

ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER

ALL CCR IMPOUNDMENTS
CCR Rule Section 257.83(b)

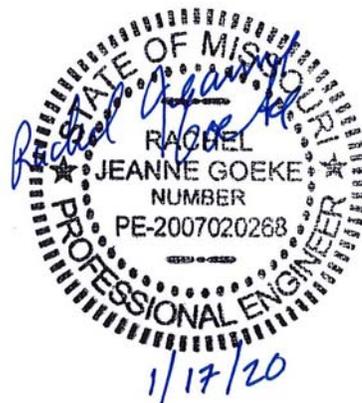
ASBURY POWER PLANT

21133 Uphill Lane
Asbury, Missouri 64832

January 17, 2020



Prepared by:



Rachel J. Goeke, P.E.
MO P.E. 2007020268

January 17, 2020

Liberty Utilities
Asbury Power Plant
21133 Uphill Lane
Asbury, Missouri 64832

RE: **Annual Inspection by a Qualified Professional Engineer –**
CCR Rule Section 257.83(b)
Liberty Utilities – Asbury Power Plant
Asbury, Missouri
PPI Project Number: 231518-2020

To Whom It May Concern:

The attached Report presents the results of Palmerton & Parrish, Inc.'s (PPI's) **Annual Inspection by a Qualified Professional Engineer** at Liberty Utilities (Liberty's) CCR Impoundment at the Asbury Power Plant (Asbury CCR Impoundment).

PPI has been involved with several projects at the Asbury Power Plant since 2010, and has been able to observe and study the condition of the existing CCR Impoundment periodically throughout that time. Based upon historical information provided by Liberty, PPI's professional training and experience, the results of PPI's studies, and PPI's observations during visual inspection of the CCR Impoundment, the Asbury CCR Impoundments were designed and constructed, and are operated and maintained, in general accordance with recognized and generally accepted engineering standards.

In accordance with Section 257.105(g) of the CCR Rule, a copy of this document should be maintained in Liberty's operating records. In accordance with Section 257.107(g), a copy of this document should also be posted to Liberty's CCR Compliance website. Notification of the availability of this document should be provided to the State Director, as required in Section 257.106(g).

PALMERTON & PARRISH, INC.

By:



Rachel J. Goeke, P.E.
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ANNUAL INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER – ALL CCR IMPOUNDMENTS

CCR RULE SECTION 257.83(B)

LIBERTY UTILITIES – ASBURY POWER PLANT

ASBURY, MISSOURI

1.0 INTRODUCTION

“CCR Rule Section 257.83(b) Annual inspections by a qualified professional engineer. (1) If the existing or new CCR surface impoundment or any lateral expansion of the CCR surface impoundment is subject to the periodic structural stability assessment requirements under Section 257.73(d) or Section 257.74(d), the CCR unit must additionally be inspected on a periodic basis by a qualified professional engineer to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards...”

Section 257.83(b) requires completion of an Annual Inspection of all CCR Impoundments by a qualified professional engineer, including a review of available documentation and previous inspection reports, and a visual inspection of the CCR unit and any hydraulic structures underlying the base of the CCR unit. This Report has been prepared in general accordance with the requirements of Section 257.83(b)(2) Inspection Report.

2.0 REVIEW OF AVAILABLE INFORMATION – CCR RULE SECTION 257.83(B)(I)

PPI has worked on numerous Projects at the Asbury Power Plant throughout the years. Since 2010, PPI has been involved as the Geotechnical Engineer of Record for projects including the Asbury Environmental Retrofit, Asbury Office Building, Asbury Railroad Embankment Repair, and the Asbury Coal Ash Site Structural Assessment. Pertinent to the CCR Rule, PPI assisted Liberty with preparation of a weekly inspection report form. PPI transitioned completion of monthly monitoring tasks to Liberty’s staff at the end of 2016.

PPI reviewed our internal files pertaining to the Asbury CCR Impoundment as part of this Levee Inspection Report. Information pertaining to the original design and construction of the Asbury CCR Impoundment is summarized in PPI’s Report entitled “Coal Ash Site Structural Assessment Report”, dated December 28, 2012. In general, the Asbury CCR Impoundment is subdivided into three (3) ponds: the Lower Pond, South Pond, and Upper Pond. The Upper Pond is subdivided into two (2) cells, identified as Upper Pond – A and Upper Pond – B.

Operating conditions at the Asbury Power Plant have changed considerably since PPI’s 2012 Report, as Liberty transitioned to a dry hauling system when the Asbury Environmental Retrofit Project was commissioned in November 2014. The amount of impounded water has decreased significantly since 2012, and the volume of stored CCR has increased in correlation to the volume of CCR byproduct that has been produced and stored in the CCR Impoundment since that time.

3.0 VISUAL INSPECTION – CCR RULE SECTIONS 257.83(b)(ii) AND (iii)

PPI completed a visual inspection of the CCR levee impoundment and hydraulic structures in general accordance with the requirements of CCR Rule Sections 257.83(b)(ii) and 257.83(b)(iii). The completed Levee Inspection Form is included in Appendix I. The levee inspection was completed on Tuesday, January 8, 2020 by Ms. Rachel Goeke, P.E.

4.0 CCR RULE SECTION 257.83 (2) INSPECTION REPORT

Section 257.83(2) lists specific information that is required in the Inspection Report. This entire Report document, including Appendix I constitutes the “Inspection Report” for the purposes of the CCR Rule. The requirements of Section 257.83(2) are summarized in the list below, along with supplemental information as appropriate.

1. Changes in impoundment structure geometry since the previous annual inspection: The last formal inspection of the CCR Impoundments, by a licensed third-party Professional Engineer, was completed by Palmerton & Parrish, Inc. (PPI) in 2019, with a formal Inspection Report dated January 18, 2019. Since that time, the geometry of the perimeter levee impoundment embankments is essentially unchanged. Additional CCR has been placed within portions of the Lower Pond, typically resulting in decreased interior embankment height and more gradual side slopes for the interior embankments. The volume of CCR placed in 2019 was considerably less than in previous years.

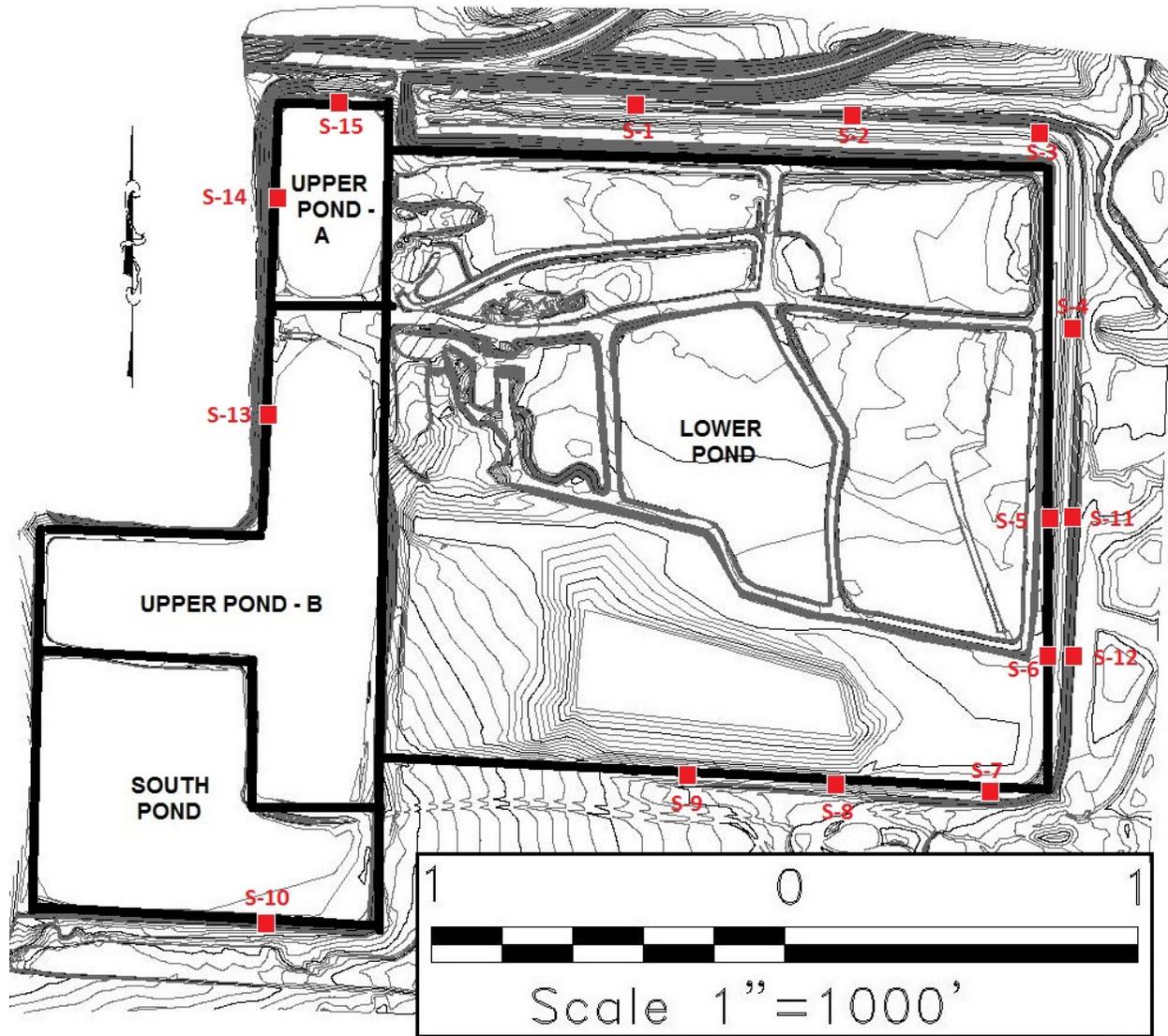
2. Locations and type of any existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection: As of the date of the 2018 inspection, there are twelve (12) settlement monuments and fifteen (15) vertical deflection monuments in place at the Asbury CCR Impoundment.

The twelve (12) settlement monuments were originally installed as part of the Site Structural Assessment Project in March 2012. The twelve (12) original settlement monuments were surveyed using traditional level loop survey methods by Allgeier, Martin & Associates (AMA) periodically from March 2012 to October 2015, when the CCR Rule went into effect. The settlement monuments were surveyed monthly from October 2015 through August 2016, at which time monthly monitoring transitioned to the vertical deflection monuments.

The fifteen (15) vertical deflection monuments were installed in July 2016 and have been monitored monthly in accordance with Section 257.83(a) since that time.

The twelve (12) settlement monuments will be maintained and will remain available for future surveying. Liberty has recently surveyed, and plans to continue surveying, the settlement monuments on an annual basis.

The general location of the vertical deflection monuments is shown on the Site Plan below. The vertical deflection monuments are identified as S-1 through S-15. Vertical deflection monuments S-1 through S-12 are located in close proximity to the twelve (12) settlement monuments, SM-1 through SM-12.



Liberty's Generation Performance Manager confirmed that the vertical deflection monuments have been monitored monthly over the past year, and readings have been stable over time.

The table on the following page summarizes the Settlement Monument Readings by AMA from May 25, 2012, May 13, 2014, and all measurements from 2016 through the present date.

Settlement Monument Readings, by AMA														
Settlement Monument	Elevation (ft.), on Surveyed Date													
	5/25/12	5/13/14	1/29/16	2/26/16	4/5/16	4/28/16	5/31/16	6/30/16	7/29/16	8/31/16	2/27/17	8/31/17	9/4/18	9/30/19
SM-1	929.17	929.26	929.20	929.26	929.25	929.27	929.25	929.28	929.29	929.30	929.26	929.23	929.24	929.27
SM-2	929.13	929.16	929.14	929.16	929.15	929.16	929.14	929.17	929.19	929.19	929.16	929.16	929.17	929.16
SM-3	927.39	927.44	927.42	927.44	927.43	927.44	927.42	927.46	927.45	927.46	927.43	927.44	927.45	927.45
SM-4	930.65	930.69	930.66	930.68	930.67	930.68	930.64	930.68	930.68	930.69	930.66	930.67	930.68	930.68
SM-5	930.91	930.94	930.91	930.93	930.92	930.93	930.93	930.94	930.93	930.94	930.91	930.92	930.92	930.92
SM-6	931.05	931.05	931.02	931.05	931.05	931.05	931.06	931.06	931.05	931.05	931.03	931.04	931.05	931.04
SM-7	931.95	931.95	931.93	931.95	931.95	931.95	931.95	931.95	931.94	931.95	931.93	931.94	931.95	931.93
SM-8	931.77	931.75	931.74	931.76	931.76	931.75	931.76	931.76	931.74	931.75	931.74	931.74	931.75	931.73
SM-9	933.86	933.89	933.85	933.86	933.86	933.86	933.86	933.86	933.85	933.85	933.85	933.86	933.85	933.84
SM-10	956.38	956.39	956.41	956.40	956.41	956.40	956.41	956.40	956.41	956.38	956.38	956.38	956.38	956.38
SM-11	926.33	926.36	926.34	926.36	926.36	926.36	926.37	926.37	926.37	926.37	926.34	926.35	926.36	926.35
SM-12	926.69	926.67	926.65	926.67	926.67	926.67	926.68	926.68	926.68	926.68	926.65	926.67	926.67	926.66

* SM-1 was disturbed by truck traffic shortly after installation.

3. Approximate minimum, maximum, and present elevation of impounded water and CCR since the previous annual inspection: Water handling procedures are unchanged since the date of the last Annual Inspection. Plant make up water is still directly sourced from the Lower Pond reservoir. Discharge water from the Foggy Pond and Coal Pile Sump is pumped and discharged directly into the northern portion of the Lower Pond.

The standing water level in the Upper Pond and South Pond was lowered in the spring of 2017 to allow for surveying of the top of the CCR surface. Since that time, new water inflow into the Upper Pond and South Pond has generally been limited to rainfall. The water level in the Upper Pond and South Pond is most typically at an elevation close to or slightly above the top of CCR elevation. Typical CCR surface elevations in the South Pond range from 947 to 951 feet. The CCR surface in the Upper Pond varies from approximately 935 feet to 951 feet.

The normal operating level of the Lower Pond is approximately 929.7 feet, and is generally maintained at an elevation 6 to 13 inches below the spillway elevation of 930.35 feet. The maximum impounded water elevation in the Lower Pond is controlled by the spillway elevation of 930.35 feet. The maximum pool elevation during overflow is 931.5 feet.

The CCR elevation within the Lower Pond is variable, as the interior dike embankments are typically constructed of CCR. The maximum elevation of the interior dikes is on the order of 950 feet near the north end of the Lower Pond. The maximum elevation in the areas where filling occurred in 2019 is approximately 949 to 949.5 feet.

CCR elevations are largely unchanged since the 2019 Inspection Report. The average elevation in the areas where filling occurred in 2019 has increased nominally, typically less than 0.5 foot. Filling of this area has resulted in increased buttressing of interior CCR dikes, and generally flatter conditions.

4. The storage capacity of the impounding structure at the time of the inspection: Approximately 1,800 cubic yards of FGD byproduct has been impounded since the time of last year's Inspection Report. Conservatively, the remaining storage capacity at the Asbury CCR Impoundment is estimated to be approximately 758,200 cubic yards. This storage capacity based on (1) no additional CCR placed in the Upper Pond, South Pond, or standing water portion of the Lower Pond, and (2) a maximum filling elevation on the order of 959.25 feet.

5. The approximate volume of impounded water and CCR at the time of the inspection: The estimated volume of impounded CCR at the time of this Report is estimated to be on the order of 2,371,500 cubic yards. Historical development of this estimate is documented in previous Inspection Reports, plus the approximately 1,500 cubic yards of additional CCR impounded in the past year.

The volume of impounded water at the Asbury CCR Impoundment is essentially unchanged from the 2019 Inspection Report. In 2019, the volume of impounded water was estimated to be approximately 4,396,000 cubic feet, or approximately 163,000 cubic yards. The current volume of impounded water is estimated to be approximately 163,000 cubic yards.

6. Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit and appurtenant structures: Evidence of structural weakness was not observed at the time of the inspection.

7 Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection: The condition of the Asbury CCR Impoundment is largely unchanged since the 2019 Annual Inspection Report. The extent of beneficial vegetation around the perimeter embankments is unchanged or improved from last year, and should continue to be maintained. There are existing ruts resulting from vehicle traffic in the levee embankment roadway crests, which should be monitored and preferably filled to prevent ponded water. There is one rut in the levee embankment roadway on the west side of Upper Pond A that is of appreciable depth and is water-filled. PPI recommends repair of this rut in the near term.

5.0 REPORT LIMITATIONS

This report has been prepared in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same geographical area. Palmerton & Parrish, Inc. (PPI) observed that degree of care and skill generally exercised by other consultants under similar circumstances and conditions. PPI's findings and conclusions must be considered not as scientific certainties, but as opinions based on our professional judgment concerning the significance of the data gathered during the course of this investigation. Other than this, no warranty is implied or intended.



APPENDIX I
LEEVE INSPECTION FORM

LEVEE INSPECTION FORM

Date: 1/8/20

Inspection By: Rachel Goeke, P.E., PPI

Dam Name: Asbury Power Plant

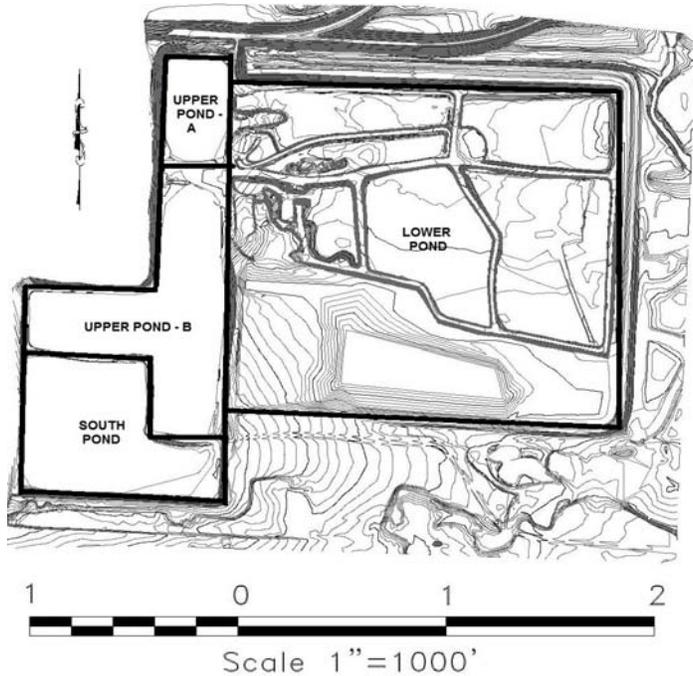
CCR Impoundment Levees

Dam Location: Asbury Missouri

Jasper County

Weather: Sunny and Clear

Temperature: 50 to 55 Degrees



Notes / Instructions: Reference previous Annual Levee Inspection prior to commencement of field work. Observe entire perimeter levee of the Impoundment.

Summarize Overall Condition of Levee Embankments: The overall condition of the perimeter levee embankments is good. Evidence of sloughing or seepage was not observed during the inspection.

Summarize Areas of Concern / Recommended Action Items: Liberty should review the condition of the levee crest roadways. Significant ruts should be filled with earth fill and regraded as necessary to prevent ponded water at the levee crest. There is one rut that needs to be addressed on the west side of Upper Pond A.

Liberty should continue to monitor the levee embankments for the presence of animal burrow holes and should continue trapping when appropriate. One animal burrow hole was noted on the South side of the South Pond and was reported to Liberty.

Overall, vegetation on the levees looked good. Liberty may want to selectively overseed in the spring.

LEEVE INSPECTION FORM - 1/8/20

ITEM	YES	NO	REMARKS
1. CREST			Rutting due to vehicles should be repaired.
a. Any visual Settlement?		X	
b. Misalignment?		X	
c. Cracking?		X	
2. INTERIOR LEEVE SLOPES			
a. Adequate grass cover?	X		
b. Any erosion?		X	
c. Trees growing on slope?		X	
d. Longitudinal cracks?		X	
e. Transverse cracks?		X	
f. Adequate rip rap protection?	X		
g. Visual depressions or bulges?		X	
h. Visual Settlements?		X	
j. Debris or trash present?		X	
3. EXTERIOR LEEVE SLOPES			
a. Adequate grass cover?	X		Need to over-seed should be reviewed.
b. Any erosion?		X	
c. Trees growing on slope?		X	
d. Longitudinal cracks?		X	Deep rut in roadway on West side of Upper Pond A needs to be repaired.
e. Transverse cracks?		X	
f. Visual depressions or bulges?		X	
g. Visual Settlements?		X	
h. Debris or trash present?		X	
i. Boils or seepage at toe?		X	
j. Seepage on slope face?		X	
k. Soft or spongy zones?		X	

ITEM	YES	NO	REMARKS
4 SPILLWAY OUTLET			
a. Is the conduit concrete?	X		
b. Do concrete surfaces show:			
(1.) Spalling?		X	
(2.) Cracking?		X	
(3.) Erosion?		X	
(4.) Scaling?		X	
(5.) Exposed Reinforcement?		X	
(6.) Other?		X	
c. Do the joints show:			
(1.) Displacement or offset?		X	
(2.) Loss of joint material?		X	
(3.) Leakage?		X	
d. Is the conduit metal?		X	
(1.) Corrosion present?			
(2.) Protective coatings adequate?			
(3.) Leakage?			
e. Seepage around the conduit?		X	
5 DITCHES / SITE DRAINAGE			
a. Describe ditch function:			Drainage channels around Impoundment perimeter.
b. Are ditches free of debris?	X		
c. Is adequate erosion protection present at the toe of slope around the perimeter?	X		
6 PHOTOGRAPHS TAKEN:	X		
7 INSTRUMENTATION IN TACT:	X		