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COAL COMBUSTION RESIDUAL IMPOUNDMENT INSPECTION – CROSS GENERATING STATION

Pineville, South Carolina



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**Please note that the terms “embankment”, “berm”, “dike”, and “dam” are used interchangeably within this report, as are the terms “pond”, “basin”, and “impoundment”.*

Executive Summary

This assessment of the stability and functionality of the Cross Generating Station (CGS) coal combustion residual (CCR) management unit is based on a review of available documents and an on-site assessment conducted by Santee Cooper engineering staff on August 24, 2020. The supporting technical information was found to be generally adequate. As detailed in Section 5.4, the assessment team had several recommendations based on field observations that may help CGS to continue to maintain the management unit in safe condition.

In summary, the CGS CCR management unit, the Bottom Ash Pond, is in generally satisfactory condition for continued safe and reliable operation. No recognized existing or potential management unit safety deficiencies were identified within the parameters of design and operation, given the unit's low hazard potential classifications.

Summary of Recommendations

Bottom Ash Pond

1. Minor erosion was observed on the upstream slope near the southeast side of the pond, where the pond abuts the decant pond. No seepage or further movement was noted at the time of inspection. This area should be repaired and monitored for further erosion.
2. Minor erosion was observed on the upstream slope near the west side of the pond, where the perimeter road meets the internal operations road. No seepage or further movement was noted at the time of inspection. This area should be repaired and monitored for further erosion.
3. The area near the abandoned underdrain outfall should continue to be monitored. If condition changes are noted in weekly inspections that warrant repair, an engineered solution should be implemented.

This assessment of dam safety reported herein is based on field observations and review of readily available information provided to the inspection team of the subject coal combustion residual (CCR) management unit at Cross Generating Station. Qualified Santee Cooper engineering staff performed the field observations and the review of pertinent information and made the assessment in conformance with the requirements of Section 257.83 of the Code of

Federal Regulations and in accordance with reasonable and generally accepted engineering practices.

Coal Combustion Residual Impoundment Inspection – Cross Generating Station

1.0 General Information and Introduction

1.1 Purpose and Scope

The purpose of this report is to fulfill the requirements of Section 257.83(b) of the Code of Federal Regulations regarding the safety and inspection of CCR surface impoundments. Section 257.83(b) states that “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 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.” The inspection must, at a minimum, include:

- i. A review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (e.g., CCR unit design and construction information required by Section 257.73(c)(1) and 257.74(c)(1), previous periodic structural stability assessments required under Section 257.73(d) and 257.74(d), the results of inspections by a qualified person, and results of previous annual inspections
- ii. A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit and appurtenant structures
- iii. A visual inspection of any hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation

The inspection report must also be written by a qualified professional engineer and must address the following (required information on the CCR impoundments at CGS included in bold below the Code of Federal Regulations excerpt):

- i. Any changes in geometry of the impounding structure since the previous annual inspection
 - **No change noted in the geometry of the Bottom Ash Pond**
- ii. The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection
 - **The Bottom Ash Pond has a staff gage and ultrasonic level detectors (see Section 4.3.3)**
- iii. The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection
 - **See Table 1.1 below for information on Bottom Ash Pond**
- iv. The storage capacity of the impounding structure at the time of inspection
 - **See Table 1.1 below for information on Bottom Ash Pond**
- v. The approximate volume of the impounding water and CCR at the time of inspection
 - **See Table 1.1 below for information on Bottom Ash Pond**

Table 1.1 – Impoundment Capacity Information

	<i>Bottom Ash Pond</i>
<i>Surface Area (acre)¹</i>	79.0
<i>Approx. Current CCR Storage Volume (acre-feet)</i>	217
<i>Total Storage Capacity (acre-feet)</i>	1,158
<i>Total Water Storage (acre-feet)</i>	941
<i>Crest Elevation (feet)</i>	91.00
<i>Current Pond Elevation/Depth (feet)²</i>	80.9/4.9
<i>Maximum Pond Elevation/Depth (feet)²</i>	88.6/12.6
<i>Minimum Pond Elevation/Depth (feet)²</i>	80.9/4.9

1. From Santee Cooper response to EPA's RFI dated March 17, 2009.

2. Pond Levels for Bottom Ash Pond are taken from a shared staff gage and/or ultrasonic level indicators in the Wastewater Decant Pond, from the period between October 2019 – September 2020.

- vi. Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit and appurtenant structures
 - **Some maintenance required on Bottom Ash Pond as discussed in the Executive Summary and Sections 4.2 and 5.4; however, pond is safe for continued operation**
- vii. Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.
 - **No other changes noted on the Bottom Ash Pond that impact the stability or operation of the impounding structure**

2.0 Description of Coal Combustion Residual Management Units

2.1 Location and General Description

The Cross Generating Station (CGS) is located on the east bank of the Diversion Canal in Berkeley County, South Carolina, approximately 5.2 miles northeast of Cross, South Carolina. CGS is located on Cross Station Road, Pineville, South Carolina, 29468. Lake Marion is northwest of CGS, and Lake Moultrie is southeast of the station.

CGS has one CCR management impoundment, the Bottom Ash Pond. The Bottom Ash Pond is adjacent to the station Wastewater Decant Pond. A trapezoidal weir served as the connection to the Wastewater Decant Pond in the past; however, in 2020 the weir was raised to match the elevation of the perimeter dike. Table 2.1 below shows a summary of the size and general dimensions of the pond:

Table 2.1: Summary of Dam Dimensions and Size

	Bottom Ash Pond
Dam Height (ft)	14
Crest Width (ft)	15 to 24
Length (ft)	6899
Design Side Slopes (upstream) H:V	3:1
Design Side Slopes (downstream) H:V	3:1

2.2 Amount and Type of CCRs Currently Stored in Unit and Maximum Capacity

The amount of CCRs currently stored in the Bottom Ash Pond and its maximum capacity are summarized in Table 1.1. The Bottom Ash Pond was designed to contain bottom ash and boiler slag. The Pond stopped receiving material in 2020. Currently, all CCR material goes directly to the onsite landfill. The adjacent decant pond receives plant stormwater and FGD process blowdown.

2.3 Principal Project Structures

2.3.1 Earth Embankments

The Bottom Ash Pond consists of a perimeter dike embankment that has geometric features and crest elevations as shown above in Tables 1.1 and 2.1. The dimensions and elevations are from construction drawings for the pond. The wider crests occur on the embankments along the southwest side of the Bottom Ash Pond (24 feet wide) to accommodate the layout of several pipelines from the power block. As discussed in Section 2.1, the Bottom Ash Pond was previously connected to the Wastewater Decant Pond via a trapezoidal weir. This connection was removed in 2020. No CCRs are stored in the Wastewater Decant Pond. The Bottom Ash Pond is lined with Bentomat, which is a thin geocomposite of bentonite sandwiched between and contained by fabric layers. The inside slopes are also armored with Fabriform revetment (grout-filled cellular fabric form) to protect the liner and slope from wave erosion and exposure. No internal drainage blankets or toe drains for seepage control were included in the design of the dikes, but such seepage control features would not be warranted or expected for low perimeter dikes impounding a lined pond.

2.3.2 Outlet Structures

The former 10-foot bottom width trapezoidal weir located between the ponds was raised in 2020 to match the perimeter dike elevation. Therefore, the Bottom Ash Pond no longer contains an outlet structure. The Wastewater Decant Pond contains an emergency outlet. This outlet consists of a reinforced concrete box structure with an overflow section set at 92.5 feet. Emergency overflow discharges from the bottom of the overflow structure through an 18-inch diameter steel pipe.

3.0 Summary of Relevant Reports and Incidents

3.1 Summary of Reports on the Safety of CCR Unit

Furnished reports of weekly inspections, conducted by CGS personnel for the reporting period indicated no major structural or operational problems. No significant deterioration was indicated in the documentation reviewed. In addition, the annual inspection report completed by Civil Projects in October 2019 and the Bottom Ash Pond Inflow Design Flood Control System Plan and Initial Structural Stability Assessment, both produced by Worley-Parsons in October 2016 were reviewed.

As indicated in Section 5.4, careful inspection of the pipe bridge(s) and the slopes immediately downstream should be included in the weekly inspections particularly following significant rainfall events.

4.0 Field Observations

4.1 Project Overview and Significant Findings

Santee Cooper qualified engineer Michelle Crocker, P.E. performed a site visit to CGS on August 24, 2020. Weather conditions during the visit were approximately 83 degrees Fahrenheit, sunny and dry.

The overall condition of the CCR impoundment dikes appeared to be satisfactory with no significant findings noted.

4.2 Bottom Ash Pond

4.2.1 Crest

The crest of the Bottom Ash Pond perimeter dike was generally found to be in satisfactory condition. No major sags, depressions, or other signs of significant settlement were observed in the crest. No tension cracks or other signs of insipient mass soil movement were observed in the crest or along the edge of the crest.

4.2.2 Upstream/Inside Slope

The upstream/inside slope of the Bottom Ash Pond perimeter dike was generally found to be in satisfactory condition. The Fabriform revetment on the upstream inside slopes was in serviceable condition. Small patches of vegetation were noted on the upstream slopes, generally along and just above the waterline or ash sediment line. No slumps, slides or other signs of shear failure were observed in the visible parts of the slopes above the water surface or ash surface.

4.2.3 Downstream/Outside Slope and Toe

The downstream slope and toe of the Bottom Ash Pond was found to be in generally satisfactory condition. Grass on the outside slope was typically observed to be maintained in good condition. Continue to maintain grass heights that allow proper visual inspection of surface conditions (recommend 6" height). No obvious signs of slumps, slides, bulges, tension cracks, seepage or animal holes were observed on the outside slope.

4.2.4 Abutments and Groin Areas

There are no abutments or groins in the dike embankment. Minor erosion was observed where the Bottom Ash Pond meets the Wastewater Decant Pond dike.

4.2.5 Overflow Structure/Outlet

The former trapezoidal weir located between the ponds was raised in 2020 to match the perimeter dike elevation.

4.2.6 Outlet Conduit

There is no outlet conduit from or through the Bottom Ash Pond perimeter dike.

4.2.7 Emergency Spillway

There is no emergency spillway within the Bottom Ash Pond. If levels in the pond were to exceed 89' elevation due to a heavy rain event, temporary pumps have been placed to pump excess water to the adjacent decant pond.

4.2.8 Other Conduits

The Bentomat liner in the Bottom Ash Pond was installed during initial construction of the pond. Due to high groundwater in the vicinity of CGS, an underdrain system consisting of slotted 12" HDPE pipe installed in sand-lined trenches was used to dewater the area, allowing the liner to be safely installed without uplift concerns during construction. Upon filling of the pond, the underdrain system was abandoned in-place and the outfall (consisting of a sump area and pump) was closed using grout. Because the underdrain system utilized small pipes installed in controlled backfill, and because the invert of the outfall is over ten (10) feet below grade, this system presents minimal risk to the integrity of the Bottom Ash Pond. Closure of the sump area further minimizes the risk of any sediment transport. This structure is completely below grade, preventing visual inspection of the structure itself; however, the vicinity of the outfall is in satisfactory condition.

The formerly used intake lines enter the pond through two (2) concrete bridge structures at the top of the perimeter dike. These structures were found to be in satisfactory condition; however, the western pipe bridge, located in the southwest corner of the pond

near the coal pile, showed some signs of minor erosion below the pipes. The erosion is not currently a threat to safe operation of the pond but continued monitoring is recommended.

4.3 Adequacy of Maintenance, Operating and Surveillance Procedures

4.3.1 Adequacy of Maintenance Procedures

Overall, maintenance of the impounding embankments appears to be adequate. No major maintenance issues were noted during the field inspection or in the weekly inspection reports completed by CGS personnel and reviewed by the inspection team.

Some minor maintenance of small erosion areas is warranted. These repairs should be completed as discussed in the Executive Summary and Section 5.4 of this report.

4.3.2 Adequacy of Operating Procedures

Based on field observations and discussions with CGS personnel, the operating procedures for the Bottom Ash Pond appear to be adequate.

4.3.3 Adequacy of Surveillance Procedures

CGS personnel complete daily informal inspections and weekly formal inspections on the Bottom Ash Pond dikes in accordance with good engineering practice and Section 257.83 of the Code of Federal Regulations. These inspections are being properly documented and should continue as they are currently being conducted. The pipe bridge crossings on the southwest edge of the Bottom Ash Pond should be closely inspected following heavy rainfall as outlined in Section 5.4 below.

The Bottom Ash Pond has no formal dam performance monitoring instrumentation. The Wastewater Decent Pond water levels are monitored by a staff gauge.

5.0 Conclusions and Recommendations

Conclusions are based on visual observations from a one-day site visit on August 23, 2020, and review of technical documentation provided to the inspection team.

5.1 Conclusions Regarding the Structural Soundness of the Management Unit

Based on a review of the engineering data provided and the observations of the inspection team during the site visit, the embankments of the Bottom Ash Pond appear to be structurally sound under static loading conditions. The dike embankments are also indicated to be stable under moderate seismic loading conditions, provided no excessive loss of shear strength occurs in the Pleistocene foundation soils. Isolated layers of very loose to loose sands and some layers of very soft to soft silty clays occur at depth in the foundation soil profile beneath the dikes. However, localized liquefaction or deformations probably would not be reflected through the firmer and stiffer overlying soils in sufficient magnitude to create unacceptable displacements in the dike embankments under moderate earthquake shaking.

5.2 Conclusions Regarding the Hydrologic/Hydraulic Safety of the Management Unit

An Inflow Design Flood Control System Plan was written by Worley Parsons in October 2016 for the Bottom Ash Pond. Since the Bottom Ash Pond no longer receives CCR, only direct rainfall affects water levels within the pond. If water levels were to exceed an elevation of 89 feet, pumps would be utilized to move excess water to the adjacent decant pond, maintaining the minimum one-foot freeboard, as required.

5.3 Conclusions Regarding Field Observations

The inspection team was provided access to all areas in the vicinity of the Bottom Ash Pond as required to conduct a thorough field inspection. The visible portions of the embankment dikes were observed to have no signs of overstress, significant settlement, shear failure or other signs of instability. No changes to the geometry of the impounding structures at the Bottom Ash Pond were noted.

5.4 Recommendations for the Bottom Ash Pond

The following maintenance and monitoring items were noted during the field inspection. Recommendations for repair and/or monitoring follow:

1. Minor erosion was observed on the upstream slope near the southeast side of the pond, where the pond abuts the decant pond. No seepage or further movement was noted at the time of inspection. This area should be repaired and monitored for further erosion.
2. Minor erosion was observed on the upstream slope near the west side of the pond, where the perimeter road meets the internal operations road. No seepage or further movement was noted at the time of inspection. This area should be repaired and monitored for further erosion.
3. The area near the abandoned underdrain outfall should continue to be monitored. If condition changes are noted in weekly inspections that warrant repair, an engineered solution should be implemented.