shall be sent to Henry Taylor. After Program Engineering receives the completed checklists, an engineering review will be performed, copies will be distributed and any necessary action will be determined.

A visual inspection will be performed after a rain event of 2 inch or greater in 24 hours or less. The monthly checklists can be used for this inspection if needed.

The Station Dam Equipment Owner shall ensure that these actions are taken in a timely manner. If immediate concerns are found, Program Engineering will be notified and respond immediately. The following are those who should be contacted in case of an immediate issue:

<u>Carolinas</u>
Henry Taylor, P.E.
(704)382-4913 O
(704)458-0360 M
Alex Papp
(704)382-1196 O
(704)996-2768 M

Annual Inspection:

_ __ _

An Annual Internal Inspection provides for a method by which the Station and Program Engineering will survey existing conditions on the impoundment dams and assess compliance activities with respect to applicable permits, environmental and dam regulations.

The Annual Internal Inspection will be performed at least once a year on all of the impoundment dams. Inspections shall be coordinated with the station mowing schedule to occur soon after a mowing.

Program Engineering is responsible for scheduling and performing the Annual Internal Inspection.

The Annual Internal Inspection will typically be performed by representatives of Program Engineering, the Dam Equipment Owner, and the site's environmental coordinator.

Checklists used to perform the Annual Internal Inspection will be furnished by Program Engineering. The checklist will be station specific and will include monthly annual monitoring programs and may also include federal/state agency and/or third party recommendations. The checklist will include GPS locations of any items or issues noted to help better identify their locations.

In the event that a Regulatory/Third Party Inspection is performed before the annual inspection is performed internally then the annual inspection will not have be performed for the calendar year. Program Engineering will follow up with the station at various intervals to determine the status of any action items, necessary work and/or monitoring programs that may have been recommended by the Third Party Inspection.

Program Engineering will collect the completed checklists, perform an engineering review, distribute copies and determine if any action is necessary.

Action plans will be developed by Program Engineering and the Station Dam Equipment Owner. Action plans will be reviewed by Station Management. Station Management will also make budgetary arrangements from station O&M as required for maintenance and repairs. Program Engineering manages all recommendations by providing engineering support, addressing any potential compliance issues identified in the checklists, monitoring progress to resolve the issues, documenting the completion of the corrective action, and verifying the maintenance or repair is successful.

Program Engineering shall assure that these actions are taken in a timely manner. If immediate concerns are found during the inspection, Program Engineering will respond immediately.

Regulatory and Third Party Inspection:

A two to five year Inspection provides for an official regulatory inspection method by which the Station, Program Engineering, EHS representative, third party geotechnical consultants and Agency officials will survey existing conditions on the pond dams and assess compliance activities with respect to applicable permits, and environmental and dam regulations.

The Inspection will be performed at intervals as required by local dam governing agencies, in which the interval between inspections will be no longer than five (5) years. Efforts will be made to coordinate with state regulatory officials to setup and perform the inspection.

Program Engineering is responsible for scheduling and assisting government agencies with the Regulatory or Third Party Inspection.

The final product of the Regulatory or Third Party Inspection will be a geotechnical consultant report utilizing GPS locations of items noted. The report shall itemize all recommendations. The recommendations must be clear, specific, and concise.

Action plans will be developed by Program Engineering and Station Pond Equipment Owner. Action plans will be reviewed by Station Management. Station Management will also make budgetary arrangements from station O&M as required for maintenance and repairs. Program Engineering manages all recommendations by providing engineering support, addressing any potential compliance issues identified in the checklists, monitoring progress to resolve the issues, documenting the completion of the corrective action, and verifying the maintenance or repair is successful.

Program Engineering shall assure that these actions are taken in a timely manner. If immediate concerns are found during the inspection, Program Engineering will respond immediately without waiting for the final inspection report.

Maintenance and Repairs

The station is responsible for all routine maintenance and repairs. The Station Equipment Owner will be responsible for O&M budgets, as well as the budgeting of annual and monthly inspections. Generation Engineering will prepare budgets for capital items.

Program Engineering will work with the plant representatives and Generation Engineering in the design of significant repairs and potential capital items. Implementation of repairs will be handled by Generation Engineering. Program Engineering will ensure that all fixes, repairs and upgrades comply with state requirements.

Record Retention

The Program Engineering Group will utilize the EH&S eTRAC management software via the Duke Energy Portal to coordinate and track checklists for all inspections.

All documents, reports, and information prepared relating to the inspection and corrective actions shall be collected and maintained by the Program Engineering Group.

Data Collection

The following list contains the types of data collected and the responsible party:

- 1. Monthly Piezometers and Monitoring Well readings associated with Dam integrity (*Performed Monthly*) Station EH&S Professional and Plant Chemistry Dept.
- 2. Settlement Monument Survey (*Performed Annually*) Surveyors Arranged by Program Engineering for Belews Creek, Buck, Dan River, Lincoln CT, and Riverbend in the Carolinas.
- 3. Inclinometer readings (Midwest only) Station Ash Pond Dam Equipment Owner
- 4. Required Monitoring from Inspection Commitments (i.e., Seepage, etc.) Station Ash Pond Dam Equipment Owner or EH&S Professional

Below are the responsible parties at the stations in the Carolinas and Midwest.

Carolinas				
Plant	Environmental	nental Engineering Contact Equipme		
	Contact			
Allen	Don Scruggs	Gary Blevins	Don Scruggs	
Belews Creek	Melonie Martin	Tom Wiest	Tom Wiest	
Buck	Nob Zalme	Elena Massimini	Bill Wilson	
Cliffside	Steve Hodges	Kelley Allison	Steve Hodges	
Dan River	George Tolbert	Tom Wiest	George Tolbert	
Lee	Marcus Pitts	Kelley Allison	Marcus Pitts	
Lincoln CT	David Brooks	Paul Beatty	Kristi McCall	
Marshall	Donna Burrell	Elena Massimini	Carlton Allred	
Riverbend	Steve Jones	Gary Blevins	Steve Jones	
	Mie	dwest		
Plant	Environmental	Engineering Contact	Equipment Owner	
	Contact			
Beckjord	Micheal L Byrd	Greg Mumford	Ron Frey	
Cayuga	Tom Knapke	Pete Massa	Tom Knapke	
East Bend	JR Wood	Michael Brissie	Andy Buckley	
Edwardsport	Shawn Flaningam	-	-	
Gallagher	Jeff Kling	Kristie Beaven	Bill Chanley	
Gibson	Becky Sparks	Kevin Olivey	Becky Sparks	
Miami Fort	Tara Thomas	Kendall McCall	Ron Frey	
Wasbash River	Sheryl Fisher	Pete Massa	Sheryl Fisher	
Zimmer	Tom Patt	Al Schmitt	Tom Patt	

After the data is collected, the responsible party forwards it to the respectful Program Engineering contacts referenced on page 8 of this procedure. These contacts are the responsible party that will load it onto the shared server. Data analysis is a function of Program Engineering. Maximo will be used to schedule station based activities. In particular, this will ensure the monthly and annual monitoring data is collected.

Exhibits

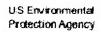
- 1. Monthly Internal Inspection Checklist
- 2. Annual Inspection Checklists
- 3. Example of completed checklist

US Environmental



Site Name: East Bend Sta	Luis		Date: 5 August 2010	
Unit Name: East Bend statio		.1		
Unit I.D.: KY 1215	7 00	ur L	Hazard Potential Classification High Sign	ificant Low
Inspector's Name: Hugh Ward,	.9 ~	_	- 1011 11 20	
Check the appropriate box below. Provide comments who		oriate. If	not applicable or not available, record "N/A". Any unusual con-	
construction practices that should be noted in the commer embankment areas. If separate forms are used, identify a			rge diked embankments, separate checklists may be used for one the form applies to in comments.	different
	Yes	No		es No
1. Frequency of Company's Dam Inspections?	Mon	11/1	18. Sloughing or bulging on slopes?	7
2. Pool elevation (operator records)?	49	0.1	19. Major erosion or slope deterioration?	1/
3. Decant inlet elevation (operator records)?	485	-5	20. Decant Pipes:	
4. Open channel spillway elevation (operator records)?	5/8	2. 5	Is water entering inlet, but not exiting outlet?	
5. Lowest dam crest elevation (operator records)?	52	0.0	Is water exiting outlet, but not entering inlet?	1
If instrumentation is present, are readings recorded (operator records)?		NA	Is water exiting outlet flowing clear?	NIA
7. Is the embankment currently under construction?		1	21. Seepage (specify location, if seepage carries fines, and approximate seepage rate below):	
8. Foundation preparation (remove vegetation,stumps, topsoil in area where embankment fill will be placed)?	V		From underdrain?	
Trees growing on embankment? (If so, indicate largest diameter below)		V	At isolated points on embankment slopes?	
10. Cracks or scarps on crest?		V	At natural hillside in the embankment area?	
11. Is there significant settlement along the crest?		1	Over widespread areas?	
12. Are decant trashracks clear and in place?		NA	From downstream foundation area?	
13. Depressions or sinkholes in tailings surface or whirlpool in the pool area?		1	"Boils" beneath stream or ponded water?	
14. Clogged spillways, groin or diversion ditches?		1	Around the outside of the decant pipe?	
15. Are spillway or ditch linings deteriorated?		1	22. Surface movements in valley bottom or on hillside?	
16. Are outlets of decant or underdrains blocked?		V	23. Water against downstream toe?	
17. Cracks or scarps on slopes?		1	24. Were Photos taken during the dam inspection?	
volume, etc.) in the space below and on th	ted in the back	these it of this	tems should normally be described (extent, loc	ation,
Inspection Issue #	Comr			
1 - Monthly inspection	s bu	5%	from environmental stoff. Ann.	12/
inspection by Dun	e En	rergy	Program Engineering / Third	furty
or State inspecto		07		
6. The Sam is not in	/	nén t		
				1//
			sting ground undercut 2 to	5 feet
to provide em ban				*
12 - Decant riser does not	have	·as	trashrack. Floating skimmer.	in place.

Coal Combustion	Dam Inspection	Check*st	Form
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Site Name: East Bend Station	Date: 5 August Zo10
Site Name: East Bend Station Unit Name: East Bend Sta. Unit 1	Operator's Name: Duko - Energy
Unit I.D.: KY 12/5	Hazard Potential Classification High Senticant Low
Inspector's Name: Hugh Ward P.E.	Joseph P. Klein # P.E.

Inspection Issue #	<u>Comments</u>
18	Minor erosion rils and scattered roder
	burrows observed.
	Some wave crossen observed near
	southeast corner of impoundment
20	Primary spillway pipe dischurge is
	located in the Ohio River below
	normal pool elevation. Observations
	made in discharge pipe vents.
	Water flow was clear and un obstructed.
	Walk 7 100 WAS Clear MAD UN DOSTUCTED.
WELLEN WITH THE TOTAL THE	

U. S. Environmental Protection Agency

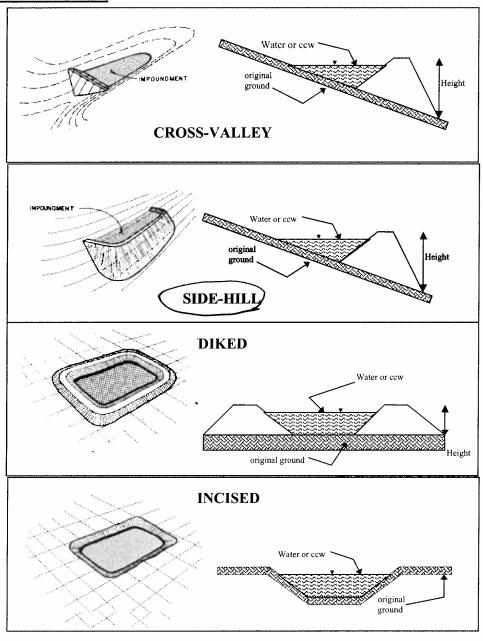


Coal Combustion Waste (CCW) Impoundment Inspection

Impoundment NPDES Permit	:# <u>KY040444</u>	INSPECTOR	Hugh Ward, P.E.
Date 5 August Zu	0/0	J	Hugh Ward, P.E. Oseph P. Klein, I P.E.
		,	•
Impoundment Name	East Bend Star	tion	
Impoundment Company	Duke Energy		
EPA Region		,	
State Agency (Field Office	Duke Energy ce) Addresss Division o	1 Water	
	8020 Ver	terans Memori	al Dr. Florence Ky 4104
Name of Impoundment _	East Bend Station	<i>i</i>	
(Report each impoundment	nt on a separate form unde	r the same Impo	undment NPDES
Permit number)			
New Update			
		Yes	No
Is impoundment currently			
Is water or ccw currently	being pumped into		
the impoundment?			
IMPOUNDMENT FUNG direct storm water cooling tower over be	CTION: Store fly as a runoff, coal piles and misc. plan	tormunter of drains.	un off, land fill runo ff,
Nearest Downstream Tow	n: Name Patriot	Iv.	
Distance from the impoun	ndment 4.5 miles (stra	1941 line acr	USS rive)
Impoundment	7. 5 miles (dows	river).	
Location: Longit	ude <u>- 84</u> Degrees <u>57</u>	Minutes z	8 Seconds
Latitud	de <u>38</u> Degrees <u>54</u>	Minutes o	7 Seconds
State _	KY County Bo	one	
Does a state agency regula	ate this impoundment? YI	ESNO _	
If So Which State Agency	? KY Dept. for Env. to	Potention, Div.	of Water

HAZARD POTENTIAL (In the event the impoundment should fail, the
following would occur):
LESS THAN LOW HAZARD POTENTIAL: Failure or misoperation of the dam results in no probable loss of human life or economic or environmental losses.
LOW HAZARD POTENTIAL: Dams assigned the low hazard potential classification are those where failure or misoperation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the owner's property.
SIGNIFICANT HAZARD POTENTIAL: Dams assigned the significant hazard potential classification are those dams where failure or misoperation results in no probable loss of human life but can cause economic loss, environmental damage, disruption of lifeline facilities, or can impact other concerns. Significant hazard potential classification dams are often located in predominantly rural or agricultural areas but could be located in areas with population and significant infrastructure.
HIGH HAZARD POTENTIAL: Dams assigned the high hazard potential classification are those where failure or misoperation will probably cause loss of human life.
DESCRIBE REASONING FOR HAZARD RATING CHOSEN:
The Significant Hazard Potenial rating is based on the probable economic loss and environmental damage in the event of a dam failure or misuperation. A dam failure would likely result in a release of ash sludge into the Ohio River which would have a damaging environmental impact and likely required extensive clean-up and long term mantarial. Add nearly as release might impact the fish hatchery and Bald Fage nesting site adjacent to the impoundment.

CONFIGURATION:



Cross-Valley						
Side-Hill						
Diked						
Incised (form cor	npletion optiona	1)				
Combination I	ncised/Dike	ed				
Embankment Height	60	feet	Embankmer	nt Material <i>ca</i>	mpacted fill w	Lolay core
Pool Area	53.4			one		_
Current Freeboard	29.9	feet	Liner Perme	eability 1614 A	planble	

Emergency	TDADEZOIDAI	TRIANCHIAR
Open Channel Spillway	TRAPEZOIDAL	TRIANGULAR
Trapezoidal	Top Width	Top Width
Triangular	Depth	Depth
Rectangular	*	▼ •
Irregular	Bottom Width	
1. 5 / depth		
bottom (or average) width	RECTANGULAR	IRREGULAR
top width	↑ Depth	Average Width Avg
L	Width	Depth
Outlet		
date the second		
inside diameter //ser		
Material corrugated metal welded steel plastic (hdpe, pvc, etc.) plastic diameter riser plastic weight of the property of	iners ly installed	Inside Diameter
s water flowing through the outlet?	YES NO	
No Outlet		
Other Type of Outlet (specif	fy)	
Γhe Impoundment was Designed By	- 441.	/

Has there ever been a failure at this site? YES	NO	
If So When?		
If So Please Describe :		

Has there ever been significant seepages at this site? YESNO/
If So When?
IF So Please Describe:

Has there ever been any measures undertaken to monitor/lower Phreatic water table levels based on past seepages or breaches at this site? YESNO				
at this site?	YES	NO/		
If so, which method (e.g., piezometers,	gw pumping,)?			
If so Please Describe :				
	→			