



Intercompany Communication

Date: October 17, 2016 **From:** Joe Kutch

Subject: R.M. Schahfer Generating Station Waste Disposal Area (“WDA”) Water Level Control Plan **Dept.:** Environmental

To: R.M. Schahfer Generating Station Operations and Engineering

The Waste Disposal Area, located at the R.M. Schahfer Generating Station meets the definition of a “CCR surface impoundment” under EPA’s CCR rule. All necessary rule-required integrity assessments were completed. In these assessments, it was noted that the auxiliary spillway located in the northwest corner region of the impoundment currently may not adequately manage peak discharge from both a Probable Maximum Flood (“PMF”) and a 1000-year flood.

The WDA’s normal pool water level typically operates at an average of approximately 677.2 feet. In compliance with §257.73(d)(1)(v)(B), the PMF and 1000-year flood event peak discharge will be met in the WDA by reducing the water level in the pond. The water level, beginning October 17, 2016, will be maintained at 675.4'. Operating the pond at this level is the highest possible level of water that will allow for prevention of potential overtopping of the slurry walled berms during the PMF and 1000-year flood events and ensure compliance with 257.73(d)(1)(v).