## ALLIANT ENERGY Wisconsin Power and Light Company Columbia Energy Center

# **CCR SURFACE IMPOUNDMENT**

## STRUCTURAL STABILITY ASSESSMENT

Report Issued: September 19, 2016 Revision 0





## **EXECUTIVE SUMMARY**

This Structural Stability Assessment (Report) is prepared in accordance with the requirements of the United States Environmental Protection Agency (USEPA) published Final Rule for Hazardous and Solid Waste Management System – Disposal of Coal Combustion Residual from Electric Utilities (40 CFR Parts 257 and 261, also known as the CCR Rule) published on April 17, 2015 and effective October 19, 2015.

This Report assesses the structural stability of each CCR unit at Columbia Energy Center in Pardeeville, Wisconsin in accordance with §257.73(b) and §257.73(d) of the CCR Rule. For purposes of this Report, "CCR unit" refers to an existing CCR surface impoundment.

Primarily, this Report is focused on documenting whether the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded within each CCR unit.



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## 1 Introduction

The owner or operator of the Coal Combustion Residual (CCR) unit must conduct an initial and periodic structural stability assessments and document whether the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded therein. This Report is prepared in accordance with the requirements of §257.73(b) and §257.73(d) of the CCR Rule.

### 1.1 CCR Rule Applicability

The CCR Rule requires a periodic structural stability assessment by a qualified professional engineer (PE) for existing CCR surface impoundments with a height of 5 feet or more and a storage volume of 20 acre-feet or more; or the existing CCR surface impoundment has a height of 20 feet or more.

### 1.2 Structural Stability Assessment Applicability

The Columbia Energy Center (COL) in Pardeeville, Wisconsin (Figure 1) has one existing and one inactive CCR surface impoundment, identified as follows:

- COL Primary Ash Pond (existing)
- COL Secondary Ash Pond (inactive)



## **2 FACILITY DESCRIPTION**

COL is located southeast of the City of Portage on the eastern shore of the Wisconsin River in Columbia County at W8375 Murray Road, Pardeeville, Wisconsin (Figure 1). Wisconsin River backwaters are located north of the generating station, while Lake Columbia, south of the generating plant, is a 480-acre non-contact cooling water pond.

COL is a fossil-fueled electric generating station that initiated operations in 1975. COL consists of two steam electric generating units. Sub-bituminous coal is the primary fuel for producing steam. The burning of coal produces a by-product of CCR. The CCR at COL includes bottom ash, fly ash, and spray dryer absorber waste from scrubbers. The fly ash can also be subdivided into two types, economizer fly ash and precipitator fly ash.

### General Facility Information:

Date of Initial Facility Operations: 1975

WPDES Permit Number: WI-0002780-08-0

Latitude / Longitude: 43° 29′ 9.73″ N 89° 25′ 8.40″ W

Unit Nameplate Ratings: Unit 1 (1975): 512 MW

Unit 2 (1978): 511 MW

#### 2.1 COL Primary Ash Pond

The COL Primary Ash Pond is located north of the generating plant and west of the COL Secondary Pond. The COL Primary Ash Pond is the primary receiver of process flows from the generating plant. Process flows include CCR sluice water (bottom ash and economizer fly ash), boiler/precipitator wash water, plant floor drains, ash line freeze protection flows, bottom ash area sump water, demineralizer area sump water, and air heater sump water. Additionally, the COL Primary Ash Pond receives storm water runoff from the surrounding area, inclusive of the closed ash landfill, located south of the CCR surface impoundments.



The western half of the COL Primary Ash Pond is a CCR handling area. A shallow narrow drainage channel is located along the south, west, and north sides of the CCR handling area. The sluiced CCR is discharged into the southeast corner of the western half of the COL Primary Ash Pond. The sluiced CCR settles out through the water column as it follows the flow of the narrow channel around the southern, western, and northern sides of the existing CCR surface impoundment. The water in the channel flows to the east and discharges through a narrow cut-out of an interior dike into the northwest corner of the large open area in the eastern half of the COL Primary Ash Pond.

The majority of the CCR that is discharged into the COL Primary Ash Pond is removed during routine maintenance dredging activities of the shallow narrow channel. The CCR that is dredged is stockpiled in the western half of the COL Primary Ash Pond for dewatering. Once dewatered the CCR is run through a sieve shaker machine to separate the coarsely graded CCR from the finely graded CCR. The CCR is then transported offsite for beneficial reuse or to the on-site active dry ash landfill.

The water in the COL Primary Ash Pond is recirculated to the generating plant via effluent pumps located in the ash recirculating pump house in the northeast corner of the eastern half of the COL Primary Ash Pond. The recirculating pumps return water to the generating plant for reuse and/or treatment and disposal per the facility's Wisconsin Pollution Discharge Elimination System (WPDES) permit. Instrumentation associated with the pump house in the northeast corner of the COL Primary Ash Pond includes a submersible hydrostatic level transducer, as well as a visual staff gauge, for monitoring water elevations in the COL Primary Ash Pond. An 18-inch diameter corrugated metal pipe is located immediately south of the pump house, in the interior dike between the COL Primary Ash Pond and COL Secondary Pond. The pipe drains to the Secondary Ash Pond and is no longer used. The influent end of the hydraulic structure, on the COL Primary Ash Pond side, consists of a manually operated gate valve which is closed.



The surface area of the COL Primary Ash Pond is approximately 14.7 acres and has an embankment height of approximately 23 feet from the crest to the toe of the downstream slope. The interior storage depth of the COL Primary Ash Pond is approximately 15 feet. The total volume of impounded CCR and water within the COL Primary Ash Pond is approximately 330,000 cubic yards.

### 2.2 COL Secondary Ash Pond

The COL Secondary Pond is located north of the generating plant and east of the COL Primary Ash Pond. The COL Secondary Ash Pond was previously a downstream receiver of influent flows from the COL Primary Ash Pond. The water within the COL Secondary Pond, prior to 2004, was pumped to a surface impoundment identified as the polishing pond. The polishing pond was located east of the generating plant. The water pumped to the polishing pond would flow to the south through the facility's WPDES Outfall 002 into "Mint Ditch" and eventually flow into the backwaters of the Wisconsin River. Presently, the COL Secondary Pond acts as a storm water detention impoundment with the only influent sources being precipitation and storm water runoff from the surrounding area. The water within the COL Secondary Pond either infiltrates or evaporates. The water elevation within the COL Secondary Pond is normally the same as the ground water elevation under the CCR Ponds approximately 10 feet lower than the COL Primary Ash Pond.

The surface area of the COL Secondary Ash Pond is approximately 9.6 acres and has an embankment height of approximately 23 feet from the crest to the toe of the downstream slope. The interior storage depth of the COL Secondary Ash Pond is approximately 12 feet. The total volume of impounded CCR and water within the COL Secondary Ash Pond is approximately 185,000 cubic yards.



# 3 STRUCTURAL STABILITY ASSESSMENT- §257.73(d)

This Report documents whether the design, construction, operation, and maintenance of each CCR unit is consistent with recognized and generally accepted good engineering practices for maximum volume of CCR and CCR wastewater which can be impounded.

### 3.1 COL Primary Ash Pond

The COL Primary Ash Pond was constructed in 1975 on the north end of the generating station. The western end of the impoundment is now filled with CCR and is used as the dewatering area for bottom ash discharged by COL. Facility construction documents indicate the embankments were constructed of the fine glacial till sand from the upland areas where the COL is located. The COL Primary Ash Pond area extends to the edge of the Wisconsin River Flood Plain to the north and unsuitable soils were stripped off of looser fine sand that likely resulted from river deposition over the till. Details of the original COL Primary Ash Pond are shown in drawings prepared by Sargent & Lundy in 1974, Appendix A.

The embankment is constructed with four horizontal to one vertical slopes which are vegetated and mowed to control the growth of woody vegetation. The COL Primary Ash Pond has a concrete wet well with pumps to recirculate water back to facility for reuse and discharge. There is a pipe that formerly allowed excess water in the COL Primary Ash Pond to overflow to the COL Secondary Ash Pond. The pipe has a valve on the inlet side that is closed and no water flows to the COL Secondary Ash Pond.

In 2011 and 2015, subsurface soil investigations were undertaken to collect soil samples and determine the in-situ density of the embankments and install monitoring wells. The soil borings were advanced using a Geoprobe and hollow stem augers and sampling was completed with a standard split spoon (ASTM D1556), Figure 2. The density information, Appendix B, indicates the current conditions of the embankments.



### 3.1.1 CCR Unit Foundation and Abutments - §257.73(d)(1)(i)

The COL Primary Ash Pond is constructed on an existing layer of loose fine sand that grades to very dense with depth. The exact thickness of the loose sand found near the toe of the embankment is not great and very dense sand is the likely foundation material at greater depths. Analysis of safety factor for the slope were completed for a soil profile that ignores the deeper very dense sand, COL Safety Factor Assessment Report §257.73. The results indicate the loose sand is an acceptable foundation for the long term stability of the embankment.

### 3.1.2 Slope Protection - §257.73(d)(1)(ii)

The COL Primary Ash Pond is incised on the west and south sides. The north embankment crest is about 20 feet wide. The upstream and downstream slopes are four feet horizontal to one foot vertical and is comprised of shallow rooting vegetation, which is adequate to protect against surface erosion. The east embankment separates the COL Primary Ash Pond and the COL Secondary Ash Pond and is about 20 feet wide. The upstream and downstream slopes are three feet horizontal to one foot vertical and is comprised of shallow rooting vegetation, which is adequate to protect against surface erosion.

Sudden drawdown is addressed in Section 3.1.7.

#### 3.1.3 CCR Embankment Density- §257.73(d)(1)(iii)

The embankment is constructed of fine sand that is native to the COL site. The results of soil borings taken in 2011 and 2015 show that the sand was compacted to near optimum density and the strength of the embankment sand is greater than the loose layer of sand that remains below the embankment. The stability of the four horizontal to one vertical embankment slope is controlled by the strength of the loose sand below the embankment and the embankment is stable for the normal and flood operating conditions of the COL Primary Ash Pond.



### 3.1.4 **Vegetation Management - §257.73(d)(1)(iv)**

Historically, vegetation management has been conducted on a periodic basis. At the time of the initial Annual Inspection in October 2015, there were no identified appearances of an actual or potential structural weakness or disruptions to the inspection of the COL Primary Ash Pond that warranted additional investigation or remedial activities. The facility plans to continue managing the grassy vegetation on the embankments at a height that facilitates effective inspections.

#### 3.1.5 Spillway Management - §257.73(d)(1)(v)

The COL Primary Ash Pond is a zero liquid discharge impoundment and does not contain a spillway.

#### 3.1.6 Hydraulic Structures - §257.73(d)(1)(vi)

The COL Primary Ash Pond is a zero liquid discharge impoundment, which has a pump house that is no longer in use.

#### 3.1.7 Sudden Drawdown - §257.73(d)(1)(vii)

The toe of the embankment is in the floodplain of the Wisconsin River. When the plant was constructed in 1974, the USACE reported that the 100 year flood elevation would be 794 feet on the north embankment of the COL Primary Ash Pond due to construction in the floodplain, Appendix C. The drawdown caused by the flood receding would result in drainage from the toe of the embankment. The embankment is constructed of fine sand (expected permeability of  $10^{-2}$  to  $10^{-3}$  cm/sec) and is not susceptible to rapid drawdown hydraulic pressure. River flooding will not lead to toe stability issues.

### 3.2 COL Secondary Ash Pond

The COL Secondary Ash Pond was constructed in 1975 on the north end of the generating station. Plant construction documents indicate the embankments were constructed of the fine glacial till sand from the upland areas where COL is located. The COL Secondary Ash Pond area extends to the edge of the Wisconsin River flood plain to the north. Details of the original COL Secondary Ash Pond are shown in drawings prepared by Sargent & Lundy in 1974, Appendix A.



The embankment is constructed with four horizontal to one vertical side slopes that are vegetated and mowed to control the growth of woody vegetation. There is no groundwater gradient at the toe if the embankment since the water elevation in the impoundment is approximately the same elevation as the toe of slope.

The COL Secondary Ash Pond has a concrete wet well with pumps and an outlet structure that formerly allowed overflow to a ditch just east of the railroad tracks on the east side of the impoundment. The former discharge is closed and the COL Secondary Ash Pond is operated as a zero liquid discharge impoundment.

In 2011 and 2015, subsurface soil investigations were undertaken to collect soil samples and determine the in-situ density of the embankments and install monitoring wells. The soil borings were advanced using a Geoprobe and hollow stem augers and sampling was completed with a standard split spoon (ASTM D1556), Figure 2. The density information, Appendix B, indicates the current conditions of the embankments.

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The COL Secondary Ash Pond is a zero liquid discharge impoundment, which has a pump house that is no longer in use.



### 3.2.7 Sudden Drawdown - §257.73(d)(1)(vii)

The toe of the embankment is in the floodplain of the Wisconsin River. When the plant was constructed in 1974, the USACE calculated the 100 year flood elevation would be 794 feet on the north embankment of COL due to construction in the floodplain, Appendix C. The drawdown caused by the flood receding would result in drainage from the toe of the embankment. The embankment is constructed of fine sand (expected permeability of  $10^{-2}$  to  $10^{-3}$  cm/sec) and is not susceptible to rapid drawdown hydraulic pressure<sup>1</sup>. River flooding will not lead to toe stability issues.

<sup>1</sup> USACE, Slope Stability, EM1110-2-1902, October 2003 Wisconsin Power and Light Company – Columbia Energy Center

Structural Stability Assessment September 19, 2016



# 4 QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

To meet the requirements of 40 CFR 257.73(d)(3), I Mark W. Loerop hereby certify that I am a licensed professional engineer in the State of Wisconsin; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in 40 CFR 257.73(b) and 40 CFR 257.73(d).



Maria La production

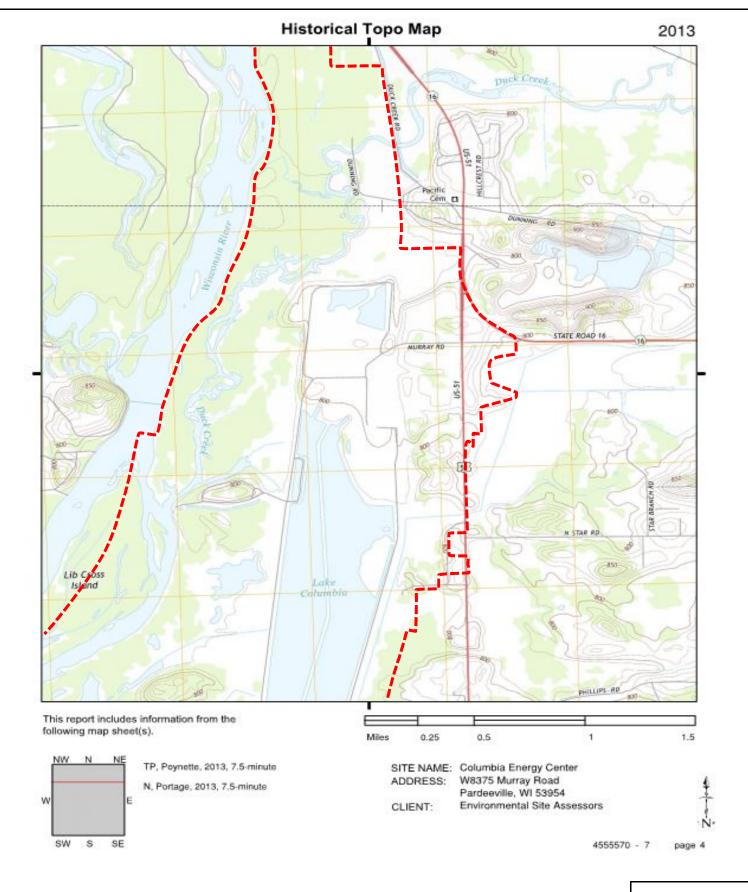
Date: <u>SEP. 19, 2016</u>

#### **FIGURES**

Alliant Energy
Wisconsin Power and Light Company
Columbia Energy Center
Pardeeville, Wisconsin

Structural Stability Assessment



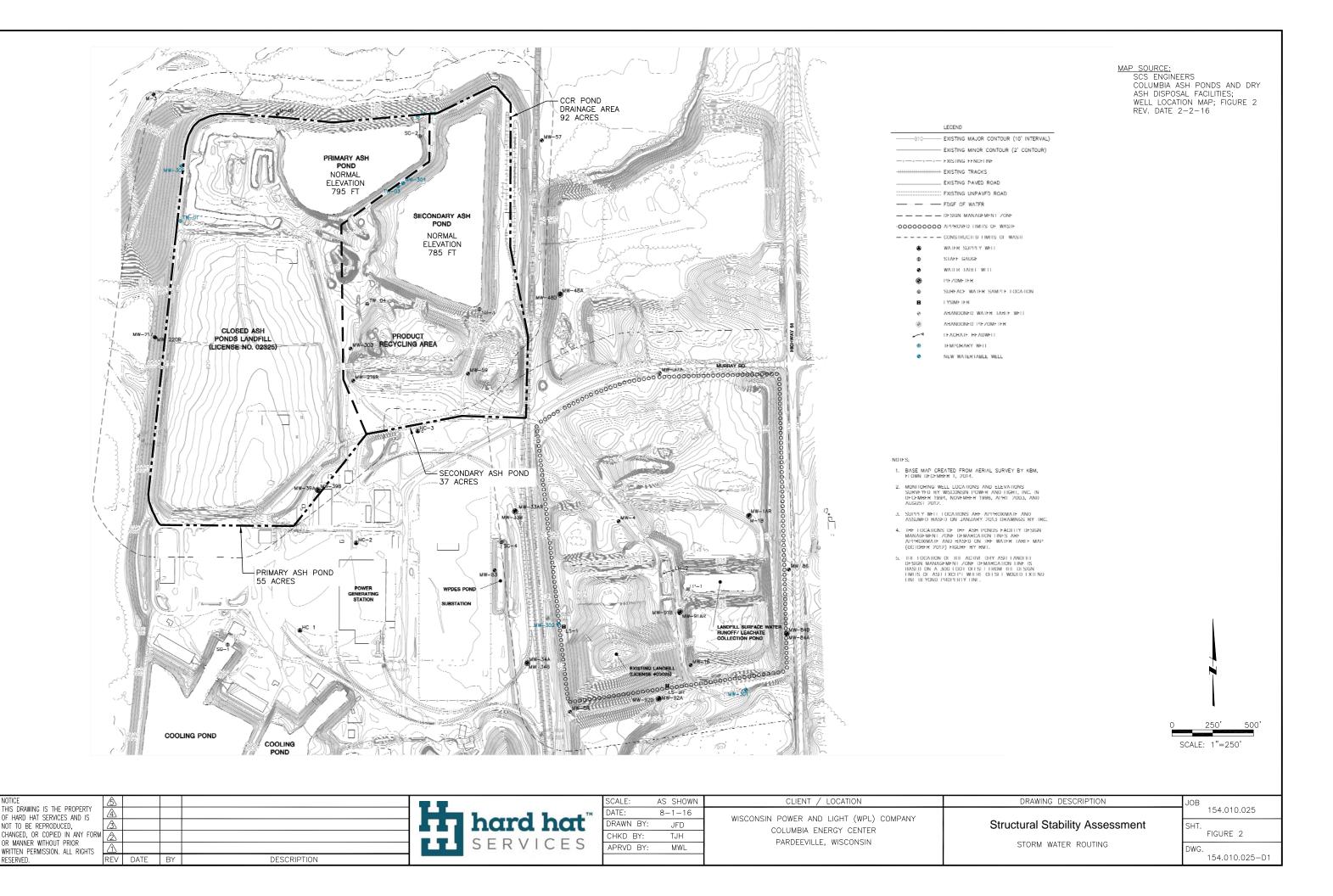


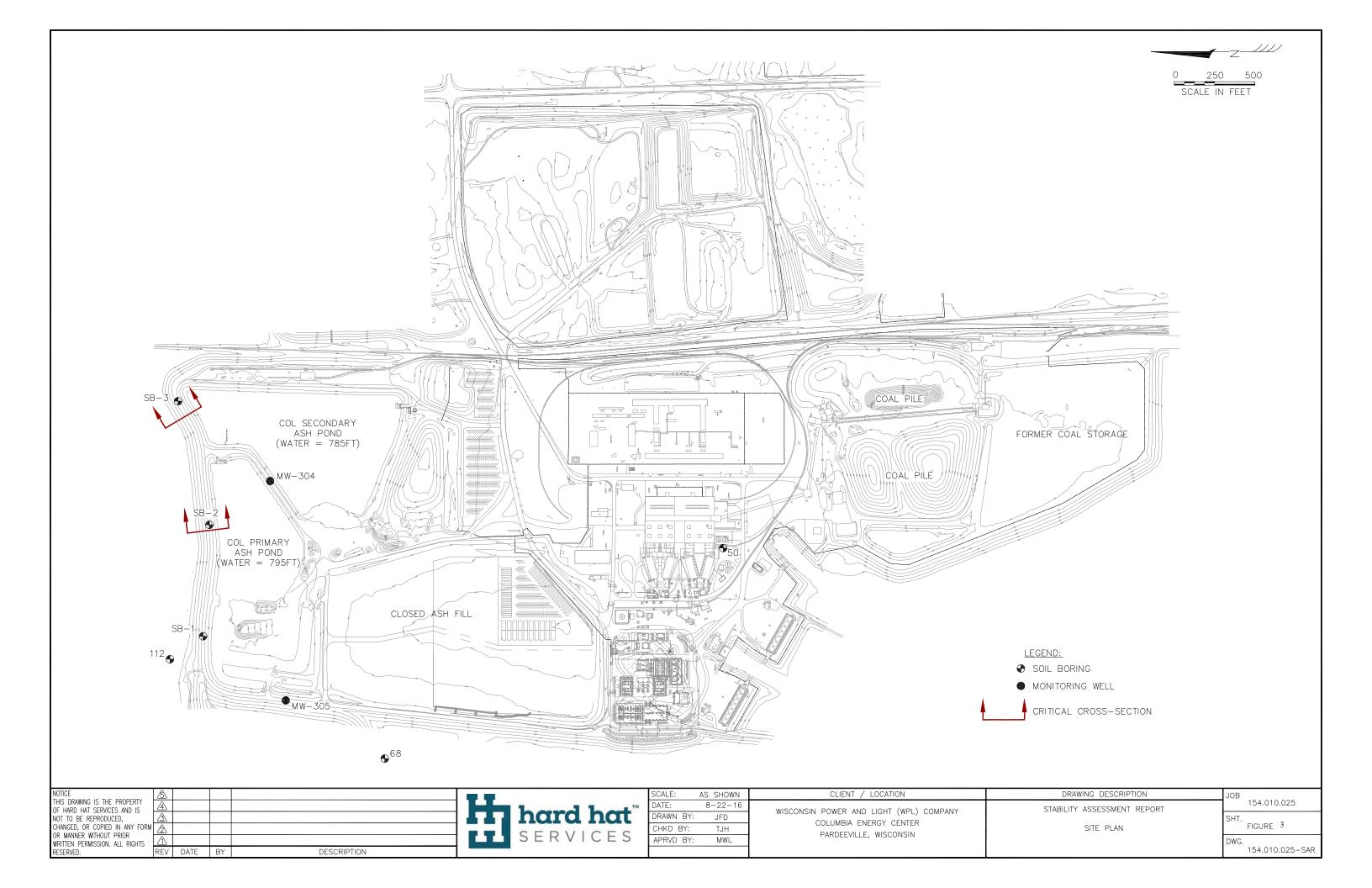




**Approximate Property Boundary** 





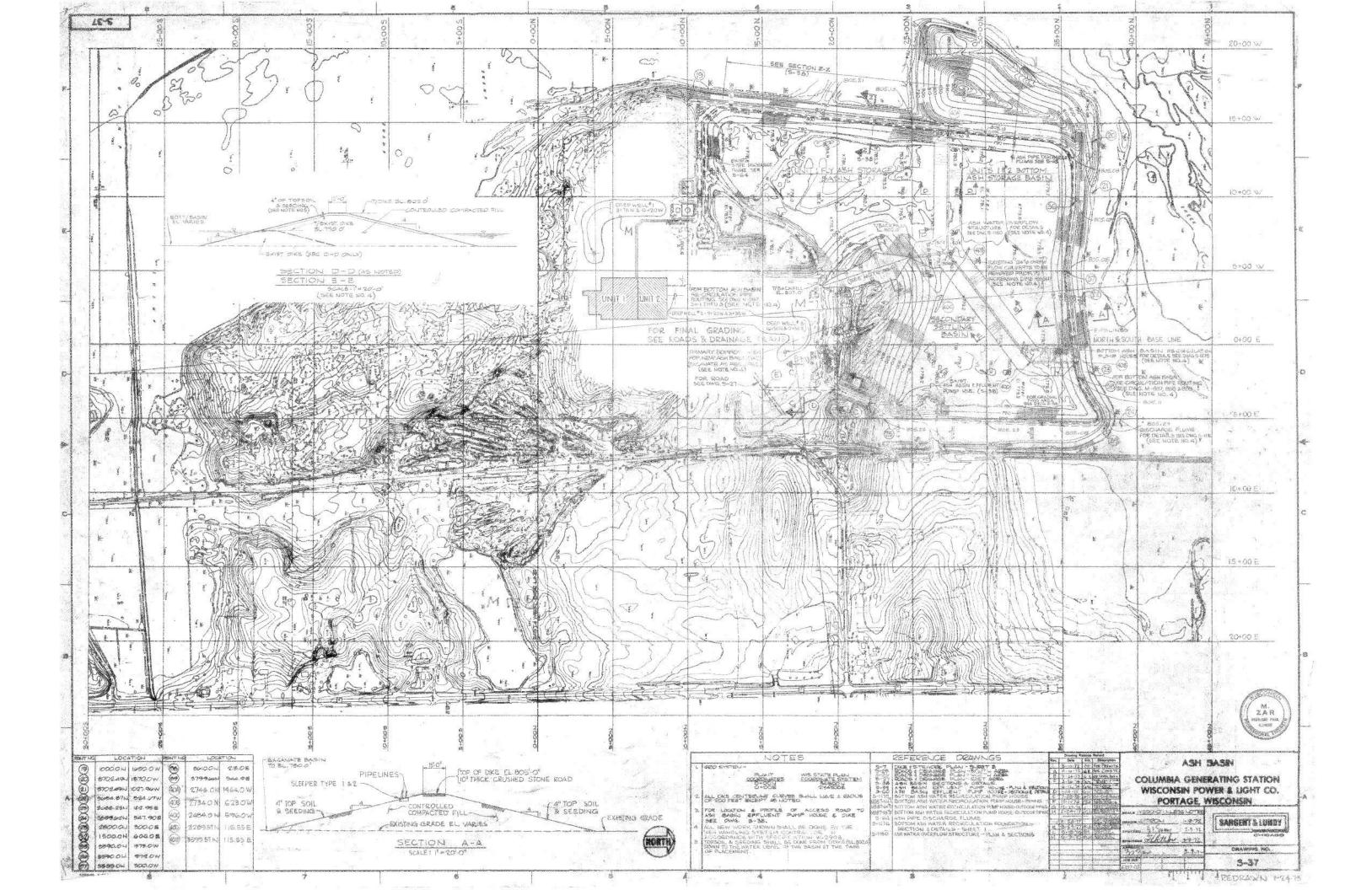


# **APPENDIX A – Ash Pond Construction Drawing**

Alliant Energy Wisconsin Power and Light Company Columbia Energy Center Pardeeville, Wisconsin

Structural Stability Assessment





# **APPENDIX B – Soil Borings on Embankment and Foundation Soils**

Alliant Energy Wisconsin Power and Light Company Columbia Energy Center Pardeeville, Wisconsin

Structural Stability Assessment



State of Wisconsin	
Department of Natural Resources	

Signature

### SOIL BORING LOG INFORMATION

Tel: (608) 224-2830

Fax:

Form 4400-122 Rev. 7-98

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**SCS** Engineers

2830 Dairy Drive Madison, WI 53711

Zach Watson

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State of Wisconsin	
Department of Natural	Resources

### SOIL BORING LOG INFORMATION

Form 4400-122 Rev. 7-98

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S6	24	22 34	-15									W						

Signature Firm SCS Engineers Tel: (608) 224-2830 for Zach watson 2830 Dairy Drive Madison, WI 53711 Fax:

This form is authorized by Chapters 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stats. Completion of this form is mandatory. Failure to file this form may result in forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on this form is not intended to be be used for any other purpose. NOTE: See instructions for more information, including where the completed form should be sent.

Form 4400-122A

	Num			V-305 Use only as an attachment to Form 4400-		Г						Soil	Prop	erties		
	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic	Log	Well	Diagram	PID/FID	Pocket Penetration (tsf)	Moisture Content	Liquid	Plasticity	P 200	RQD/
		31 30 41 50/2	_16 17	SILTY SAND, trace gravel, tan (10YR 5/6), some large dolomite chunks.	SM							W				
u			-18	End of boring at 18 ft bgs.												

# Boring Log Legend

#### Sample

No: (Number) Soil samples are numbered consecutively from the ground surface. Core samples are numbered consecutively from the first core run.

Interval: The depth of sampling interval in feet below ground surface

#### **Blow Count**

The number of blows required to drive a 2-inch O.D. split-spoon sampler with a 140 pound hammer falling 30-inches. When appropriate, the sampler is driven 18 inches and blow counts are reported for each 6-inch interval. The sum of blow counts for the last two 6-inch intervals is designated as the standard penetration resistance (N) expressed as blows per foot.

#### **Recovery in Inches**

The length of sample recovered by the sampling device.

#### U.S.C.S. Soil Type

The Unified Soil Classification System symbol for recovered soil samples determined by visual examination or laboratory tests. Refer to ASTM D2487-69 for a detailed description of procedure and symbols. Underlined symbols denote classifications based on laboratory tests (i.e. ML), all others are based on visual classification only.

#### **Percent Moisture**

Natural moisture content of sample expressed as percent of dry weight.

#### q., TSF

Unconfined compressive strength in tons per square foot obtained by hand penetrometer. Laboratory compression test values are indicated by underlining.

#### **Contact Depth**

The contact depth between soil layers is interpreted from significant changes in recovered samples and observations during drilling. Actual changes between soil layers often occur gradually and the contact depths shown on the boring logs should be considered as approximate.

#### Soil Description and Remarks

Soil descriptions include consistency or density, color, predominant soil types and modifying constituents.

	Cohesive Soils		Cohesionless Soils						
Consistency	g <sub>u</sub> (TSF)	Blows/ft.	Density	Blows/ft.					
Very Soft	less than 0.25	0-1	Very Loose	4 or less					
Soft	0.25 to 0.50	2-4	Loose	5 to 10					
Medium Stiff	0.50 to 1.00	5-8	Medium Dense	11 to 30					
Stiff	1.00 to 2.00	9-15	Dense	30 to 50					
Very Stiff	2.00 to 4.00	15-30	Very Dense	Over 50					
Hard	more than 4.00	Over 30							

#### Particle Size Description Definition of Terms

Boulder =	Larger than 12 inches	Trace =	5 to 12 percent by weight
Cobble =	3 to 12 inches	Some =	12 to 30 percent by weight
Gravel =	0.187 to 3 inches	And =	Approximately equal fractions
Sand =	0.074 to 4.76 mm	( ) =	Driller's observation
Silt and Clay =	smaller than 0.074 mm		

#### Piezo.

(Piezometer) Screened interval of the piezometer installation is denoted by cross-hatching.

#### **General Note**

The boring log and related information depicted subsurface conditions only at the specified locations and date indicated. Soil conditions and water levels at other locations may differ from conditions occurring at these boring locations. Also the passage of time may result in a change in the conditions at these boring locations.

#### Soil Test Boring Refusal

Defined as any material causing a blow count greater that 50 blows/6 inches. Such material may include bedrock, "floating" rock slabs, boulders, dense gravel seams, hard pan clay, or cemented soils. Refusal is usually indicated in fractional notation showing number of blows as the numerator and inches of penetration as the denominator.



# **BORING LOG**

N NOT SURVEYED

COORDINATES: E NOT SURVEYED

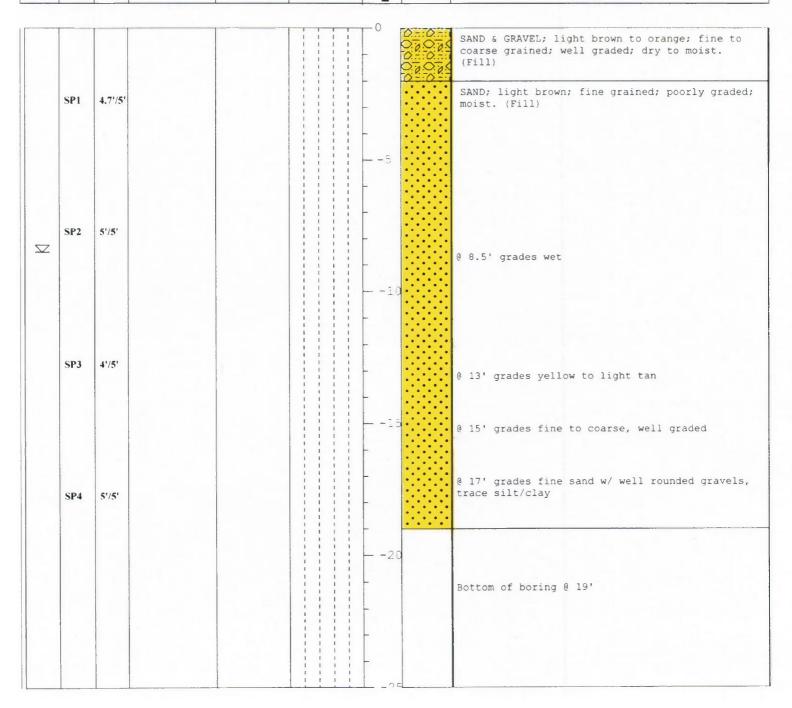
Environmental Field Services, LLC

**CLIENT:** Aether dbs

PROJECT: Alliant Columbia Station BORING NO.: SB1

page 1 of 1

E DRILLING PLE NO.	PLE RECOVERY	PLE INFROMATION	KET PENETROMETER NS/FT2)	NSISTENCY VS. DEPTH	I IN FEET	ILE	LOGGED BY: EDITED BY: CHECKED BY: DATE BEGAN: DATE FINISHED GROUND SURFA	John Noyes John Noyes Chris Sullivan 06-01-11 0: 06-01-11 ACE ELEVATION:	-
WHII SAMI	SAM	SAM	POC (TO	io o	EPTI	PROF		DESCRIPTION	





# **BORING LOG**

N NOT SURVEYED

COORDINATES: E NOT SURVEYED

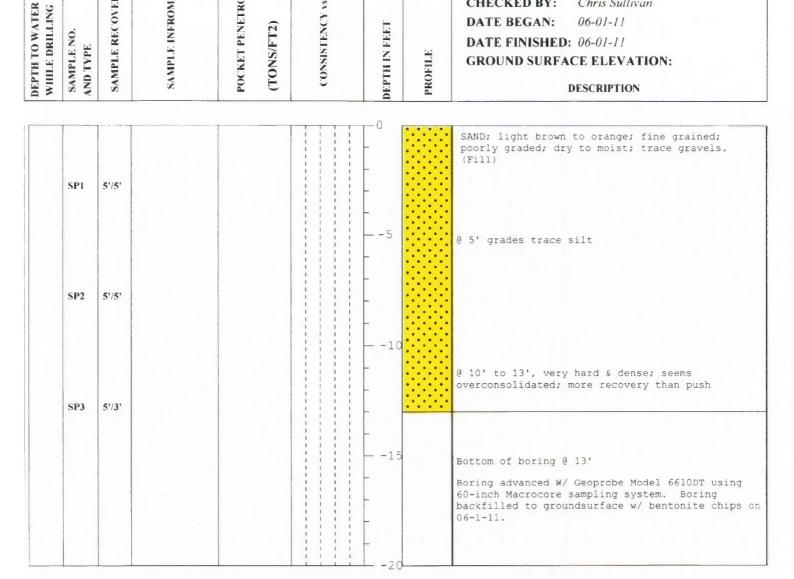
**CLIENT: Aether dbs PROJECT: Alliant Columbia Station** 

BORING NO.: SB2

page 1 of 1

# Environmental Field Services, LLC

DRILLING ENO. PE	E RECOVERY	E INFROMATION	T PENETROMETER	//FT2)	STENCY vs. DEPTH	REET	(42)	LOGGED BY: EDITED BY: CHECKED BY: DATE BEGAN: DATE FINISHED	
E DRILLING TE NO. YPE	LE RECOVER	PLE INFROMA	CET PENETRO	NS/FT2)	SISTENCY vs.	IN FEET	LE	DATE BEGAN:	06-01-11: : 06-01-11





# **BORING LOG**

N NOT SURVEYED

COORDINATES: E NOT SURVEYED

Environmental Field Services, LLC

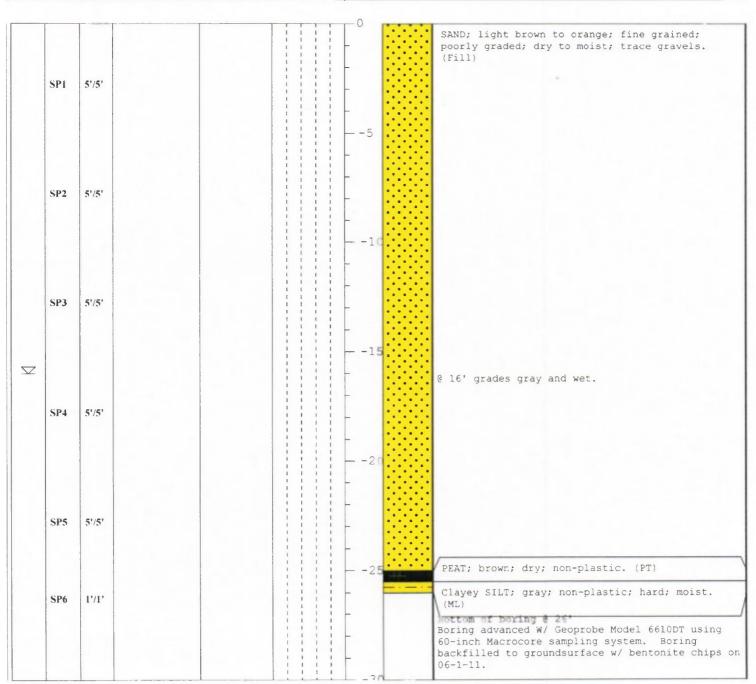
**PROJECT: Alliant Columbia Station** 

**CLIENT: Aether dbs** 

BORING NO.: SB3

page 1 of 1

WHILE DRILLING SAMPLE NO.	SAMPLE RECOVERY	SAMPLE INFROMATION	POCKET PENETROMETER (TONS/FT2)	CONSISTENCY VS. DEPTH	DEPTH IN REET	LOGGED BY: John Noyes  EDITED BY: John Noyes  CHECKED BY: Chris Sullivan  DATE BEGAN: 06-01-11  DATE FINISHED: 06-01-11  GROUND SURFACE ELEVATION:  DESCRIPTION
---------------------------	-----------------	--------------------	--------------------------------	-----------------------	---------------	---



USED 54-0 OF CASING EL. 873-0 ORANGE-BROWN FINE SAND, LITTLE TO TRACE OF SILT & MEDIUM SAND, TRACE OF SMALL GRAVE 4 FIRM 24 HARD LIGHT BROWN TO GRAY, FINE TO MEDIUM SAND, LITTLE TO TRACE OF COARSE SAND, TRACE OF SILT, OCCASIONAL SMALL TO MEDIUM GRAVEL & STONE CHIPS. 120 .. OH DAYS .. WHILE DRILLING Lacking Gravel & STONE CHIPS (00) BOULDER - 6" BLACK GRANITE LIGHT BROWN TO WHITE FINE TO MEDIUN SAND. PROBABLE SANDSTONE 100 1/2 714-0" END OF BORING

EL BOBIO TOP SOIL ORANGE - BROWN FINE BAND, LITTLE TO TRACE OF SILT & MEDIUM SAND, 13 \* TRACE OF SMALL GRAVE HARD 120 fine to Nedum San LITTLE TO TEACE OF 120 COAKSE SAND, TEAKE OF BLT, OCCASIONAL SMALL TO MEDIUM \* \* SEAVEL & STONE CHIPS. 120 CAVED & MOIST @ 34 HOW 4(0)46 CAVED & WET ON MA HOUR W.L. WHILE DEILLING LITTLE MOD NO

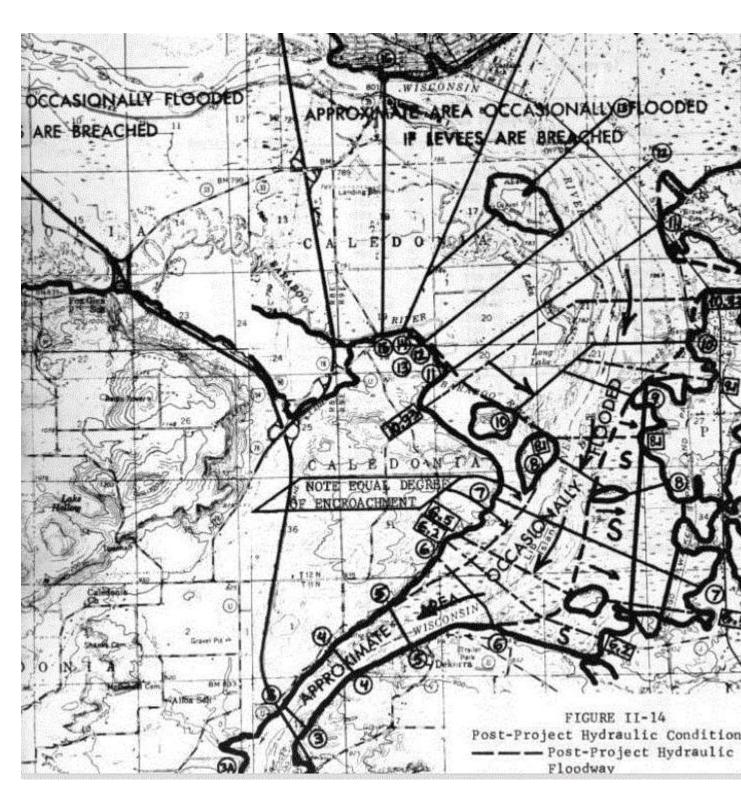
MOVED EVER S 2'S.T. G-0'TO GRAY EXCHANGING FINISHAND NAME FOR N.M. = 512 Lagic = 724 TANKEL FINE TO FINE end of Ecading

### **APPENDIX C – 100 Year Flood Prediction**

Alliant Energy Wisconsin Power and Light Company Columbia Energy Center Pardeeville, Wisconsin

Structural Stability Assessment





HEC Analysis 1974 Draft Environmental Impact Report/Impact of Construction of Columbia Energy Center Prepared by USACE River Cross-Section 8 and 10 at North End of COL

11-20 TABLE II-11 - WISCONSIN RIVER LEVELS\*
REGIONAL FLOOD (100 Year)

(123,000 cfs below confluence with Baraboo River & 115,000 cfs above)

Section	River Mile	Natural	v/Dike Proposal** of 5/26/71	Increased Stage	
14	102.0	780.00	780.00	0	
2A	103.6	782.60	782.60	0	
34	105.3	784.68	784.68		
3	106.15	786.69	786.69	0	
4	106.85	789.07	789.07	0	
5	107.65	790.89	790.89	0	
6	108.50	792.40	792.40	0	
7	109.55	793.11	793.11	0	
8	110.50	793.39	793.69	+0.30	
8A.	110.60	793.43	793.74	+0.31	
10	112.10	794.23	794.66	+0.43	
11	112.70	794.46	794.97	+0.51	
12	113.00	794.56	795.06	+0.50	
13	113.50	794.79	795.26	+0.47	
14	114.35	795.29	795.78	+0.49	
16	115.75	797.73	797.99	+0.26	

<sup>\*</sup>After revision, represents a flood with a 100+ year frequency. \*\*Equal degree of encroachment.