Coleman Station Legacy Pond A CCR Surface Impoundment

Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule
Structural Integrity Criteria for Existing CCR Surface Impoundments
Initial Hazard Potential Classification

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
Structural Integrity Criteria for Existing CCR Surface Impoundments
Initial Hazard Potential Classification

CCR Surface Impoundment Information

Name:	Pond A Legacy CCR Surface Impoundment
Operator:	Coleman Generating Station
Address:	4982 River Road Hawesville, Kentucky 42348
CCR Unit Identification Number:	Kentucky State Dam Inventory System ID No. 01255

Qualified Professional Engineer

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

Regulatory Applicability

As part of the § 257.73 Structural integrity criteria for existing CCR surface impoundments requirements, an owner or operator of an existing CCR surface impoundment must no later than May 8, 2026:

> Conduct an initial hazard potential classification assessment per § 257.73(a)(2). The owner or operator must document the hazard potential classification of each CCR unit as either a high hazard potential CCR surface impoundment, a significant hazard potential CCR surface impoundment, or a low hazard potential CCR surface impoundment. The owner or operator must also document the basis for each hazard potential classification.

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 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.

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 Soil Survey of Daviess and Hancock Counties, Kentucky, published by the U.S. Department of Agriculture Soil Conservations Service, indicates the following soil units to be· present at the surface over the site: Otwell silt loam (OtA), Wheling loam (WnB), Weinbach silt loam 9Wh), Newark silt loam (Ne), Elk silt loam_ (EkB), Jacob silty clay loam (Ja), and the Ginat silt loam (Gn).

Although several units are represented, they exhibit a similar range of properties with regard to texture and engineering. Most are silt loams or silty clay loams, with engineering classification being silt (ML), silty clay (CL-ML), or lean clay (CL). Shrink-swell potential is generally low. This was verified by the geotechnical data obtained in the SM&E geotechnical report dated April 2019.

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.

The Inactive Ash Pond A Legacy CCR Impoundment is a combined incised/earthen embankment structure. The pond covers an area of approximately forty-eight (48) acres; the embankment is approximately 5,900 feet long with a maximum height of 30 feet. The east embankment faces the Ohio River and has rock toe armoring and a rock downstream slope where the spillway is located. The embankments were built with 2.5:1 upstream and downstream slopes.

Based on our review of historic documentation the approximate volume of CCR contained in Pond A is 1,470,000 cubic yards. This volume estimate was calculated based on the design drawings and historic survey information.

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 ever been discharged. The primary discharge of the impoundment is a discharge structure with adjustable stop logs with a minimum elevation of 388 discharging to a 36" RCP 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.

The Legacy CCR facility listed in the Kentucky State Dam Inventory System ID No. 00842 as a Moderate / Significant Hazard facility.

The Legacy CCR unit has been in place for 46 years. Per the Legacy Rule CCR requirements, the CCR unit is inspected as follows:

Weekly CCR Unit Inspection
The CCR unit must be examined by a qualified person at least once every seven days for any appearance of actual or potential structural weakness or other conditions that are disrupting or that have the potential to disrupt the operation or safety of the CCR unit.

Monthly Instrumentation Inspection
Monitoring of the embankment and all instrumentation supporting the operation of the CCR unit must be conducted by a qualified person no less than once per month.

Annual Legacy CCR Unit Inspection
The CCR unit inspection must be conducted annually throughout its operating life. These annual inspections are focused primarily on the structural stability of the CCR surface impoundment and must ensure that the operation and maintenance of the CCR surface impoundment is in accordance with recognized and generally accepted good engineering standards.

The CCR unit operator has general maintenance and repair procedures in place as they determine necessary. There are no known occurrences of structural instability of the CCR unit.

Kentucky Division of Water Structure Classification

Per the Kentucky Department for Natural Resources and Environmental Protection, Division of Water (now the Department for Environmental Protection, Division of Water) Engineering Memorandum No. 5 (incorporated into 401 KAR 4:030); guidance for applicable impoundment structure potential hazard classification follows:

The following broad classes of structures are established to permit the association of criteria with the damage that might result from a sudden major breach of the structure.

A. Class (A) - Low Hazard
   This classification may be applied for structures located such that failure would cause loss of the structure itself but little or no additional damage to other property. Such structures will generally be located in rural or agricultural areas where failure may damage farm buildings other than residences, agricultural lands, or county roads.

B. Class (B) - Moderate Hazard
   This classification may be applied for structures located such that failure may cause significant damage to property and project operation, but loss of human life is not envisioned. Such structures will generally be located in predominantly rural agricultural areas where failures may damage isolated homes, main highways or major railroads, or cause interruption of use or service of relatively important public utilities.

C. Class (C) - High Hazard
   This classification must be applied for structures located such that failure may cause loss of life, or serious damage to houses, industrial or commercial buildings, important public utilities, main highways or major railroads. This classification must be used if failure would cause probable loss of human life.

Based on the impoundment design information and assessment of the potential to impact downstream structures, environment and public safety, the Kentucky Division of Water has determined that the Coleman Pond A Legacy CCR Surface impoundment, to have a Class (A) Low Hazard classification.

Disposal of Coal Combustion Residuals from Electric Utilities Final Rule Structural Integrity Criteria – Initial Hazard Potential Classification

Per 257.73(a)(2) Initial Hazard Potential Classification requirements guidance for potential hazard classification follows:

The following hazard potential classifications are established to assess the potential adverse incremental consequences that would occur if there was a failure of the CCR surface impoundment.

Hazard Potential Classifications

- 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.

Based on the criteria of § 257.73 Structural integrity criteria for existing CCR surface impoundments, the responsible engineer certifying the initial potential hazard classification, has determined that the **Coleman Station Pond A Legacy CCR Surface impoundment meets the classification of a Moderate / Significant Hazard potential Legacy CCR surface impoundmen**t. This determination by the responsible engineer is based on failure or mis-operation results in no probable loss of life but can cause economic loss, environmental damage, disruption of lifeline facilities.

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

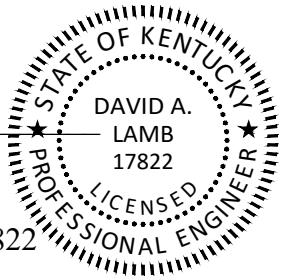
Engineering design drawings and other information provided by Big Rivers Electric Corporation

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

Kentucky Energy and Environment Cabinet, Department for Environmental Protection, Division of Water (401 KAR 4:030)

Professional Engineer Certification [Per 40 CFR § 257.73(a)(2)]
Coleman Station Pond A Legacy CCR Impoundment Initial Hazard Potential Classification

I hereby certify that myself or an agent under my review has prepared this Initial Hazard Potential Classification (Classification), 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 Classification has been prepared in accordance with good engineering practices and meets the intent of 40 CFR Part 257.73(a)(2). To the best of my knowledge and belief, the information contained in this Classification 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
Structural Integrity Criteria for Existing CCR Surface Impoundments
Initial Hazard Potential Classification

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
Structural Integrity Criteria for Existing CCR Surface Impoundments
Initial Hazard Potential Classification

CCR Surface Impoundment Information

Name:	Pond C Legacy CCR Surface Impoundment
Operator:	Coleman Generating Station
Address:	4982 River Road Hawesville, Kentucky 42348
CCR Unit Identification Number:	This facility was removed from the Kentucky State Dam Inventory System.

Qualified Professional Engineer

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

Regulatory Applicability

As part of the § 257.73 Structural integrity criteria for existing CCR surface impoundments requirements, an owner or operator of an existing CCR surface impoundment must no later than May 8, 2026:

> Conduct an initial hazard potential classification assessment per § 257.73(a)(2). The owner or operator must document the hazard potential classification of each CCR unit as either a high hazard potential CCR surface impoundment, a significant hazard potential CCR surface impoundment, or a low hazard potential CCR surface impoundment. The owner or operator must also document the basis for each hazard potential classification.

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 slurried bottom ash and fly ash. No CCR was placed in the pond after the coal units were retired in May of 2014. The immediate watershed that drains to the CCR unit, and

in which the CCR unit is considered to be located, is unnamed and 90 acres in size.

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 Soil Survey of Daviess and Hancock Counties, Kentucky, published by the U.S. Department of Agriculture Soil Conservations Service, indicates the following soil units to be· present at the surface over the site: Otwell silt loam (OtA), Wheling loam (WnB), Weinbach silt loam 9Wh), Newark silt loam (Ne), Elk silt loam_ (EkB), Jacob silty clay loam (Ja), and the Ginat silt loam (Gn).
Although several units are represented, they exhibit a similar range of properties with regard to texture and engineering. Most are silt loams or silty clay loams, with engineering classification being silt (ML), silty clay (CL-ML), or lean clay (CL). Shrink-swell potential is generally low. This was verified by the geotechnical data obtained during geotechnical investigations performed by SM&E in April 2019. This data was reviewed as part of this report. The final as Built for this structure is dated February 12, 1971. Historic drawings provided by Big Rivers Electric Corporation and reviewed as a part of this report show the pond to be very close to full in August of 1990.

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 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.

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. 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. This data was reviewed as part of this report. The final as Built for this structure is dated February 12, 1971. Historic drawings provided by Big Rivers Electric Corporation and reviewed as a part of this report show the pond to be very close to full in August of 1990.

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.

The impoundment has a gated outfall structure located approximately 935 feet east of the southwest corner of the structure. The valve remains closed at all times and the pond area is a vegetated field which absorbs the precipitation from rainfall events.

The Legacy CCR unit has been in place for approximately 55 years. Per the Legacy Rule CCR requirements, the CCR unit is inspected as follows:

Monthly Embankment and Instrumentation Inspection
Monitoring of the embankment and all instrumentation supporting the operation of the CCR unit must be conducted by a qualified person no less than once per month.

Annual Legacy CCR Unit Inspection
The CCR unit inspection must be conducted annually throughout its operating life. These annual inspections are focused primarily on the structural stability of the CCR surface impoundment and must ensure that the operation and maintenance of the CCR surface impoundment is in accordance with recognized and generally accepted good engineering standards.

The CCR unit operator has general maintenance and repair procedures in place as they determine necessary. There are no known occurrences of structural instability of the CCR unit.

Kentucky Division of Water Structure Classification

Per the Kentucky Department for Natural Resources and Environmental Protection, Division of Water (now the Department for Environmental Protection, Division of Water) Engineering Memorandum No. 5 (incorporated into 401 KAR 4:030); guidance for applicable impoundment structure potential hazard classification follows:

The following broad classes of structures are established to permit the association of criteria with the damage that might result from a sudden major breach of the structure

A. Class (A) - Low Hazard
This classification may be applied for structures located such that failure would cause loss of the structure itself but little or no additional damage to other property. Such structures will generally be located in rural or agricultural areas where failure may damage farm buildings other than residences, agricultural lands, or county roads.

B. Class (B) - Moderate Hazard
This classification may be applied for structures located such that failure may cause significant damage to property and project operation, but loss of human life is not envisioned. Such structures will generally be located in predominantly rural agricultural areas where failures may damage isolated homes, main highways or major railroads, or cause interruption of use or service of relatively important public utilities.

C. Class (C) - High Hazard
This classification must be applied for structures located such that failure may cause loss of life, or serious damage to houses, industrial or commercial buildings, important public utilities, main highways or major railroads. This classification must be used if failure would cause probable loss of human life.

Based on the impoundment design information and assessment of the potential to impact downstream structures, environment and public safety, the Kentucky Division of Water has determined that the Coleman Pond C Legacy CCR Surface impoundment, (Kentucky State Dam Inventory System), is no longer a regulated facility and therefore has no hazard classification. The most conservative assessment of the potential hazard classification of the facility is Low (Class A).

Disposal of Coal Combustion Residuals from Electric Utilities Final Rule Structural Integrity Criteria – Initial Hazard Potential Classification

Per 257.73(a)(2) Initial Hazard Potential Classification requirements guidance for potential hazard classification follows:

The following hazard potential classifications are established to assess the potential adverse incremental consequences that would occur if there was a failure of the CCR surface impoundment.

Hazard Potential Classifications

- 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.

Based on the criteria of § 257.73 Structural integrity criteria for existing CCR surface impoundments, the responsible engineer certifying the initial potential hazard classification, has determined that the Coleman Station Pond C Legacy CCR Surface impoundment meets the classification of a Low hazard potential Legacy CCR surface impoundment. This determination by the responsible engineer is based on 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.

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

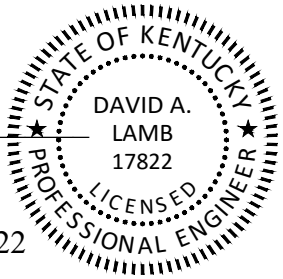
Engineering design drawings and other information provided by Big Rivers Electric Corporation

United States Geological Survey U.S. Geological Survey (USGS) 7.5 minute Robards and Delaware topographic quadrangle maps

Kentucky Energy and Environment Cabinet, Department for Environmental Protection, Division of Water (401 KAR 4:030)

Professional Engineer Certification [Per 40 CFR § 257.73(a)(2)]
Coleman Station Pond C Legacy CCR Impoundment Initial Hazard Potential Classification

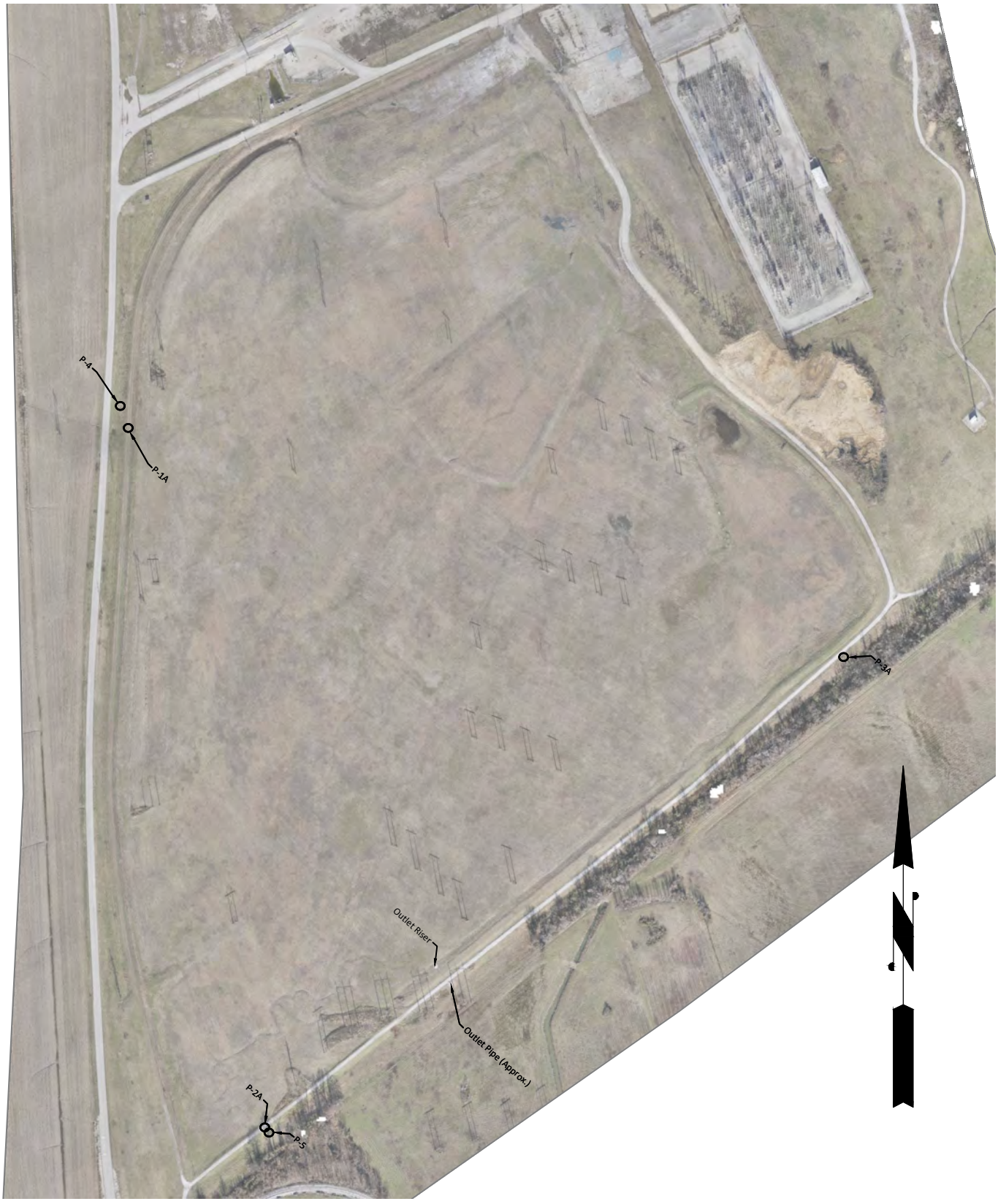
I hereby certify that myself or an agent under my review has prepared this Initial Hazard Potential Classification (Classification), and being familiar with the provisions of the final rule to regulate the disposal of coal combustion residuals (CCR) as solid waste under subtitle D of the Resource Conservation and Recovery Act (RCRA), attest that this Classification has been prepared in accordance with good engineering practices and meets the intent of 40 CFR Part 257.73(a)(2). To the best of my knowledge and belief, the information contained in this Classification 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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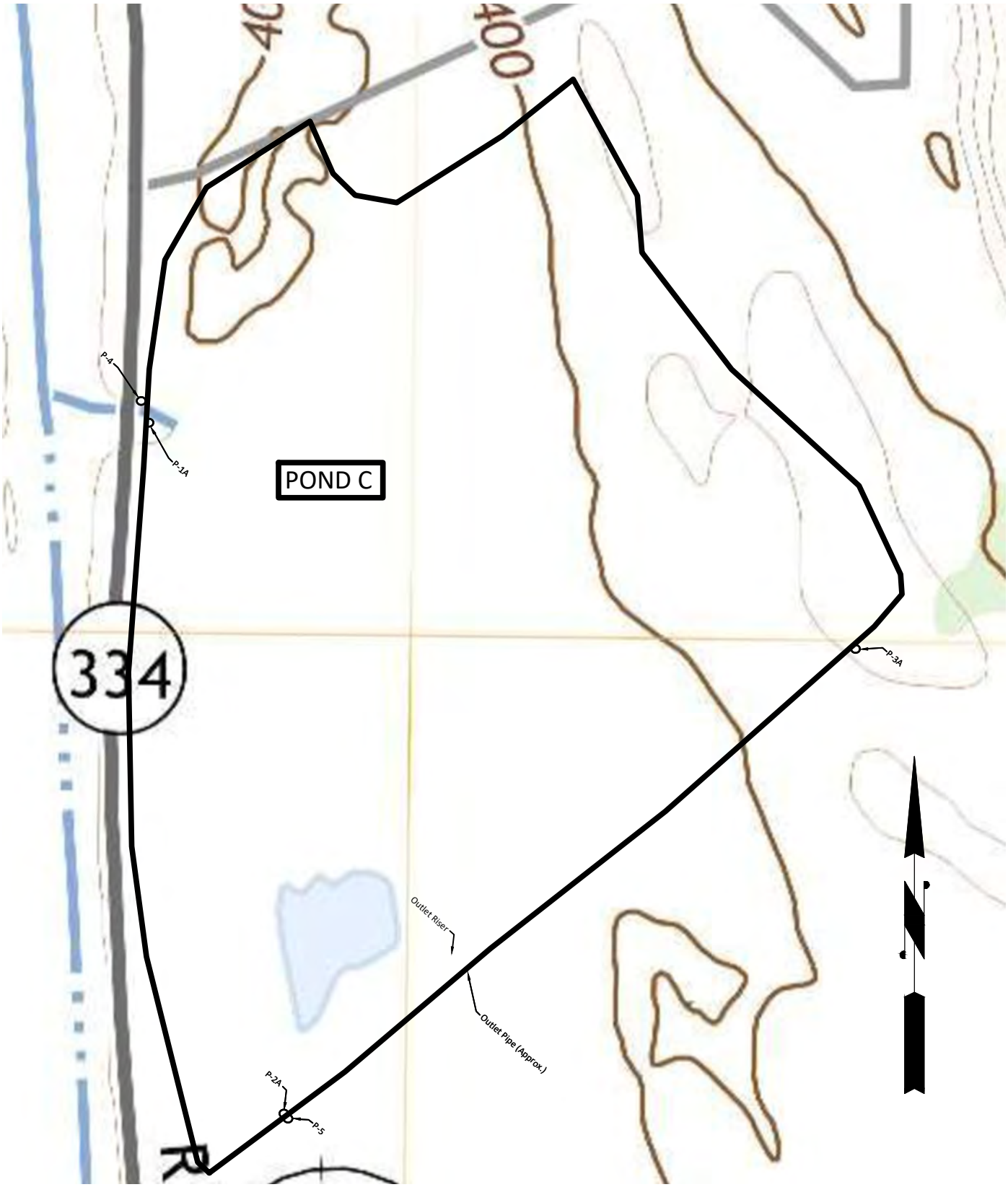

Big Rivers Electric Corp.

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
Structural Integrity Criteria for Existing CCR Surface Impoundments
Initial Hazard Potential Classification

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
Structural Integrity Criteria for Existing CCR Surface Impoundments
Initial Hazard Potential Classification

CCR Surface Impoundment Information

Name:	Pond D Legacy CCR Surface Impoundment
Operator:	Coleman Generating Station
Address:	4982 River Road Hawesville, Kentucky 42348
CCR Unit Identification Number:	Kentucky State Dam Inventory System ID No. 01255

Qualified Professional Engineer

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

Regulatory Applicability

As part of the § 257.73 Structural integrity criteria for existing CCR surface impoundments requirements, an owner or operator of an existing CCR surface impoundment must no later than May 8, 2026:

> Conduct an initial hazard potential classification assessment per § 257.73(a)(2). The owner or operator must document the hazard potential classification of each CCR unit as either a high hazard potential CCR surface impoundment, a significant hazard potential CCR surface impoundment, or a low hazard potential CCR surface impoundment. The owner or operator must also document the basis for each hazard potential classification.

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.

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 Soil Survey of Daviess and Hancock Counties, Kentucky, published by the U.S. Department of Agriculture Soil Conservations Service, indicates the following soil units to be· present at the surface over the site: Otwell silt loam (OtA), Wheling loam (WnB), Weinbach silt loam 9Wh), Newark silt loam (Ne), Elk silt loam_ (EkB), Jacob silty clay loam (Ja), and the Ginat silt loam (Gn).

Although several units are represented, they exhibit a similar range of properties with regard to texture and engineering. Most are silt loams or silty clay loams, with engineering classification being silt (ML), silty clay (CL-ML), or lean clay (CL). Shrink-swell potential is generally low. This was verified by the geotechnical data obtained to gain approval from the Kentucky Natural Resources and Environmental Protection Cabinet. Permit No. 14678 was issued on January 25, 2005. This was further verified by the geotechnical data obtained during geotechnical investigations performed by SM&E in April 2019. This data was reviewed as part of this report. The final as Built for this structure is dated September 22, 2008. Historic drawings and aerial photography provided by Big Rivers Electric Corporation and Associated Engineers, Inc. reviewed as a part of this report show the pond never impounded significant water.

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.

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" 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 with Anti-seep collars that penetrates the embankment and discharges at elevation 390.

The Legacy CCR facility listed in the Kentucky State Dam Inventory System ID No. 01255 as a Low Hazard facility.

The Legacy CCR unit has been in place for 18 years. Per the Legacy Rule CCR requirements, the CCR unit is inspected as follows:

Weekly CCR Unit Inspection
The CCR unit must be examined by a qualified person at least once every seven days for any appearance of actual or potential structural weakness or other conditions that are disrupting or that have the potential to disrupt the operation or safety of the CCR unit.

Monthly Embankment Inspection
Monitoring of the embankment and all instrumentation supporting the operation of the CCR unit must be conducted by a qualified person no less than once per month.

Annual Legacy CCR Unit Inspection
The CCR unit inspection must be conducted annually throughout its operating life. These annual inspections are focused primarily on the structural stability of the CCR surface impoundment and must ensure that the operation and maintenance of the CCR surface impoundment is in accordance with recognized and generally accepted good engineering standards.

The CCR unit operator has general maintenance and repair procedures in place as they determine necessary. There are no known occurrences of structural instability of the CCR unit.

Kentucky Division of Water Structure Classification

Per the Kentucky Department for Natural Resources and Environmental Protection, Division of Water (now the Department for Environmental Protection, Division of Water) Engineering Memorandum No. 5 (incorporated into 401 KAR 4:030); guidance for applicable impoundment structure potential hazard classification follows:

The following broad classes of structures are established to permit the association of criteria with the damage that might result from a sudden major breach of the structure.

A. Class (A) - Low Hazard
   This classification may be applied for structures located such that failure would cause loss of the structure itself but little or no additional damage to other property. Such structures will generally be located in rural or agricultural areas where failure may damage farm buildings other than residences, agricultural lands, or county roads.

B. Class (B) - Moderate Hazard
   This classification may be applied for structures located such that failure may cause significant damage to property and project operation, but loss of human life is not envisioned. Such structures will generally be located in predominantly rural agricultural areas where failures may damage isolated homes, main highways or major railroads, or cause interruption of use or service of relatively important public utilities.

C. Class (C) - High Hazard
   This classification must be applied for structures located such that failure may cause loss of life, or serious damage to houses, industrial or commercial buildings, important public utilities, main highways or major railroads. This classification must be used if failure would cause probable loss of human life.

Based on the impoundment design information and assessment of the potential to impact downstream structures, environment and public safety, the Kentucky Division of Water has determined that the Coleman Pond D Legacy CCR Surface impoundment, to have a Class (A) Low Hazard classification.

Disposal of Coal Combustion Residuals from Electric Utilities Final Rule Structural Integrity Criteria – Initial Hazard Potential Classification

Per 257.73(a)(2) Initial Hazard Potential Classification requirements guidance for potential hazard classification follows:

The following hazard potential classifications are established to assess the potential adverse incremental consequences that would occur if there was a failure of the CCR surface impoundment.

Hazard Potential Classifications

- 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.

Based on the criteria of § 257.73 Structural integrity criteria for existing CCR surface impoundments, the responsible engineer certifying the initial potential hazard classification, has determined that the Coleman Station Pond D Legacy CCR Surface impoundment meets the classification of a **Low hazard potential Legacy CCR surface impoundment**. This determination by the responsible engineer is based on 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.

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

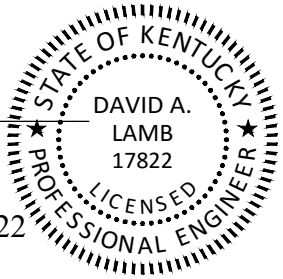
Engineering design drawings and other information provided by Big Rivers Electric Corporation

United States Geological Survey U.S. Geological Survey (USGS) 7.5 minute Robards and Delaware topographic quadrangle maps

Kentucky Energy and Environment Cabinet, Department for Environmental Protection, Division of Water (401 KAR 4:030)

Professional Engineer Certification [Per 40 CFR § 257.73(a)(2)]
Coleman Station Pond D Legacy CCR Impoundment Initial Hazard Potential Classification

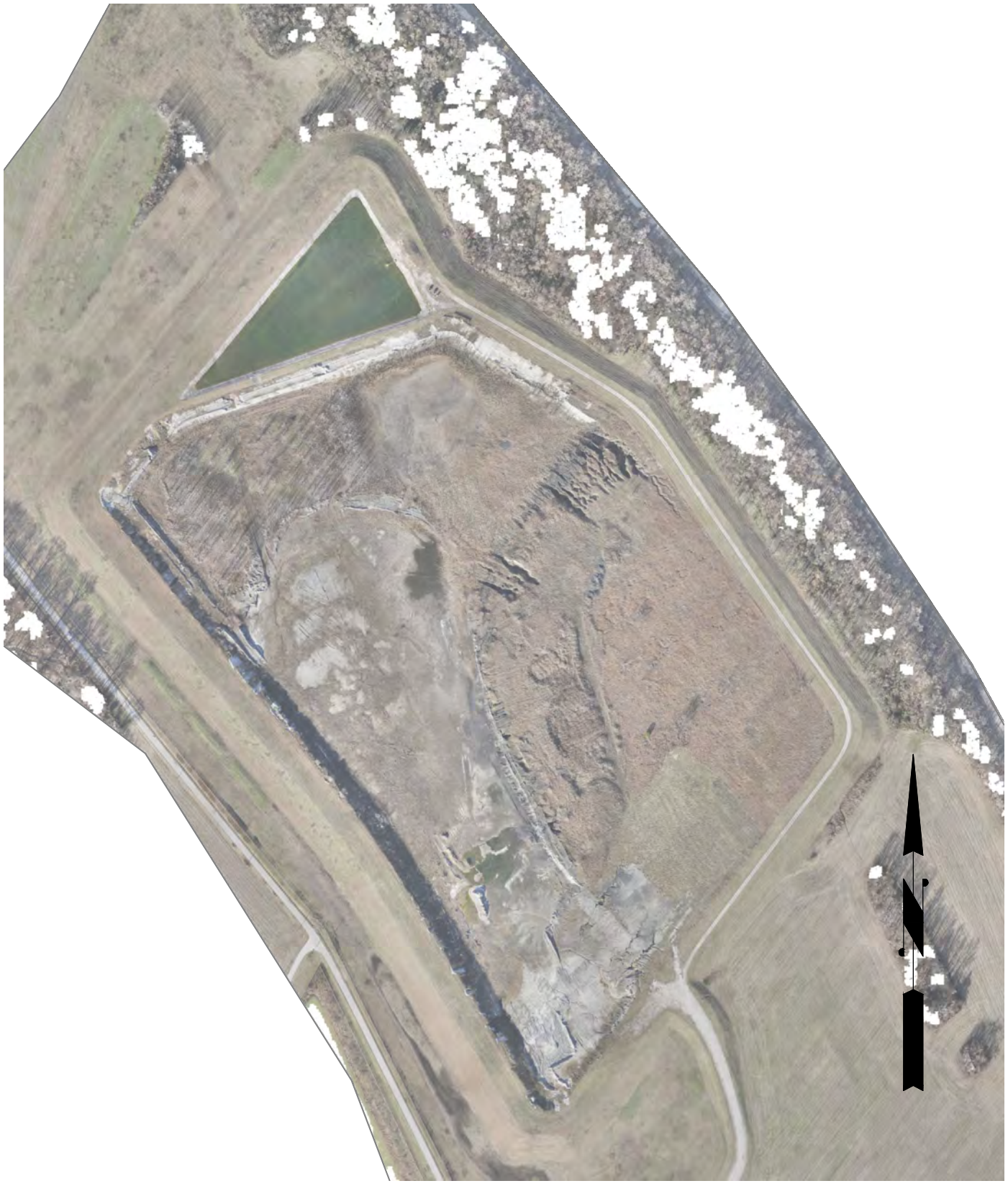
I hereby certify that myself or an agent under my review has prepared this Initial Hazard Potential Classification (Classification), and being familiar with the provisions of the final rule to regulate the disposal of coal combustion residuals (CCR) as solid waste under subtitle D of the Resource Conservation and Recovery Act (RCRA), attest that this Classification has been prepared in accordance with good engineering practices and meets the intent of 40 CFR Part 257.73(a)(2). To the best of my knowledge and belief, the information contained in this Classification 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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