



Green CCR Landfill

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

CCR Landfill Information

Name: Green CCR Landfill
Operator: Sebree Generating Station
Address: 9000 Highway 2096
Robards, KY 42452

Qualified Professional Engineer

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

Regulatory Applicability

Per 40 CFR §257.84(b), annual inspections by a qualified professional engineer must ensure that the design, construction, operation, and maintenance of the CCR landfill is consistent with recognized and generally accepted good engineering standards.

Annual inspections of any CCR landfill must include, at a minimum: (1) a review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (e.g., the results of inspections by a qualified person, and results of previous annual inspections); and (2) a visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit.

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 structure since the previous annual inspection, (2) the approximate volume of CCR at the time of the inspection, (3) 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 (4) any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection.

Inspection Description

This is the eleventh annual inspection report for the Green CCR Landfill pursuant to the Disposal of Coal Combustion Residuals (CCR) from Electric Utilities Final Rule which became effective April 17, 2015. The 2025 inspection was concluded 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.

The inspection consisted of a visual assessment of the landfill and associated drainage control features; and began on the west side of the landfill adjacent to the vertical expansion combination wall (expansion wall). Evidence of minor seepage and slight ponding in a few isolated places along the toe of the wall approximately 1,400' north of the southwest end of the wall was observed. This condition was also observed in 2024. It appears this seepage was being managed by the subsurface drainage system along the toe of the wall. The subsurface drainage system includes a perforated subsurface pipe and trench filled with drainage medium to route the seepage underground to strategically placed pump stations surrounding the landfill. This subsurface drainage system is effectively managing seepage throughout the entire perimeter of the landfill except for a small section on the north end of the pile where the system was not required. In the areas where higher concentrations of moisture were previously present laterals and/or parallel subsurface draining structures were added to further reduce the presence and effects of seepage at the surface. At the time of the inspection virtually all the seepage from the landfill had been routed underground to the subsurface drainage system which flows to a series of pump stations. These pump stations are then pumped to the target manhole which is then pumped into the IW Pond where it is treated and discharged thru the former Green Ash Pond 009 discharge with the remainder of the contact water. There was a limited area on the southwest corner of the landfill which exhibited sparse vegetation and moderate surficial erosion. This area had been recently regraded and will be addressed as routine maintenance during spring seeding season. The drainage ditch adjacent to the west access road that parallels the expansion wall and reports to Pond 012 at the south end of the landfill has been regraded and repurposed to primarily convey non-contact surface run off. This ditch has areas of minor erosion and sparse vegetation in places due to prolonged periods of water in areas. It will be addressed as part of regular maintenance. There are areas of minor ponding on the west access road due to equipment traffic and road grading. It will be addressed as part of regular maintenance.

The inspection proceeded from the west side landfill to the inactive east side along the access road adjacent to the embankment toe. Proceeding north, the completion of the subsurface seepage collection system appears to have re-routed most if not all the seepage previously noted underground. The ditch along the east side of the landfill had recently been mowed with the exception of areas that were too wet to access at the time of mowing, and was functioning properly. There were two areas along the east toe which the subsurface drainage system was

had cleanouts that accessed the surface from excavated pits that were protected by berms and barriers. These areas had open excavations and lacked vegetative cover due to the construction activities, but seeding and final grading of the surface is scheduled for the spring per BREC. There were limited areas of surficial erosion in the soil cover at the north end. This will be addressed as a part of routine maintenance. The inspection of the lower slope continued to the north side of the inactive portion of the landfill where there was one area of stressed vegetation along the northeast toe which appears to be caused by equipment access conducting mowing construction activities associated with the adjacent road. This vegetation will be replaced as a part of ongoing construction activities.

After the inspection of the lower slope and toe the inspection proceeded to the first bench of the landfill on the west side which is comprised by the top of Poz-O-Tec fill placed against the expansion wall. This area had been recently graded to approximate 3H:1V slopes but had not yet been covered with soil. The area exhibited surficial erosion which will be addressed during cover and revegetation operations. The inspection then proceeded along the south, east, and north sides continuing bench by bench to the top of the landfill. The CCR fill material was firm and had been compacted in all permeant areas of placement. The landfill has been receiving CCR material from the closure of both the Green and Reid HMP&L ash ponds along with storm water pond cleanout operations. Material from the pond cleanout and closure is being placed and dried at various locations along the north end of landfill, primarily west of the roadway entering on the northeast corner of the facility. These activities are taking place from the top of the first bench to the top of the landfill. Temporary areas are being utilized to dry the material and it is then placed in compacted lifts in its final configuration. Along the west side of the landfill CCR material from the closure of the Reid HMP&L ash pond has been placed dried and then moved to its final location along the second and third benches of the west side of the landfill. At isolated locations there are temporary over steepened CCR piles that are being dried and manipulated. These piles pose no significant threat to the overall structural integrity of the landfill. As inspection activities proceeded upward areas of minor to erosion and sparse vegetation were noted. Particularly: The southwest corner of the fifth, sixth, and seventh bench. These areas have not received permanent vegetation at this time. The northeast corner of the seventh bench has areas of sparse or no vegetation. This area receives drainage from open areas of the landfill and has not yet been permanently vegetated. This area will be addressed as a part of the routine maintenance and ongoing closure activities of the facility. Active CCR placement above these areas has resulted in CCR material being deposited on the previously established grass. This condition was also present during the 2024 inspection. This will be addressed as part of the closeout of the currently active areas as grading and shaping is concluded.

Inspection Report Specifications

(i) CCR Landfill Geometry

The Green CCR Landfill is used for the placement of coal combustion residual material, currently fly ash, bottom ash and related material. The landfill is raised above adjacent ground to a maximum elevation of approximately 615 feet above mean sea level. The original ground surface within the landfill footprint was irregular and the predominant features were small stream valleys draining towards the Green River which is located just east of the landfill; and towards Groves Creek which is located just south of the landfill.

Changes to the landfill geometry since the previous (2024) annual inspection include continued placement and grading of CCR material behind the constructed vertical expansion wall on the west exterior slope; and the placement of additional CCR and cover material on the landfill.

(ii) CCR Landfill Volume

The total volume of CCR material contained in the Green CCR Landfill was estimated to be 24.97 million cubic yards. This volume was calculated from available baseline topography compared to October 20, 2025 flight derived topographic contours.

(iii) CCR Landfill Structural, Operational, and Safety Items

No deficiencies or disrupting conditions that would require immediate measures to remedy were identified in the inspection. The inspection findings consisted of maintenance items that were not observed to be signs or potential signs of significant structural weakness.

(iv) CCR Landfill Changes

There have been no changes to the Green CCR Landfill since the previous 2024 annual inspection that have the potential to affect the stability or operation of the landfill. Changes include placement of additional CCR material as well as general maintenance activities and mowing.



Flight Date: October 20, 2025

BIG RIVERS ELECTRIC CORPORATION

Sebree Station Green CCR Landfill
2025 Annual Inspection Aerial Photo

Job Number:	25-0131	Revisions:
Date:	11/10/2025	
Scale:	1" = 500'	
Drawn By:	A.E.I.	

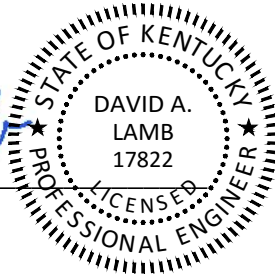
**BREC Final Rule CCR Landfill 2025
Annual Inspection Checklist**

Operator: Sebree Generating Station CCR Landfill: Green Date: November 3, 2025					Weather: Overcast Temperature (Degrees F): 55 (high) Inspector/Qualified Person: David A. Lamb P.E.	
ITEM		STATUS			OBSERVATIONS	
		YES	NO	N/A		
1	CONDITION OF INACTIVE AREA					
	Access road deterioration (potholes, rutting, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	Any erosion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Some surficial erosion/rills in cover material	
	Longitudinal cracks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
	Transverse cracks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
	Visual depressions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Some low areas in bench flowlines and longitudinal tracking from tractor/mower tires	
	Visual settlement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
	Bulging or slumping	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
	Any drainage features obstructed or damaged	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Some runoff ditches have erosion and contain sediment in areas	
	Are drainage features flowing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	Is seepage present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Seepage has primarily been routed and contained to the subsurface seepage collection system.	
	Is seepage or discharge carrying sediment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
	Adequate vegetative cover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Isolated bare areas and invasive species monocultures	
	Are trees growing on the slope	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
	Are there any animal burrows	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	animal burrows; primarily rodent	
	Any stone deterioration	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
	Adequate riprap/slope protection	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
	Debris or trash present	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
	Is there exposed CCR material	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Isolated areas	
2	CONDITION OF ACTIVE AREA					
	Access road deterioration (potholes, rutting, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Minor rutting from wet weather traffic.	
	Any erosion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	Any cracks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Minor to moderate erosion on active disposal areas and haul roads	
	Any slides	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

	Visual depressions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		STATUS			OBSERVATIONS
		YES	NO	N/A	
	Visual settlement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	Bulging or slumping	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	Any drainage features obstructed or damaged	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	Is seepage present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Minor quantities along face of combination wall remainder is routed to the subsurface collection system.
	Is seepage or discharge carrying sediment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	Debris or trash present	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3	LINER AND LEACHATE COLLECTION SYSTEM				
	Are liners intact and being installed correctly	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Is the leachate collection operating correctly	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Is the leachate collection pond/storage functioning correctly	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Is there any slope/bank erosion on pond	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Are there any animal burrows on pond	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Is the spillway functioning and discharging correctly	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4	RUN-ON/RUNOFF-CONTROLS				
	Are run-on/runoff controls in place	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Are run-on/runoff controls functioning	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Are run-on/runoff controls effective	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Are run-on runoff controls being maintained	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Signs of seepage or wetness	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Sediment transport or deposition	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
DEFICIENCIES AND MAINTENANCE ITEMS					
<p>No deficiencies or disrupting conditions that would require immediate measures to remedy were identified in the inspection. The inspection findings consisted of maintenance items that were not observed to be signs or potential signs of significant structural weakness.</p>					

**Professional Engineer Certification [Per 40 CFR §257.84(b)]
Green CCR Landfill
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 257.84(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