

BIG RIVERS ELECTRIC CORPORATION

LEGACY SURFACE IMPOUNDMENT APPLICABILITY REPORT

KENNETH C COLEMAN GENERATING STATION
– ASH POND A
AGENCY INTEREST NO. 1640

REVISION 0

NOVEMBER 8, 2024

Owner/Operator Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Mark Bertram

Authorized Representative Name (signature)

MARK BERTRAM

Authorized Representative Name (printed)

DIRECTOR ENVIRONMENTAL SERVICES

Title

Date: 11-08-2024

Introduction

On May 8, 2024, the United States Environmental Protection Agency (EPA) issued the Final Legacy Coal Combustion Residual (CCR) Surface Impoundment Rule¹ (Legacy Rule) that established regulations for CCR surface impoundments at inactive facilities (legacy surface impoundments). The Legacy Rule requires that legacy surface impoundments (LSI) that no longer received CCR but contained both CCR and liquid on or after October 19, 2015 and that is located at an inactive electric utility, generally comply with the EPA requirements for inactive CCR surface impoundments in accordance with Title 40 of the Code of Federal Regulations (CFR), Part 257 Subpart D Hazardous and Solid Waste Management System; Disposal of CCR from Electric Utilities (EPA, 2015). The effective date of the Legacy Rule is November 8, 2024. An LSI Applicability Report in accordance with 40 CFR §257.100(f)(1) is required for each LSI by the Legacy Rule effective date.

Big Rivers Electric Corporation (BREC) has contracted with Burns & McDonnell Engineering, Inc. (Burns & McDonnell) to develop an Applicability Report for Ash Pond A located at its Kenneth C Coleman Generating Station (Coleman Station), a former coal-fired power plant, or inactive electric utility or facility, that is located in Hawesville, Kentucky. This Applicability Report contains the required information outlined in 40 CFR §257.100(f)(1).

This Applicability Report was developed using information provided by BREC, publicly available online information, and aerial imagery of Coleman Station.

¹ Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Legacy CCR Surface Impoundments; 40 CFR 257, Federal Register Vol 89, May 8, 2024

Legacy Surface Impoundment Evaluation

The following regulatory requirements for this report, as outlined in 40 CFR §257.100(f)(1), are each stated with the required information that must be reported for Ash Pond A.

40 CFR §257.100(f)(1)(i)(A): “The name and address of the person(s) owning and operating the legacy CCR surface impoundment with their business phone number and email address.”

- Name of Owner and Operator

Big Rivers Electric Corporation
710 West 2nd Street
Owensboro, KY 42301

- Authorized Representative

Mark Bertram
Director of Environmental Services
Big Rivers Electric Corporation
PO Box 20015
Owensboro, KY 42304-0015
Mark.bertram@bigrivers.com
270-844-6297

- Facility Contact

Diana R Merritt
Performance/Environmental Specialist
Big Rivers Electric Corporation
5663 State Rt. 85W
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diana.merritt@bigrivers.com
270-844-5008

40 CFR §257.100(f)(1)(i)(B): “The name associated with the legacy CCR surface impoundment.”

- Kenneth C Coleman Station - Ash Pond A
 - Also referred to in some documents as the “Active Recirculation Ash Pond²” or “Active Ash Pond A³”
 - Note that the LSI is inactive. The names “Active Recirculation Ash Pond” and “Active Ash Pond A” are outdated.

² Richard Kinch Letter to Western Kentucky Energy; EPA Archive Document, Washington, DC; May 14, 2009

³ Assessment of Dam Safety - Coal Combustion Surface Impoundments (Task 3) Final Report - Big Rivers Electric Cooperative, Coleman Generating Station; CHA, Albany, NY; Lockheed Martin, Edison, NJ; EPA, Washington, DC February 19, 2010

40 CFR §257.100(f)(1)(i)(C): “Information to identify the legacy CCR surface impoundment, including a figure of the facility and where the unit is located at the facility, facility address, and the latitude and longitude of the facility.”

- 4982 River Road, Hawesville, KY 42348
- Latitude (decimal degrees) 37.965287°
- Longitude (decimal degrees) -86.795010°
- Location maps are depicted in Appendix A.

40 CFR §257.100(f)(1)(i)(D): “The identification number of the legacy CCR surface impoundment if one has been assigned by the state.”

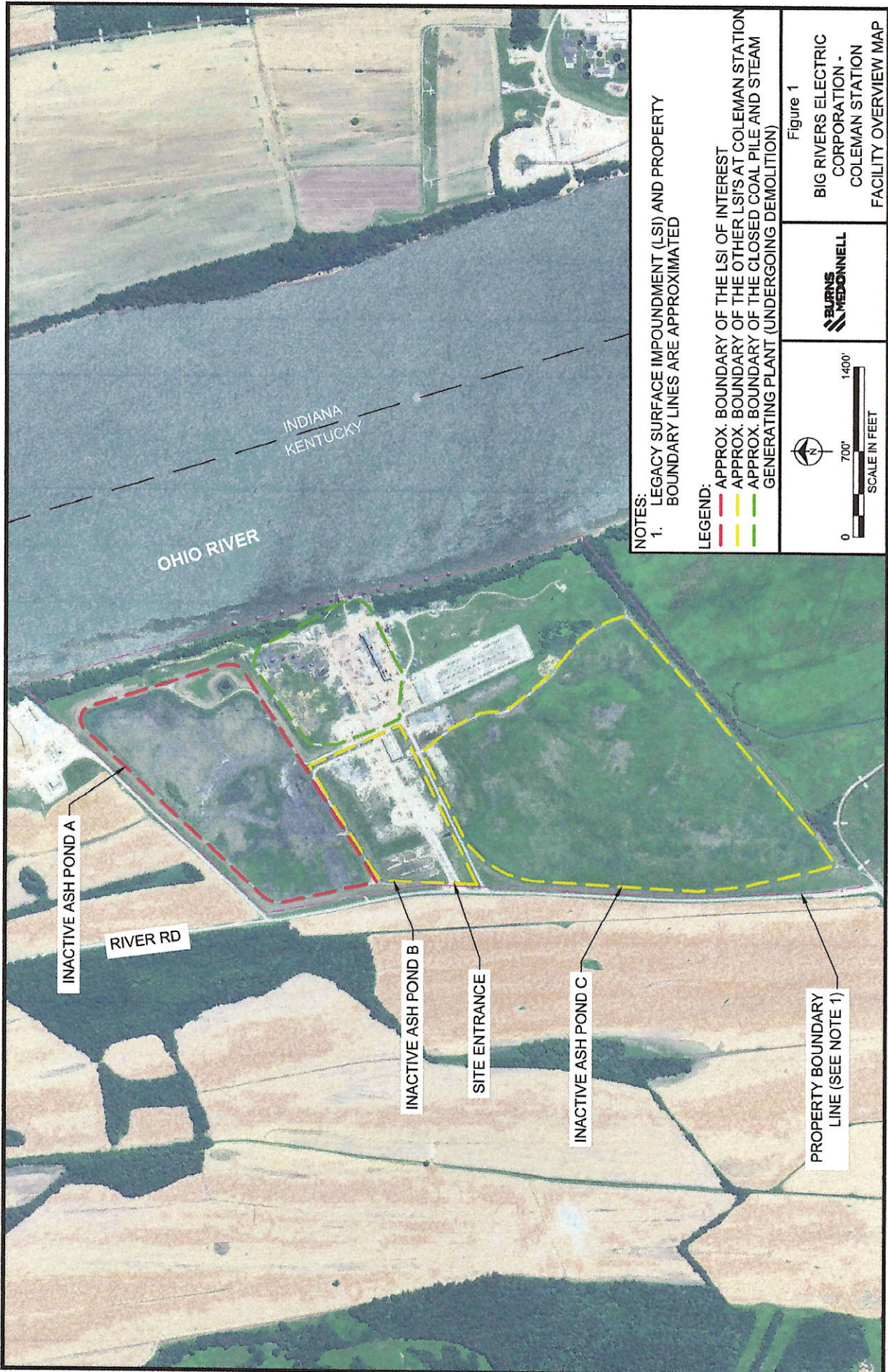
- The state identification number associated with this LSI is not assigned.

40 CFR §257.100(f)(1)(i)(E): “A description of the current site conditions, including the current use of the inactive facility.”

Ash Pond A is inactive and does not support operational activities at BREC. Ash Pond A is densely vegetated and does not have an engineered cover system. In a previous report⁴, the LSI was estimated to have a surface area of approximately 48 acres. To the east, the LSI is bordered by the Ohio River. Ash Pond B and former Coleman Station Steam Generating Facility are located to the south of the LSI. River Road borders the LSI to the west, and a property boundary runs along the LSI northern edge. An former metal cleaning waste pond (inactive) is located within the LSI boundary.

⁴ Assessment of Dam Safety - Coal Combustion Surface Impoundments (Task 3) Final Report - Big Rivers Electric Cooperative, Coleman Generating Station; CHA, Albany, NY; Lockheed Martin, Edison, NJ; EPA, Washington, DC February 19, 2010

APPENDIX A - FIGURES



NOTES:
 1. LEGACY SURFACE IMPOUNDMENT (LSI) AND PROPERTY BOUNDARY LINES ARE APPROXIMATED

LEGEND:
 - - - - - APPROX. BOUNDARY OF THE LSI OF INTEREST
 - - - - - APPROX. BOUNDARY OF THE OTHER LSI'S AT COLEMAN STATION
 - - - - - APPROX. BOUNDARY OF THE CLOSED COAL PILE AND STEAM GENERATING PLANT (UNDERGOING DEMOLITION)

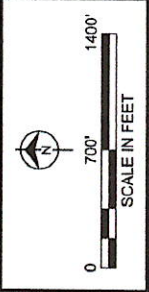
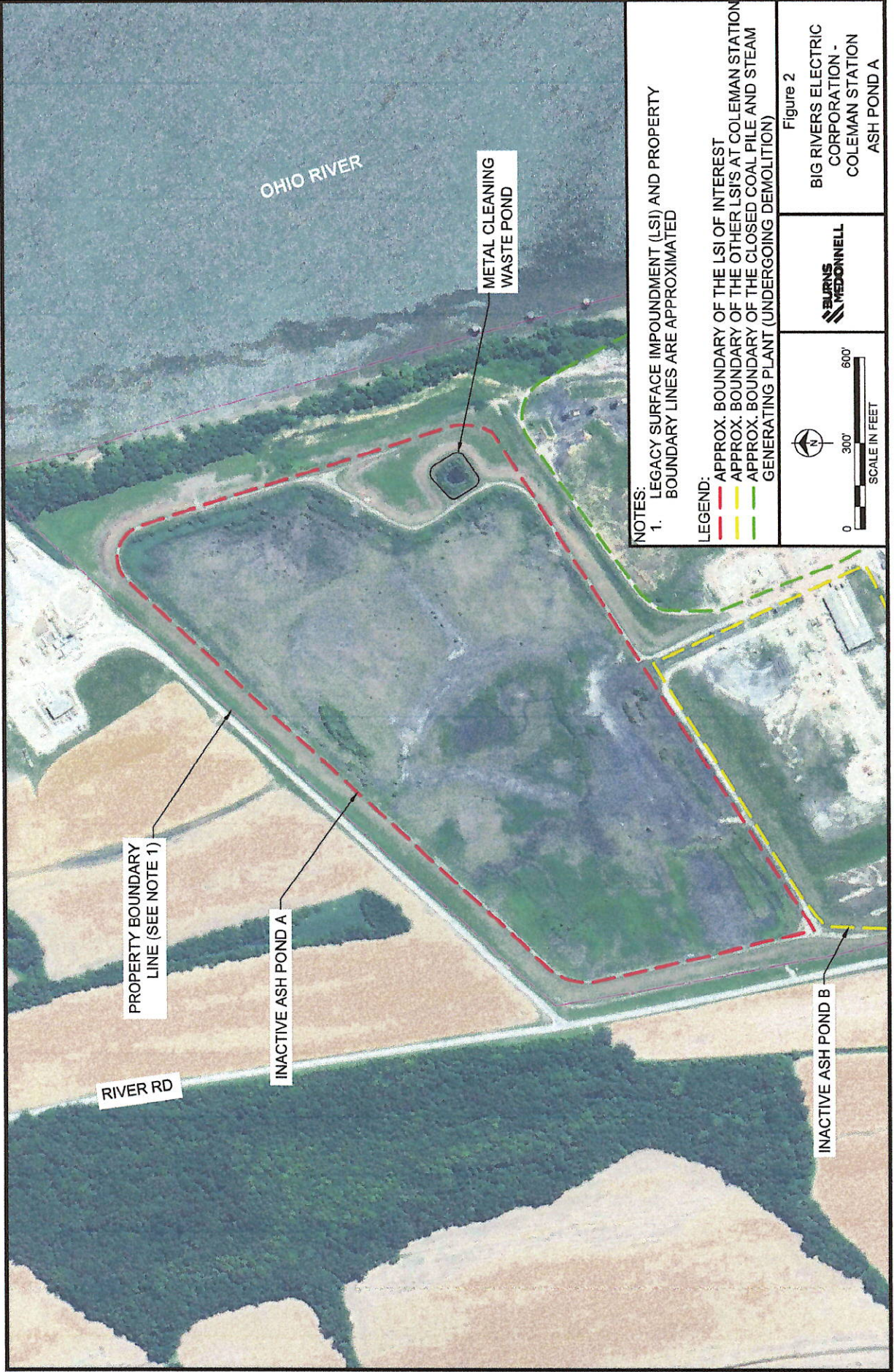


Figure 1

BIG RIVERS ELECTRIC CORPORATION - COLEMAN STATION FACILITY OVERVIEW MAP





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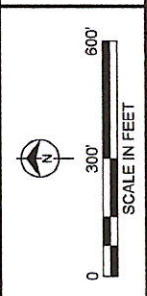
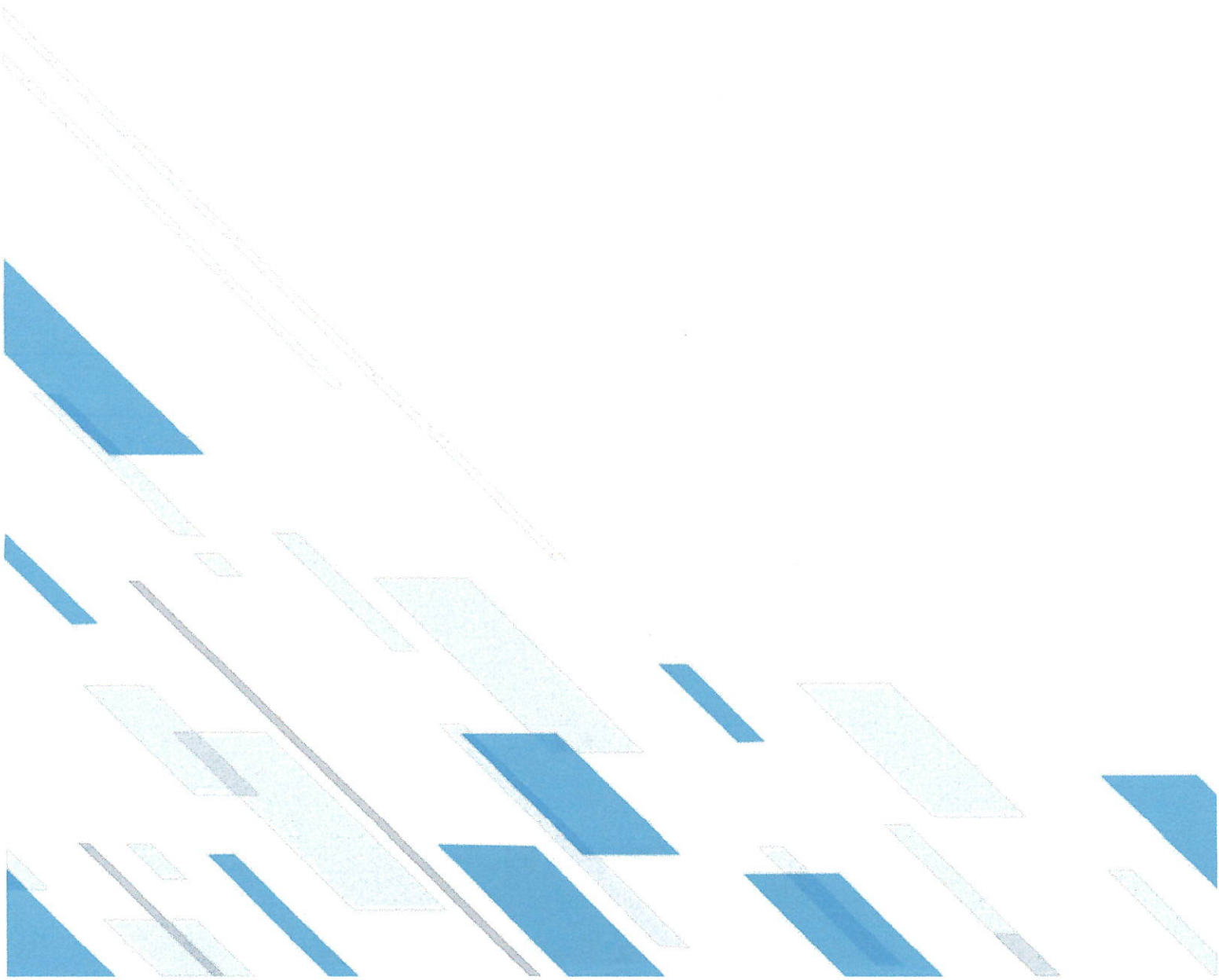


Figure 2
 BIG RIVERS ELECTRIC CORPORATION - COLEMAN STATION ASH POND A



BURNS  **MCDONNELL.**



BIG RIVERS ELECTRIC CORPORATION

LEGACY SURFACE IMPOUNDMENT APPLICABILITY REPORT

KENNETH C COLEMAN GENERATING STATION

– ASH POND B

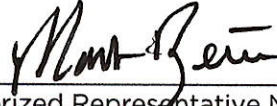
AGENCY INTEREST NO. 1640

REVISION 0

NOVEMBER 8, 2024

Owner/Operator Certification

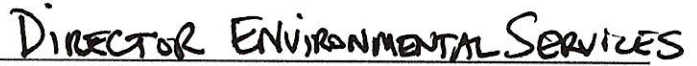
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Authorized Representative Name (signature)



Authorized Representative Name (printed)



Title

Date: 11-08-2024

Introduction

On May 8, 2024, the United States Environmental Protection Agency (EPA) issued the Final Legacy Coal Combustion Residual (CCR) Surface Impoundment Rule¹ (Legacy Rule) that established regulations for CCR surface impoundments at inactive facilities (legacy surface impoundments). The Legacy Rule requires that legacy surface impoundments (LSI) that no longer received CCR but contained both CCR and liquid on or after October 19, 2015 and that is located at an inactive electric utility, generally comply with the EPA requirements for inactive CCR surface impoundments in accordance with Title 40 of the Code of Federal Regulations (CFR), Part 257 Subpart D Hazardous and Solid Waste Management System; Disposal of CCR from Electric Utilities (EPA, 2015). The effective date of the Legacy Rule is November 8, 2024. An LSI Applicability Report in accordance with 40 CFR §257.100(f)(1) is required for each LSI by the Legacy Rule effective date.

Big Rivers Electric Corporation (BREC) has contracted with Burns & McDonnell Engineering, Inc. (Burns & McDonnell) to develop an Applicability Report for Ash Pond B at its Former Kenneth C Coleman Generating Station (Coleman Station), a former coal-fired power plant, or inactive electric utility or facility, that is located in Hawesville, Kentucky. This Applicability Report contains the information required as outlined in 40 CFR §257.100(f)(1).

This Applicability Report was developed using information provided by BREC, publicly available online information, and aerial imagery of the Coleman Station.

¹ Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Legacy CCR Surface Impoundments; 40 CFR 257, Federal Register Vol 89, May 8, 2024

Legacy Surface Impoundment Evaluation

The following regulatory requirements for this report, as outlined in 40 CFR §257.100(f)(1), are each stated with the required information that must be reported for Ash Pond B.

40 CFR §257.100(f)(1)(i)(A): “The name and address of the person(s) owning and operating the legacy CCR surface impoundment with their business phone number and email address.”

- Name of Owner and Operator

Big Rivers Electric Corporation
710 West 2nd Street
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- Authorized Representative

Mark Bertram
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270-844-5008

40 CFR §257.100(f)(1)(i)(B): “The name associated with the legacy CCR surface impoundment.”

- Kenneth C Coleman Station – Ash Pond B
 - Also referred to in some documents as “North Ash Pond²”, “Ash Pond Reclaimed for Beneficial Reuse”, or “Beneficial Reuse Ash Pond³”

² Fugitive Dust Control Plan for Coal Combustion Residuals – Big Rivers Electric Corporation – Kenneth C. Coleman Generating Station; Associated Engineers, Inc; August 25, 2015

³ Assessment of Dam Safety - Coal Combustion Surface Impoundments (Task 3) Final Report - Big Rivers Electric Cooperative, Coleman Generating Station; CHA, Albany, NY; Lockheed Martin, Edison, NJ; EPA, Washington, DC February 19, 2010

40 CFR §257.100(f)(1)(i)(C): “Information to identify the legacy CCR surface impoundment, including a figure of the facility and where the unit is located at the facility, facility address, and the latitude and longitude of the facility.”

- 4982 River Road, Hawesville, KY 42348
- Latitude (decimal degrees) 37.962198°
- Longitude (decimal degrees) -86.795762°
- Location maps are depicted in Appendix A.

40 CFR §257.100(f)(1)(i)(D): “The identification number of the legacy CCR surface impoundment if one has been assigned by the state.”

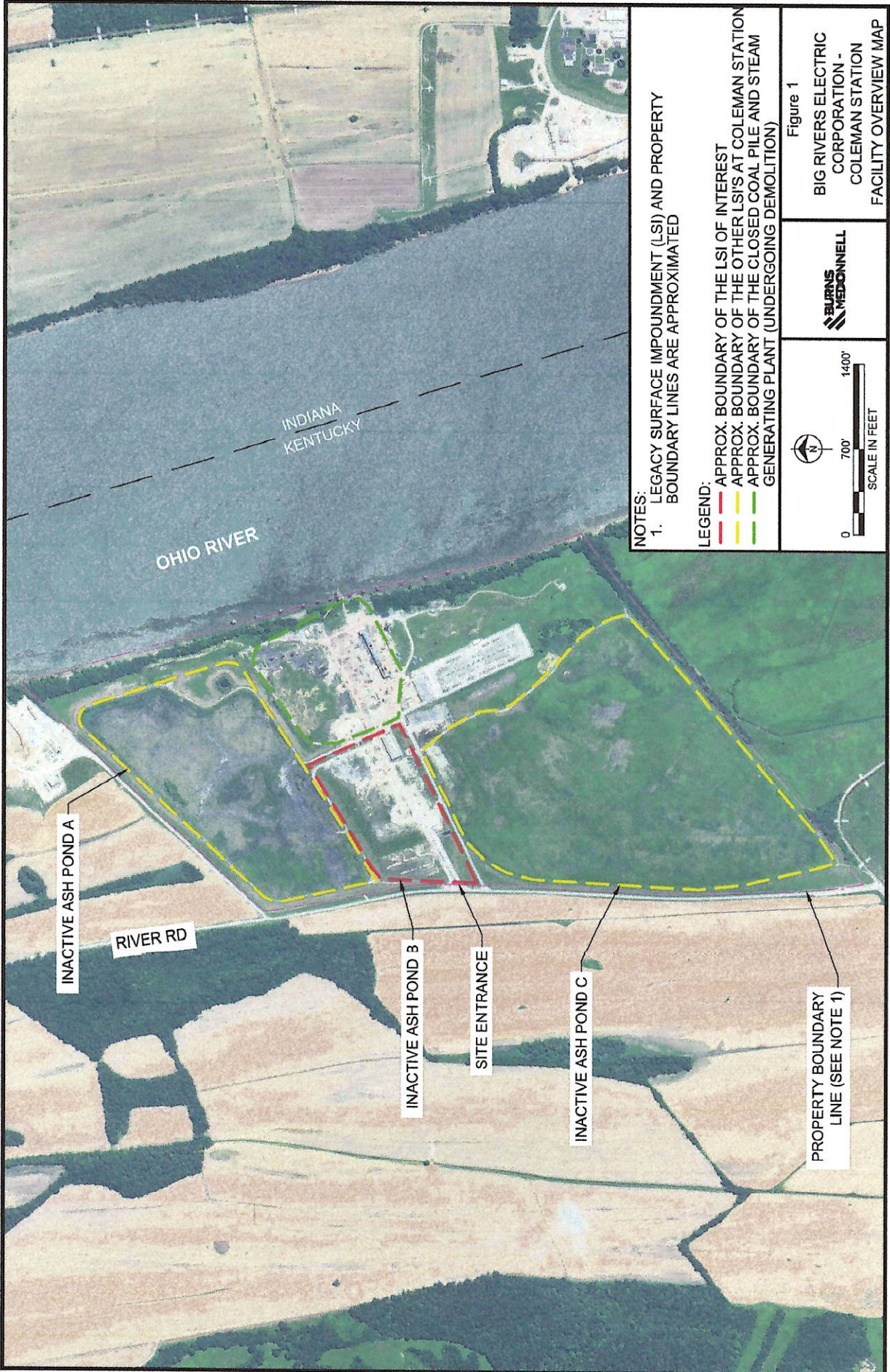
- The state identification number associated with this LSI is not assigned.

40 CFR §257.100(f)(1)(i)(E): “A description of the current site conditions, including the current use of the inactive facility.”

Ash Pond B is currently inactive. In 2002, the LSI was closed, regraded, and reclaimed for use as external storage, construction laydown area, and parking. Ash Pond B has a soil cover, and in several places, asphalt has been placed on top of the soil cover. Based on previous reports⁴, the LSI had a surface area of approximately 21 acres. To the south, the LSI is bordered by a paved road. The former Coleman Station Steam Generating Facility is located to the east of the LSI. To the north and west of the LSI, a gravel access road runs along the top of Ash Pond B’s berm.

⁴ Assessment of Dam Safety - Coal Combustion Surface Impoundments (Task 3) Final Report - Big Rivers Electric Cooperative, Coleman Generating Station; CHA, Albany, NY; Lockheed Martin, Edison, NJ; EPA, Washington, DC February 19, 2010

APPENDIX A - FIGURES



NOTES:
 1. LEGACY SURFACE IMPOUNDMENT (LSI) AND PROPERTY BOUNDARY LINES ARE APPROXIMATED

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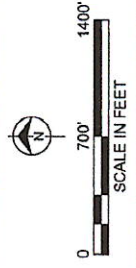


Figure 1

PROPERTY BOUNDARY LINE (SEE NOTE 1)

INACTIVE ASH POND C

SITE ENTRANCE

INACTIVE ASH POND B

RIVER RD

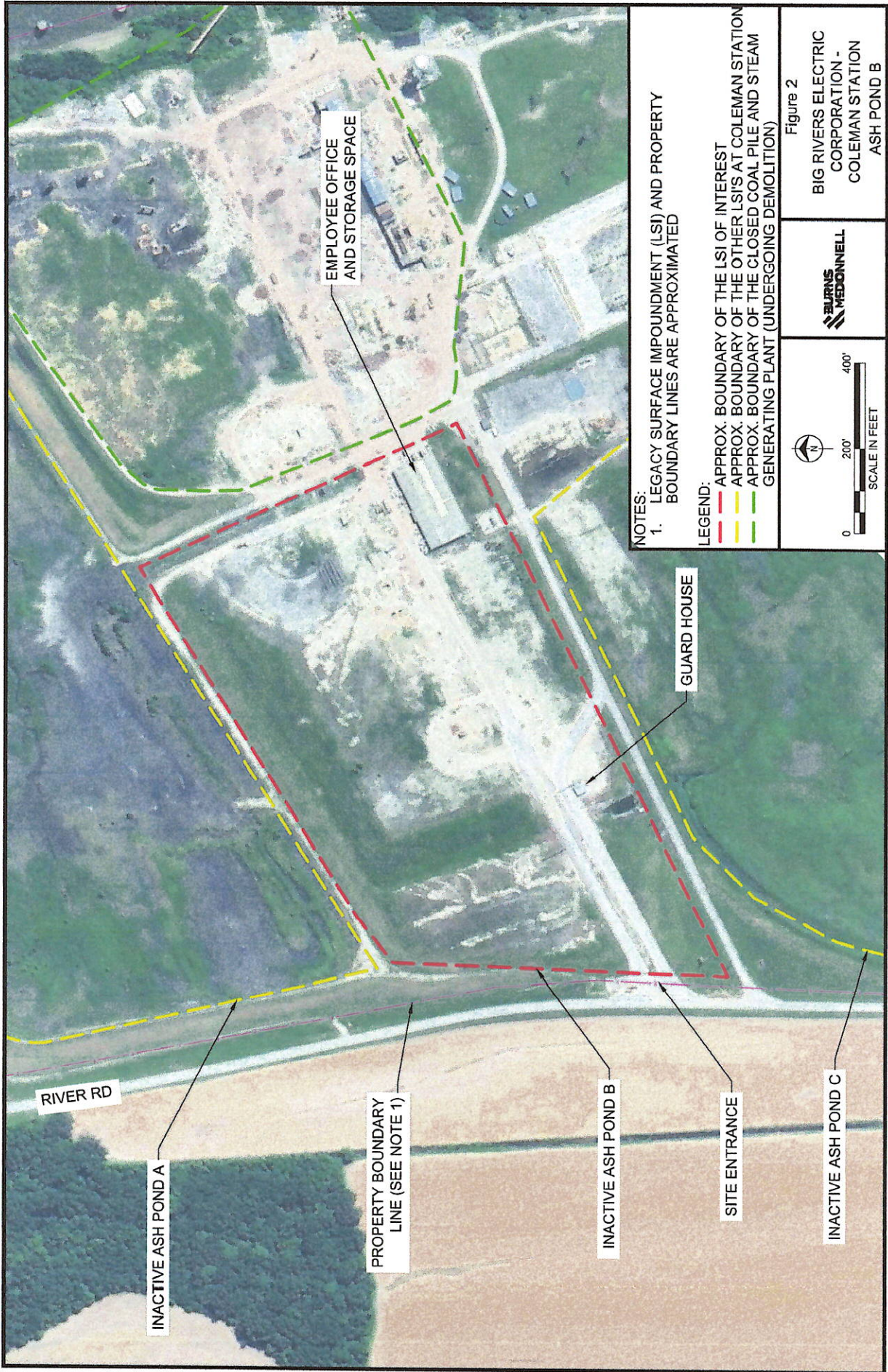
INACTIVE ASH POND A

OHIO RIVER

INDIANA
 KENTUCKY



BIG RIVERS ELECTRIC CORPORATION - COLEMAN STATION FACILITY OVERVIEW MAP



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Figure 2

BURNS & MCDONNELL

BIG RIVERS ELECTRIC CORPORATION - COLEMAN STATION - ASH POND B

0 200' 400'
SCALE IN FEET

BURNS  **MCDONNELL.**



BIG RIVERS ELECTRIC CORPORATION

LEGACY SURFACE IMPOUNDMENT APPLICABILITY REPORT

KENNETH C COLEMAN GENERATING STATION

– ASH POND C

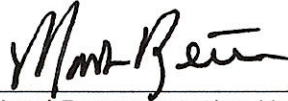
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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Authorized Representative Name (signature)



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Title

Date: 11-08-2024

Introduction

On May 8, 2024, the United States Environmental Protection Agency (EPA) issued the Final Legacy Coal Combustion Residual (CCR) Surface Impoundment Rule¹ (Legacy Rule) that established regulations for CCR surface impoundments at inactive facilities (legacy surface impoundments). The Legacy Rule requires that legacy surface impoundments (LSI) that no longer received CCR but contained both CCR and liquid on or after October 19, 2015 and that is located at an inactive electric utility, generally comply with the EPA requirements for inactive CCR surface impoundments in accordance with Title 40 of the Code of Federal Regulations (CFR), Part 257 Subpart D Hazardous and Solid Waste Management System; Disposal of CCR from Electric Utilities (EPA, 2015). The effective date of the Legacy Rule is November 8, 2024. An LSI Applicability Report in accordance with 40 CFR §257.100(f)(1) is required for each LSI by the Legacy Rule effective date.

Big Rivers Electric Corporation (BREC) has contracted with Burns & McDonnell Engineering, Inc. (Burns & McDonnell) to develop an Applicability Report for Ash Pond C at its Former Kenneth C Coleman Generating Station (Coleman Station), a former coal-fired power plant, or inactive electric utility or facility, that is located in Hawesville, Kentucky. This Applicability Report contains the information required as outlined in 40 CFR §257.100(f)(1).

This Applicability Report was developed using information provided by BREC, publicly available online information, and aerial imagery of Coleman Station.

¹ Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Legacy CCR Surface Impoundments; 40 CFR 257, Federal Register Vol 89, May 8, 2024

Legacy Surface Impoundment Evaluation

The following regulatory requirements for this report, as outlined in 40 CFR §257.100(f)(1), are each stated with the required information that must be reported for Ash Pond C.

40 CFR §257.100(f)(1)(i)(A): “The name and address of the person(s) owning and operating the legacy CCR surface impoundment with their business phone number and email address.”

- Name of Owner and Operator

Big Rivers Electric Corporation
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- Authorized Representative

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- Facility Contact

Diana R Merritt
Performance/Environmental Specialist
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Centertown, KY 42328
diana.merritt@bigrivers.com
270-844-5008

40 CFR §257.100(f)(1)(i)(B): “The name associated with the legacy CCR surface impoundment.”

- Kenneth C Coleman Station - Ash Pond C
 - Also referred to in some documents as the South Ash Pond²

40 CFR §257.100(f)(1)(i)(C): “Information to identify the legacy CCR surface impoundment, including a figure of the facility and where the unit is located at the facility, facility address, and the latitude and longitude of the facility.”

- 4982 River Road, Hawesville, KY 42348
- Latitude (decimal degrees) 37.957727°
- Longitude (decimal degrees) -86.794400°

² Fugitive Dust Control Plan for Coal Combustion Residuals – Big Rivers Electric Corporation – Kenneth C. Coleman Generating Station; Associated Engineers, Inc; August 25, 2015

- Location maps are depicted in Appendix A.

40 CFR §257.100(f)(1)(i)(D): “The identification number of the legacy CCR surface impoundment if one has been assigned by the state.”

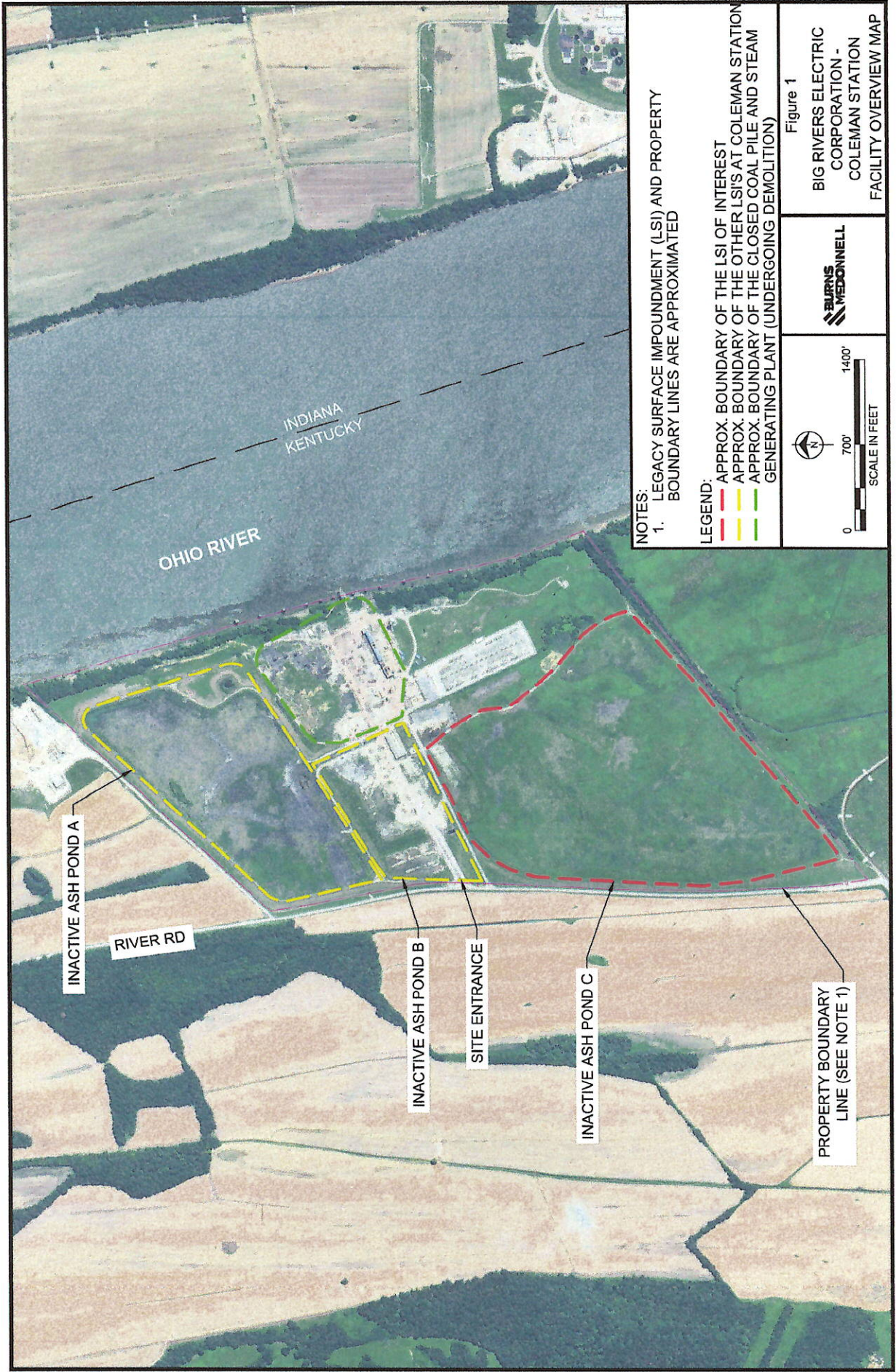
- The state identification number associated with this LSI is not assigned.

40 CFR §257.100(f)(1)(i)(E): “A description of the current site conditions, including the current use of the inactive facility.”

Ash Pond C is inactive and does not support BREC operations. Ash Pond C is densely vegetated and does not have an engineered cover system. In previous reports³, the LSI was estimated to cover approximately 90 acres. Several overhead powerlines connecting to the switchyard are on top of the LSI. To the east and south, Ash Pond C is bordered by an unpaved gravel access road. To the west, railroad tracks that previously supported operations at the facility run along the top of the LSI’s western berm. A paved road runs along the edge of the LSI to the north. River Road borders the LSI to the west, and the property boundary runs along the LSI western and southern edges.

³ Assessment of Dam Safety - Coal Combustion Surface Impoundments (Task 3) Final Report - Big Rivers Electric Cooperative, Coleman Generating Station; CHA, Albany, NY; Lockheed Martin, Edison, NJ; EPA, Washington, DC February 19, 2010

APPENDIX A - FIGURES



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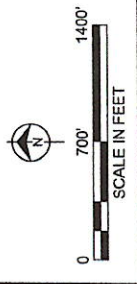
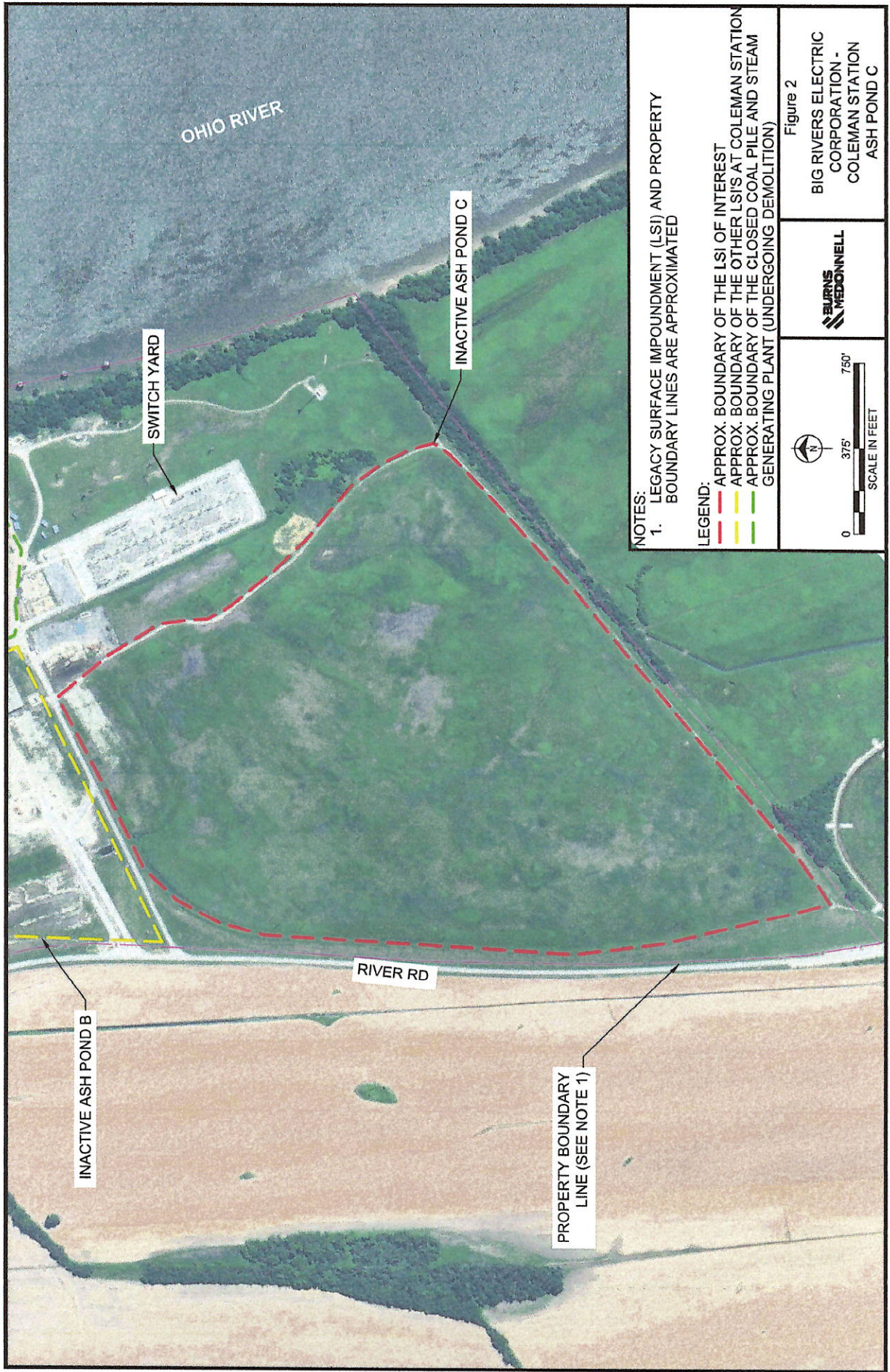


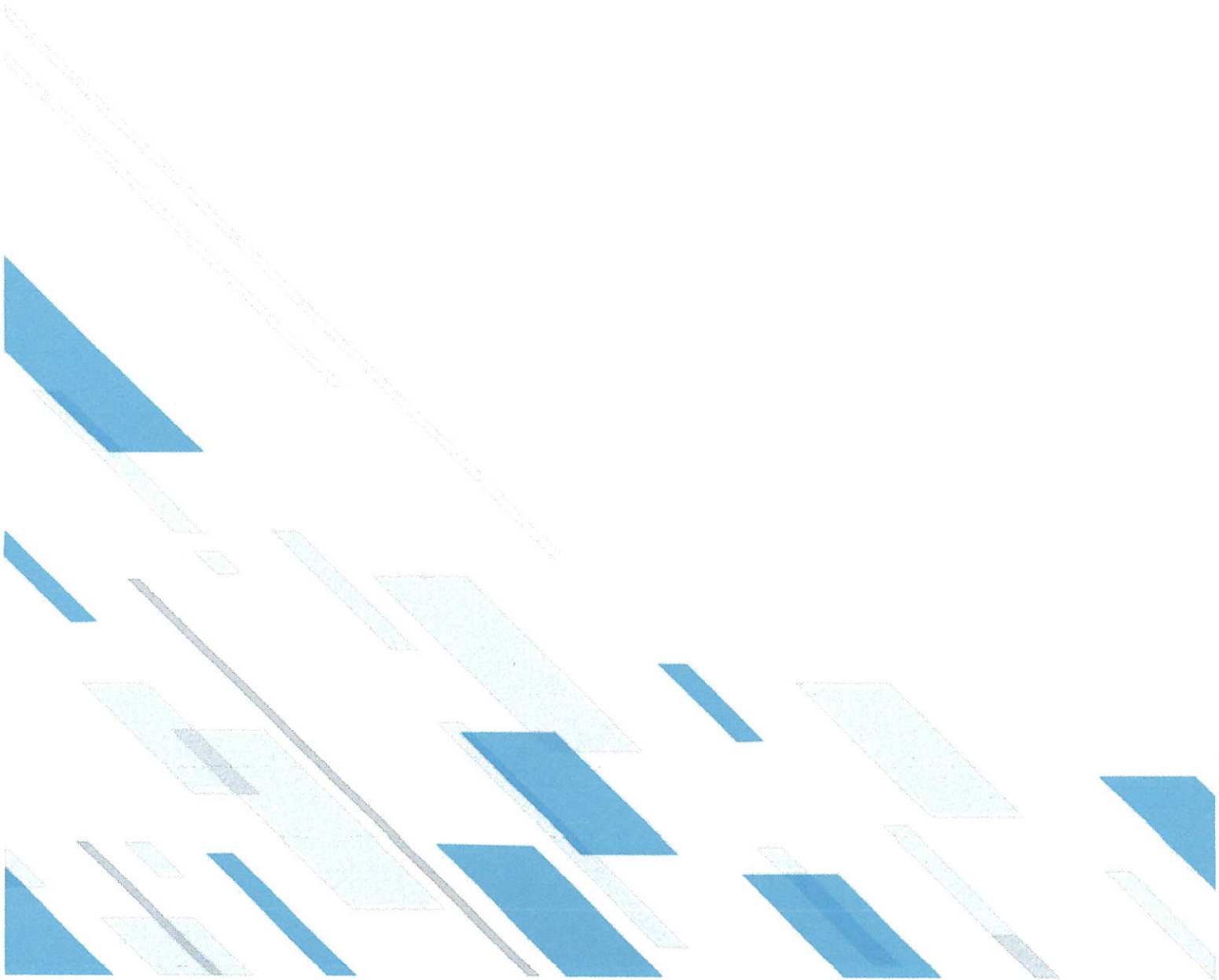
Figure 1

BIG RIVERS ELECTRIC CORPORATION - COLEMAN STATION FACILITY OVERVIEW MAP





BURNS  **MCDONNELL.**



BIG RIVERS ELECTRIC CORPORATION

LEGACY SURFACE IMPOUNDMENT APPLICABILITY REPORT

KENNETH C COLEMAN GENERATING STATION
– ASH POND D
AGENCY INTEREST NO. 1640

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Authorized Representative Name (signature)

MARK BERTAM

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DIRECTOR ENVIRONMENTAL SERVICES

Title

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Legacy Surface Impoundment Evaluation

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- Name of Owner and Operator

Big Rivers Electric Corporation
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40 CFR §257.100(f)(1)(i)(B): “The name associated with the legacy CCR surface impoundment.”

- Kenneth C Coleman Station – Ash Pond D
 - Also referred to in some documents as Wastewater Treatment Facility², New Ash Pond³, or the West Ash Pond⁴

² Fugitive Dust Control Plan for Coal Combustion Residuals – Big Rivers Electric Corporation – Kenneth C. Coleman Generating Station; Associated Engineers, Inc; August 25, 2015

³ Assessment of Dam Safety - Coal Combustion Surface Impoundments (Task 3) Final Report - Big Rivers Electric Cooperative, Coleman Generating Station; CHA, Albany, NY; Lockheed Martin, Edison, NJ; EPA, Washington, DC February 19, 2010

⁴ Coleman Station West Ash Pond Dam; National Inventory of Dams – United States Army Core of Engineers; April 9, 2021

40 CFR §257.100(f)(1)(i)(C): “Information to identify the legacy CCR surface impoundment, including a figure of the facility and where the unit is located at the facility, facility address, and the latitude and longitude of the facility.”

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- Location maps are depicted in Appendix A.

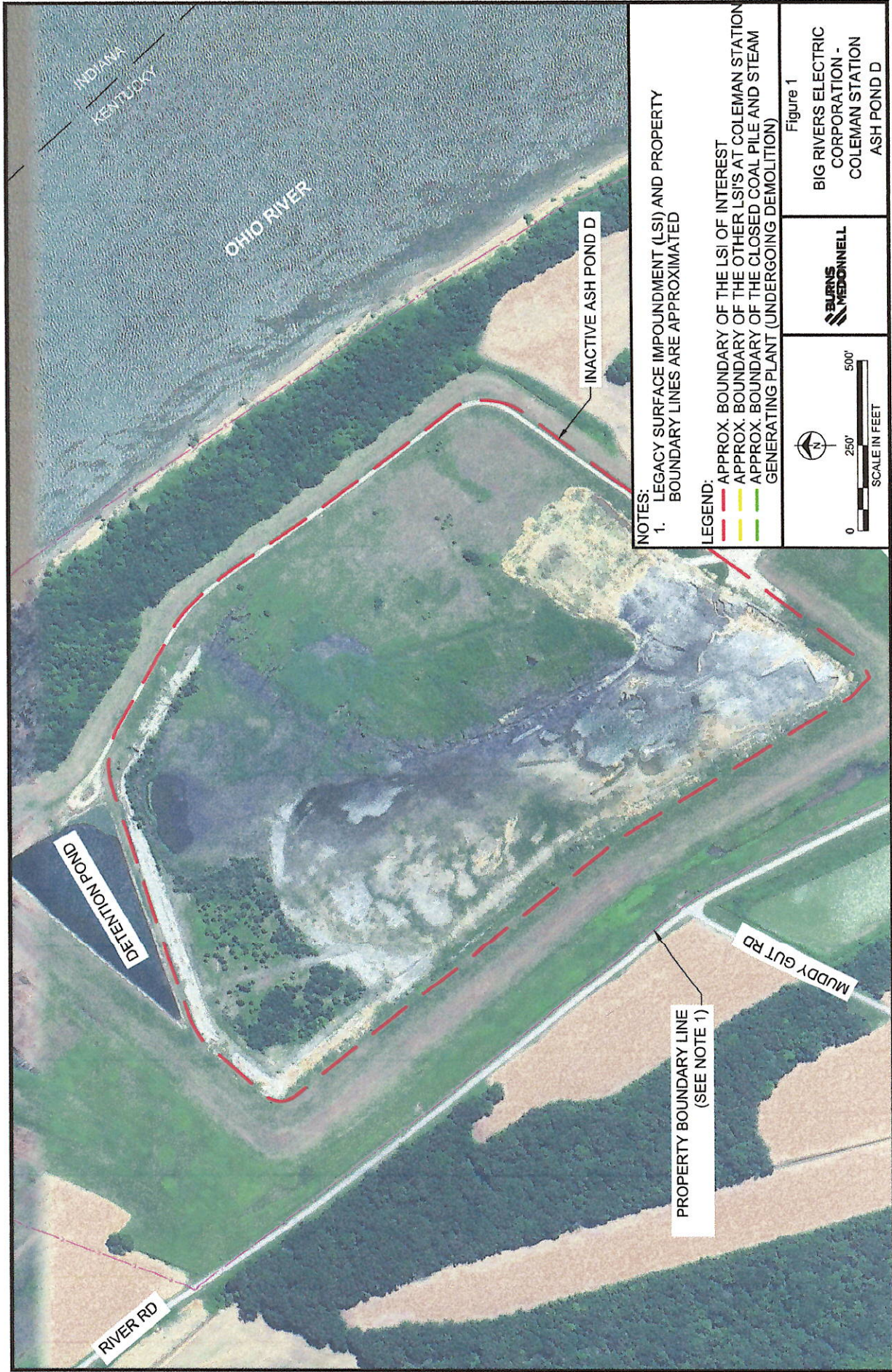
40 CFR §257.100(f)(1)(i)(D): “The identification number of the legacy CCR surface impoundment if one has been assigned by the state.”

- The state identification number associated with this LSI is not assigned.

40 CFR §257.100(f)(1)(i)(E): “A description of the current site conditions, including the current use of the inactive facility.”

Ash Pond D is inactive and does not support operational activities at BREC. The eastern part of Ash Pond D has a soil cover and is densely vegetated. The gypsum previously stored in the western portion of Ash Pond D was recently excavated for resale. Hence, the western portion of the LSI sits at a lower elevation than the eastern portion of the LSI. The LSI's western section is sparsely vegetated. An unpaved access road located on top of the LSI's berm loops around the border of Ash Pond D. A detention pond is situated north of the LSI, and the Ohio River runs along the northeast side of the LSI.

APPENDIX A - FIGURE



BURNS  **MCDONNELL**

