aes Indiana

Eagle Valley
Generating Station

Annual Inspection of CCR Surface Impoundments

Revision 0

January 9, 2026

Issue Purpose: For Use

Project No.: A10572.166

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CERTIFICATION PAGE

I certify that this report was prepared by me or under my supervision and that I am a registered professional engineer under the laws of the State of Indiana.

This report is released for use under the authority of Travis Constantine, Indiana PE # 12400991 on January 9, 2025.

Certified By: Travis Constantine Date: (See Digital Signature)

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1 PURPOSE

Pursuant to 40 CFR 257.83(b)(2), this document provides the annual inspection report for the applicable existing coal combustion residual (CCR) surface impoundments at AES Indiana's (AESI) Eagle Valley Generating Station. This annual inspection has been performed in accordance with the U.S. Environmental Protection Agency's "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments," which are codified in 40 CFR Part 257 Subpart D (Reference 1) and are referred to herein as the "Federal CCR Rule.".

The following applicable CCR units were visually inspected on November 18, 2025, by Mr. Travis Constantine, P.E. (Licensed in IN, IL, WI, LA) and Mr. Ethan J. Klein:

- Pond A,
- Pond B, and
- Pond C.

2 INSPECTION OF EXISTING CCR SURFACE IMPOUNDMENTS

Federal CCR Rule References: 40 CFR 257.83(b)(1)(i), 257.83(b)(1)(ii) & 257.83(b)(1)(iii)

This annual inspection of the CCR surface impoundments included:

1. Review of previously generated information regarding the status and condition of each CCR surface impoundment including, but not limited to, operating records, publicly accessible Internet site entries, design and construction drawings, and other documents and reports,
2. A visual inspection of the applicable CCR surface impoundments and appurtenant structures to identify signs of any distress or malfunction, and
3. A visual inspection of the accessible portions of known hydraulic structures underlying the bases of the CCR surface impoundments and passing through the dikes of the CCR surface impoundments for structural integrity and continued safe and reliable operation.

The following sections present the observations and findings from the visual inspection of the CCR surface impoundments.

2.1 CHANGES IN GEOMETRY

Federal CCR Rule Reference: 40 CFR 257.83(b)(2)(i)

Since the previous annual inspection completed on December 10, 2024, AES Indiana has advanced closure activities for Ponds A, B, and C at the Eagle Valley Station. On January 10, 2025, the Indiana Department of Environmental Management (IDEM) approved AES Indiana's closure and post-closure plan for Ponds A, B, and C. A contractor is currently closing Ponds A, B, and C in accordance with the approved closure and post-closure plan and additional state and county permits. These activities represent a change in operational status from active impoundments to impoundments undergoing closure construction.

2.2 REVIEW OF EXISTING INSTRUMENTATION

Federal CCR Rule Reference: 40 CFR 257.83(b)(2)(ii)

The existing CCR unit instrumentation for Ponds A, B, and C that was documented in the 2024 Annual CCR Pond Inspection report was again reviewed for this 2025 inspection. Each CCR surface impoundment outlet structure is equipped with a staff gauge. Maximum staff gauge readings since the last annual inspection (December 10, 2024) are reported in Section 2.3. Available instrumentation records between the previous annual inspection on December 10, 2024, and the current inspection on November 18, 2025, were reviewed to identify any readings that might indicate changes in impoundment performance or stability. This review was performed in the context of the ongoing closure activities for Ponds A, B, and C, which are being implemented in accordance with the IDEM-approved closure and post-closure plan dated January 10, 2025.

2.3 IMPOUNDMENT PARAMETERS

Federal CCR Rule References: 40 CFR 257.83(b)(2)(iii), 257.83(b)(2)(iv), & 257.83(b)(2)(v)

AES Indiana has initiated closure construction for Ponds A, B, and C in accordance with the IDEM-approved closure and post-closure plan. The impoundment geometry is currently in active construction for the closure and post-closure activities.

Tables 1, 2, and 3 summarize the measurable impoundment parameters required by 40 CFR 257.83(b)(2)(iii) through (v), as recorded since 2024 annual inspection and at the time the current visual inspection. The estimated average depth and volume of ash stored in each impoundment was calculated using 2015 topographic data and bottom-of-ash elevations recorded in 73 soil borings advanced through Ponds A, B, and C in subsurface investigations conducted at the site in 2011, 2015, 2019, and 2023.

TABLE 1: APPROXIMATE DEPTH OF WATER AND WATER SURFACE ELEVATION OF CCR SURFACE IMPOUNDMENTS

CCR Surface Impoundment	Minimum Depth[1] (ft)	Maximum Depth[1] (ft)	Present Depth[2] (ft)	Minimum Elevation[1] (ft)	Maximum Elevation[1] (ft)	Present Elevation[2] (ft)
Pond A	N/A[3]	N/A[3]	N/A[3]	N/A[3]	N/A[3]	N/A[3]
Pond B	N/A[3]	N/A[3]	N/A[3]	N/A[3]	N/A[3]	N/A[3]
Pond C	N/A[3]	N/A[3]	N/A[3]	N/A[3]	N/A[3]	N/A[3]

Notes:

1. Since the previous annual inspection on December 10, 2024.
2. At the time of visual inspection on November 18, 2025.
3. N/A – Pond did not impound significant water at the time of the annual inspection nor during the prior year.

TABLE 2: APPROXIMATE AVERAGE DEPTH OF CCR AND AVERAGE CCR SURFACE ELEVATION WITHIN CCR SURFACE IMPOUNDMENTS[1]

CCR Surface Impoundment	Minimum Depth[2] (ft)	Maximum Depth[2] (ft)	Present Depth[3] (ft)	Minimum Elevation[2] (ft)	Maximum Elevation[2] (ft)	Present Elevation[3] (ft)
Pond A	24	24	24	625	625	625
Pond B	13	13	13	616	616	616
Pond C	8	8	8	611	611	611

Notes:

1. Depths and elevations presented are averages over the aerial extent of each impoundment.
2. Since the previous annual inspection on December 10,2024.
3. Ponds A, B, and C are in active construction for closure activities. The present depth and elevation are being modified during the closure construction. Visual inspection was done on November 18, 2025.

TABLE 3: APPROXIMATE STORAGE CAPACITY AND VOLUME OF IMPOUNDED WATER AND CCR AT TIME OF INSPECTION

CCR Surface Impoundment	Approximate Total Available Storage Capacity (ac-ft)	Approximate Actual Volume of Impounded Water (ac-ft)	Approximate Actual Volume of Impounded CCR (ac-ft)
Pond A	550	Dry	480
Pond B	320	Dry	190
Pond C	140	Dry	60

2.4 VISUAL INDICATION OF ACTUAL OR POTENTIAL STRUCTURAL WEAKNESSES

Federal CCR Rule Reference: 40 CFR 257.83(b)(2)(vi)

A visual inspection of Ponds A, B, and C and the associated embankments was performed on November 18, 2025, during ongoing construction activities related to closure of Ponds A, B, and C. The embankment crests, slopes, and surrounding areas were visually inspected to document conditions during these closure activities. Based on the November 18, 2025, visual inspection, S&L did not observe any evidence of existing conditions that are disrupting or could reasonably be expected to have the potential to disrupt the operation and safety of the applicable CCR surface impoundments.

2.5 OTHER CHANGES

Federal CCR Rule Reference: 40 CFR 257.83(b)(2)(vii)

Ongoing construction activities related to closure of Ponds A, B, and C represent the primary change in site conditions since the 2024 annual inspection. During the November 18, 2025, inspection, construction traffic,

temporary access routes, active earthwork, and material stockpiles associated with implementation of the IDEM-approved closure and post-closure plan were observed in and around the impoundments.

These closure activities are being performed within and adjacent to the CCR units as part of the planned transition from operating surface impoundments to closed units. Aside from the construction-related updates described in Sections 2.1, 2.3, and 2.4, no additional changes in geometry, operating configuration, or site conditions were identified that would adversely affect the stability or performance of the applicable CCR surface impoundments at the time of the 2025 inspection.

3 CONCLUSION

This annual inspection confirmed that the design, construction, operation, and maintenance of the applicable existing CCR surface impoundments at AESI's Eagle Valley Generating Station are consistent with recognized and generally accepted good engineering standards.

4 REFERENCES

1. U.S. Environmental Protection Agency. “Standards for Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments.” 40 CFR Part 257 Subpart D. https://www.ecfr.gov/current/title-40/chapter-I/subchapter-I/part-257/subpart-D. Accessed December 18, 2025.