SCS ENGINEERS

January 27, 2017 File No. 25211357.31

Mr. John Terrell Indianapolis Power & Light Eagle Valley Generating Station 4040 Bluff Road Martinsville, IN 46151-7887

Subject: 2016-1 Dike Inspection-Eagle Valley Generating Station

Ponds A, B, and C Ash Ponds

Dear Mr. Terrell:

SCS Engineers (SCS) is pleased to submit this dike and basin inspection report for the Indianapolis Power & Light Company (IPL) Eagle Valley Generating Station Ponds A, B, and C Ash Ponds. This report was prepared by Mr. David M. Hendron, PE. The report presents a Summary of Visual Observations, and Conclusions and Recommendations. The inspection was performed on November 2, 2016, by Mr. Hendron and Mr. John Terrell. A presentation of the preliminary findings was given to Mr. Terrell at the conclusion of the inspection. The weather at the time of this inspection was clear and cool.

For this inspection, we filled out the IPL Dike Field Review Checklist form to document the results of the inspection. The completed form is given in **Attachment A** to this letter report. Documentation of the visual conditions of the dikes and ponds during this inspection is presented in the text of this report and shown in the photographs taken during the inspection. Photographs taken during this inspection are shown in **Attachment B**.

SUMMARY OF VISUAL OBSERVATIONS

IPL's Eagle Valley Plant has discontinued operation. Use of Ponds A through C will continue to handle small amounts of water from plant sumps until the existing generating facilities are demolished in the future. Ponds A through C are not expected to retain full hydraulic heads to handle these fluids.

In general, conditions at the ash ponds continue to appear satisfactory. Water levels in Ash Ponds A, B, and C were significantly below the invert of discharge structures for each pond. There were no visual indications of seepage flow occurring anywhere on the downstream slope of any of the ponds. The vegetation on the downstream slopes of all the ash ponds was in good condition. IPL mowed the vegetation on the downstream slopes just prior to the inspection. There was no visible damage to the slopes by the mowing operations.

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The following observations are noted.

Ash Ponds A, B, and C

The layouts of the Ponds A, B, and C facility are shown on **Figure 1**. At the time of the inspection, IPL was not operating the Eagle Valley Plant. Photographs taken during the inspection of Ponds A, B, and C are presented in **Attachment B** to this letter.

Results of the visual inspection performed on November 2, 2016, for Ponds A, B, and C are summarized below.

- 1. The freeboard in Pond A appeared to remain adequate.
- 2. There was no discharge occurring from any of the ponds at the time of the inspection.
- 3. The vegetation on all exterior slopes appeared to be in good condition. These slopes were moved prior to the inspection. The slopes appeared to be in good condition.
- 4. The interior slopes of Pond C at the time of the inspection continued to appear to be in good condition. Pond C contained no evidence of water at the time of the inspection.
- 5. The exterior slopes of Ponds A, B, and C continue to appear stable and well-vegetated with no visual evidence of seepage along the dike toes at the time of the inspection.
- 6. The visible portions of the inside slope of the exterior dikes of Ponds A and B continued to appear in good condition.
- 7. There were no areas of softening or rutting noted during this inspection.
- 8. IPL previously placed the material excavated from the interior of Pond A along the downstream slope of the intermediate dike between Pond A and Pond B as shown on **Figure 1**. No instabilities of the berm material were observed during placement, and the completed berm appeared stable during the inspection.

CONCLUSIONS AND RECOMMENDATIONS

Based on the observations made during the inspection, we conclude that conditions in Ponds A, B, and C are satisfactory at this time, and these basins show no visible signs of significant erosion or instability.

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Recommendations for Ash Ponds A, B, and C

We make the following recommendations for Ponds A, B, and C.

1. Recommend that all interior slopes of perimeter dikes for Ponds A, B, and C be continued to be monitored for erosion and that rip-rap be placed on the interior slopes if and when erosion activities are significant.

SCS appreciates the opportunity to perform this inspection and looks forward to assisting IPL in future inspection of their ash disposal facilities. If you have any questions with regard to this report, please do not hesitate to contact me at 312-286-9397.

Sincerely,

David M. Hendron, PE Indiana PE 10000050 SCS ENGINEERS

DH/lmh

Enclosures: Figure 1 – Location Plan of Basin and Ponds

Attachment A – IPL Dike Field Review Checklist Form

Attachment B – Photographs

FIGURE 1

Location Plan of Basin and Ponds



Figure 1 — Location Plan of Basin and Ponds

ATTACHMENT A

IPL Dike Field Review Checklist Form

Attachment A - IPL Dike Field Review Checklist - Inspection 16-1 Eagle Valley Station

)	Complete all Portions of this Section (Pre-review) – Inspection 16-1
	Date of Review: November 2, 2016
	Name of Dike: Eagle Valley Basins A, B, and C Project Number 25211357.31
)	Review Inventory – Highlight missing information (Pre-review)
	Owner(s) Name(s): Indianapolis Power and Light Company
	Address: 4040 Blue Bluff Road
	City: Martinsville State Indiana Zip (+4) 46151-7887
	Telephone (Home):Telephone (Work): <u>765-349-3401</u>
	Contact Persons: Mr. John Terrell
	Designed By: IPL
	Constructed By: IPL contractors and sub-contractors
	Year Completed: <u>Unknown</u> Plans Available (Yes, No) (Location): <u>Not complete for</u>
	all ponds.
	Purpose of Dike: Form basins for Ash Ponds A, B, and C at the Eagle Valley Facility
	Age of Dike:
)	General Information
	Mowing (times per year): Once or twice
	Prior problems (wet areas, erosion, slides): See previous inspection reports.
	Repair or modification (what & when): IPL has continued to make periodic monitoring and
	inspection of the dikes since last inspection. IPL has ceased operation of the coal-fired
	generating plant and does not use any of the ponds to process ash materials. Water levels in
	Ponds A, B, and C were essentially dry at the time of the inspection. There was no discharge
	from Pond C at the time of the inspection.
	Failure/Incident/Breach (max. pool): None since the last inspection.
	Downstream hazard status (recent changes): No changes
	Dike Embankment Material: Primarily ash materials with well-vegetated downstream slope
	erosion protection. Vegetation in good condition as a result of recent rainfall amounts.
	Downstream slopes recently mowed.
	Slope Erosion Control: <u>Interior – rip-rap along most slopes</u> . <u>Only remaining interior slopes</u>
	without rip-rap protection in the west and north of Pond C. Continue to recommend placing
	rip-rap in this area if erosion of the slopes is observed to occur. No significant erosion at the
	time of the inspection.
	Field Information (while at site)
	Pool Elevation (during review): Water levels in all active Ponds were essentially dry at the time
	of the inspection. There will be no further use of any of the ponds for ash processing
	operations at the site.
	Site Conditions (temp., weather, ground moisture): Clear and cool
	Review Party: Dave Hendron, PE, and Mr. John Terrell. Mr. Terrell briefed after the inspection
	with a summary of findings.

	Required Action
INSIDE SLOPE Gradient: Horizontal: <u>Unknown</u> Vertical: (est. meas.) x□ VEGETATION [no problem]	None Monitor Maintenance Engineer
x□ Trees: Quantity: (<5, sparse, dense) None Diameter: (<6", 6-12", >12") Location: Notes: x□ Brush: Quantity: (spare, dense) None to sparse	X
Location: <u>See photos in Attachment B</u> Notes: x□ Ground Cover: Type: (grass, crown vetch) Other:	
quantity: (bare, sparse, adequate, dense) Poor where rip-rap not present in Pond C. Appearance: (too tall, too short, good) Lush Notes: Continue to monitor Pond C and add rip-rap if erosion is observed.	□ X □ □
x□ SLOPE PROTECTION [no problem, could not inspect thoroughly] □ None x□ Riprap: Average Diameter: Approximately 5 to 6 inches where present (adequate, sparse, displaced, weathered, vegetation) (bedding/fabric noted—yes, no) Notes: Rip-rap placed in most areas except for west and north interior slope of Pond C. Continue to recommend that rip-rap be placed as recommended in	- X
previous section of this report. □ Wave Berm: Vegetation: (adequate, bare, sparse, improper vegetation) Notes:	
□ Other: Notes: Notes: x□ EROSION [no problem, could not inspect thoroughly] x□ Wave Erosion (beaching): Scarp: Length: Height:	
Location: Minor erosion noted on west and north interior slopes of Pond C. Notes: Recommend to place rip-rap in these areas if erosion continues or if the water level in the basin impinges on exterior slope and erosion is observed. x Runoff Erosion (Gullies): Quantity: Some minor erosion noted on interior slopes of Pond C as noted previously in this inspection report. Depth: Width:	□ X □ □
Length:	□ X □ □
x INSTABILITIES [no problem, could not inspect thoroughly] Slides: Transverse Length: Longitudinal Length: Location: Location: Depth: Location: L	x
Notes/Causes Cracks: Transverse Longitudinal Other Quantity: Length: Width: Depth: Location:	
Notes/Causes:	None Monitor Maintenance Engineer

	Required Action
□ Cracks: □ Transverse □ Longitudinal □ Other Quantity: Length: Width: Depth: Location: Notes/Causes:	□ None □ Monitor □ Maintenance □ Engineer
□ Bulges □ Depressions □ Hummocky Size: Height: Depth: Location: Notes/Causes:	
□ Bulges □ Depressions □ Hummocky Size: Height: Depth: Location: Notes/Causes:	0000
x□ OTHER [no problem, could not inspect thoroughly] □ Rodent Burrows: (few, numerous) No animal activity noted. Location: Notes/Causes:	x o o o o
□ Other: Notes:	0000
6) CREST Length: Width: (est. meas.)	
x VEGETATION [no problem] Trees: Quantity: (<5, sparse, dense) Diameter: (<6", 6-12", >12") Location: Notes:	x
□ Brush: Quantity: (spare, dense) Location: Notes:	
Ground Cover: Type: (grass, crown vetch) Other: Stone roadway continues in good condition in all areas of the ash ponds. Quantity: (bare, sparse, adequate, dense) Appearance: (too tall, too short, good) Notes:	X 0 0 0 0
x EROSION [no problem, could not inspect thoroughly] Runoff Erosion (Gullies): Quantity: Depth: Width: Length: Location: Notes:	X :

	Required Action
x□ WIDTH [no problem]	None Monitor Maintenance Engineer
□ Too Narrow	x
Location:	
Notes/Causes:	
x INSTABILITIES [no problem, could not inspect thoroughly] Cracks: Transverse Longitudinal Other Quantity: Length: Width: Depth: Location: Notes/Causes:	x o
□ Cracks: □ Transverse □ Longitudinal □ Other Quantity: Length: Width: Depth: Location: Notes/Causes:	
□ Bulges: □ Depressions □ Hummocky Size: Height: Depth: Location: Notes/Causes:	
X OTHER [no problem, could not inspect thoroughly] Rodent Burrows: (few, numerous) Location: Notes:	x
X□ Other: Notes:	x
OUTSIDE SLOPE Gradient: Horizontal: 3.0 Vertical: 1.0 (est. meas.) x VEGETATION [no problem] Trees: Quantity: (<5, sparse, dense) Diameter: (<6", 6-12", >12") Location: Notes:	x
 □ Brush: Quantity: (spare, dense)	
Quantity: (bare, sparse, adequate, dense) Appearance: (too tall, too short, good) Notes: Vegetation was mowed just prior to the inspection. Vegetation appeared to be in good condition throughout.	
{Inside Slope, Crest, Outside Slope , Outlet/Inlet Structures, Pond Drain}	None None Wonitor Dazin Maintenance Engineer

7)

	Required Action
x□ EROSION [no problem, could not inspect thoroughly]	None Monitor Maintenance Engineer
□ Runoff Erosion (Gullies): Quantity: Depth: Width: Length: Location: Notes/Causes:	
x INSTABILITIES [no problem, could not inspect thoroughly] Slides: Transverse Length: Longitudinal Length: Scarp: Width: Length: Location: Length: Crack: Width: Length: Notes/Causes:	x
□ Cracks: □ Transverse □ Longitudinal □ Other Quantity: Length: Width: Depth: Location: Notes/Causes:	
□ Cracks: □ Transverse □ Longitudinal □ Other Quantity: Length: Width: Depth: Location: Notes/Causes:	
□ Bulges: □ Depressions x□ Hummocky Size: Height: Depth: Location: Notes/Causes: No evidence of new rutting or seepage on any exterior during this inspection.	□ x□ □ □
x□ OTHER [no problem, could not inspect thoroughly] □ Rodent Burrows: (few, numerous) None observed □ Other:	
x SEEPAGE [no problem, could not inspect thoroughly] Wet Area Flow Boil Sinkhole Flow Rate; Size: Location: Aquatic Ve	□ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □
 □ Rust Colored Deposits □ Sediment in Flow □ Other: Notes/Causes: 	
	Required Action
{Inside Slope, Crest, Outside Slope , Outlet/Inlet Structures, Pond Drain}	None Monitor Maintenance Engineer

	□ Wet Area □ Flow □ Boil □ Sinkhole
	Flow Rate Size:
	Location: □ Aquatic Vegetation □ None
	□ Rust Colored Deposits □ None
	□ Sediment in Flow □ None
	□ Other: Notes/Causes:
	Notes, Oddses.
8)	OUTLET/INLET STRUCTURES
	x□ GENERAL INLET [no problem, could not inspect thoroughly]
	x□ Inlet Pipe Dimensions: About 10 inches (adequate, too small)
	Type: (steel, concrete, aluminum, stainless steel, corrugated metal wood, other): Steel
	Location:
	Deterioration: (missing sections, rusted, collapsed)
	In Use: (Yes, No)
	x□ Pond Erosion at Inlet: (Describe) None observed
	□ Other –
	x□ OUTLET STRUCTURES [no problem, could not inspect thoroughly]
	□ Number of Outlet Structures: Three
	x□ Description/Location of Outlet Structures: All outlet structures visible at the time of the
ins	pection. All appeared to be in good condition. Water level in ash Ponds A, B, and C was
bel	ow the invert elevation of all discharge pipes.
	x□ Outlet Structure 1: Basin A to B
	Type: (steel, concrete, aluminum, stainless steel, corrugated metal wood, other):
	Deterioration:(missing section, collapsed, rusted):
	Erosion at Outlet Structure: (soil piping, seep collar, etc.)
	Debris: (leaves, trash, logs, ice, etc.)
	Notes: No discharge occurring at the time of the inspection.
	110.001 110 diconding coodining at the time of the mapositon.

{Inside Slope, Crest, Outside Slope, Outlet/Inlet Structures, Pond Drain}

	Required Action
	None Monitor Maintenance Engineer
x□ Outlet Structure 2 Basin B to Basin C	None Monitor Maintena Engineer
Type: (steel, concrete, aluminum, stainless steel, corrugated metal wood, other):	
	X □ □ □
Deterioration:(missing section, collapsed, rusted):	
Erosion at Outlet Structure: (soil piping, seep collar, etc.)	
Debris: (leaves, trash, logs, ice, etc.)	
Notes: No discharge at the time of the inspection.	
x□ Outlet Structure 3 Basin C to the river	
Type: (steel, concrete, aluminum, stainless steel, corrugated metal wood, other):	
Deterioration:(missing section, collapsed, rusted):	X □ □ □ □
Erosion at Outlet Structure: (soil piping, seep collar, etc.)	
Debris: (leaves, trash, logs, ice, etc.)	
Notes: No discharge occurring at the time of the inspection.	
□ Outlet Structure 4	
Type: (steel, concrete, aluminum, stainless steel, corrugated metal wood, other): Deterioration:(missing section, collapsed, rusted):	
Erosion at Outlet Structure: (soil piping, seep collar, etc.)	
Debris: (leaves, trash, logs, ice, etc.)	
Notes: No discharge occurring at the time of the inspection.	
POND DRAIN	
x□ GENERAL □ None Found □ Does not have one	
x□ Type of Pond Drain <u>Drainage provided by Outlet 3 to the river</u>	
(isolated control/intake tower, valve vault w/outlet conduit, valve in riser/drop inlet, siphon) Notes:	X □ □ □
□ Operated During Inspection (yes, <u>no</u>) Notes: No discharge occurring at the time of the inspection	
x□ ACCESS TO VALVE/SLUICE GATE [no problem, could not inspect thoroughly]	X
x□ Type (not accessible, from shore, boat, walkway, other) Notes	X O O O O
 □ Walkway/Platform: □ Concrete Deterioration □ Cracks (platform, piers, end supports, railing) 	
Location: Northwest corner of Pond C	0
Notes: Appeared to be In satisfactory condition. Valve operation not tested.	None Monitor Maintenanc 9
{Inside Slope, Crest, Outside Slope, Outlet/Inlet Structures, Pond Drain }	None Required Action

Required

Action

9)

	None Monitor Maintenance Engineer
□ Wood Deterioration	
Notes:	- -
☐ Metal Deterioration (minor, moderate, extensive, other) Notes:	
x□ POND DRAIN COMPONENTS [no problem, could not inspect thoroughly]	
X□ Concrete Structure	X
Locations: Description: (deterioration, misalignment, cracks):	-
Notes/Causes:	- -
X□ Valve Control (Operating Device) □ No Operating Device □ No Stem □ Bent/Broken Stem □ Other Notes/Operability: Not tested at this inspection	-
□ Metal Deterioration: (surface rust, minor, moderate, extensive, other) Location: Flow Rate: Notes/Causes:	
□ Mis-alignment Notes/Causes: □ Leakage − Flow Rate:	
Notes/Causes:	- 0000
 ☐ Outlet Conduit ☐ Metal: (loss of coating/paint, surface rust, corrosion (pitting, scaling), rusted out) Location:	- 0000
□ Concrete (bug holes, hairline crack, efflorescence) (spalling, popouts, honeycombing, scaling, craze/map cracks) (isolated crack, exposed rebar, disintegration, other) Dimensions/Location: Notes/Causes:	- -
□ Plastic: (deterioration, cracking) Location: Notes/Causes:	

{Inside Slope, Crest, Outside Slope, Outlet/Inlet Structures, **Pond Drain**}

None Nonitor Paulineance Paulinear Pengineer

	None	Monitor	Maintenance Engineer
□ Conduit Deformation □ Mis-Alignment: Location: Notes/Causes:	_		
□ Separated Joint □ Loss of Joint Material Location/Description: Notes/Causes:	- -		
□ Undermining Location/Description: Notes/Causes:	-		
□ Vegetation (trees, brush) Notes:	_		
□ Other Notes:	- -		
□ Discharge Outlet □ Type (pipe outlet, concrete channel, rock-lined channel, none) Notes:	_		
□ Riprap: Average Diameter: (adequate, sparse, displaced, weathered, vegetation) bedding/fabric noted – yes, no)) Notes:	<u> </u>		
□ Concrete (bug holes, hairline crack, efflorescence) (spalling, popouts, honeycombing, scaling, craze/map cracks) (isolated crack, exposed rebar, disintegration, other) Dimensions/Location: Notes/Causes:	_		
☐ Mis-alignment Location/Description: Notes/Causes:	_		
□ Separated Joint □ Loss of Joint Material Location/Description: Notes/Causes:	- - -		
□ Undermining Location/Description: Notes/Causes:			
Other Notes: {Inside Slope, Crest, Outside Slope, Outlet/Inlet Structures, Pond Drain}	- None	S Monitor	paring range baring range paring range parin

Required Action

ATTACHMENT B

Photographs



Photo 1: East Perimeter Dike of Pond A, looking south.



Photo 2: Same as Photo 1, looking west.



Photo 3: Same as Photo 1, looking northwest.



Photo 4: Condition of the top of Pond A. Looking west from the northeast corner of Pond A.



Photo 5: Same as Photo 4, looking south.



Photo 6: Pond A, looking west from the top of the southeast corner of Pond A. Pond A was dry at the time of the inspection.



Photo 7: Same, looking northwest from the southeast corner of Pond A.



Photo 8: Same, looking north.



Photo 9: Discharge pipes from Pond A to Pond B, looking east.

Pond A was dry at the time of the inspection.



Photo 10: Same as Photo 9, looking southeast.



Photo 11: Pond B, looking north from the southwest corner of Pond B.



Photo 12: Same, looking east along the intermediate dike between Pond A and Pond B.



Photo 13: Pond B, looking northeast from the southwest corner of Pond B.



Photo 14: Same, looking north. Some residual ponded water in Pond B at the time of the inspection.



Photo 15: Same, looking west.



Photo 16: Discharge structure at the northwest corner of Pond C.Pond C was dry at the time of the inspection.



Photo 17: Pond C, looking southeast from the northwest corner of Pond C.



Photo 18: Typical condition of the crest of the West Perimeter Dike of Pond C.