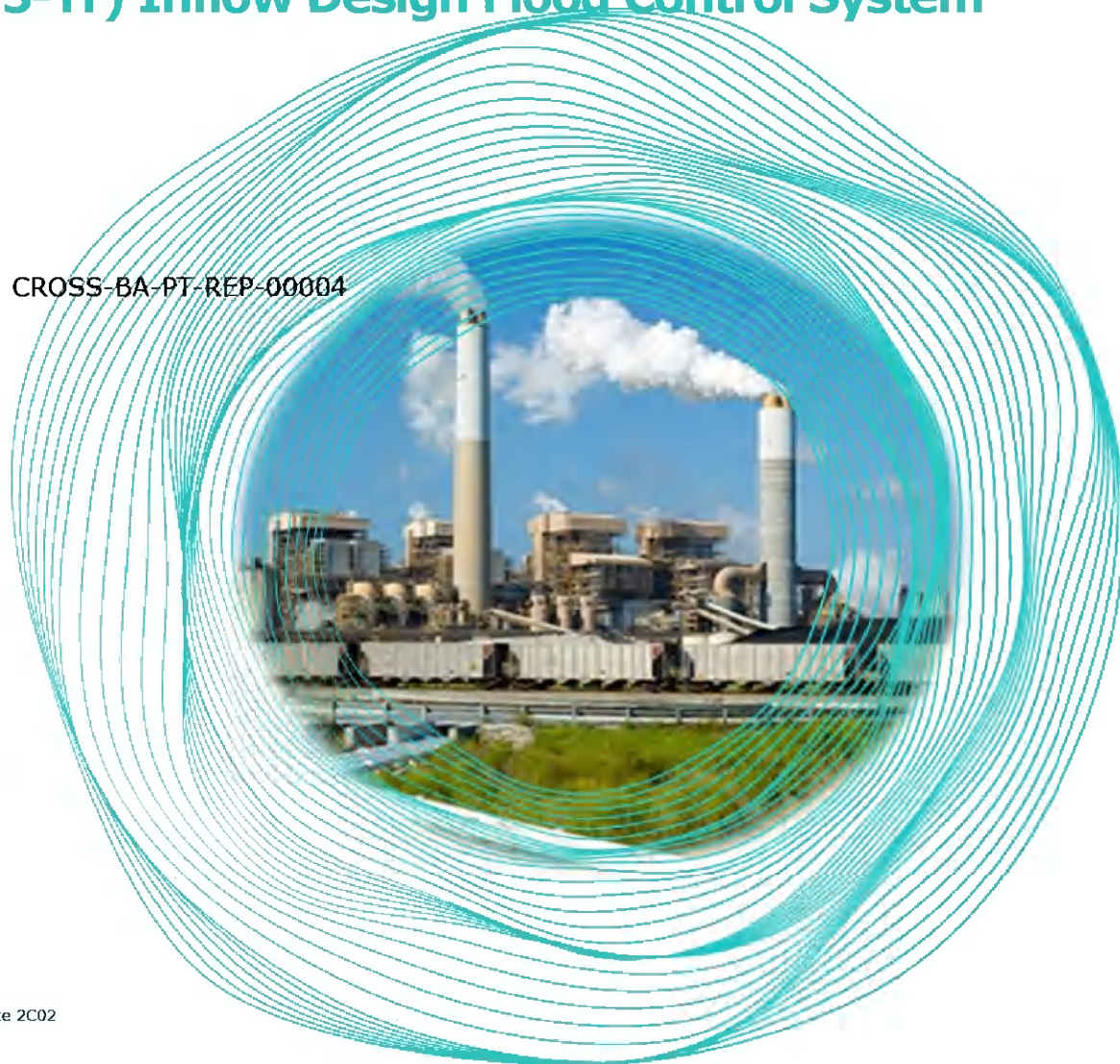


SANTEE COOPER

Cross Generating Station Bottom Ash Pond

Periodic (5-Yr) Inflow Design Flood Control System Plan

Document no. 0: CROSS-BA-PT-REP-00004



1 Sep 2026

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Synopsis

This report presents the second periodic inflow design flood control system plan for the Cross Generating Station Bottom Ash Pond and provides the required certification by a qualified professional engineer in accordance with 40 CFR Part 257 (§257.82(c)).

The Cross Generating Station Bottom Ash Pond meets the applicable requirements of this section.

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PROJECT 418008-00795 - CROSS-BA-PT-REP-00004: Cross Generating Station Bottom Ash Pond - Periodic (5-Yr) Inflow Design Flood Control System Plan

Rev	Description	Originator	Reviewer	Worley Approver	Revision Date	Customer Approver	Approval Date
0	Issued for Use	Fletcher Wood F. Wood	Yingwu Xu Y. Xu	Fletcher Wood F. Wood	1 Sep 2026		

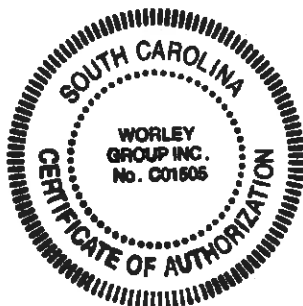
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Appendices

Appendix A. Calculation CROSS-BA-PT-CAL-00001

Bottom Ash Pond Periodic (5-Yr) Inflow Design Flood Control System Plan Calculation



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1. Introduction

The United States Environmental Protection Agency (EPA) promulgated regulations regarding Coal Combustion Residuals (CCRs). These regulations (40 CFR Part 257) were published in the Federal Register on April 17, 2015. One of the requirements of the regulations (§257.82(c)) is to prepare initial and periodic inflow design flood control system plans documenting how the inflow design flood control system has been designed and constructed to meet the requirements of this section, and obtain a certification from a qualified professional engineer that the requirements of this section are met.

Three sets of revisions to 40 CFR Part 257 have been published in the Federal Register since the 2015 CCR Rule was first published. The first set of revisions was published on July 30, 2018, the second set on November 12, 2020, and the most recent set (final legacy rule) on May 8, 2024. The 2018 revisions amended §257.82(c)(5) to adopt two alternative performance standards allowing for owners or operators of CCR surface impoundments to obtain approval from either Participating State Directors (in states with approved CCR permit programs) or the EPA (where the EPA is the permitting authority) stating that the initial and periodic inflow design flood control system plans meet the requirements of §257.81(c) in lieu of a certification from a qualified professional engineer. Neither of these alternative performance standards are applicable in this case. The 2020 and 2024 revisions did not include any changes to the §257.82(c) requirements addressing initial and periodic inflow design flood control system plans for CCR surface impoundments.

§257.82(c)(4) requires that inflow design flood control system plans are prepared every five years. The date of completing the initial inflow design flood control system plan is the basis for establishing the deadline to complete the first periodic assessment, and so on for each subsequent assessment. The first periodic inflow design flood control system plan for the existing Bottom Ash Pond at Cross Generating Station is dated October 14, 2021 [Ref. 1]. The second periodic inflow design flood control system plan therefore must be completed and placed in the operating record on or before October 14, 2026.

This report presents the second periodic inflow design flood control system plan for the Cross Generating Station Bottom Ash Pond and provides the required certification by a qualified professional engineer.

2. Discussion

2.1 General

Cross Generating Station consists of four generating units and is located between Lakes Marion and Moultrie in Pineville, South Carolina. All four units have undergone dry conversion, with bottom ash dewatered and stacked out locally in a containerized bunker located adjacent to each of the four units, where it is either hauled offsite for beneficial reuse, or hauled to the onsite Class Three Landfill. Prior to dry conversion, bottom ash from all four units was sluiced to the existing onsite Bottom Ash (BA) Pond.

The BA Pond is a diked CCR surface impoundment covering approximately 87 acres, with its perimeter dike comprising the CCR Unit boundary. Portions of the south and east dikes of the BA Pond are shared with the adjacent Wastewater Decant (WD) Pond, which lies outside the CCR Unit boundary.

BA Pond closure by removal of waste was initiated in August 2020. All wastewater inflows to the BA Pond were terminated at that time and the BA Pond trapezoidal weir outfall (previously located within the shared dike to convey BA Pond effluent from the BA Pond to the WD Pond) was removed. As part of the weir removal, the shared dike in this area was restored to its original design elevation. There are no longer any inflows to the pond other than direct rainfall, and no gravity outflows from the pond. Although evaporation from the pond offsets the direct rainfall into the pond over the long term, temporary pumps are used to maintain a low pool within the BA Pond during ongoing bulk CCR removal operations, by pumping water from the BA Pond to the WD Pond when necessary.

§257.82(c) requires that the inflow design flood control system plan must document how the inflow design control system has been designed and constructed to meet the applicable requirements of this section. Each plan must be supported by appropriate engineering calculations. This information is provided below.

2.2 Design Flood

§257.82(a)(3) states that the inflow design flood is determined, based on classification under §257.73(a)(2) (existing CCR surface impoundments) or §257.74(a)(2) (new CCR surface impoundments), as:

- For a high hazard potential CCR surface impoundment, the probable maximum flood;
- For a significant hazard potential CCR surface impoundment, the 1,000-year flood;
- For a low hazard potential CCR surface impoundment, the 100-year flood.

The BA Pond is classified as a low hazard potential CCR surface impoundment [Ref. 2]. Therefore, the appropriate inflow design flood is the 100-year flood.



2.3 CCR Surface Impoundment Inflows

§257.82(a)(1) states that *the inflow design flood control system must adequately manage flow into the CCR unit during and following the peak discharge of the inflow design flood.*

As mentioned above, with the onset of closure by removal of waste in August 2020, all wastewater inflows to the BA Pond have ceased. The impoundment is surrounded on all sides by a raised perimeter dike (i.e. it is not incised), which limits stormwater run-on to that generated within the footprint of the pond itself. Therefore, there are no longer any inflows to the pond other than rainfall that lands directly on the pond. The interior side slope of the perimeter dike is covered with concrete erosion control revetment, which protects the dike from erosion due to the portion of the design flood event that lands on the perimeter dike and flows immediately into the pond.

The entire volume of water associated with the design flood event is approximately 70 ac-ft. Refer to Calculation CROSS-BA-PT-CAL-00001 in Appendix A for more detail.

2.4 CCR Surface Impoundment Outflows

§257.82(a)(2) states that *the inflow design flood control system must adequately manage flow from the CCR unit to collect and control the peak discharge resulting from the inflow design flood.*

As mentioned above, the BA Pond trapezoidal weir outfall was removed with the onset of closure by removal of waste in August 2020. Therefore, there are no longer any gravity outflows from the pond. Temporary pumps are used to maintain a very low water level within the BA Pond during ongoing closure activities by pumping water from the BA Pond to the WD Pond, when necessary, but are generally turned off during the winter season when closure work is minimal. These pumps are not used to manage or control the design flood. The entire volume (and therefore the peak flow) of the design flood is now managed using the significant storage capacity available within the BA Pond.

Based on the annual end of year topographic progress survey obtained in December 2025, there is over 479 ac-ft of available water storage within the BA Pond. This means that the entire volume of water associated with the design flood event (70 acre-ft) can be stored in the BA Pond. Although the normal pool in the BA Pond typically is maintained at around EL 80 or lower, there is still sufficient available storage to retain the entire volume associated with the design flood event above EL 88, while maintaining 1 ft of freeboard. Refer to Calculation CROSS-0-BA-PT-CAL-00001 in Appendix A for more detail.

It should be noted that this storage capacity calculation is very conservative in that it does not include the significant additional water storage volume available in other areas of the pond where the top surface of the existing CCR is above the normal pool level (but below the top of the dike), nor does it include the available storage within perimeter areas of the pond, or within the CCR itself (above the water level).



Additionally, as closure proceeds and CCR is removed from the BA Pond, the available water storage volume will continue to increase over time, while the volume associated with the design flood event will not change. Therefore, there is significant excess storage capacity within the BA Pond to store the design flood event.

§257.82(b) states that discharge from the CCR unit must be handled in accordance with the surface water requirements under §257.3-3. When temporary pumps are operated to lower the water level in the BA Pond (during closure dewatering, or as required after any prolonged period of wet weather), the effluent from the temporary pump will be discharged to the WD Pond for initial settling. The WD Pond effluent is then conveyed to the low volume waste wastewater treatment system prior to discharging to permitted outfall NPDES 002 after all water quality requirements are met. Therefore, all discharge from the CCR unit is handled in accordance with the surface water requirements under §257.3-3.

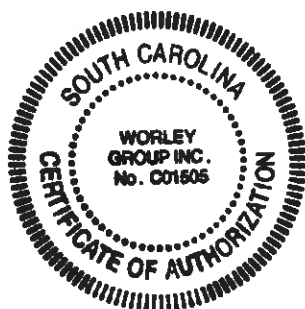
3. Conclusions

This report satisfies the requirements of §257.82 by providing an inflow design flood control system plan that documents how the design flood control systems for the existing CCR surface impoundment at Cross Generating Station have been designed and constructed to meet the applicable requirements of this section, including supporting engineering calculations.



4. Certification

I, the undersigned Professional Engineer registered in good standing in the State of South Carolina, do hereby certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I certify, for the Cross Generating Station Bottom Ash Pond CCR Impoundment, that the periodic inflow design flood control system plan contained herein is in accordance with 40 CFR §257.82.



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Wood

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ou=AMER
Reason: I am signing my seal
Date: 2026.09.01 09:26:26 -05'00'

Fletcher Wood

Printed Name of Professional Engineer



5. References

1. Worley, Santee Cooper Cross Generating Station Bottom Ash Pond Periodic (5-Yr) Inflow Design Flood Control System Plan, October 14, 2021
2. Worley, Santee Cooper Cross Generating Station Bottom Ash Pond Periodic (5-Yr) Hazard Potential Classification Assessment, September 1, 2026

Appendix A. Calculation CROSS-BA-PT-CAL-00001
Bottom Ash Pond Periodic (5-Yr) Inflow Design Flood Control
System Plan Calculation

CALCULATION

Project Information			
Customer	Santee Cooper	Project No.	418008-00795
Project Title	Bottom Ash Pond Periodic (5-yr) Inflow Design Flood Control System Plan Calculation	Calc No.	CROSS-BA-PT-CAL-00001
Calculation Title	Cross Generating Station	Rev No	0
Elec File Location	https://worleyparsons.sharepoint.com/sites/SanteeCooper/Shared Documents/10.0 Engineering/10.02 Civil/Cross/2026 CCR Demonstrations (5-Yr Periodic Updates)/BA-00004 Flood Control Plan/2026-09-01 Rev 0/CROSS-BA-PT-CAL-00001-R0.docx		
			Page 1 of 13

Calculation Objective

The objective of this calculation is to demonstrate how the inflow design flood control system for the Cross Generating Station Bottom Ash Pond (CCR Unit) is designed and constructed in accordance with CCR Rule 40 CFR §257.82. The system is designed for the 100-yr, 24-hr storm event.

Calculation Method

The calculation method compares the available storage volume in the bottom ash pond with the total inflow design flood volume. The inflow design flood volume is a direct calculation of the storm volume associated with a 100-yr, 24-hr rainfall event, applied across the total pond drainage area. The available storage volume is a simple direct measurement of the available storage depth applied across the total pond areas available for storing water, based on very conservative assumptions.

Assumptions

All assumptions are included in the calculation. None that requires further verification.

Software / Automation Used

Title	Version	Validated: (Y/N/ N/A)
N/A		

References

1. Worley, Santee Cooper Cross Generating Station Bottom Ash Pond Periodic (5-Yr) Hazard Potential Classification Assessment, September 1, 2026
2. NOAA Atlas 14, Volume 2, Version 3, PDS-based point precipitation frequency estimates with 90% confidence intervals for Pineville, South Carolina
3. SCDNR, South Carolina State Climatology Office, South Carolina Average Annual Pan Evaporation Map 1961-1990
4. SCDNR, South Carolina State Climatology Office, Annual Average Rainfall for Berkeley County
5. USEPA Final CCR Rule 40 CFR Part 257

Conclusions

A very conservative estimate of the available water storage capacity in the bottom ash pond indicates that it far exceeds the entire volume of the inflow design flood. The Cross Generating Station Bottom Ash Pond inflow design flood control system satisfies the requirements of §257.82.

Related to a Safety Critical System?	No	Status of Supplier Data used	N/A
0	1 Sep 2026	Issued for Use	Fletcher Wood Digitally signed by Fletcher Wood DN: cn=Fletcher Wood, o=Worley Reason: I am the author of this document. Date: 2026.09.01 08:24:16 -0500 Yingwu Xu Digitally signed by Yingwu Xu DN: cn=Yingwu Xu, o=Worley Reason: I am approving this document. Date: 2026.09.01 01:47:29 -0500 Fletcher Wood Digitally signed by Fletcher Wood DN: cn=Fletcher Wood, o=Worley Reason: I am approving this document. Date: 2026.09.01 06:48:01 -0500
Rev	Date	Description	By Checked Approved
			FMW YX FMW

This Calculation represents the work of Worley performed to recognized engineering principles and practices appropriate for the terms of reference provided by Worley contractual Customer. This Calculation is confidential and prepared solely for the use of the Customer. The contents of this Calculation may not be disclosed to or relied upon by any party other than the Customer, and neither Worley, its subconsultants nor their respective employees assume any liability for any reason, including, but not limited to, negligence, to any other party for any information or representation herein.



Calculation Checklist		
Please check boxes for all applicable items checked or type as "N/A" if Not Applicable near the checkbox:		
Originator	Checker	
General Requirements:		
☒	☒	Calculation number assigned. Ref SANTEE-00-PM-STD-00001-R0
☒	☒	All required information on Cover Sheet & Table of Contents has been provided
☒	☒	Rev history box complete and signed. Complete traceability of signatories is available
☒	☒	Appropriate stamp applied to cover page for preliminary issue of calculation
Technical Requirements:		
☒	☒	Source of input data stated in body of calculation (with revision number and date if relevant)
☒	☒	The source of the input data is confirmed to be reliable, or a Hold has been applied
☒	☒	The calculation accords with customer's requirements / standards
☒	☒	Approach used is appropriate for problem being solved
☒	☒	Method clear and logical to follow
☒	☒	Assumptions have been reviewed and are reasonable
☒	☒	Calculation has undergone 'Thorough Checking' per Engineering Checking & Stamps Std (MS-EP-STD-0074)
☒	☒	Calculation result is within expected limits
☒	☒	Calculation tolerances stated if significant
☒	☒	Units used are as required by customer
☒	☒	Unit conversions have been verified to be correct
☒	☒	Hazards associated with the design have been documented and managed to be ALARP
☒	☒	Safety across the Asset Lifecycle has been addressed accordingly
☒	☒	Sustainability across the Asset Lifecycle has been addressed accordingly
☒	☒	Conclusions of the calc are reasonable and clearly stated
Checking Records:		
☒	☒	Check Print is available as evidence of check (complete with signed Check Print stamp)
☒	☒	Checking colors used are per Checking & Stamps Std (MS-EP-STD-0074)
☒	☒	Corrections have been made and back checking has been completed by the checker
Revisions:		
☐	☐	Changes have been clouded or otherwise clearly identified
☐	☐	Revision history block updated
☐	☐	Impact of changes have been checked
☐	☐	Check Print is available as evidence of check of revisions (with signed Check Print stamp)
☐	☐	The reasonableness of the conclusions of the revised calc have been verified

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Appendices

Appendix A. Pond Drainage and Storage Areas



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1. Introduction

§257.82(c) requires that the inflow design flood control system plan must document how the inflow design flood control system has been designed and constructed to meet the applicable requirements of this section. Each plan must be supported by appropriate engineering calculations. This information is provided below for the Bottom Ash (BA) Pond at Cross Generating Station.

2. Design Basis

The following design criteria govern the flows into the BA Pond, storage within the BA Pond, and flows out of the BA Pond:

- The design flood is the 100-year flood per 40 CFR §257.82(a)(3) and based on the low hazard potential classification of the BA Pond [Ref. 1]
- The design flood corresponds to a 9.6-inch rainfall based on NOAA Atlas 14, Volume 2, Version 3 [Ref. 2]
- There are no longer any wastewater inflows to the BA Pond since it is undergoing closure by removal of waste
- The entire volume of the inflow design flood is equal to the depth of the design rainfall event multiplied by the entire drainage area of the BA Pond
- The top of the pond dike (at lowest surveyed spot elevation) is EL 90.46 ft
- The normal pool in the pond is assumed equal to EL 80 based on elevations measured during the 2025 annual year-end survey of the BA Pond, which indicated the elevation of the pooled water surface in various portions of the pond bottom ranged between EL 76 and EL 80.
- The available water storage volume in the pond is equal to the available water storage height (minimum top of dike elevation minus normal pool elevation, minus 1 foot of freeboard) times the water storage area (area above normal pool elevation where CCR solids have been removed).
- The outflow from the pond during the design flood is zero (conservatively ignores any water that may be pumped from the BA Pond to the WD Pond, should a design storm event happen to occur when the pumps are running to support pond closure dewatering efforts, which would increase water storage capacity in the BA Pond)

3. Discussion

3.1 Bottom Ash Pond Inflow Design Flood

With the initiation of pond closure in August 2020, there are no longer any pond inflows except for rainfall that lands directly on the area inside the BA Pond perimeter dike system.

The precipitation associated with the 100-year, 24-hour flood event is 9.6 inches [Ref. 2]. The total area of the BA Pond as measured inside the centerline of the crowned perimeter dike is approximately 87 acres (see red dashed line in Appendix A). Therefore, the entire volume of water associated with the design flood event is:

Inflow design flood volume: $87 \text{ ac} \times 9.6 \text{ in} \times 1 \text{ ft} / 12 \text{ in} = 69.6 \text{ ac-ft} \sim 70 \text{ ac-ft}$

3.2 Bottom Ash Pond Outflow / Available Storage Volume

With the initiation of pond closure in August 2020, the former outfall weir has been removed and there no longer is a gravity outfall from the BA Pond. The available storage volume in the pond must therefore be large enough to store the entire volume of water associated with the design flood event.

A conservative estimate of the available storage in the pond can be obtained by multiplying the available water storage height (the difference in elevation between the maximum normal pool elevation and the minimum top of dike elevation, minus a freeboard of 1 ft) times the area of the empty pond (i.e. where no CCR solids remain above this normal pool elevation).

With the ongoing closure of the BA Pond, several low areas of the pond have reached the target near-term CCR removal depth equal to about 30" above the bottom of the pond. However, several raised temporary roads are present within the pond to allow access to the remaining waste for ongoing removal efforts. Some of these low areas are isolated by the temporary road network, with an observed water level higher than the larger open areas. The observed water levels across all areas ranged between EL 76 and EL 80 at the time of the annual end of year topographic progress survey in December 2025 (see Appendix A). The normal pool is therefore conservatively assumed to be EL 80. The lowest observed elevation along the top of the perimeter dike system is EL 90.4 based on previous topographic survey. The available water storage height is therefore:

Available Water Storage Height: $90.4 \text{ ft} - 80.0 \text{ ft} - 1 \text{ ft} = 9.4 \text{ ft}$

The area of available storage above EL 80 was determined by scaling off the contours from the annual end of year topographic progress survey shown in Appendix A. These sub-areas (indicated by the red shaded areas in Appendix A) are summarized in Table 1, below:

TABLE 1 BOTTOM ASH POND WATER STORAGE AREAS	
Subarea ID	Area (sf)
1	749,299
2	17,102
3	547,217
4	24,673
5	19,149
6	26,914
7	588,357
8	198,079
9	54,919
Total Water Storage Surface Area	2,225,709 sf
	~51 ac

Based on the above, there is approximately 51 ac-ft of available storage for each foot of available water storage height.

Available Water Storage: $51 \text{ ac-ft/ft} \times 9.4 \text{ ft} = \sim 479 \text{ ac-ft}$

4. Results

When the pond water level is at the normal pool level, the available storage (479 ac-ft) far exceeds the total inflow design flood volume (70 ac-ft). The entire volume of the inflow design flood can therefore be managed within the existing excess available storage in the pond, which satisfies the requirements of §257.82(c). It should be noted that this is a very conservative estimate of the available storage capacity of the pond because it excludes all the areas of the pond where the top surface of the existing CCR is above the water level (but below the top of the dike), as well as storage within perimeter areas of the pond. It also excludes any available storage within the CCR itself (above the water level).

The long-term (annual) pan evaporation rate is over 62 inches [Ref. 3], which exceeds the long-term (annual) average rainfall into the pond of approximately 50 inches [Ref. 4]. However, during periods of excessively wet weather over the short-term, the water level within the pond may increase. Temporary pumps may be used to lower



the BA Pond water level back down to the normal pool level, if needed (by pumping to the WD Pond). For example, if the pond level approaches the elevation above which the available storage volume will reduce below 70 ac-ft (excluding freeboard), pumps must be engaged to lower the water level. This maximum allowable high water elevation is conservatively calculated as follows:

High Water Level (max allowable): $EL\ 90.4\ ft - 1\ ft - 70\ ac\text{-}ft / 51\ ac = \mathbf{EL\ 88\ ft}$

5. Conclusion

A very conservative estimate of the available water storage capacity in the BA Pond indicates that it far exceeds the entire volume of the inflow design flood. Temporary pumps are available to lower the pond water level, if needed, to maintain the required minimum water storage capacity. The Cross Generating Station Bottom Ash Pond inflow design flood control system satisfies the requirements of §257.82.



worley

Customer: Santee Cooper
Project:
Bottom Ash Pond Periodic (5-
yr) Inflow Design Flood Control
System Plan Calculation
Project No.: 418008-00795

Calc: Cross Generating Station
Calc No.: CROSS-BA-PT-CAL-00001
Rev: 0, Date: 1 Sep 2026
Page 8 of 13

Appendix A. Pond Drainage and Storage Areas

(6 total pages)

NOTES

1. DRAINAGE CALCULATIONS BASED ON 100-YEAR FLOOD.
2. TOTAL DRAINAGE AREA IS 3,791,045.42 SF. THIS AREA IS BASED ON THE PERIMETER DIKE SYSTEM. THE DRAINAGE AREA IS BASED ON THE PERIMETER DIKE SYSTEM. THE DRAINAGE AREA IS BASED ON THE PERIMETER DIKE SYSTEM.

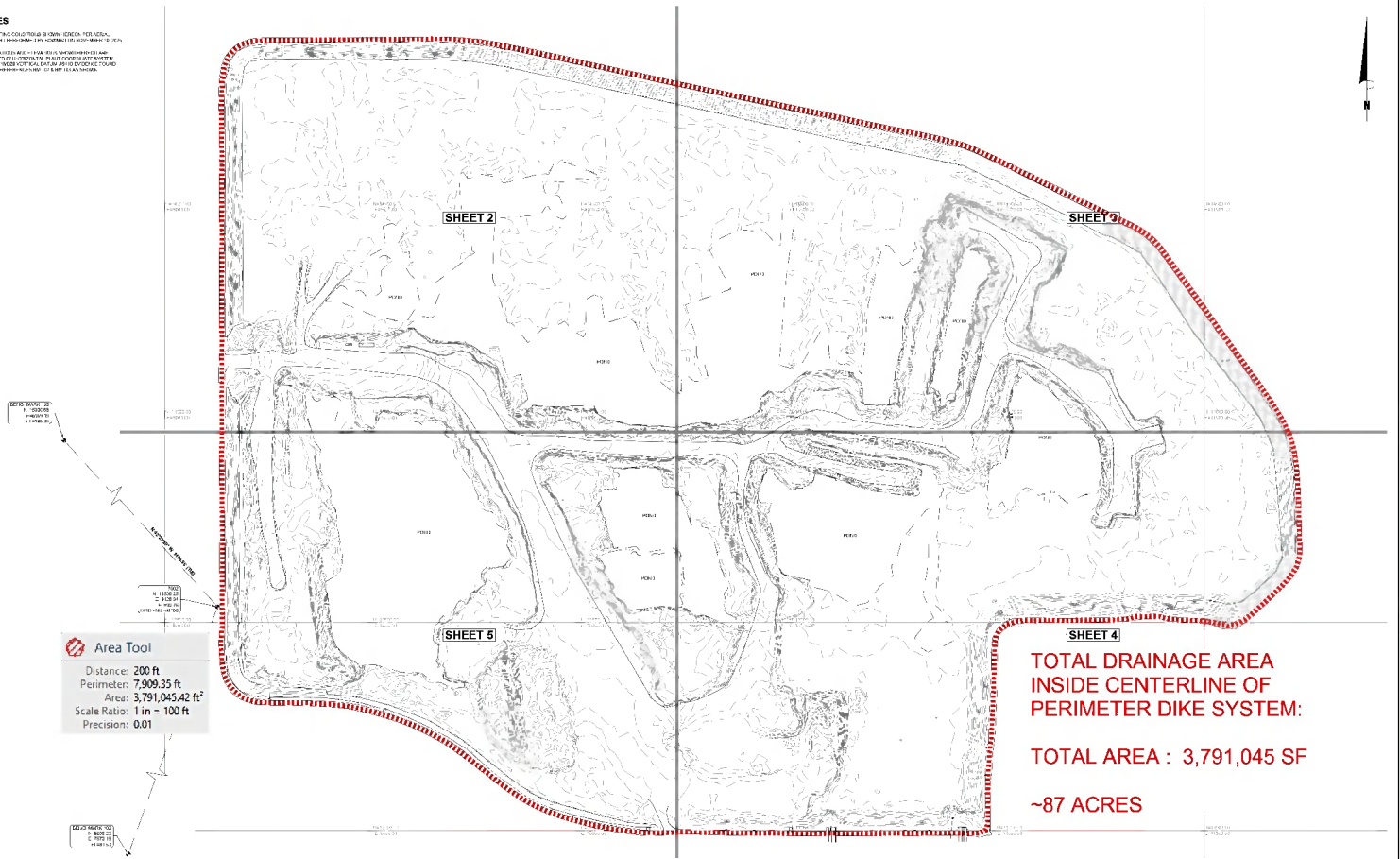


EXHIBIT SHOWING EXISTING POND TOPOGRAPHY

Bowman

880 Island Park Drive, Suite 400
 Charleston, South Carolina 29492

Plan: V-1000000 - SATELITE COPIES/000000-03-001 (SUT) - CROSS GENERATING STATION PNEUMATIC, SC/SURVEY/TOPG BOUNDARY/000000-03-001 TOPG CROSS GEN STATION DWS

SHEET 1 OF 5

CROSS GENERATING STATION-
 BOTTOM ASH POND EXPANSION
 DATE OF FIELDWORK: NOVEMBER 10, 2025
 DATE OF EXHIBIT: DECEMBER 2, 2025
 REVISED:

TOTAL AREA WITH STORAGE
ABOVE EL 80 ON THIS SHEET:

AREA 1: 749,299 SF
AREA 2: 17,102 SF
TOTAL: 766,401 SF

17.59 ACRES

TOTAL AREA WITH STORAGE
ABOVE EL 80 ON ALL SHEETS:

AREA 1: 749,299 SF
AREA 2: 17,102 SF
AREA 3: 547,217 SF
AREA 4: 24,673 SF
AREA 5: 19,149 SF
AREA 6: 26,914 SF
AREA 7: 588,357 SF
AREA 8: 198,079 SF
AREA 9: 54,919 SF
TOTAL: 2,225,709 SF

~51 ACRES

Area Tool
Distance: 12.77 ft
Perimeter: 4,145.26 ft
Area: 749,299.12 ft²
Scale Ratio: 1 in = 50 ft
Precision: 0.01

Area Tool
Distance: 3.78 ft
Perimeter: 1,043.66 ft
Area: 12,102.11 ft²
Scale Ratio: 1 in = 50 ft
Precision: 0.01

SHEET 2 OF 5

CROSS GENERATING STATION-
BOTTOM ASH POND EXPANSION
DATE OF FIELDWORK: NOVEMBER 10, 2025
DATE OF EXHIBIT: DECEMBER 2, 2025
REVISED:

EXHIBIT SHOWING EXISTING POND TOPOGRAPHY

Bowman 880 Island Park Drive, Suite 400
Charleston, South Carolina 29492

Plan: V:\000000 - SHATE COOPER\000000-03-001 (SHT) - CROSS GENERATING STATION PNEUMATIC SURVEY\TOPO BOUNDARY\000000-03-001 TOPO CROSS GEN STATION.DWG

