Coleman Station Legacy Pond A CCR Surface Impoundment

Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule
Hydrologic and Hydraulic Capacity Assessment and
Initial Inflow Design Flood Control System Plan

May 8, 2026

Prepared By:

ASSOCIATED ENGINEERS, INC.
2740 North Main St. • Madisonville, KY 42431
Phone: (270) 821-7732 • Fax: (270) 821-7789

Project ID: 26-0144

Big Rivers Electric Corporation
Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule
Hydrologic and Hydraulic Capacity Assessment and
Initial Inflow Design Flood Control System Plan

CCR Surface Impoundment Information

Name:	Pond A Legacy CCR Impoundment
Operator:	BREC Coleman Station
Address:	4982 River Road Hawesville, Kentucky 42348

CCR Unit Identification Number: Kentucky State Dam Inventory System ID No. 0855

Qualified Professional Engineer

Name:	David A. Lamb
Company:	Associated Engineers, Inc.
Kentucky P.E. Number:	17822

Regulatory Applicability

As part of the § 257.82 Hydrologic and hydraulic capacity requirements for CCR surface impoundments, an owner or operator of an existing or new CCR surface impoundment or any lateral expansion of a CCR surface impoundment must design, construct, operate, and maintain an inflow design flood control system as specified below. The owner or operator of the CCR unit must prepare the initial inflow design flood control system plan no later than October 17, 2016. The hazard potential classification definitions (from: VI. Development of the Final Rule - Technical Requirements) that must be considered follow:

- High hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation will probably cause loss of human life

- Significant hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.

- Low hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of life and

low economic and/or environmental losses. Losses are principally limited to the surface impoundment's owner's property.

1) 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 specified in item 3) of this section.

2) 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 specified item 3) of this section.

3) The inflow design flood is:

   (i) For a high hazard potential CCR surface impoundment the inflow design flood is the probable maximum flood;

   (ii) For a significant hazard potential CCR surface impoundment the inflow design flood is the 1,000-year flood;

   (iii) For a low hazard potential CCR surface impoundment the inflow design flood is the 100-year flood;

   (iv) For an incised CCR surface impoundment the inflow design flood is the 25-year flood.

Discharge from the CCR unit must be handled in accordance with the surface water requirements under § 257.3-3 (Part 257 - Criteria for Classification of Solid Waste Disposal Facilities and Practices Subpart A - Classification of Solid Waste Disposal Facilities and Practices Section 257.3-3 - Surface water).

Inflow design flood control system Plan:

1) *Content of the plan.* The owner or operator must prepare an initial inflow design flood control system plan that must document how the inflow design flood control system has been designed and constructed to meet the requirements of this section. Each plan must be supported by appropriate engineering calculations.

2) *Amendment of the plan.* The owner or operator of the CCR unit may amend the written inflow design flood control system plan at any time provided the revised plan is placed in the facility's operating record. The owner or operator must amend the written inflow design flood control system plan whenever there is a change in conditions that would substantially affect the written plan in effect.

Description of Impoundment

An aerial photo of the CCR unit is provided as Attachment A and an excerpt from U.S. Geological Survey (USGS) 7.5 minute Robards and Delaware topographic quadrangle maps showing the location of the CCR unit is provided as Attachment B.

The Legacy CCR unit which has been in place for 45 years, was used for the placement of coal combustion residual material; Primarily sluiced fly ash and bottom ash. No CCR was placed in the pond after the coal units were retired in May 2014. The immediate watershed that drains to the CCR unit and in which the CCR unit is located, is unnamed and 48 acres in size. This is an elevated structure, and the only inflow is precipitation that falls directly on the structure. Discharge is routed directly to the Ohio River

The CCR unit is a combined incised/earthen embankment structure. Embankments form the perimeter of the structure. The lower portion of the structure is incised. The interior of the pond was used as a borrow area. Original ground inside the structure ranged in elevation from elevation 390 to elevation 400. Based on the Burns & Roe, Inc. Design Manual dated February 1980 the borrow excavation went as low as elevation 388. The Ohio River is located approximately 200 feet east of the structure. Due to surface relief, the toe area of the structure is subject to flooding. The area was made up of cultivated fields containing a house place. The area generally drains east to the Ohio River. Underlying preconstruction soils consisted of Quaternary Alluvium. This material is variable in composition, locally consisting of unconsolidated sand, gravel, silt, or clay. Bedrock underlying the site is part of the Pennsylvanian Caseyville and Tradewater formations. Bedrock lies a 115’ to 165’ below the surface.

The dike is generally at elevation 415. The dike reaches a maximum height of 27 feet along the northwest corner. The dike reaches a maximum height of approximately 28 feet on the northwest corner. The Associated Engineers, Inc. survey dated March 20, 2019 was reviewed. It should be noted that the current condition was field verified. Based on grading activities that have occurred after the pond ceased receiving CCR there is no longer impounded water visible in the structure. The SM&E geotechnical report dated April 2019 indicated that no groundwater was encountered in holes drilled inside the pond limits.

Depths of impounded water and CCR are 0.0 feet and 27 feet (at respective locations of maximum impounded water and CCR depths). Corresponding elevations of impounded CCR is 411 feet, above mean sea level. This was verified by geotechnical drilling conducted inside the dry pond in April 2019.

The remaining storage capacity is approximately 217,800 cubic yards (if water can accumulate to the elevation of the emergency spillway). This volume was calculated based on the maximum allowable storage volume and the current volume of CCR stored in the facility based on the most recent survey.

The approximate volume of impounded water and CCR is 1,470,00 cubic yards (approximate water volume is 2,250 cubic yards (in an isolated shallow depression) and approximate CCR volume is 1,467,749.00 cubic yards). This volume was calculated based on the maximum storage capacity, the current amount of CCR stored in the facility based on the most recent ic survey, and the best available as-built data for the structure construction prior to placement of CCR.

The CCR impoundment emergency discharge consists of a rip rap trapezoidal channel with a bottom width of 20 feet at elevation 414 feet with 30:1 side slopes to elevation 415. This discharges into a rip rap energy dissipation pad. There is no evidence that this emergency spillway has discharged. The primary discharge of the impoundment is a concrete discharge structure with adjustable stop logs with a minimum elevation of 388 discharging to a 36" reinforced concrete pipe at elevation 386 which discharges to the Ohio River. Stop logs have been placed to elevation 408 and the pond shows no evidence of discharging or accumulating water.

Inflow Design Flood Control System Plan

The initial inflow design flood control system plan documents that the inflow design flood control system has been designed and constructed to meet the storm generated discharge requirements for a Significant hazard potential CCR surface impoundment which means a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns. The inflow design flood for a Significant hazard potential CCR surface impoundment is the 1,000-year flood.

Analysis of the of the Coleman Station Pond A Legacy CCR impoundment site drainage demonstrates that the design flood control system adequately manages inflow and discharge out of the CCR unit during and following the specified 1,000-year/24-hour storm event. The structure has the capacity to pass the 1,000-year/24-hour storm maintaining adequate freeboard.

The operating facility has verified that discharge from the Coleman Station Pond A Legacy CCR impoundment is handled in accordance with the surface water requirements under § 257.3-3 (Part 257 - Criteria for Classification of Solid Waste Disposal Facilities and Practices Subpart A - Classification of Solid Waste Disposal Facilities and Practices Section 257.3-3 - Surface water).

Sources of Information

Geotechnical and other information provided by Associated Engineers, Inc.

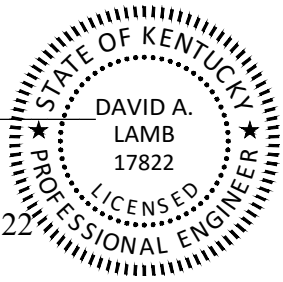
Geotechnical data obtained during geotechnical investigations performed by SM&E in April 2019. Reliance letter Dated April 14, 2026

Engineering design drawings and other information provided by Big Rivers Electric Corporation

United States Geological Survey U.S. Geological Survey (USGS) 7.5 minute Hawesville topographic quadrangle maps

Professional Engineer Certification [Per 40 CFR § 257.82]
Coleman Station Pond A Legacy CCR Impoundment
Initial Inflow Design Flood Control System Plan

I hereby certify that myself or an agent under my review has prepared this Initial Inflow Design Flood Control System Plan (Plan), and being familiar with the provisions of the final rule to regulate the disposal of coal combustion residuals (CCR) as solid waste under subtitle D of the Resource Conservation and Recovery Act (RCRA), attest that this Plan has been prepared in accordance with good engineering practices and meets the intent of 40 CFR Part 257.82. To the best of my knowledge and belief, the information contained in this Plan is true, complete, and accurate.



David A. Lamb P.E.

State of Kentucky License No. 17822

Date: May 8, 2026

Big Rivers Electric Corp.

Coleman Facility, Hawesville, Kentucky
Attachment A: Pond A Inspection Map

Job Number:	25-0007
Date:	01/30/2026
Scale:	1" = 400'
Drawn By:	D.T.H.

Revisions:

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Big Rivers Electric Corp.

Coleman Facility, Hawesville, Kentucky

Attachment B: Pond A Inspection Map - USGS TOPO OVERLAY

Job Number:	25-0007
Date:	01/30/2026
Scale:	1" = 400'
Drawn By:	D.T.H.

Revisions:

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Coleman Station Legacy Pond C CCR Surface Impoundment

Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule
Hydrologic and Hydraulic Capacity Assessment and
Initial Inflow Design Flood Control System Plan

May 8, 2026

Prepared By:

ASSOCIATED ENGINEERS, INC.
2740 North Main St. • Madisonville, KY 42431
Phone: (270) 821-7732 • Fax: (270) 821-7789

Project ID: 26-0144

Big Rivers Electric Corporation
Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule
Hydrologic and Hydraulic Capacity Assessment and
Initial Inflow Design Flood Control System Plan

CCR Surface Impoundment Information

Name:	Pond C Legacy CCR Impoundment
Operator:	BREC Coleman Station
Address:	4982 River Road Hawesville, Kentucky 42348

CCR Unit Identification Number: Kentucky State Dam Inventory System ID: None

Qualified Professional Engineer

Name:	David A. Lamb
Company:	Associated Engineers, Inc.
Kentucky P.E. Number:	17822

Regulatory Applicability

As part of the § 257.82 Hydrologic and hydraulic capacity requirements for CCR surface impoundments, an owner or operator of an existing or new CCR surface impoundment or any lateral expansion of a CCR surface impoundment must design, construct, operate, and maintain an inflow design flood control system as specified below. The owner or operator of the CCR unit must prepare the initial inflow design flood control system plan no later than October 17, 2016. The hazard potential classification definitions (from: VI. Development of the Final Rule - Technical Requirements) that must be considered follow:

- High hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation will probably cause loss of human life

- Significant hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.

- Low hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of life and

low economic and/or environmental losses. Losses are principally limited to the surface impoundment's owner's property.

1) 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 specified in item 3) of this section.

2) 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 specified item 3) of this section.

3) The inflow design flood is:

   (i) For a high hazard potential CCR surface impoundment the inflow design flood is the probable maximum flood;

   (ii) For a significant hazard potential CCR surface impoundment the inflow design flood is the 1,000-year flood;

   (iii) For a low hazard potential CCR surface impoundment the inflow design flood is the 100-year flood;

   (iv) For an incised CCR surface impoundment the inflow design flood is the 25-year flood.

Discharge from the CCR unit must be handled in accordance with the surface water requirements under § 257.3-3 (Part 257 - Criteria for Classification of Solid Waste Disposal Facilities and Practices Subpart A - Classification of Solid Waste Disposal Facilities and Practices Section 257.3-3 - Surface water).

Inflow design flood control system Plan:

1) *Content of the plan.* The owner or operator must prepare an initial inflow design flood control system plan that must document how the inflow design flood control system has been designed and constructed to meet the requirements of this section. Each plan must be supported by appropriate engineering calculations.

2) *Amendment of the plan.* The owner or operator of the CCR unit may amend the written inflow design flood control system plan at any time provided the revised plan is placed in the facility's operating record. The owner or operator must amend the written inflow design flood control system plan whenever there is a change in conditions that would substantially affect the written plan in effect.

Description of Impoundment

An aerial photo of the CCR unit is provided as Attachment A and an excerpt from U.S. Geological Survey (USGS) 7.5 minute Robards and Delaware topographic quadrangle maps showing the location of the CCR unit is provided as Attachment B.

The Legacy CCR unit which has been in place for approximately 55 years, was used for the placement of coal combustion residual material; Primarily sluiced fly ash and bottom ash. No CCR was placed in the pond after the coal units were retired in May 2014. The immediate watershed that drains to the CCR unit and in which the CCR unit is located, is unnamed and 90 acres in size. This is an elevated structure, and the only inflow is precipitation that falls directly on the structure. Discharge is routed to a drain to the south which discharges directly to the Ohio River

The CCR unit is a combined incised/earthen embankment structure. Embankments with a maximum height of 15 feet from the perimeter of the structure. The lower portion of the structure is incised. The interior of the pond was used as a borrow area. The Ohio River is located approximately 800 feet east of the structure. Due to surface relief, the toe area of the south dike is subject to flooding. The area was made up historically of cultivated fields, draining to the Ohio River. Underlying preconstruction soils consisted of Quaternary Alluvium. This material is variable in composition, locally consisting of unconsolidated sand, gravel, silt, or clay. Bedrock underlying the site is part of the Pennsylvanian Caseyville and Tradewater formations. Bedrock lies a 115' to 165' below the surface.

The dike is generally at elevation 405. The dike reaches a maximum height of 15 feet along the west and southern portion of the structure. There is also a rail bed constructed along the west and north portion of the dike. The east side of the structure appears to be incised. The north side of the structure is contained by fill placed for the plant entrance road and plant construction.

There are numerous transmission lines and associated power poles throughout the pond. The pond has had a soil cover placed and the area is currently vegetated and maintained. The facility does not currently function as a pond.

There is no impounded water in the structure at this time. There are areas inside the structure where the covered and vegetated CCR reaches elevation 412 in isolated areas where cover activities and transmission poles resulted in elevated areas. Based on review of geotechnical data, the CCR reaches an estimated maximum thickness of 19 feet.

This was verified by the geotechnical data obtained during geotechnical investigations performed by SM&E in April 2019. The Legacy CCR facility has been removed from the Kentucky Division of Water Dam Inventory System and is no longer considered a regulated dam by the state of Kentucky.

Depths of impounded water and CCR are 0.0 feet and 19 feet (at respective locations of maximum impounded water and CCR depths). Corresponding elevations of impounded CCR range from 400 feet to 406 feet, above mean sea level. This was verified by geotechnical drilling conducted inside the dry pond in April 2019.

The remaining storage capacity is approximately 131,648 cubic yards (if water can accumulate to the elevation of 1foot below the dam crest). This volume was calculated based on the maximum allowable storage volume and the current volume of CCR stored in the facility based on the most recent survey. It should be noted that this facility no longer operates as a water impoundment. It is currently a grass field that is regularly mowed to maintain the facility for inspection. The valve on the outlet structure is left in the closed position and the pond does not accumulate water.

Geotechnical drilling reveals moist to wet CCR material beneath the temporary soil cover but there is not an established pool. T

The Inactive Ash Pond C Legacy CCR Impoundment is a combined incised/earthen embankment structure. The pond covers an area of approximately ninety (90) acres; the crest is approximately 8,000 feet long with the earthen embankment being approximately 6,300 feet long with a maximum height of 15 feet. The embankments were built with 2:1 upstream and downstream slopes. A decant is located in the southern area of the pond. The primary outlet structure is a 24-inch diameter, slotted PVC riser connected to a 24" diameter PVC pipe located along the south dike. The decant valve remains closed so no water is discharged.

Inflow Design Flood Control System Plan

The initial inflow design flood control system plan documents that the inflow design flood control system has been designed and constructed to meet the storm generated discharge requirements for a Low hazard potential CCR surface impoundment which means a diked surface impoundment where failure or mis-operation results in no probable loss of life and low economic and/or environmental losses. Losses are principally limited to the surface impoundment's owner's property. The inflow design flood for a Low hazard potential CCR surface impoundment is the 100-year/24-hour flood.

Analysis of the of the Coleman Station Pond C Legacy CCR impoundment site drainage demonstrates that the design flood control system adequately manages inflow and discharge out of the CCR unit during and following the specified 100-year/24-hour storm event. The structure has the capacity to hold 100-year/24-hour storm event without discharging. The discharge structure has remained closed for several years and the pond has not accumulated water. Transpiration, evaporation, and infiltration adequately manage the storm.

The operating facility has verified that discharge from the Coleman Station Pond C Legacy CCR impoundment is handled in accordance with the surface water requirements under § 257.3-3 (Part 257 - Criteria for Classification of Solid Waste Disposal Facilities and Practices Subpart A - Classification of Solid Waste Disposal Facilities and Practices Section 257.3-3 - Surface water).

Sources of Information

Geotechnical and other information provided by Associated Engineers, Inc.

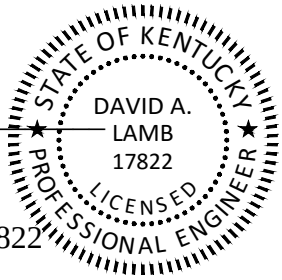
Geotechnical data obtained during geotechnical investigations performed by SM&E in April 2019. Reliance letter Dated April 14, 2026

Engineering design drawings and other information provided by Big Rivers Electric Corporation

United States Geological Survey U.S. Geological Survey (USGS) 7.5 minute Hawesville topographic quadrangle maps

Professional Engineer Certification [Per 40 CFR § 257.82]
Coleman Station Pond C Legacy CCR Impoundment
Initial Inflow Design Flood Control System Plan

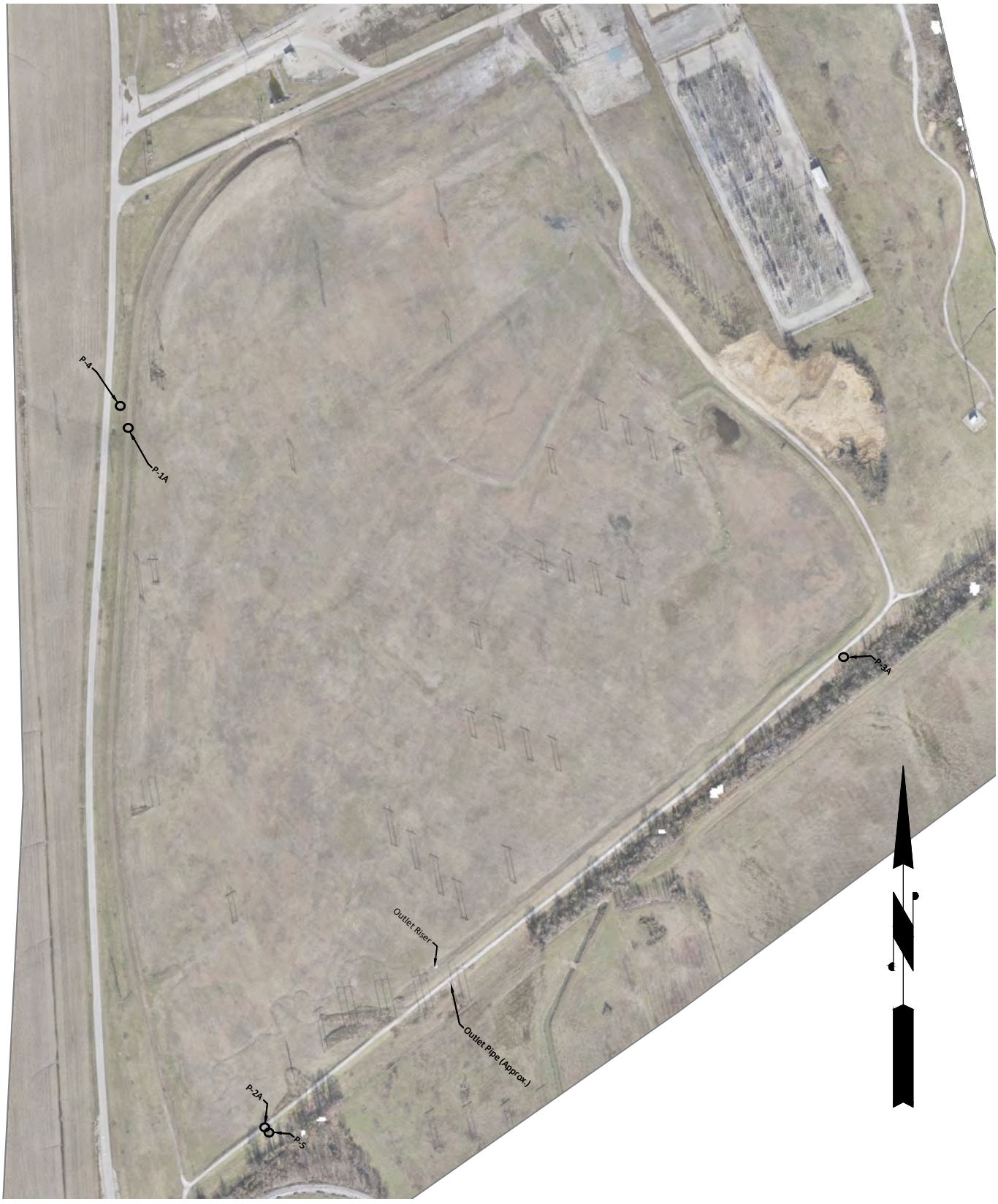
I hereby certify that myself or an agent under my review has prepared this Initial Inflow Design Flood Control System Plan (Plan), and being familiar with the provisions of the final rule to regulate the disposal of coal combustion residuals (CCR) as solid waste under subtitle D of the Resource Conservation and Recovery Act (RCRA), attest that this Plan has been prepared in accordance with good engineering practices and meets the intent of 40 CFR Part 257.82. To the best of my knowledge and belief, the information contained in this Plan is true, complete, and accurate.



David A. Lamb P.E.

State of Kentucky License No. 17822

Date: May 8, 2026



Big Rivers Electric Corp.

Coleman Facility, Hawesville, Kentucky
Attachment A: Pond C Inspection Map

Job Number:	25-0007
Date:	01/30/2026
Scale:	1" = 400'
Drawn By:	D.T.H.

Revisions:

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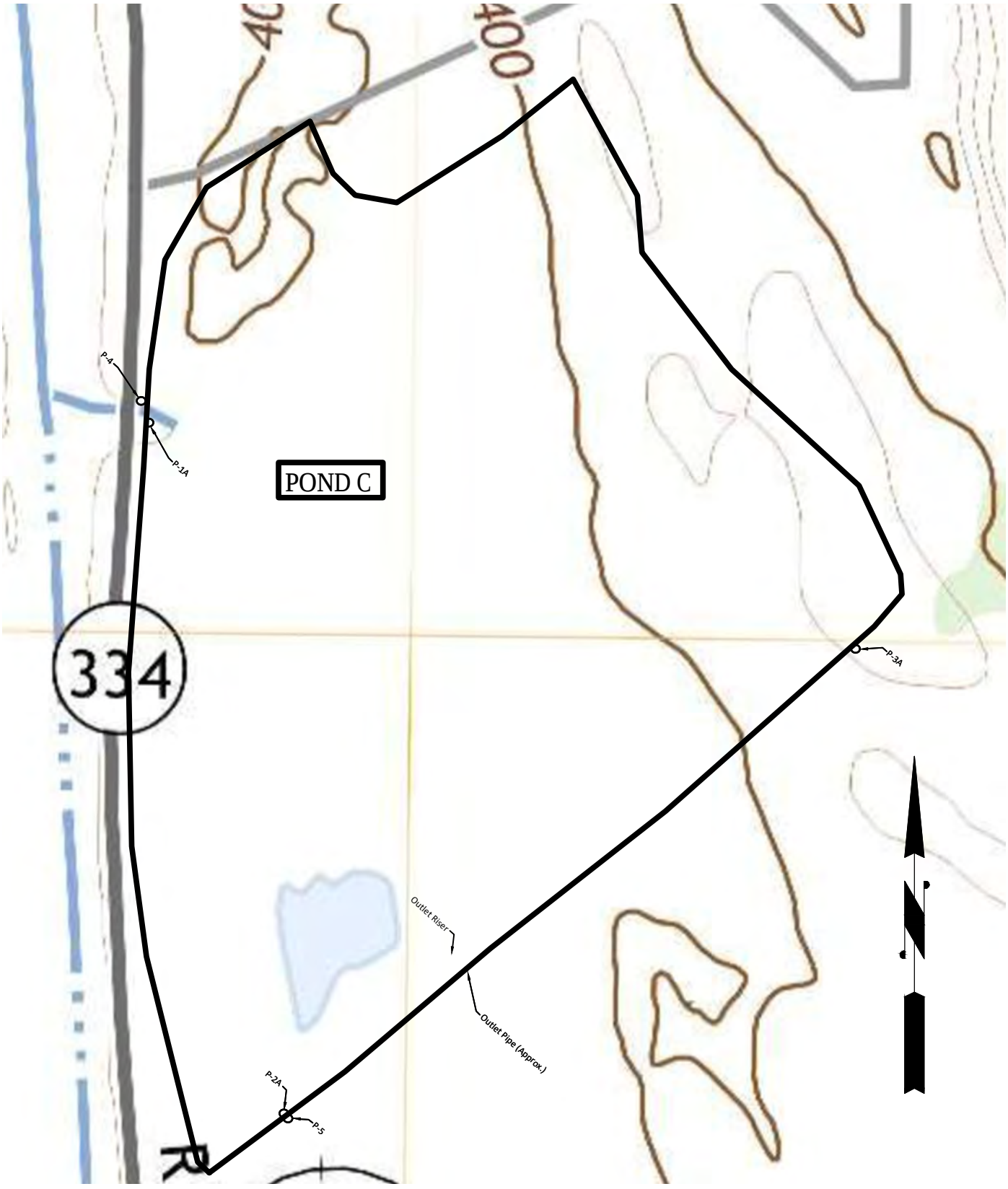

Big Rivers Electric Corp.

Coleman Facility, Hawesville, Kentucky

Attachment B: Pond C Inspection Map - USGS TOPO OVERLAY

Job Number:	25-0007
Date:	01/30/2026
Scale:	1" = 400'
Drawn By:	D.T.H.

Revisions:

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Coleman Station Legacy Pond D CCR Surface Impoundment

Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule
Hydrologic and Hydraulic Capacity Assessment and
Initial Inflow Design Flood Control System Plan

May 8, 2026

Prepared By:

ASSOCIATED ENGINEERS, INC.
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Phone: (270) 821-7732 • Fax: (270) 821-7789

Project ID: 26-0144

Big Rivers Electric Corporation
Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule
Hydrologic and Hydraulic Capacity Assessment and
Initial Inflow Design Flood Control System Plan

CCR Surface Impoundment Information

Name:	Pond D Legacy CCR Impoundment
Operator:	BREC Coleman Station
Address:	4982 River Road Hawesville, Kentucky 42348

CCR Unit Identification Number: Kentucky State Dam Inventory System ID: 01255

Qualified Professional Engineer

Name:	David A. Lamb
Company:	Associated Engineers, Inc.
Kentucky P.E. Number:	17822

Regulatory Applicability

As part of the § 257.82 Hydrologic and hydraulic capacity requirements for CCR surface impoundments, an owner or operator of an existing or new CCR surface impoundment or any lateral expansion of a CCR surface impoundment must design, construct, operate, and maintain an inflow design flood control system as specified below. The owner or operator of the CCR unit must prepare the initial inflow design flood control system plan no later than May 8, 2026. The hazard potential classification definitions (from: VI. Development of the Final Rule - Technical Requirements) that must be considered follow:

- High hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation will probably cause loss of human life

- Significant hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.

- Low hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of life and

low economic and/or environmental losses. Losses are principally limited to the surface impoundment's owner's property.

1) 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 specified in item 3) of this section.

2) 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 specified item 3) of this section.

3) The inflow design flood is:

   (i) For a high hazard potential CCR surface impoundment the inflow design flood is the probable maximum flood;

   (ii) For a significant hazard potential CCR surface impoundment the inflow design flood is the 1,000-year flood;

   (iii) For a low hazard potential CCR surface impoundment the inflow design flood is the 100-year flood;

   (iv) For an incised CCR surface impoundment the inflow design flood is the 25-year flood.

Discharge from the CCR unit must be handled in accordance with the surface water requirements under § 257.3-3 (Part 257 - Criteria for Classification of Solid Waste Disposal Facilities and Practices Subpart A - Classification of Solid Waste Disposal Facilities and Practices Section 257.3-3 - Surface water).

Inflow design flood control system Plan:

1) *Content of the plan.* The owner or operator must prepare an initial inflow design flood control system plan that must document how the inflow design flood control system has been designed and constructed to meet the requirements of this section. Each plan must be supported by appropriate engineering calculations.

2) *Amendment of the plan.* The owner or operator of the CCR unit may amend the written inflow design flood control system plan at any time provided the revised plan is placed in the facility's operating record. The owner or operator must amend the written inflow design flood control system plan whenever there is a change in conditions that would substantially affect the written plan in effect.

Description of Impoundment

An aerial photo of the CCR unit is provided as Attachment A and an excerpt from U.S. Geological Survey (USGS) 7.5 minute Robards and Delaware topographic quadrangle maps showing the location of the CCR unit is provided as Attachment B.

The Legacy CCR unit was used for the placement of coal combustion residual material; Primarily gypsum delivered to the pond by truck beginning October 2008. No CCR was placed in the pond after the coal units were retired in May 2014. The immediate watershed that drains to the CCR unit, and in which the CCR unit is located, is unnamed and 83.5 acres in size. A stormwater runoff pond is within the footprint of the legacy CCR unit . This is an elevated structure, with the only influent as precipitation that falls directly on the stormwater pond. A permitted discharge from the pond is conveyed to the Ohio River via pipe. The valve of the discharge pipe is closed, and is routinely monitored during weekly inspections for conditions that would require a discharge based on precipitation events.

The CCR unit is a combined incised/earthen embankment structure. Embankments form the perimeter of the structure. The lower portion of the structure is incised. The interior of the pond was used as a borrow area. Original ground inside the structure ranged in elevation from elevation 387 to elevation 402. Based on September 22, 2008, As-Build drawing the borrow excavation went as low as elevation 376. The Green River is located approximately 300 feet east of the structure. Due to surface relief, the toe area of the structure is subject to flooding. The area was made up of cultivated fields with a low ridge transecting the area from southwest to northeast, draining northeast to the Ohio River. Underlying preconstruction soils consisted of Quaternary Alluvium. This material is variable in composition, locally consisting of unconsolidated sand, gravel, silt, or clay. Bedrock underlying the site is part of the Pennsylvanian Caseyville and Tradewater formations. Bedrock lies a 115’ to 165’ below the surface.

The dike is generally at elevation 415. The dike reaches a maximum height of 27 feet along the northwest corner. The east dike reaches a maximum height of approximately 25 feet on the north end and 17 feet at the south end. The south dike height trends from 16 feet at the east end to 21 feet at the west end. The west dike height ranges in height from 25 feet at the south end to 27 feet at the north end. The Associated Engineers, Inc. plans approved in the Dam Construction permit dated January 25, 2005 were reviewed. It should be noted that the approved plans allow for a dam crest elevation of 424. The construction was terminated at elevation 415. CCR primarily composed of dry Gypsum has been placed in the impoundment and a significant portion has been reclaimed for beneficial reuse. The main body of the pond does not impound water at this time. The stormwater portion of the structure on the northeast corner is the only area that impounds water.

Depth of impounded water in the storm water section of the pond is currently approximately 6 feet. The approximate volume of impounded water in the storm water section of the pond is 29,095 cubic yards. Maximum and minimum elevation of CCR is 414 feet and 379 feet,

respectively, above mean sea level. These approximate depths and respective elevations are based on the most recent (December 2025) flight derived topographic contours.

Between 2020 and 2023 approximately 919,802 cubic yards of gypsum were removed from the impoundment for beneficial reuse purposes. The remaining storage capacity is approximately 1,599,800 cubic yards. This volume was calculated based on the maximum allowable storage volume and the current volume of CCR stored in the facility based on the most recent survey.

Depths of impounded water and CCR are 6 feet in the Stormwater pond 0.0 feet in the CCR pond area and 33 feet (at respective locations of maximum impounded water and CCR depths). Corresponding elevations of impounded CCR range from 400 feet to 406 feet, above mean sea level. This was verified by geotechnical drilling conducted inside the dry pond in April 2019.

The remaining storage capacity is approximately 1,599,800 cubic yards. This volume was calculated based on the maximum allowable storage volume and the current volume of CCR stored in the facility based on the most recent survey.

The Inactive Ash Pond D Legacy CCR Impoundment is a combined incised/earthen embankment structure. The Pond covers an area of approximately seventy six (76) acres; the crest is approximately 7,200 feet long with a maximum height of 27 feet. The embankments were built with 3:1 upstream and 2:1 downstream slopes.

The CCR portion of impoundment discharge consists of a rip rap trapezoidal channel with a bottom width of 10 feet at elevation 410 feet with 3:1 side slopes to elevation 412. This discharges into the stormwater portion of the impoundment. The discharge from this portion of the impoundment is a valved 18" bituminous coated corrugated metal pipe at elevation 401 which enters the 5' diameter precast discharge riser with a 4'x4' inlet at elevation 409.1 feet. The discharge structure has a 36" reinforced concrete pipe with Anti-seep collars that penetrates the embankment and discharges at elevation 390.

Inflow Design Flood Control System Plan

The initial inflow design flood control system plan documents that the inflow design flood control system has been designed and constructed to meet the storm generated discharge requirements for a Low hazard potential CCR surface impoundment which means a diked surface impoundment where failure or mis-operation results in no probable loss of life and low economic and/or environmental losses. Losses are principally limited to the surface impoundment's owner's property. The inflow design flood for a Low hazard potential CCR surface impoundment is the 100-year/24-hour flood.

Analysis of the of the Coleman Station Pond D Legacy CCR impoundment site drainage demonstrates that the design flood control system adequately manages inflow and discharge

out of the CCR unit during and following the specified 100-year/24-hour storm event. The remaining storage capacity is approximately 1,599,800 cubic yards. The structure has the capacity to hold 100-year/24-hour storm event without discharging. Transpiration, evaporation, and infiltration adequately manage the storm. However, the rip rap trapezoidal channel with a bottom width of 10 feet at elevation 410 feet with 3:1 side slopes to elevation 412 can also pass the 100-year/24-hour flood in the event that the CCR section of the pond ever filled. The storm water portion of the pond which only receives participation has valved 18" BCCMP at elevation 401 which enters the 5' diameter precast discharge riser with a 4'x4' inlet at elevation 409.1 feet. The discharge structure has a 36" RCP. This structure is actively managed and discharged to maintain water at or below elevation 407 to allow for storage capacity in excess of the 100-year/24-hour storm event. If not managed properly the inlet at elevation 409.1 has adequate capacity to pass the 100-year/24-hour storm event.

The operating facility has verified that discharge from the Coleman Station Pond D Legacy CCR impoundment is handled in accordance with the surface water requirements under § 257.3-3 (Part 257 - Criteria for Classification of Solid Waste Disposal Facilities and Practices Subpart A - Classification of Solid Waste Disposal Facilities and Practices Section 257.3-3 - Surface water).

Sources of Information

Geotechnical and other information provided by Associated Engineers, Inc.

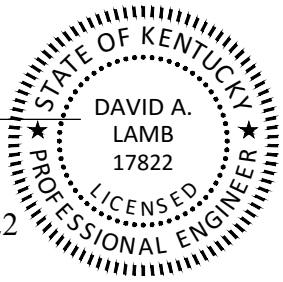
Geotechnical data obtained during geotechnical investigations performed by SM&E in April 2019. Reliance letter Dated April 14, 2026

Engineering design drawings and other information provided by Big Rivers Electric Corporation

United States Geological Survey U.S. Geological Survey (USGS) 7.5 minute Hawesville topographic quadrangle maps

Professional Engineer Certification [Per 40 CFR § 257.82]
Coleman Station Pond D Legacy CCR Impoundment
Initial Inflow Design Flood Control System Plan

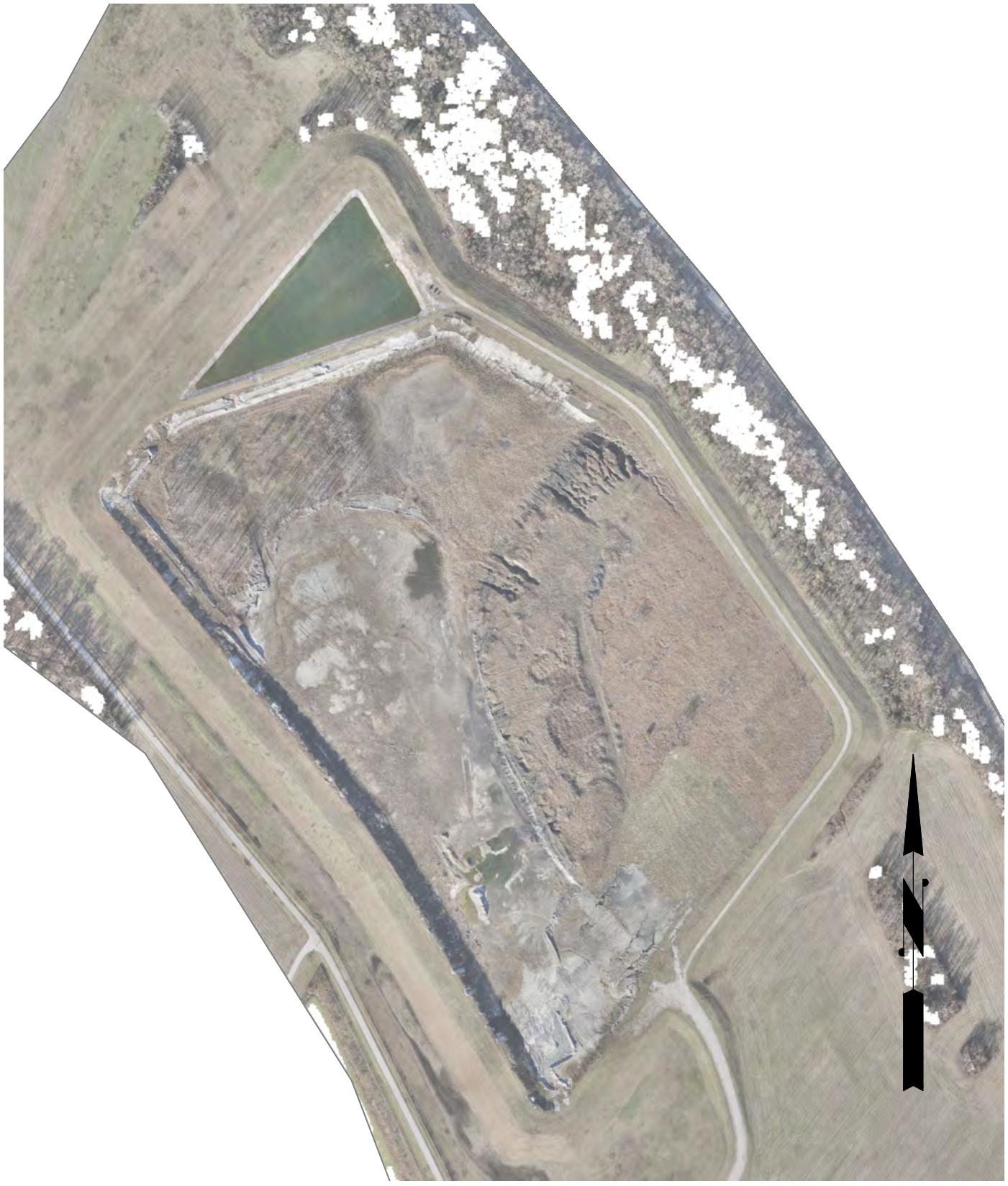
I hereby certify that myself or an agent under my review has prepared this Initial Inflow Design Flood Control System Plan (Plan), and being familiar with the provisions of the final rule to regulate the disposal of coal combustion residuals (CCR) as solid waste under subtitle D of the Resource Conservation and Recovery Act (RCRA), attest that this Plan has been prepared in accordance with good engineering practices and meets the intent of 40 CFR Part 257.82. To the best of my knowledge and belief, the information contained in this Plan is true, complete, and accurate.



David A. Lamb P.E.

State of Kentucky License No. 17822

Date: May 8, 2026



Big Rivers Electric Corp.

Coleman Facility, Hawesville, Kentucky
Attachment A: Pond D Inspection Map

Job Number:	25-0007
Date:	01/30/2026
Scale:	1" = 400'
Drawn By:	D.T.H.

Revisions:

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Big Rivers Electric Corp.

Coleman Facility, Hawesville, Kentucky

Attachment B: Pond D Inspection Map - USGS TOPO OVERLAY

Job Number:	25-0007
Date:	01/30/2026
Scale:	1" = 400'
Drawn By:	D.T.H.

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