

APPENDIX C SUPPORTING DOCUMENTS

GENERAL NOTES

DESCRIPTION OF SYMBOLS AND ABBREVIATIONS

Grab Sample	Shelby Tube	EVEL	Water Initially Encountered Water Level After a Specified Period of Time Water Level After a Specified Period of Time	STS	N (HP) (T)	Standard Penetration Test Resistance (Blows/Ft.) Hand Penetrometer Torvane
Standard Penetration Test		7	Water levels indicated on the soil boring logs are the levels measured in the	D TE	(DCP)	Dynamic Cone Penetrometer
SAN		WATE	borehole at the times indicated. Groundwater level variations will occur	ᄪ	(PID)	Photo-Ionization Detector
			over time. In low permeability soils, accurate determination of groundwater levels is not possible with short term water level observations.		(OVA)	Organic Vapor Analyzer

DESCRIPTIVE SOIL CLASSIFICATION

Soil classification is based on the Unified Soil Classification System. Coarse Grained Soils have more than 50% of their dry weight retained on a #200 sieve; their principal descriptors are: boulders, cobbles, gravel or sand. Fine Grained Soils have less than 50% of their dry weight retained on a #200 sieve; they are principally described as clays if they are plastic, and silts if they are slightly plastic or non-plastic. Major constituents may be added as modifiers and minor constituents may be added according to the relative proportions based on grain size. In addition to gradation, coarse-grained soils are defined on the basis of their in-place relative density and fine-grained soils on the basis of their consistency.

LOCATION AND ELEVATION NOTES

Ground surface elevations and coordinates of the as-drilled boring/sounding locations were determined using a Leica Viva NetRover survey grade GPS with the following references: WGS84 latitude and longitude with WGS84 ellipsoid height. Based on satellite availability, the horizontal survey data accuracy was reported as ±0.1 foot. The horizontal and vertical references are NAD83 and NAVD88 respectively.

	(More than 50%	OF COARSE-GRAINED SOILS retained on No. 200 sieve.) Standard Penetration Resistance	Consiste visual	CONSISTENCY OF FINE-GRAINED (50% or more passing the No. 200 s ency determined by laboratory shear stre -manual procedures or standard penetra	sieve.) ength testing, field
ERMS	Descriptive Term (Density)	Standard Penetration or N-Value Blows/Ft.	Descriptive Term (Consistency)	Unconfined Compressive Strength Qu, (tsf)	Standard Penetration or N-Value Blows/Ft.
-	Very Loose	0 - 3	Very Soft	less than 0.25	0 - 1
IGTH	Loose	4 - 9	Soft	0.25 to 0.50	2 - 4
RENG	Medium Dense	10 - 29	Medium Stiff	0.50 to 1.00	4 - 8
ST	Dense	30 - 50	Stiff	1.00 to 2.00	8 - 15
	Very Dense	> 50	Very Stiff	2.00 to 4.00	15 - 30
	2		Hard	> 4.00	> 30

RELATIVE PROPORTIONS (ASTM D2488)

Descriptive Term(s) of other constituents	Percent of Dry Weigh		
Trace	< 5		
Few	5 - 10		
Little	15 - 25		
Some	30 - 45		
Mostly	50 - 100		

GRAIN SIZE TERMINOLOGY

Major Component of Sample	Particle Size
Boulders	Over 12 in. (300 mm)
Cobbles	12 in. to 3 in. (300mm to 75mm)
Gravel	3 in. to #4 sieve (75mm to 4.75 mm)
Sand	#4 to #200 sieve (4.75mm to 0.075mm
Silt or Clay	Passing #200 sieve (0.075mm)

PLASTICITY DESCRIPTION

<u>Term</u>	Plasticity Index
Non-plastic	0
Low	1 - 10
Medium	11 - 30
High	> 30



Exhibit: C-1

UNIFIED SOIL CLASSIFICATION SYSTEM

				^		Soil Classification
Criteria for Assig	ning Group Symbols	s and Group Name	s Using Laboratory	Tests ^	Group Symbol	Group Name ⁸
	Gravels:	Clean Gravels:	$Cu \ge 4$ and $1 \le Cc \le 3^E$		GW	Well-graded gravel F
	More than 50% of	Less than 5% fines c	Cu < 4 and/or 1 > Cc > 3	E	GP	Poorly graded gravel
Caaraa Crainad Caila	coarse fraction retained	Gravels with Fines:	Fines classify as ML or M	1H	GM	Silty gravel F,G,H
Coarse Grained Soils: More than 50% retained	on No. 4 sieve	More than 12% fines ^c	Fines classify as CL or C	Н	GC	Clayey gravel F,G,H
on No. 200 sieve	Sands:	Clean Sands:	$Cu \ge 6$ and $1 \le Cc \le 3^E$		SW	Well-graded sand
	50% or more of coarse fraction passes No. 4 sieve	Less than 5% fines D	Cu < 6 and/or 1 > Cc > 3	E	SP	Poorly graded sand
		Sands with Fines: More than 12% fines	Fines classify as ML or MH		SM	Silty sand G,H,I
			Fines classify as CL or C	Н	SC	Clayey sand G,H,I
	Silts and Clays: Liquid limit less than 50	Inorganic:	PI > 7 and plots on or above "A" line J		CL	Lean clay K,L,M
			PI < 4 or plots below "A" I	ine ^J	ML	Silt K,L,M
Fine-Grained Soils:		Organic:	Liquid limit - oven dried	< 0.75	01	Organic clay K,L,M,N
50% or more passes the		Organic.	Liquid limit - not dried		OL	Organic silt K,L,M,O
No. 200 sieve	Silts and Clays: Liquid limit 50 or more	Inorganic:	PI plots on or above "A" line		СН	Fat clay K,L,M
			PI plots below "A" line		МН	Elastic Silt K,L,M
			Liquid limit - oven dried	< 0.75	ОН	Organic clay K,L,M,P
		Organic.		Liquid limit - not dried	On	Organic silt K,L,M,Q
Highly organic soils:	Primarily	organic matter, dark in o	color, and organic odor		PT	Peat

^A Based on the material passing the 3-inch (75-mm) sieve

^B If field sample contained cobbles or boulders, or both, add "with cobbles or boulders, or both" to group name.

^c Gravels with 5 to 12% fines require dual symbols: GW-GM well-graded gravel with silt, GW-GC well-graded gravel with clay, GP-GM poorly graded gravel with silt, GP-GC poorly graded gravel with clay.

Sands with 5 to 12% fines require dual symbols: SW-SM well-graded sand with silt, SW-SC well-graded sand with clay, SP-SM poorly graded sand with silt, SP-SC poorly graded sand with clay

E Cu =
$$D_{60}/D_{10}$$
 Cc = $\frac{(D_{30})^2}{D_{10} \times D_{60}}$

^F If soil contains ≥ 15% sand, add "with sand" to group name.

^G If fines classify as CL-ML, use dual symbol GC-GM, or SC-SM.

^H If fines are organic, add "with organic fines" to group name.

If soil contains ≥ 15% gravel, add "with gravel" to group name.

If Atterberg limits plot in shaded area, soil is a CL-ML, silty clay.

If soil contains 15 to 29% plus No. 200, add "with sand" or "with gravel," whichever is predominant.

Left soil contains ≥ 30% plus No. 200 predominantly sand, add "sandy" to group name.

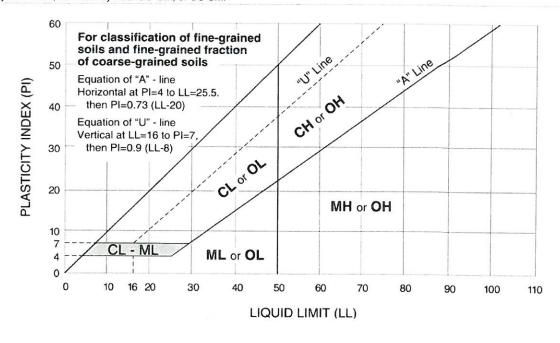
^M If soil contains ≥ 30% plus No. 200, predominantly gravel, add "gravelly" to group name.

^N PI ≥ 4 and plots on or above "A" line.

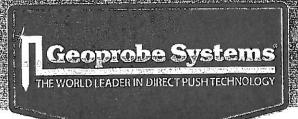
° PI < 4 or plots below "A" line.

P PI plots on or above "A" line.

^Q PI plots below "A" line.







CERTIFICATE FOR CPT PROBE 4342

PROBE NUMBER DATE OF CALIBRATION CALIBRATED BY 4342 (Terracon)
June 25, 2015
Sean Bigler
Geoprobe® Systems

POINT RESISTANCE

Sensor Range 100.00 MPa

Scaling Factor 858
Net Area Factor 0.85

LOCAL FRICTION

Sensor Range 1.00 MPa
Scaling Factor 3752
Net Area Factor 0.000

PORE PRESSURE

Sensor Range 2.00 MPa Scaling Factor 3833

TILT ANGLE

Range o-40 deg.

CALIBRATION EQUIPMENT

Sensotec® Precision Load Cell Model 73/2537-11-02

Calibrated June 11, 2009

Serial No. 804409 Calibration at 0.0, 3000, 6000, 9000, 12000, 15000, 18000, 21000, 24000, 27000, 30000, 27000, 24000, 21000, 18000, 15000, 12000, 9000, 6000, 3000, 0.0 lbs

Sensotec® Pressure Transducer Model A-10/6076-08

Calibrated June 11, 2009

Calibration at 0.0, 30, 60, 90, 120, 150, 180, 210, 240, 270, 300, 270, 240, 210, 180, 150, 120, 90, 60, 30, 0.0 psi

Documentation of NIST Traceability available upon request.

Cone penetration test probe calibration results are accurate at the time of calibration. Geoprobe Systems does not guarantee probe accuracy at the time of field testing. ISSMFE international reference test procedure for cone penetration testing recommends probe calibration at least every 3 months.



CERTIFICATE FOR CPT PROBE 4399

PROBE NUMBER
DATE OF CALIBRATION
CALIBRATED BY

4399 (Terracon-OH) October 21, 2014 Troy Schmidt Geoprobe[®] Systems

POINT RESISTANCE

Sensor Range Scaling Factor Net Area Factor

100.00 MPa 862

0.82

LOCAL FRICTION

Sensor Range Scaling Factor Net Area Factor

1.00 MPa 3806 0.000

PORE PRESSURE

Sensor Range Scaling Factor

2.00 MPa 3**75**0

TILT ANGLE

Range

0-40 deg.

CALIBRATION EQUIPMENT

Sensotec[®] Precision Load Cell Model 73/2537-11-02 Serial No. 804409

Calibrated August 01, 2014

Calibration at 0.0, 3000, 6000, 9000, 12000, 15000, 18000, 21000, 24000, 27000, 30000, 27000, 24000, 21000, 18000, 15000, 12000, 9000, 6000, 3000, 0.0 lbs

Sensotec® Pressure Transducer Model A-10/6076-08

Calibrated August 01, 2014

Calibration at 0.0, 30, 60, 90, 120, 150, 180, 210, 240, 270, 300, 270, 240, 210, 180, 150, 120, 90, 60, 30, 0.0 psi

Documentation of NIST Traceability available upon request.

Cone penetration test probe calibration results are accurate at the time of calibration. Geoprobe Systems does not guarantee probe accuracy at the time of field testing. ISSMFE international reference test procedure for cone penetration testing recommends probe calibration at least every 3 months.

CPT GENERAL NOTES

DESCRIPTION OF MEASUREMENTS AND CALIBRATIONS

To be reported per ASTM D5778:

Uncorrected Tip Resistance, q_c
Measured force acting on the cone divided by the cone's projected area

Corrected Tip Resistance, q, Cone resistance corrected for porewater and net area ratio effects $q_1 = q_2 + u_2(1 - a)$

Where a is the net area ratio a lab calibration of the cone typically between 0.70 and 0.85

Pore Pressure, u

Pore pressure measured during penetration u, - sensor on the face of the cone

u₂ - sensor on the shoulder (more common)

Sleeve Friction, f.

Frictional force acting on the sleeve divided by its surface area

Normalized Friction Ratio, F,

The ratio as a percentage of f, to q, accounting for overburden pressure

To be reported per ASTM D7400, if collected:

Shear Wave Velocity, V_s
Measured in a Seismic CPT and provides direct measure of soil stiffness

DESCRIPTION OF GEOTECHNICAL CORRELATIONS

Normalized Tip Resistance, Q, $Q_i = (q_i - \sigma_{V0})/\sigma'_{V0}$

Over Consolidation Ratio, OCR OCR (1) = $0.25(Q_i)$ OCR (2) = $0.33(Q_i)$

Undrained Shear Strength, S,

 $S_u = Q_i \times \sigma'_{VO}/N_{kt}$ N_{kt} is a soil-specific factor (shown on S_u plot)

 $S_t = (q_t - \sigma_{V0}/N_{kt}) \times (1/f_s)$

Effective Friction Angle, ϕ' $\phi'(1) = \tan^{-1}(0.373[\log(q/\sigma'_{VO}) + 0.29])$ $\phi'(2) = 17.6 + 11[\log(Q_i)]$

Unit Weight, γ

 $\gamma=(0.27[\log(F_{\rm r})]+0.36[\log(q/atm)]+1.236)$ x $\gamma_{\rm water}$ $\sigma_{\rm vo}$ is taken as the incremental sum of the unit weights

Small Strain Shear Modulus, Go

 $G_0(1) = \rho V_s^2$ $G_0(2) = 0.015 \times 10^{(0.55/c + 1.68)} (q_t - \sigma_{v0})$

Soil Behavior Type Index, I_c $I_c = [(3.47 - \log(Q_i)^2 + (\log(F_i) + 1.22)^2]^{0.5}$ $\begin{array}{c} \text{SPT N}_{60} \\ \text{N}_{60} = (\text{q/atm}) \ / \ 10^{(1.1268 + 0.2817 k)} \end{array}$

 ~ 0.3 i.e. FS = 3) Elastic Modulus, E $_{\rm s}$ (assumes q/q $_{\rm ullimate}$ ~ 0.3, i.e. FS = E $_{\rm s}$ (1) = 2.6 ψ G $_{\rm 0}$ where ψ = 0.56 - 0.33logQ $_{\rm t,clean \, sand}$

 $E_s(2) = G_0$ $E_s(3) = 0.015 \times 10^{(0.55/c + 1.68)} (q_1 - \sigma_{V0})$ $E_s(4) = 2.5q_1$

Constrained Modulus, M $M = \alpha_{M}(q_{t} - \sigma_{V0})$ For $I_{c} > 2.2$ (fine-grained soils)

 $\alpha_{\rm M} = Q_{\rm t}$ with maximum of 14 For $I_{\rm c} < 2.2$ (coarse-grained soils)

 $\alpha_M = 0.0188 \times 10^{(0.55/c + 1.68)}$

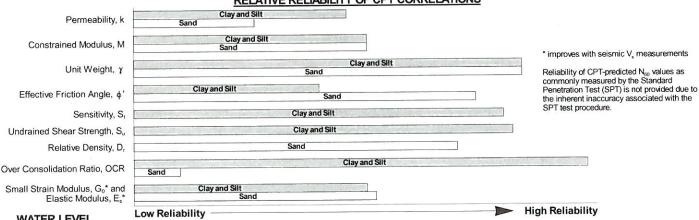
Hydraulic Conductivity, k For $1.0 < l_c < 3.27$ k = $10^{(0.952 \cdot 3.04/c)}$ For $3.27 < l_c < 4.0$ k = $10^{(4.52 \cdot 1.37/c)}$

Relative Density, D_r $D_r = (Q_t / 350)^{0.5} \times 100$

REPORTED PARAMETERS

CPT logs as provided, at a minimum, report the data as required by ASTM D5778 and ASTM D7400 (if applicable). This minimum data include q_i, f_s, and u. Other correlated parameters may also be provided. These other correlated parameters are interpretations of the measured data based upon published and reliable references, but they do not necessarily represent the actual values that would be derived from direct testing to determine the various parameters. To this end, more than one correlation to a given parameter may be provided. The following chart illustrates estimates of reliability associated with correlated parameters based upon the literature referenced below.

RELATIVE RELIABILITY OF CPT CORRELATIONS



WATER LEVEL

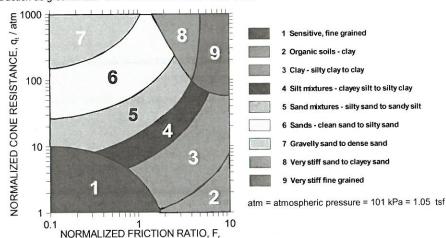
The groundwater level at the CPT location is used to normalize the measurements for vertical overburden pressures and as a result influences the normalized soil behavior type classification and correlated soil parameters. The water level may either be "measured" or "estimated:"

Measured - Depth to water directly measured in the field Estimated - Depth to water interpolated by the practitioner using pore pressure measurements in coarse grained soils and known site conditions While groundwater levels displayed as "measured" more accurately represent site conditions at the time of testing than those "estimated," in either case the groundwater should be further defined prior to construction as groundwater level variations will occur over time.

CONE PENETRATION SOIL BEHAVIOR TYPE

The estimated stratigraphic profiles included in the CPT logs are based on relationships between corrected tip resistance (q,), friction resistance (fs), and porewater pressure (u2). The normalized friction ratio (F,) is used to classify the soil behavior type.

Typically, silts and clays have high F, values and generate large excess penetration porewater pressures; sands have lower F,'s and do not generate excess penetration porewater pressures. The adjacent graph (Robertson et al.) presents the soil behavior type correlation used for the logs. This normalized SBT chart, generally considered the most reliable, does not use pore pressure to determine SBT due to its lack of repeatability in onshore CPTs.



REFERENCES

Kulhawy, F.H., Mayne, P.W., (1997). "Manual on Estimating Soil Properties for Foundation Design," Electric Power Research Institute, Palo Alto, CA. Mayne, P.W., (2013). "Geotechnical Site Exploration in the Year 2013," Georgia Institue of Technology, Atlanta, GA. Robertson, P.K., Cabal, K.L. (2012). "Guide to Cone Penetration Testing for Geotechnical Engineering," Signal Hill, CA. Schmertmann, J.H., (1970). "Static Cone to Compute Static Settlement over Sand," Journal of the Soil Mechanics and Foundations Division, 96(SM3), 1011-1043.



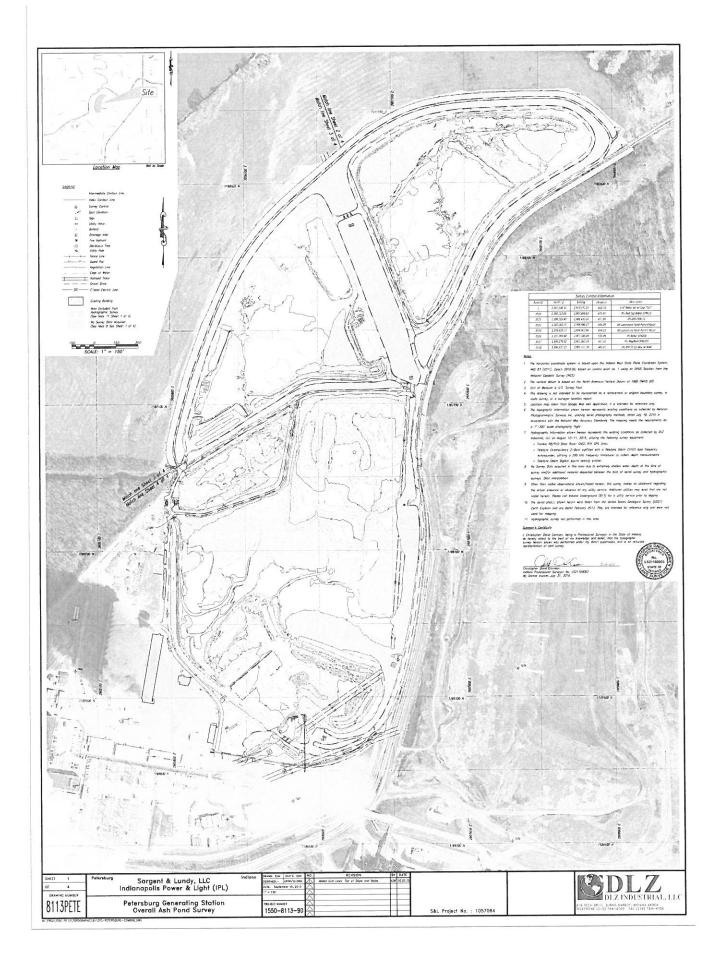


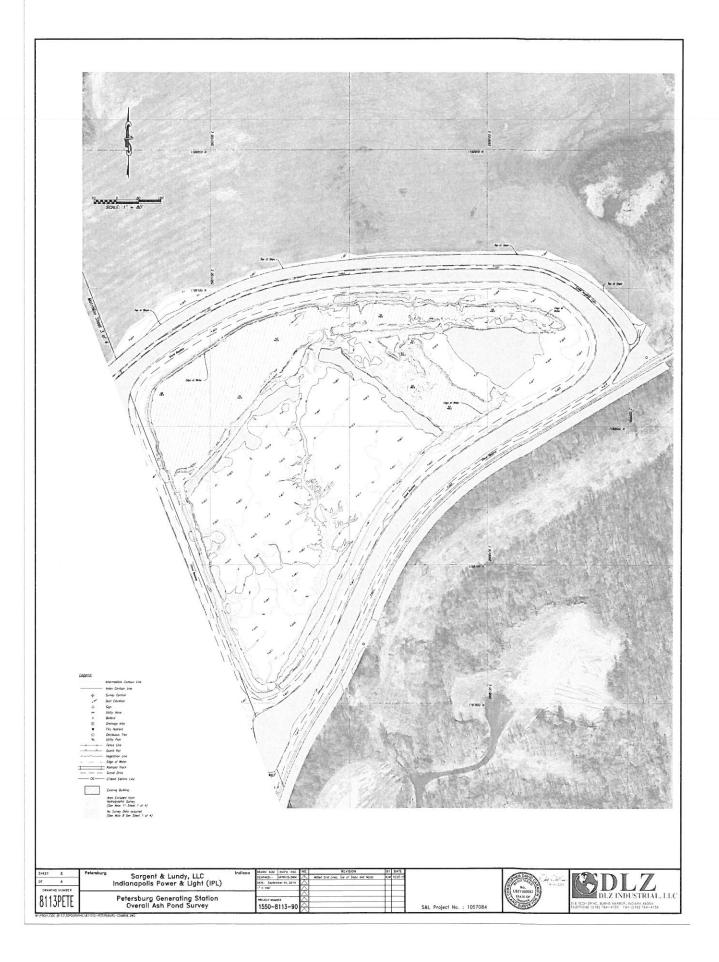
Rev. 0 October 14, 2016

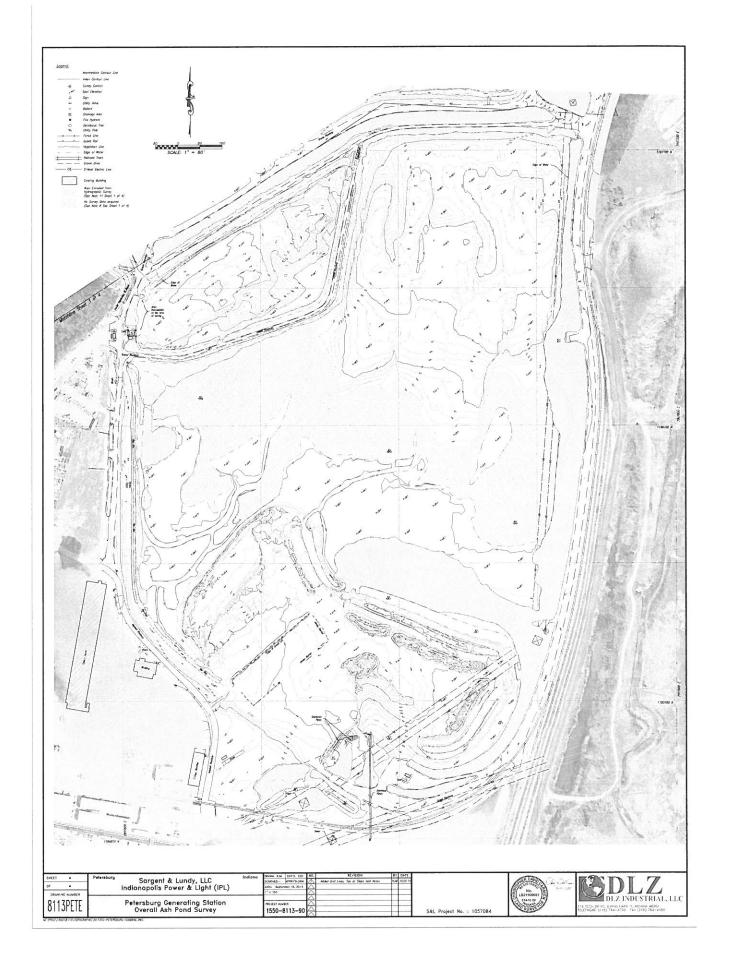
ATTACHMENT D

TOPOGRAPHIC & BATHYMETRIC SURVEYS OF ASH POND SYSTEM

Item	Drawing Number	Title
1	8113PETE SHT 1	Petersburg Generating Station, Overall Ash Pond Survey
2	8113PETE SHT 2	Petersburg Generating Station, Overall Ash Pond Survey [of Pond C]
3	8113PETE SHT 4	Petersburg Generating Station, Overall Ash Pond Survey [of Ponds A & A'







ATTACHMENT E OPERATIONS & MAINTENANCE PLAN

SCS BT SQUARED















Ash Pond Operations and Maintenance Plan

Indianapolis Power & Light Company Petersburg Generating Station Petersburg, Indiana

Prepared for:

Indianapolis Power & Light Company



6925 N. State Road 57 Petersburg, Indiana 47567

Prepared by:

SCS BT SQUARED 2830 Dairy Drive Madison, Wisconsin 53718-6751 (608) 224-2830

> April 2012 File No. 25211429.53

Offices Nationwide www.scsengineers.com

Ash Pond Operations and Maintenance Plan Petersburg Generating Station Petersburg, Indiana

Prepared for:

Indianapolis Power & Light Company 6925 N. State Road 57 Petersburg, Indiana 47567

Prepared by:

SCS BT SQUARED 2830 Dairy Drive Madison, Wisconsin 53718-6751 (608) 224-2830

> April 2012 File No. 25211429.53

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Figures

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- 2 Piezometer and Staff Gauge Location Plan

Appendices

- A Example Monitoring Forms
- B Example Inspection Forms
- C Example Maintenance Forms
- D Completed Forms

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1.0 INTRODUCTION

The ash ponds are owned and operated by Indianapolis Power and Light Company (IP&L). This Operations and Maintenance Plan (O&M) Plan was prepared to fulfill Tasks 3a and 3b of the Action Plan prepared in response to the U.S. Environmental Protection Agency report prepared by CDM following their inspection of ash ponds at the Petersburg (PS) Station in May 2010.

This O&M Plan was prepared using the Indiana Dam Safety Inspection Manual, Part 1 - Overview of Dams and Ownership in Indiana, and Part 2 - Dam Management and Maintenance by the Indiana Department of Natural Resources, Division of Water dated August 28, 2007, for general guidance.

This O&M Plan is for the four ash ponds (Ponds A, B, C, and A-Discharge) located northwest of the generating station. Ash generated by burning coal at the generating station is mixed with water and pumped to Pond A where initial sedimentation occurs. The supernatant fluid from Pond A then flows to Pond A-Discharge for final sedimentation. After sedimentation in Pond A-Discharge is complete, the fluid is discharged from Pond A-Discharge to the National Pollutant Discharge Elimination System permitted outfall to the discharge channel (Lick Creek) that flows to the White River. The ash/water slurry from the Station can also be pumped (dredged) to Ponds B or C for storage purposes until excavated for beneficial reuse projects or mine placement. Water from Pond B flows to Pond C and then to Pond A. Water from Pond C can flow to Pond B or Pond A. The ponds were created by berms constructed of native site soils including clay and sand and ash. There is an access road on the top of each berm, and the outside of each berm is vegetated. The layout of the ponds is shown on Figure 1.

This O&M Plan has been prepared to assist IP&L in assuring the safety of the ash ponds and berms and allow continuous operation of the ponds, minimize the need for costly repairs, and extend the useful life of each pond.

2.0 OPERATIONS

There are four ash ponds at the PS Station. The layout of the ponds is shown on **Figure 1**. The approximate area of each of the ponds is as follows:

Pond A	65 acres	Initial Sedimentation
Pond B	24 acres	Secondary Sedimentation
Pond C	28 acres	Secondary Sedimentation
Pond A-Discharge	6 acres	Secondary sedimentation

2.1 NORMAL OPERATION

Figure 1 shows the flow of ash slurry through the present (March 2012) normal operation of the ash ponds at the PS Station. The ash ponds at Petersburg receive slurry of ash and water from the Station. There is a 35 acre area around the Station where storm water is collected and pumped to the ash ponds with the ash slurry. Pond A normally receives the water from the Station and acts as the primary ash settling pond. Water from Pond A is discharged through two 36-inch-diameter pipes to Pond A-Discharge. The outlet of Pond A-Discharge is a concrete outlet structure. Water entering this outlet structure flows to the discharge channel (Lick Creek) and to the White River.

The dredging of Pond A typically begins when Pond A fills with ash and the ash from Pond A is dredged and pumped to Pond B or C or the ash is excavated and sent off site for beneficial reuse or mine placement. This creates additional airspace in Pond A for continued use for initial sedimentation of ash for Station use.

During normal operation, the fluid level in Pond A, Pond B, Pond C, and Pond A-Discharge is approximately the same elevation as the invert elevation of the discharge structure. Water is allowed to discharge freely from each pond and water is not backed up in the ponds. The level of fluid in Pond B and Pond C can be controlled by the addition of stop logs in the discharge structure located in each pond.

3.0 INSTRUMENTATION AND MONITORING

3.1 PIEZOMETER MONITORING

There are ten piezometers (PZ-1 through PZ-10) located around the ash ponds at Petersburg Station. The location of the piezometers is shown on **Figure 2**. The piezometers are used to monitor the elevation of the water inside the berm of the ash ponds. The water level in the piezometers shall be measured on a monthly basis. Water levels shall be recorded on the example monitoring form included in **Appendix A**.

Liquid levels measured in the piezometers can be compared to the following liquid levels.

Pond	Piezometers	Water Level
A	PZ5	435.3
A-Discharge	PZ6	431.0
D	PZ2 (upper lift)	448.0
13	PZ7 (lower lift)	434.0
C	PZ3 and PZ4 (upper lift)	448.0
	PZ9 and PZ10 (lower lift)	434.0

If the level in any piezometer exceeds the elevation listed above, a Station supervisor must be notified.

3.2 POND WATER LEVEL MONITORING

There are four staff gauges installed in the ash ponds at PS Station. Each ash pond has a staff gauge located at the outlet structure of the pond. The staff gauges are used to monitor the level of the water in each pond. The water level in each ash pond will be recorded weekly. There is an example monitoring form included in **Appendix A**.

The water level in the ash ponds can be compared to the following table:

Pond	Water Elevation	
A	438.3	
A-Discharge	437.1	
В	453.1	
С	453.1	

If the water level in any of the ponds is above the above water elevations, a Station supervisor must be notified.

3.3 RECORD KEEPING

Completed monitoring forms shall be kept in **Appendix D** of this O&M Plan or at an alternative location determined by the facility. Where necessary, these forms will direct users to additional records prepared in response to all actions discussed and taken in response to measurements in either the piezometers or staff gages that exceeded recommended values.

4.0 INSPECTIONS

The ash pond inspection program includes two types of inspections:

- Maintenance inspections
- Informal inspections

Maintenance inspections shall be performed as a preventative measure to identify problems and develop solutions to prevent further degradation. Maintenance inspections shall be a complete inspection of all of the ash ponds and berms.

Informal inspections may be performed on only a portion of the ash pond berm where a problem is known to exist or provide an update on site conditions

4.1 INSPECTION PERSONNEL

Maintenance inspection shall be performed by personnel familiar with dam design and construction, the causes of dam failures, and the visual signs which identify problems or potential concerns, preferably a qualified external professional.

Informal inspections may be performed by IP&L personnel familiar with the ash ponds and berms who possess sufficient knowledge to make an accurate assessment of the ponds and berms conditions.

4.2 INSPECTION FREQUENCY

Maintenance inspections shall be performed on a semi-annual basin in the spring and fall of every year.

Informal inspections shall be performed on a bi-weekly basis or after a significant rain event/weather condition.

4.3 INSPECTION FORMS

Example inspection forms for the inspections are included in **Attachment B**. These forms are to be completed for every inspection.

4.4 RECORD KEEPING

Completed inspection forms shall be kept in Appendix D of this O&M Plan or at an alternative location as determined by the facility.

5.0 MAINTENANCE

5.1 VEGETATION

A good, thick grass cover at an appropriate height is an important part of berm maintenance. A healthy stand of grass can serve the following purposes:

- 1. Protect the surface from extreme runoff events
- 2. Minimize animal penetrations
- 3. Minimize growth of woody vegetation
- 4. Allow for visual monitoring of the berm surface

A good grass cover requires mowing twice per year, if acceptable safety conditions exist to keep the grass at a reasonable height and discourage the establishment of woody vegetation. Any bare or thin spots should be reseeded as needed.

Any trees or brush should be cut flush with the ground. If necessary, the stump should be removed and the excavation filled with compacted structural fill.

5.2 EROSION

Erosion is a natural process and its continuous forces will eventually wear down almost any surface or structure. Erosion is a particularly important consideration for the ash pond dikes at the PS Station because the dikes are constructed of ash. Ash is a relatively easily erodible material, subject to damage in the event of improper drainage, settlement, vehicle traffic, inadequate vegetation, animal burrows, or other factors. Periodic and timely maintenance is essential in preventing continuous deterioration and possible failure.

A healthy and sturdy Station growth on all sloped surfaces is one of the most effective means of erosion protection. Prompt repair of vegetated areas that develop erosion is required to prevent more serious damage to the berm. Rills and gullies should be filled with suitable soil (the upper 4 inches should be topsoil), lightly compacted, and seeded.

Erosion on the top of the berm on the access road should be addressed. Of particular importance is the provision of a "hardened" gravel surface roadway on top of all ash pond dikes at the PS Station. Vehicle traffic can result in tire ruts, which can be areas where water collects and erosion occurs. The access road should be maintained using road gravel or bottom ash and compacted to allow vehicle access in all weather conditions. Additionally, an erosion resistant surface should be provided and maintained between the road surface and the vegetative cover or the rip rap surface provided on the upstream (inside) and downstream (outside) slopes of all of the ash pond dikes.

Erosion on the inside of the berm can be caused by wave action within the pond. Rock riprap may be required on the interior slope of the berm to prevent erosion.

Any erosion issues shall be documented in the inspection sheet. Records of all repair / maintenance activities should be documented and either located in **Appendix D** or an alternative location.

5.3 SEEPAGE

Seepage may be through the foundation of the berm, through the embankment or along the foundation / embankment interface. Seepage can emerge anywhere on the downstream face of the berm, beyond the toe, or on the downstream abutments. Seepage may vary from a "soft" wet area to a flowing channel of water. It may show up first as an area where vegetation is lush and dark green. Cattails, reeds, moss, and other marsh vegetation often become established in a seepage area.

Seepage poses the highest risk to failure of ash pond dikes like those at PS Station, and any suspicion of the occurrence of seepage must be noted and identified to the EAC and EAE immediately. Specifically, any time that seepage is suspected to be occurring, these areas should be noted on the inspection forms with the exact location of the seepage and the approximate dimensions. The information must be communicated with the EAC and EAE immediately. As necessary, the On-Call Engineer should be consulted if any actual seepage is observed to be occurring.

5.4 OUTLETS

The outlet of each ash pond should be inspected during the semi-annual RPI inspections. Several of the outlets are corrugated metal pipes, which can corrode and breakdown over time. The outlets should not be blocked with debris or ash and water should be able to freely enter and exit the outlets. Any debris blocking the flow into the pipe should be removed.

If the outlet has a mechanical gate structure, decisions should be made whether to attempt to open and close the gate. If the gate has not been operated for a long period of time, opening the gate may result in damage that requires substantial repair cost and can actually result in risk to the dike structure. In the event that IP&L decides that it is too risky to attempt to operate a mechanical gate, it will be assumed that this gate does not exist for operation and any EAP provisions that rely on operation of this gate will be reviewed and modified as necessary.

Any issues associated with the ash pond outlets shall be documented in the inspection sheet. Records of all repair / maintenance activities should be documented and either located in **Appendix D** or an alternative location.

5.5 RIPRAP

The riprap on the interior slope of the ash ponds should be inspected during the RPI and IMI inspections. Any areas of eroded or missing riprap should be noted and repaired.

Records of all repair / maintenance activities should be documented and either located in **Appendix D** or an alternative location.

5.6 ACCESS ROADS

There are gravel access roads along the top of the ash pond berms. The access roads should be maintained to allow safe passage of vehicles. The road surface must be maintained to allow access to the ash ponds and berms. Any areas of erosion or degraded areas should be immediately repaired.

Records of all repair / maintenance activities should be documented and either located in **Appendix D** or an alternative location.

5.7 RODENT CONTROL

Rodents such as groundhogs, muskrats, and beaver can make burrows in the ash pond berms and compromise the structural integrity of the berms by the creation of holes in the dike by burrowing. The burrows can collapse thus weakening the structure, and can serve as an unobstructed pathway for seepage into the core area of the dike.

In the event burrows are observed, these should be filled immediately using methods that restore structural integrity to the dike and restore a completely obstructed flow path to water.

Additionally, IMI inspections should be increased to locate any new burrows and to identify what animals are active. Removal of the animals should be an immediate priority.

Any issues associated with rodents shall be documented in the inspection sheet. Records of all repair / maintenance activities should be documented and either located in **Appendix D** or an alternative location.

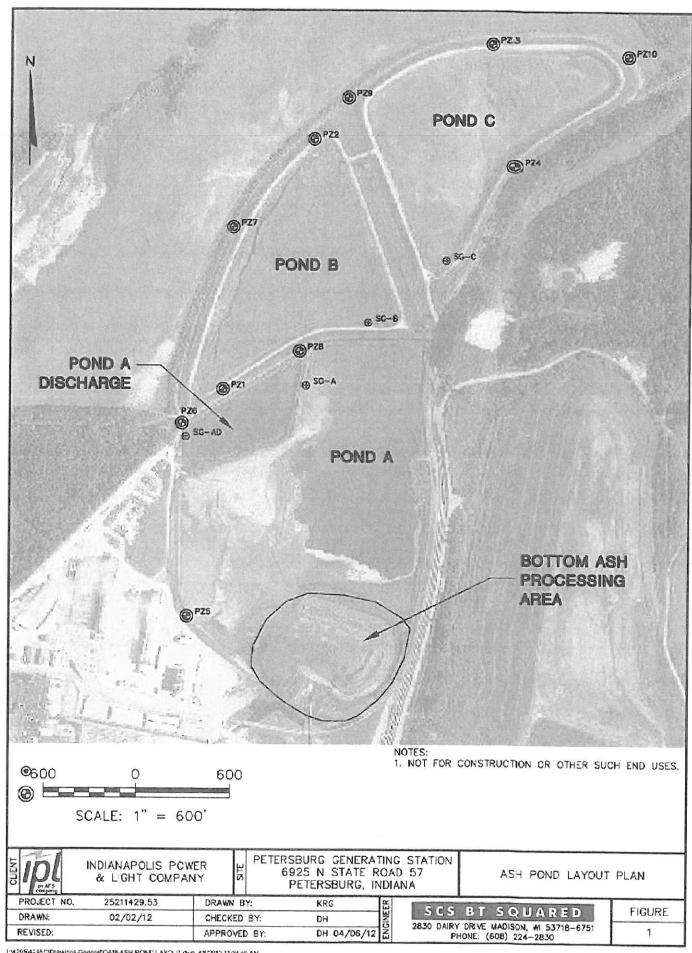
5.8 RECORD KEEPING

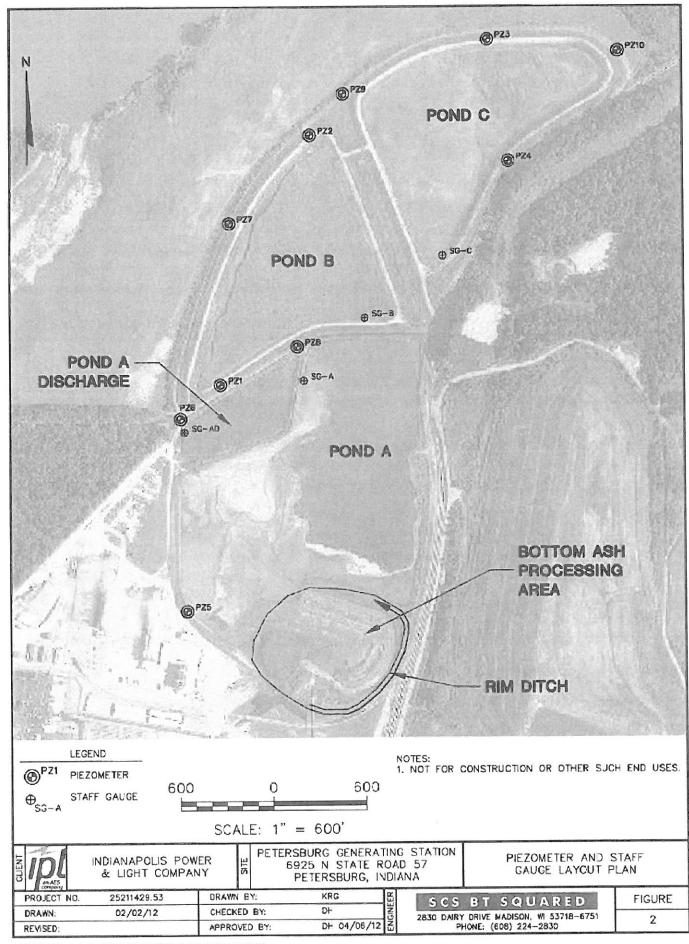
An example maintenance form is included in **Appendix C**. Completed forms of any maintenance activities performed should be kept in **Appendix D** of this O&M Plan or an alternative location as determined by the facility for a minimum of three years.

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FIGURES

- 1
- Ash Pond Layout Plan Piezometer and Staff Gauge Location Plan 2





APPENDIX A

Example Monitoring Forms

Ash Pond Monitoring Form Petersburg Generating Station Indianapolis Power & Light Company Petersburg, Indiana

Date:	
Personnel:	100

Piezometer Reading

Piezometer	Coordinates		Top of Casing El.	Depth to Water from Top of Casing	Water Elevation	
	N	E,		Top or cusing		
PZ1	166.50	722.89	454.69			
PZ2	1,792.66	1,309.62	454.91			
PZ3	2,414.89	2,469.10	456.11			
PZ4	1,620.70	2,601.93	456.84			
PZ5	-1,303.68	498.75	440.46			
PZ6	-54.91	461.42	439.11			
PZ7	1,218.32	784.93	440.10			
PZ8	414.76	1,220.41	440.67			
PZ9	2,062.09	1,526.96	439.31			
PZ10	2,338.91	3,317.43	440.32			

Staff Gauge Reading

Pond A	
Pond A-Discharge	
Pond B	
Pond C	

1:/4295/4295C/Reports/PB Monitoring Form.xls

APPENDIX B

Example Inspection Forms

PETERSBURG STATION BI-WEEKLY ASH POND(S) INSPECTION RECORD

DATE:____

This record is completed on a bi-weekly basis after inspection is completed.

					<u> </u>		and a figure of the state of the	Victoria de la composición della composición del	Secretary of the second	Initia	els
Ash Pond Description (Name/ID)	Date	Erosion Along Crest or Embankment Slopes (Y/N)	Appearance of Sinkholes or Seepage (Y/N)*	Tension Cracks Along Crest or Slope Faces (V/N)	Presence of Vegetation Cover Along the Embankment Slopes (Y/N)	Changes in Dike Alignment (Y/N)	Appearance of Erosion/Deterioration Around Outlet Structures (Y/N)	Sloughing or Bulging On Slopes?	Description of Current Operational Conditions (Normal/ Abnormal)	Anthorized Supervisor	Personnel
										A. 15 5	
										- 100 - T	
											1

*Seep	age:
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- 1. Location Description:
 2. Active Flow? (Y/N)
 3. Color of Active Flow:

Inspection Issue	Work Order #	Responsible Person	Corrective Action Taken	Date Issue Resolved

Rev. 6-18-10

IPL Dike Field Review Checklist

Project Number				
Review Inventory – Highlight missing information (Pre-review) Owner(s) Name(s): Indianapolis Power & Light Company				
Road_				
State Indiana 7in (+4)				
State IndianaZip (+4) _Telephone (Work):				
relephone (vvork)				
Plans Available (Yes, No) (Location):				
Plans Available (Yes, No) (Location):				
erosion, slides):				
ax. pool):				
(recent changes):				
(recent changes):				
(recent changes):				

		Required Action
5)	INSIDE SLOPE Gradient: Horizontal: Vertical: (est. meas.)	None Monitor Maintenance Engineer
	□ VEGETATION [no problem] □ Trees: Quantity: (<5, sparse, dense) Diameter: (<6", 6-12", >12") Location: Notes:	
	□ Brush: Quantity: (spare, dense) Location: Notes:	
	Ground Cover: Type: (grass, crown vetch) Other: Quantity: (bare, sparse, adequate, dense) Appearance: (too tall, too short, good) Notes:	- -
	□ SLOPE PROTECTION [no problem, could not inspect thoroughly] □ None □ Riprap: Average Diameter:	
	□ Wave Berm:	
	□ Other:Notes:	
	□ EROSION [no problem, could not inspect thoroughly] □ Wave Erosion (beaching): Scarp: Length: Height: Location: Notes:	- 0000
	□ Runoff Erosion (Gullies): Quantity: Depth: Width: Length: Location: Notes/Causes:	=
	□ INSTABILITIES [no problem, could not inspect thoroughly] □ Slides: Transverse Length: Longitudinal Length: Scarp: Width: Length: Location: Crack: Width: Depth:	-
	Notes/Causes Cracks: □ Transverse □ Longitudinal □ Other Quantity: Length: Width: Depth:	90
	Location:Notes/Causes:	

		Kequired Action
	□ Cracks: □ Transverse □ Longitudinal □ Other Quantity: Length: Width: Depth: Location: Notes/Causes:	None None Monitor Maintenance Engineer
	□ Bulges □ Depressions □ Hummocky Size: Height: Depth: Location: Notes/Causes:	-
	□ Bulges □ Depressions □ Hummocky Size: Height: Depth: Location: Notes/Causes:	- - -
	□ OTHER [no problem, could not inspect thoroughly] □ Rodent Burrows: (few, numerous) Location: Notes/Causes:	
	□ Other:Notes:	- 0000
6)	CREST Length: Width: (est. meas.) UVEGETATION [no problem] Trees: Quantity: (<5, sparse, dense) Diameter: (<6", 6-12", >12") Location: Notes:	-
	□ Brush: Quantity: (spare, dense) Location: Notes:	
	Ground Cover: Type: (grass, crown vetch) Other: Quantity: (bare, sparse, adequate, dense) Appearance: (too tall, too short, good) Notes:	
	□ EROSION [no problem, could not inspect thoroughly] □ Runoff Erosion (Gullies): Quantity: Depth: Width: Length: Location: Notes:	

None
Nonitor
Naintenance
Paulineer

		Kequirea Action
	□ WIDTH [no problem]	None Monitor Maintenance Engineer
	□ Too Narrow Location:	
	Notes/Causes: INSTABILITIES [no problem, could not inspect thoroughly] Cracks: Transverse Longitudinal Other Quantity: Length: Width: Depth: Location: Notes/Causes:	
	□ Cracks: □ Transverse □ Longitudinal □ Other Quantity: Length: Width: Depth: Location: Notes/Causes:	
	□ Bulges: □ Depressions □ Hummocky Size: Height: Depth: Location: Notes/Causes:	
	□ OTHER [no problem, could not inspect thoroughly] □ Rodent Burrows: (few, numerous) Location: Notes:	
	□ Other: Notes:	
7)	OUTSIDE SLOPE Gradient: Horizontal: Vertical: (est. meas.) UVEGETATION [no problem] Trees: Quantity: (<5, sparse, dense) Diameter: (<6", 6-12", >12") Location: Notes:	
	□ Brush: Quantity: (spare, dense) Location: Notes:	_
	Ground Cover: Type: (grass, crown vetch) Other: Quantity: (bare, sparse, adequate, dense) Appearance: (too tall, too short, good) Notes:	- - - - ea.
4	{Inside Slope, Crest, Outside Slope, Outlet/Inlet Structures, Pond Drain}	None Wonitor Augmentance Description