



Reid/HMP&L CCR Surface Impoundment

Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule CCR Impoundment 2025 Annual Inspection Report

December 30, 2025

Prepared By:



Project ID: 25-0131

**Big Rivers Electric Corporation
Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule
CCR Impoundment 2024 Annual Inspection Report**

CCR Surface Impoundment Information

Name: Reid/HMP&L CCR Surface Impoundment
Operator: Sebree Generating Station
Address: 9000 Highway 2096
Robards, Kentucky 42452

Qualified Professional Engineer

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

Regulatory Applicability

Per 40 CFR §257.83(b), annual inspections by a qualified professional engineer must ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards.

Annual inspections of any CCR surface impoundment must include, at a minimum: (1) a review of all previously generated information regarding the status and condition of the CCR unit, including, but not limited to, all operating records and publicly accessible internet site entries, design and construction drawings and other documentation; (2) a thorough visual inspection to identify indications of distress, unusual or adverse behavior, or malfunction of the CCR unit and appurtenant structures; and (3) a thorough visual inspection of hydraulic structures underlying the base of the CCR unit and passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation.

Additionally, following each annual inspection, the qualified professional engineer must prepare an inspection report which documents the following: (1) any changes in geometry of the impounding structure since the previous annual inspection; (2) the location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection; (3) the approximate maximum, minimum, and present depth and elevation of the impounded water and CCR since the previous annual inspection; (4) the storage capacity of the impounding structure at the time of inspection; (5) the approximate volume of the impounded water and CCR at the time of the inspection; (6) any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the

CCR unit and appurtenant structures; and (7) any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.

Inspection Description

This is the eleventh annual inspection report for the Reid/HMP&L CCR Surface Impoundment pursuant to the Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule which became effective April 17, 2015. The inspection was conducted on November 3, 2025, by David A. Lamb, P.E. of Associated Engineers, Inc. of Madisonville, Kentucky. Weekly (7-day) inspections conducted by Big Rivers Electric Corporation are kept in the facility operating record.


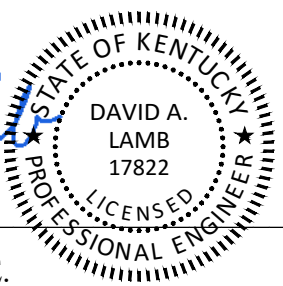
This inspection was to confirm that in 2024 Big Rivers Electric Corporation completed executing implementation of the closure plan for this facility. **The Division of Waste Management performed an inspection on September 11, 2024, Woody Higginbotham, P.E. of DWM confirmed that the pond had achieved closure by removal of all CCR material.**

On October 29, 2024, Big Rivers Electric Corporation received final acceptance of their Clean Closure of the facility in a letter signed by Danny Anderson, P.E. Manager, Solid Waste Branch. This letter is attached to this certification for reference.

The inspection consisted of a visual assessment of the former CCR surface impoundment. Water was present at the time of the inspection due to rainfall.

Professional Engineer Certification [Per 40 CFR §257.83(b)]
Reid/HMP&L CCR Surface Impoundment
Annual Inspections by a Qualified Professional Engineer

I hereby certify that myself or an agent under my review has prepared this Annual Inspection Report (Report), 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 Report has been prepared in accordance with good engineering practices and meets the intent of 40 CFR Part 257.83(b). To the best of my knowledge and belief, the information contained in this Report is true, complete, and accurate.

David A. Lamb, P.E.

State of Kentucky License No. 17822

Date: December 30, 2025



Andy Beshear
GOVERNOR

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

300 Sower Boulevard
Frankfort, Kentucky 40601
Phone: (502) 564-2150
Fax: 502-564-4245

Rebecca Goodman
SECRETARY

Anthony R. Hatton
COMMISSIONER

October 29, 2024

Ms. Heather Todd
Big Rivers Electric Corporation
9000 KY 2096
Robards, Kentucky 42452

Sent via e-mail only

RE: Acceptance of Clean Closure Construction Progress Report (CPR)
Approval of Post-Closure Plan
Big Rivers Electric Corp – Reid HMP&L Station 2 – Green Station
Agency Interest No. 4196
Application I.D. No. APE20240006
Webster County

Dear Ms. Todd,

The Kentucky Division of Waste Management (DWM), Solid Waste Branch has completed review of the above-referenced clean closure CPR and post-closure plan, received on October 8, 2024. The CPR, certified by Sargent & Lundy, documents the closure of the Henderson Municipal Power and Light Station Pond (CCR Pond 2). On September 11, 2024, Woody Higginbotham, P.E., of DWM conducted a final inspection. DWM hereby accepts the report and approves the post-closure plan.

Enclosed is a copy of the facility permit. To receive an electronic copy of the approved application, please utilize Kentucky Department for Environmental Protection's eSearch tool via <https://dep.gateway.ky.gov/eSearch/AgencyInterest> on or around November 12, 2024.

Be advised that if you consider yourself aggrieved by the issuance of this permit, you have the right, pursuant to KRS 224.10-420(2) to file a petition demanding a hearing with the Cabinet.

This right shall be limited to a period of thirty (30) days from issuance of this permit. The petition should be filed with The Office of Administrative Hearings located at 211 Sower Blvd., Frankfort, KY 40601. See <https://eec.ky.gov/About/Administrative-Hearings/Pages/default.aspx> for additional information. If you need additional information, please contact Woody Higginbotham, P.E., at Woody.Higginbotham@ky.gov or 502-782-0147.

Sincerely,



Signed by: Danny Anderson

Danny Anderson, P.E.
Manager, Solid Waste Branch

Enclosure
DA/cwh/oy/lkg

c: Ms. Heather Todd via e-mail: heather.todd@bigrivers.com
Mr. Mark Bertram via e-mail: mark.bertram@bigrivers.com

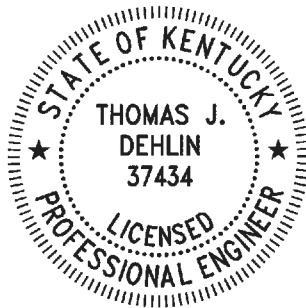
REID/HMP&L CCR SURFACE IMPOUNDMENT CLOSURE CERTIFICATION

In accordance with 40 CFR 257.102(f)(3) and 401 KAR 46:110 Section 9, I certify that the Reid/HMP&L CCR Surface Impoundment has been closed in accordance with:

- The closure plan specified in 40 CFR 257.102(b) and 401 KAR 46:110 Section 9 ("Reid/HMP&L CCR Surface Impoundment Closure Plan," Rev. 2, dated July 24, 2023).
- The requirements of 40 CFR 257.102, as revised and republished by U.S. Environmental Protection Agency Final Rule, "Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities; Legacy CCR Surface Impoundments" (89 FR 38950).
- The requirements of 401 KAR 46:110 Section 9, which incorporates the requirements of 40 CFR 257.102 by reference.

Certified By: Thomas J. Dehlin Date: September 30, 2024

Seal:



Digitally signed by
Thomas Dehlin
Date: 2024.09.30
06:37:15-05'00'



Green CCR Surface Impoundment

Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule CCR Impoundment 2025 Annual Inspection Report

December 30, 2025

Prepared By:



Project ID: 25-0131

**Big Rivers Electric Corporation
Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule
CCR Impoundment 2025 Annual Inspection Report**

CCR Surface Impoundment Information

Name: Green CCR Surface Impoundment (CCR Pond 1)
Operator: Sebree Generating Station
Address: 9000 Highway 2096
Robards, Kentucky 42452

Qualified Professional Engineer

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

Regulatory Applicability

Per 40 CFR §257.83(b), annual inspections by a qualified professional engineer must ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards.

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Additionally, following each annual inspection, the qualified professional engineer must prepare an inspection report which documents the following: (1) any changes in geometry of the impounding structure since the previous annual inspection; (2) the location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection; (3) the approximate maximum, minimum, and present depth and elevation of the impounded water and CCR since the previous annual inspection; (4) the storage capacity of the impounding structure at the time of inspection; (5) the approximate volume of the impounded water and CCR at the time of the inspection; (6) any

appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit and appurtenant structures; and (7) any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.

Inspection Description

This is the eleventh and final annual inspection report for the Green CCR Surface Impoundment pursuant to the Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule which became effective April 17, 2015. The inspection was conducted on November 3, 2025, by David A. Lamb, P.E. of Associated Engineers, Inc. of Madisonville, Kentucky. Weekly (7-day) inspections conducted by Big Rivers Electric Corporation for previous years are kept in the facility operating record.

This inspection was to confirm that in 2024 Big Rivers Electric Corporation completed executing implementation of the closure plan for this facility. **The Division of Waste Management performed an inspection on August 7, 2024, Robert M. Hatfield, P.E. of DWM confirmed that the pond had achieved closure by removal of all CCR material.**

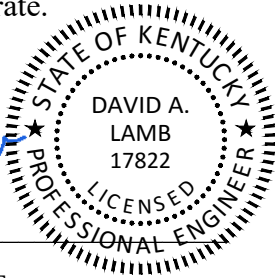
On March 27, 2025, Big Rivers Electric Corporation received final acceptance of their Clean Closure of the facility in a letter signed by Danny Anderson, P.E. Manager, Solid Waste Branch. This letter is attached to this certification for reference.

The inspection consisted of a visual assessment of the former CCR surface impoundment. Water was present at the time of the inspection due to rainfall.

**Professional Engineer Certification [Per 40 CFR §257.83(b)]
Green CCR Surface Impoundment
Annual Inspections by a Qualified Professional Engineer**

I hereby certify that myself or an agent under my review has prepared this Annual Inspection Report (Report), 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 Report has been prepared in accordance with good engineering practices and meets the intent of 40 CFR Part 257.83(b). To the best of my knowledge and belief, the information contained in this Report is true, complete, and accurate.





David A. Lamb, P.E.

State of Kentucky License No. 17822

Date: December 30, 2025



Andy Beshear
GOVERNOR

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

300 Sower Boulevard
Frankfort, Kentucky 40601
Phone: (502) 564-2150
Fax: 502-564-4245

Rebecca Goodman
SECRETARY

Anthony R. Hatton
COMMISSIONER

March 27, 2025

Ms. Heather Todd
Big Rivers Electric Corporation
9000 KY 2096
Robards, Kentucky 42452

Sent via e-mail only

RE: Acceptance of Clean Closure Construction Progress Report (CPR)
Big Rivers Electric Corp – Reid HMP&L Station 2 – Green Station
Agency Interest No. 4196
Application I.D. No. APE20240008
Webster County

Dear Ms. Todd,

The Kentucky Division of Waste Management (DWM), Solid Waste Branch has completed review of the above-referenced clean closure CPR, received on March 7, 2025. The CPR, certified by Burns & McDonnell, documents the closure of the Green Station Ash Pond (CCR Pond 1). On August 7, 2024, Robert M. Hatfield, P.E., of DWM conducted a final inspection. DWM hereby accepts the report.

Enclosed is a copy of the facility permit. To receive an electronic copy of the approved application, please utilize Kentucky Department for Environmental Protection's eSearch tool via <https://dep.gateway.ky.gov/eSearch/AgencyInterest> on or around April 10, 2025.

Be advised that if you consider yourself aggrieved by the issuance of this permit, you have the right, pursuant to KRS 224.10-420(2) to file a petition demanding a hearing with the Cabinet. This right shall be limited to a period of thirty (30) days from issuance of this permit. The petition should be filed with The Office of Administrative Hearings located at 211 Sower Blvd., Frankfort, KY 40601. See our website at <https://eec.ky.gov/About/Administrative-Hearings/Pages/default.aspx> for additional information. If you need additional information, please contact Woody Higginbotham, P.E., at Woody.Higginbotham@ky.gov or (502) 782-0147.

Sincerely,



Signed by: Danny Anderson

Danny Anderson, P.E.
Manager, Solid Waste Branch

DA/cwh/lkg/

c: Ms. Heather Todd via e-mail heather.todd@bigrivers.com
Mr. Mark Bertram via e-mail mark.bertram@bigrivers.com



Notification of Removal of CCR
Big Rivers Electric Corporation – Robert D. Green Generating Station
Green Ash Pond

I certify, as a Professional Engineer in the State of Kentucky, that the Green Ash Pond at Robert D. Green Generating Station was closed by removal of CCR, pursuant to the CCR removal requirements provided in 40 CFR 257.102(c). This notification does not include certification that groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to § 257.95(h).

The CCR removal activities were completed on August 06, 2024, in accordance with the following documents:

- Closure Plan, Rev. 3 dated June 20, 2022, that is posted on the Big Rivers Electrical Corporation public CCR website.
- Burns & McDonnell Construction Plans, originally dated October 17, 2022, and all revisions.
- Burns & McDonnell Technical Specification, originally dated April 17, 2022, and all revisions.

A handwritten signature in black ink, reading "Matthew D. Bleything". The signature is written in a cursive, flowing style.

Matthew D. Bleything, P.E. (KY #37673)

Date: 10/02/2024
