AECOM

Submitted to
AES Indiana
Petersburg Generating Station
6925 North State Road 57
Petersburg, IN 47567

Submitted by
AECOM
1300 E 9th Street
Suite 500
Cleveland, OH 44114

November 12, 2025

CCR Annual Inspection §257.83 (b)

for the

Ash Ponds A, A', B, C, and D

at the

Petersburg Generating Station

Revision 0

Table of Contents

Tables

Appendices

Executive Summary

This Coal Combustion Residuals (CCR) Annual Inspection for Ash Ponds A, A', B, C, and D (herein "Ash Ponds") at the AES Indiana (AESI), Petersburg Generating Station has been prepared in accordance with the requirements specified in the USEPA CCR Rule under 40 Code of Federal Regulations §257.83 (b). These regulations require that the specified documentation and assessments for an existing CCR surface impoundment be prepared within one year of the placement of the previous inspection report within the facility's operating record. The 2024 inspection report was placed in the Operating Record on November 12, 2024. AES Indiana is placing this year's report in the facility's Operating Record no later than November 12, 2025, which is within one year of the date the previous year's inspection report was placed within the facility's Operating Record.

This Inspection for the Ash Ponds meets the regulatory requirements as summarized in **Table ES-1**.

Table ES-1 – Summary

Report Section	CCR Rule Reference	Requirement Summary	Requirement Met?	Comments
2.1	§257.83 (b)(1)	*Annual Inspection*	Yes	The CCR Unit has met the annual inspection requirements
2.2	§257.83 (b)(2)	*Inspection Report*	Yes	The CCR Unit has met the inspection report requirements
2.3	§257.83 (b)(4)	*Frequency of Inspections*	Yes	The CCR Unit has met the required frequency of inspections
2.4	§257.83 (b)(5)	*No Deficiency Identified*	Yes	No deficiency identified

The Ash Ponds have ceased operations and do not receive waste. All inspection requirements were evaluated, and the ponds were found to meet all requirements within each individual assessment in §257.83 (b).

1 Introduction

1.1 Purpose of this Report

The purpose of the Annual Inspection presented in this report is to document that the requirements specified in 40 Code of Federal Regulations (CFR) §257.83 (b) have been met to support the requirement under each of the applicable regulatory provisions for the Petersburg Generating Station Ash Ponds. The CCR Rule requires that the specified documentation and assessments for an existing CCR surface impoundment be prepared within one year of the placement of the previous inspection report within the facility's operating record. The 2024 inspection report was placed into the facility's Operating Record on November 12, 2024. AES Indiana is placing this year's report in the facility's Operating Record no later than November 12, 2025, which is within one year of the date the previous year's inspection report was placed within the Facility's Operating Record.

The following table summarizes the documentation required within the CCR Rule and the sections that specifically respond to those requirements of this assessment.

Table 1-1 – CCR Rule Cross Reference Table

Report Section	Title	CCR Rule Reference
2.1	Annual Inspection	§257.83 (b)(1)
2.2	Inspection Report	§257.83 (b)(2)
2.3	Frequency of Inspections	§257.83 (b)(4)
2.4	Deficiency Identified	§257.83 (b)(5)

1.2 Brief Description of the Impoundments

The Petersburg Generating Station is located in Pike County, Indiana, north of Petersburg, Indiana, and is owned and operated by AES Indiana (AESI). The Petersburg Station is located along the east bank of the White River and Lick Creek along the southeast portion of the site. The Petersburg Station has three CCR Rule-regulated surface impoundments, identified as A, A' and C. Two additional units, Ponds B and D, received CCR material, but are not regulated under the CCR Rule. Ponds A, A', B and C are closed under an Indiana Department of Environmental Management (IDEM)-approved Closure Plan. Pond D has been closed under an IDEM-approved closure plan; closure approval by IDEM is pending. The Ash Ponds are located directly north of the Station and are approximately 160 acres in size, cumulatively.

Ash Ponds A and A' are approximately 70 acres and were closed in place with a geosynthetic capping system. Ash Pond B is approximately 33 acres and was also closed in place with a geosynthetic capping system. A portion of the south slope of Pond B was originally covered with a soil final cover system but was later replaced with a geosynthetic capping system when Ponds A and A' were closed. Ash Pond C is approximately 46 acres and was closed in place with a geosynthetic capping system. Ash Pond D is approximately 8 acres and was constructed by using a sheet pile wall to segregate its area from Pond A. Pond D was closed using a geotextile separation layer,

aggregate fill and an asphalt layer to facilitate the area's use as a wastewater treatment plant and equipment storage/parking area.

A site Location Map showing the area surrounding the Station is included as **Figure 1** of **Appendix A**. **Figure 2** in **Appendix A** presents the Petersburg Site Map.

2 Annual Inspection Description

Regulatory Citation: 40 CFR §257.83 Inspection requirements for CCR surface impoundments

The Annual Inspection for the Ash Ponds is described in this section. Information about operational and maintenance procedures was provided by Petersburg plant personnel. The Petersburg Station follows an established maintenance program that quickly identifies and resolves issues of concern.

2.1 Annual Inspection

Regulatory Citation: 40 CFR §257.83 (b) Annual inspections by a qualified professional engineer;

- *(1) If the existing or new CCR surface impoundment or any lateral expansion of the CCR surface impoundment is subject to the periodic structural stability assessment requirements under §257.73 (d) or §257.74 (d), the CCR unit must additionally be inspected on a periodic basis by a qualified professional engineer to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards.*

  The Ash Ponds are subject to the periodic structural stability assessment requirements as mentioned. Thus, the following items were performed to comply with the CCR Rule.

2.1.1 Review of Available Information

Regulatory Citation: 40 CFR §257.83 (b)(1);

- *(i) 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., CCR unit design and construction information required by §257.73 (c)(1) and §257.74 (c)(1), previous periodic structural stability assessments required under §257.73 (d) and §257.74 (d), the results of inspections by a qualified person, and results of previous annual inspections).*

  The available information was reviewed for the Petersburg Ash Ponds, including the weekly inspection reports for inspections performed by plant personnel and the previous CCR Rule annual inspection performed by Atlas on September 26, 2024.

2.1.2 Visual Inspection

Regulatory Citation: 40 CFR §257.83 (b)(1);

- *(ii) A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit and appurtenant structures.*

  The Ash Ponds were visually inspected by AECOM on October 29, 2025. While minor maintenance repairs will be required, no significant signs of distress or malfunction of the CCR units and appurtenant structures were identified, as noted in Section 2.4.2.

Regulatory Citation: 40 CFR §257.83 (b)(1);

- *(iii) A visual inspection of any hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation.*

  There are no active hydraulic structures underlying the base or passing through the dikes of the CCR units of the Ash Ponds. Therefore, no signs of structural deficiencies were identified during the visual inspection on October 29, 2025.

2.2 Content of the Inspection Report

Regulatory Citation: 40 CFR §257.83 (b)(2) Inspection report. The qualified professional engineer must prepare a report following each inspection that addresses the following:

- *(i) Any changes in geometry of the impounding structure since the previous annual inspection.*

  No changes were observed.

- *(ii) The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection.*

  All impounded water has been removed from the Ash Ponds.

- *(iii)The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection.*

  All impounded water has been removed from the Ash Ponds.

  CCR depths range from 0 feet to approximately 35 feet. The ponds were constructed with natural soil liners placed at elevation 420. Original berms were constructed to elevation 432, but berms in Ponds B and C were later raised to elevation 455.

- *(iv) The storage capacity of the impounding structure at the time of the inspection.*

  The storage capacity of the impounding structure for the entire ash pond system is approximately 5.7 million CY.

- *(v) The approximate volume of the impounded water and CCR at the time of the inspection.*

  At the time of the inspection, there is no impounded water on the Ash Ponds. There is approximately 5.7 million CY of CCR contained within the closed Ash Ponds.

- *(vi) 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.*

  The visual inspection performed on October 29, 2025, did not reveal any actual or potential structural weaknesses.

- *(vii) Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.*

There were no changes which might have affected the stability or operation of the impounding structure since the previous annual inspection.

2.3 Frequency of Inspections

Regulatory Citation: 40 CFR §257.83 (b)(4);

- *(i) Except as provided for in paragraph (b)(4)(ii) of this section, the owner or operator of the CCR unit must conduct the inspection required by paragraphs (b)(1) and (2) of this section on an annual basis. The date of completing the initial inspection report is the basis for establishing the deadline to complete the first subsequent inspection. Any required inspection may be conducted prior to the required deadline provided the owner or operator places the completed inspection report into the facility's operating record within a reasonable amount of time. In all cases, the deadline for completing subsequent inspection reports is based on the date of completing the previous inspection report. For purposes of this section, the owner or operator has completed an inspection when the inspection report has been placed in the facility's operating record as required by §257.105 (g)(6).*

  The prior annual inspection report was placed in the operating record on November 12, 2024. AESI will be placing this inspection report in the facility's operating record no later than November 12, 2025.

- *(ii) In any calendar year in which both the periodic inspection by a qualified professional engineer and the quinquennial (occurring every five years) structural stability assessment by a qualified professional engineer required by §257.73 (d) and §257.74 (d) are required to be completed, the annual inspection is not required, provided the structural stability assessment is completed during the calendar year. If the annual inspection is not conducted in a year as provided by this paragraph (b)(4)(ii), the deadline for completing the next annual inspection is one year from the date of completing the quinquennial structural stability assessment.*

  The quinquennial structural stability assessment is not required for this year as it was completed in October 2021. Thus, an annual inspection report was submitted to AESI as stipulated in §257.83 (b)(4)(i).

2.4 Deficiency Identified

Regulatory Citation: 40 CFR §257.83 (b)(5);

- *If a deficiency or release is identified during an inspection, the owner or operator must remedy the deficiency or release as soon as feasible and prepare documentation detailing the corrective measures taken.*

  Areas of concern from previous inspections were reviewed and described below in Section 2.4.1. No areas of concern were noted during this year's annual inspection performed on October 29, 2025, as noted in Section 2.4.2.

2.4.1 Previous Inspection

There were no major areas of concern noted during the previous annual inspection performed on September 26, 2024, but minor areas are listed below.

Ash Pond A and A'

- Debris and/or tall vegetation observed around outlet pipe riprap located on south side of Ash Pond A.

- Minor erosion and bare sports were observed at five separate locations on the top section of Ash Pond A.

Ash Pond B

- Accumulated sediments/debris and/or tall vegetation observed at three separated drop inlets located at Ash Pond B.
- Minor erosion rills were observed at six separate locations on the west section of Ash Pond B.
- The drop inlet domed grate cover is damaged on the west side of Pond B.

Ash Pond C

- Accumulated sediments/debris and/or tall vegetation observed at five separate locations on Ash Pond C.
- Minor erosion rills were observed at two separate locations on the north section of Ash Pond C.

Ash Pond D

- No observations were made in reference to Ash Pond D.

2.4.2 Current Inspection

No major areas of concern were noted during the annual inspection performed on October 29, 2025, but minor observations areas are listed below. Locations are shown on **Figure 3** and in **Appendix B** Observation Photo Log.

Ash Pond A and A'

- Erosion rills, vehicle tracks, and bare spots at four locations (A-1, A-2, A-3, and A-5).
    - Recommend repair and reseed.
- Unguarded stormwater risers at location A-4.
    - Recommend replacing stormwater riser guards and trimming back vegetation.

Ash Pond B

- Erosion rills, vehicle tracks, animal burrows and bare spots at four locations (B-1, B-2, B-3, B-4, B-7, and B-8).
    - Recommend repair and reseed.
- Unguarded stormwater risers at locations B-5 and B-6.
    - Recommend replacing stormwater riser guards and trimming back vegetation.

Ash Pond C

- Erosion rills, vehicle tracks, animal burrows and bare spots at four locations (C-1, C-2, C-3, C-5, C-7, and C-8).
    - Recommend repair and reseed.
- Poor stormwater drainage at location C-4.
    - Recommend repairing the drainage at the location.
- Tall vegetation in need of mowing at location C-6.
    - Recommend mowing/removing vegetation at the location.

Ash Pond D

- Stormwater ponding and asphalt cracks at locations D-1, D-2, and D-3, D-4
    - Recommend sealing asphalt cracks and repairing as necessary.

3 Certification

This Certification Statement documents that the annual inspection has been completed for Ash Ponds A, A' and C at the Petersburg Generating Station and that the inspection and this inspection report meet the requirements specified in 40 CFR §257.83 (b).

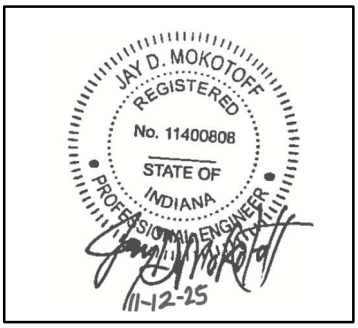
I, Jay Mokotoff, being a Registered Professional Engineer in good standing in the State of Indiana, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this report has been prepared in accordance with the accepted practice of engineering.

Jay D. Mokotoff

Printed Name

November 12, 2025

Date



4 Limitations

Background information, design basis, and other data which AECOM has used in preparation of this report have been furnished to AECOM by AES Indiana. AECOM has relied on this information as furnished and is not responsible for the accuracy of this information. Our recommendations are based on available information from previous and current investigations. These recommendations may be updated as future investigations are performed.

The conclusions presented in this report are intended only for the purpose, site location, and project indicated. The recommendations presented in this report should not be used for other projects or purposes. Conclusions or recommendations made from these data by others are their responsibility. The conclusions and recommendations are based on AECOM's understanding of current plant operations, maintenance, stormwater handling, and ash handling procedures at the Station, as provided by AES Indiana. Changes in any of these operations or procedures may invalidate the findings in this report until AECOM has had the opportunity to review the findings and revise the report if necessary.

This development of the Annual Inspection was performed in accordance with the standard of care commonly used as state-of-practice in our profession. Specifically, our services have been performed in accordance with accepted principles and practices of the engineering profession. The conclusions presented in this report are professional opinions based on the indicated project criteria and data available at the time this report was prepared. Our services were provided in a manner consistent with the level of care and skill ordinarily exercised by other professional consultants under similar circumstances. No other representation is intended.

Appendix A
Figures

Figure 1 – Overall Site Map
Figure 2 – Ash Ponds Map
Figure 3 – Observations Location Map

FIGURE 01 REV.

LEGEND

ASH POND LIMITS

N

0 1000 2000 3000

GRAPHIC SCALE (IN FEET)

AECOM

TITLE

OVERALL SITE MAP

FOR

SEAL

aes

SCALE:	DES:
DWG TYPE:.DWG	DFTR:
JOB NO:	CHKD:
DATE:	ENGR:
FILENAME: ANNUAL ASH PONDS INSPECTION.DWG	APPD:

DWG SIZE	DRAWING NO.	REVISION
ANSI D 22.0"x34.0"	FIGURE 01	

FIGURE 01 REV.

C:\Users\cameron.mcclocke\AECOM\AES-Indiana - AES-Indiana Petersburg Ash Ponds\300_CAD_GIS\310_CAD\Annual Ash Ponds Inspection.dwg User:cameron.mcclocke Nov 06, 2025 - 3:55pm

0 INCHES 1 2 3 TENTHS 10 20 30

FIGURE 02

REV.

LEGEND

ASH POND LIMITS

N

0 250 500 750

GRAPHIC SCALE (IN FEET)

AECOM

TITLE

SITE LOCATION MAP

FOR

SEAL

aes

SCALE:	DES:
DWG TYPE:.DWG	DFTR:
JOB NO:	CHKD:
DATE:	ENGR:
FILENAME: ANNUAL ASH PONDS INSPECTION.DWG	APPD:

DWG SIZE	DRAWING NO.	REVISION
ANSI D 22.0"x34.0"	FIGURE 02	

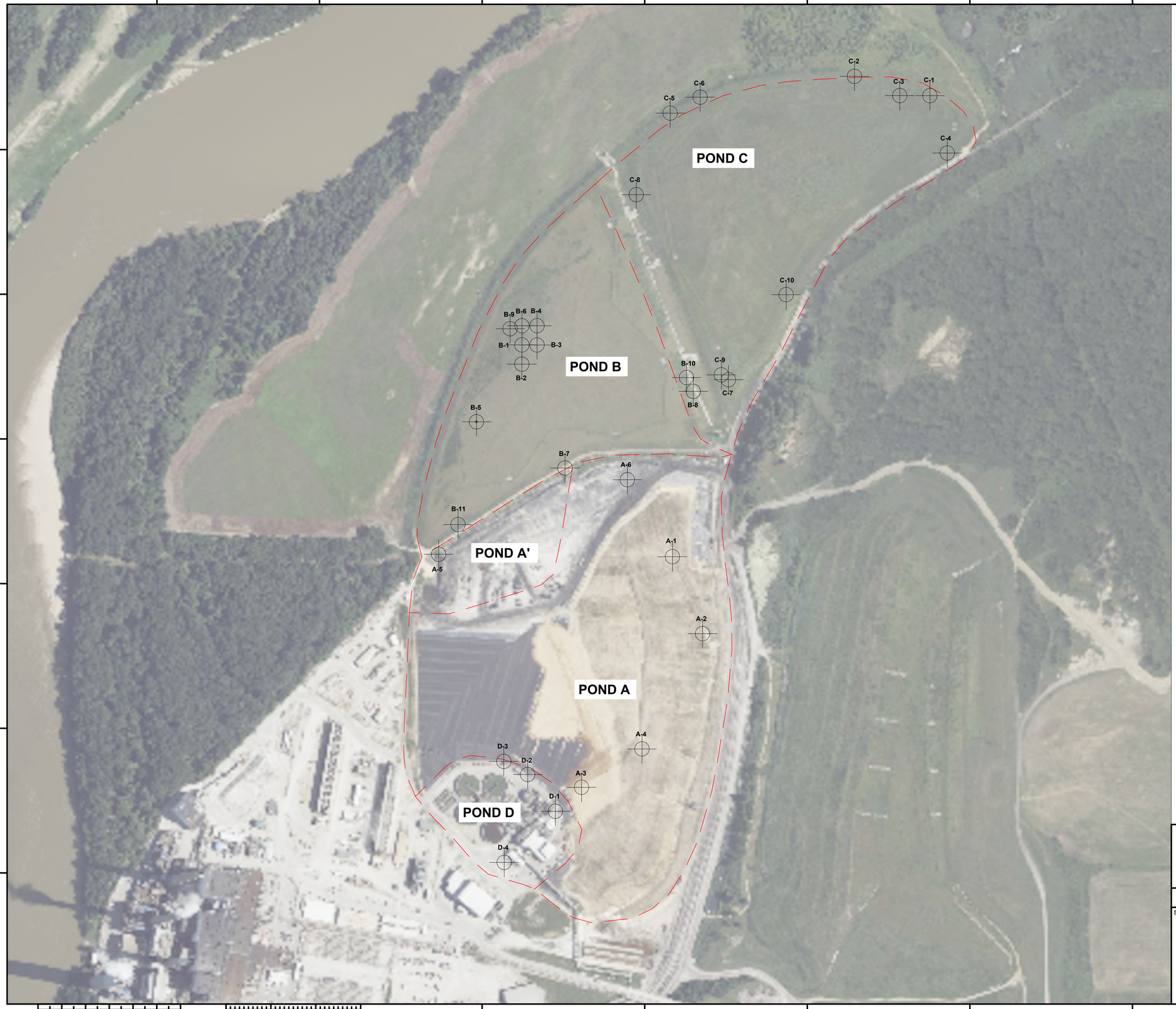
FIGURE 02

REV.

C:\Users\cameron.mocioce\AECOM\AES-Indiana - AES-Indiana Petersburg Ash Ponds\900_CAD_GIS\910_CAD\Annual Ash Ponds Inspection.dwg User:cameron.mocioce Nov 06, 2025 - 3:52pm

0 INCHES 1 2 3

TENTHS 10 20 30



LEGEND

- ASH POND LIMITS
- OBSERVATION LOCATION
- C-1 OBSERVATION NUMBER

N

0 250 500 750
GRAPHIC SCALE (IN FEET)

AECOM

TITLE
OBSERVATION LOCATION MAP

FOR

SEAL

SCALE:	DES:
DWG TYPE:.DWG	DFTR:
JOB NO:	CHKD:
DATE:	ENGR:
FILENAME: ANNUAL ASH PONDS INSPECTION.DWG	APPD:
DWG SIZE: ANSI D 22.0"x34.0"	DRAWING NO.: FIGURE 03
	REVISION

FIGURE 03 REV.

Appendix B
Observation Photo Log

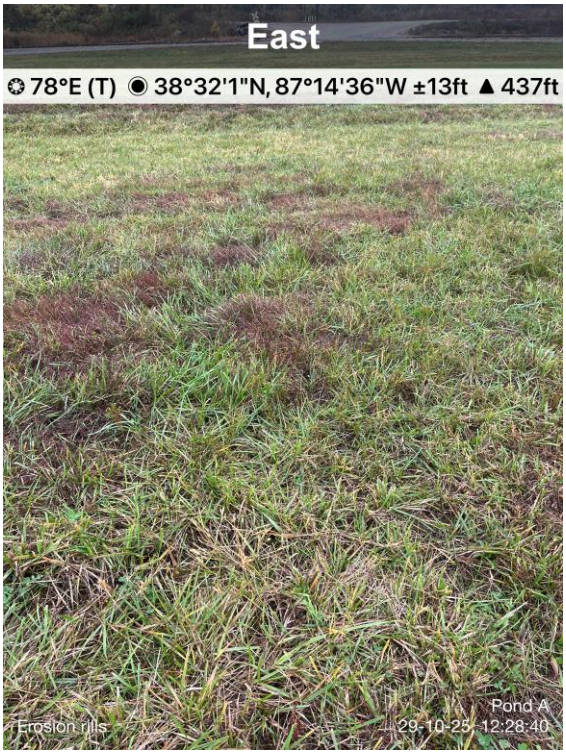
Photo A-1	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond A		
Description: Facing East, erosion rills. Recommend repair and reseed.		
Photo A-2	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond A		
Description: Facing North, erosion rills. Recommend repair and reseed.		

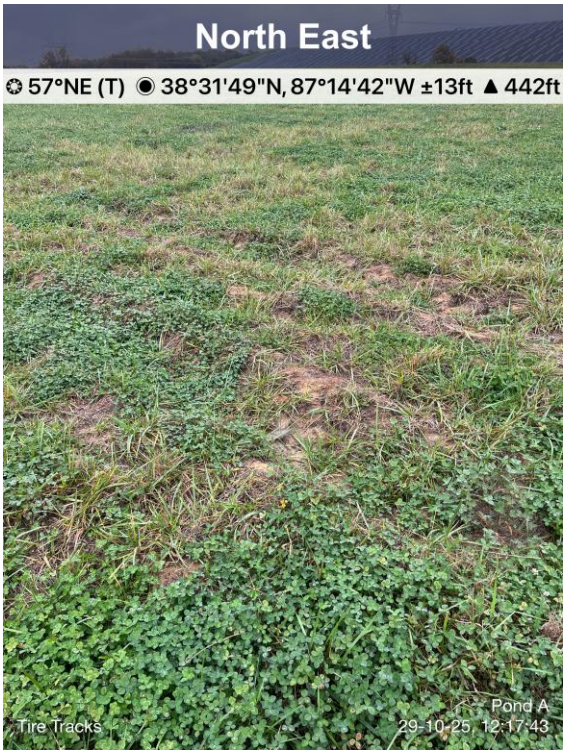
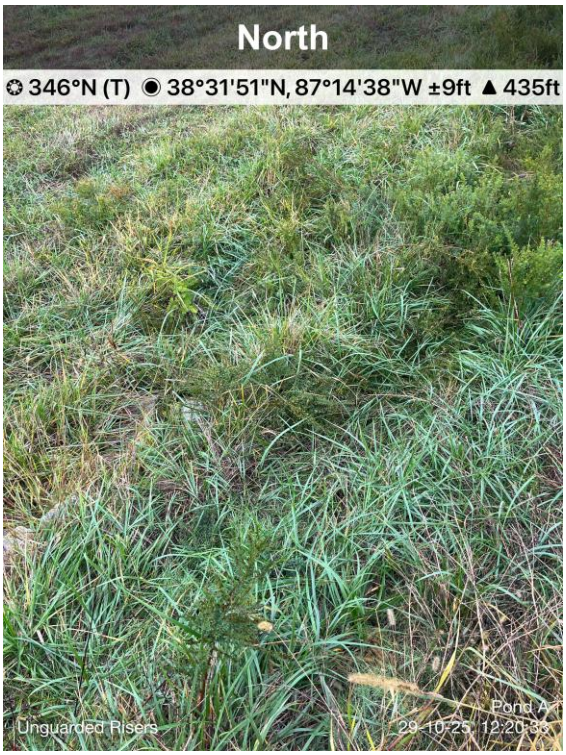
Photo A-3	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond A		
Description: Facing Northeast, tire tracks. Recommend repair and reseed.		
Photo A-4	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond A		
Description: Facing North, stormwater risers without guards. Recommend replacement of stormwater riser guards and trim back vegetation.		

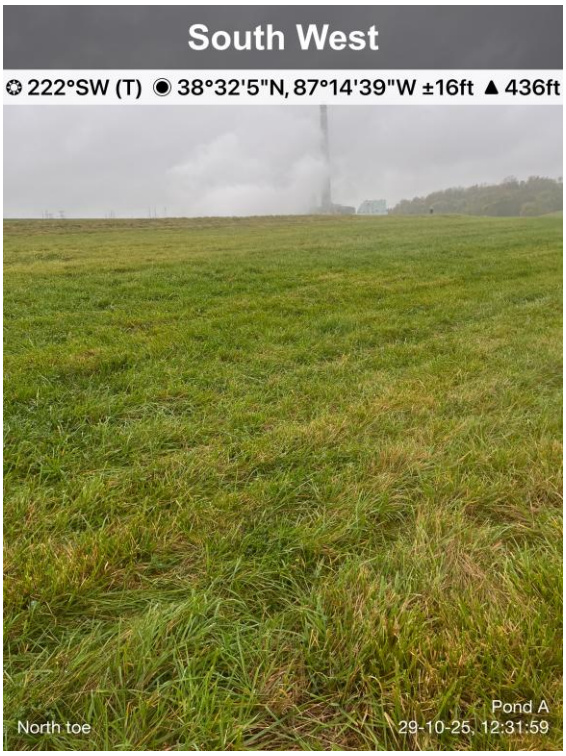
Photo A-5	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond A'		
Description: Facing Northeast, erosion rills and bare spots. Recommend repair and reseed.		
Photo A-6	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond A		
Description: Facing Southwest, good vegetation and slope. No issues observed.		

Photo A-7	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond A		
Description: Facing Northeast, Stormwater berms and proper vegetation. No issues observed.		
Photo B-1	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond B		
Description: Facing West, erosion and bare spots. Recommend repair and reseed.		

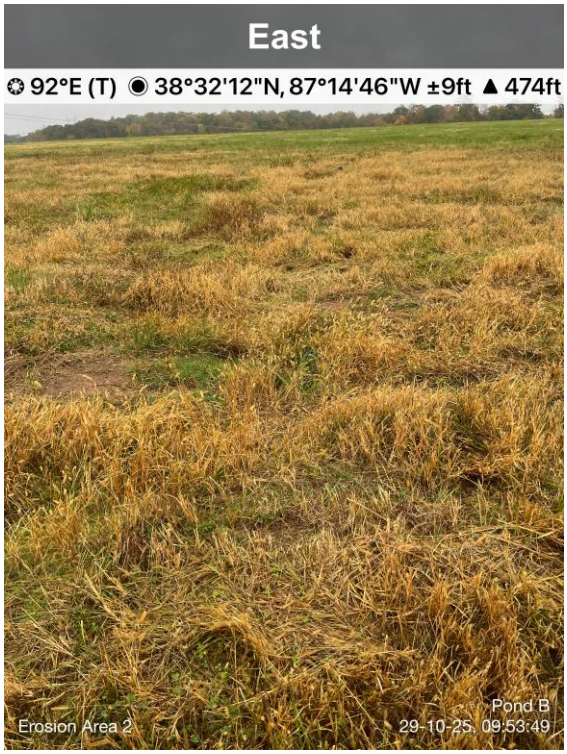
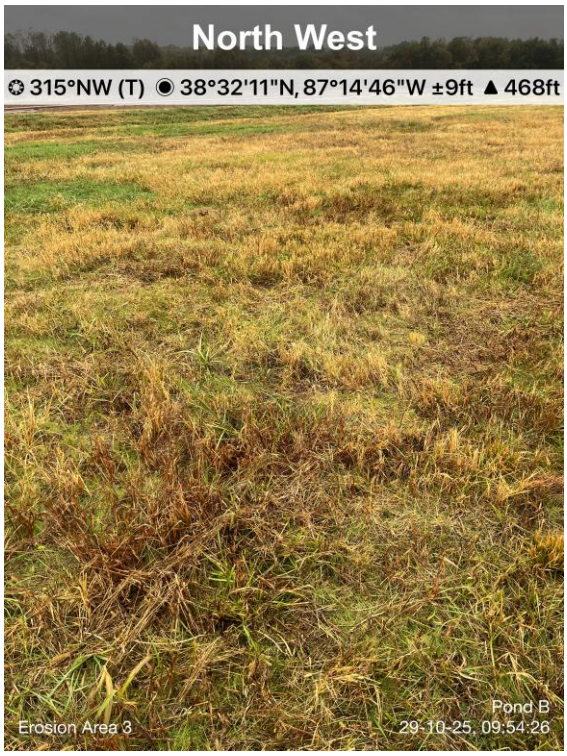
Photo B-2	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond B		
Description: Facing East, erosion and bare spots. Recommend repair and reseed.		
Photo B-3	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond B		
Description: Facing Northwest, erosion and bare spots. Recommend repair and reseed.		

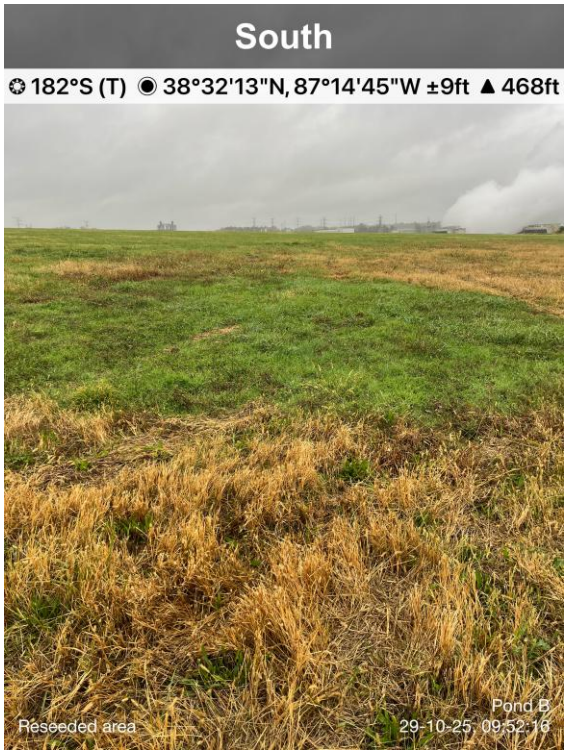
Photo B-4	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond B		
Description: Facing South, reseeded area. Recommend monitoring area and reseeding as necessary.		
Photo B-5	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond B		
Description: Facing North, stormwater risers without guards. Recommend replacement of stormwater riser guards and trim back vegetation		

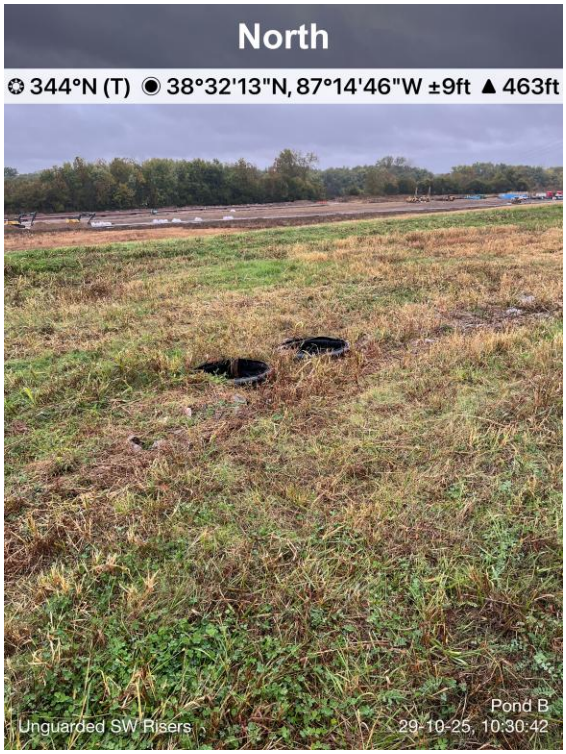
Photo B-6	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond B		
Description: Facing North, stormwater risers without guards. Recommend replacement of stormwater riser guards and trim back vegetation		
Photo B-7	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond B		
Description: Facing Southwest, animal burrows. Recommend repair and reseed.		

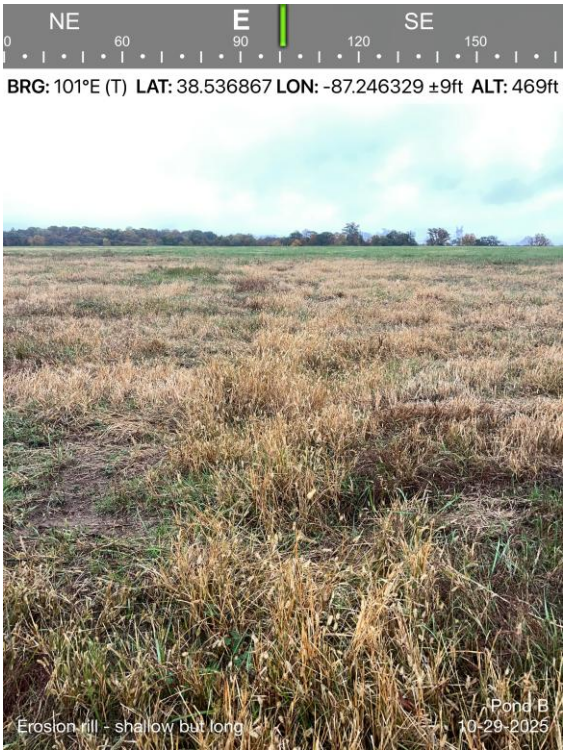
Photo B-8	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond B		
Description: Facing Southwest, bare spots and erosion. Recommend repair and reseed.		
Photo B-9	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond B		
Description: Facing East, long and shallow erosion rill. Recommend repair and reseed.		

Photo B-10	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond B		
Description: Facing Southeast, East slope well vegetated. No issues observed.		
Photo B-11	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond B		
Description: Facing Southwestm south slope towards plant, well vegetated. No issues observed.		

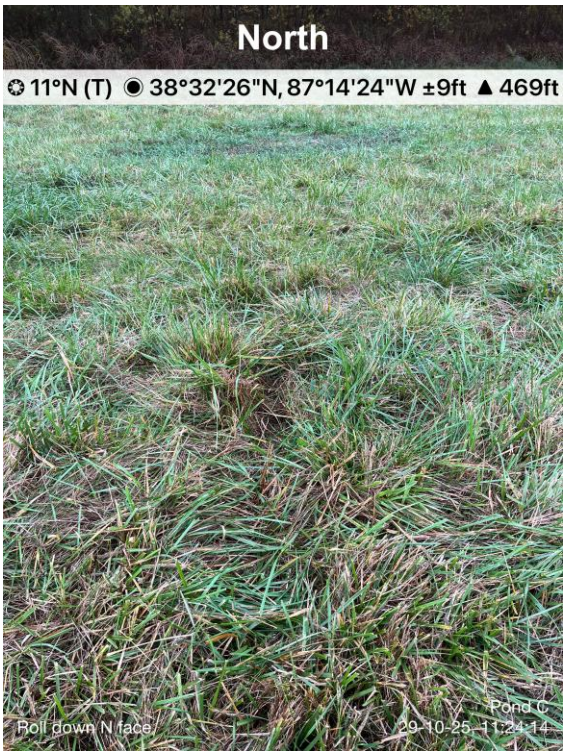
Photo C-1	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond C		
Description: Facing North, potholing along slope. Recommend repair and reseed.		
Photo C-2	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond C		
Description: Facing North, erosion rill down slope face. Recommend repair and reseed.		

Photo C-3	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond C		
Description: Facing Northwest, stormwater risers without guards. Recommend replace stormwater riser guards and trim back vegetation.		
Photo C-4	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond C		
Description: Facing East, poor drainage at toe. Recommend drainage repair at toe.		

Photo C-5	Date: 10/29/2025
Location: Indiana Petersburg, Ash Pond C	
Description: Facing Northeast, bare spots and erosion. Recommend repair and reseed.	

Photo C-6	Date: 10/29/2025
Location: Indiana Petersburg, Ash Pond C	
Description: Facing West, toe of slope tall vegetation. Recommend mowing.	

Photo C-7	Date: 10/29/2025
Location: Indiana Petersburg, Ash Pond C	
Description: Facing Southwest, bare spots and erosion. Recommend repair and reseed.	

Photo C-8	Date: 10/29/2025
Location: Indiana Petersburg, Ash Pond C	
Description: Facing Southeast, erosion and vehicle tracks along slope. Recommended repair and reseed.	

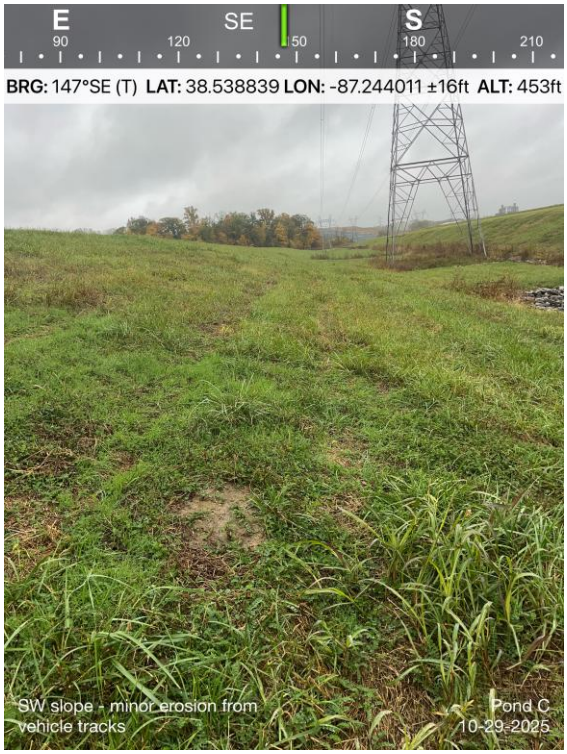


Photo C-9	Date: 10/29/2025
Location: Indiana Petersburg, Ash Pond C	
Description: Facing Northeast, overall pond cap, well vegetated. No issues observed.	

Photo C-10	Date: 10/29/2025
Location: Indiana Petersburg, Ash Pond C	
Description: Facing North, Stormwater diversion berm. Good vegetation and slopes. No issues observed.	

Photo D-1	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond D		
Description: Facing East, ponding near sheet pile. Recommend monitoring and repairing as necessary.		
Photo D-2	Date: 10/29/2025	
Location: Indiana Petersburg, Ash Pond D		
Description: Facing West, limited puddling on asphalt. Recommend monitoring and repairing as necessary.		

Photo D-3	Date: 10/29/2025
Location: Indiana Petersburg, Ash Pond D	
Description: Facing Southwest, ponding over asphalt. Recommend monitoring and repairing as necessary.	

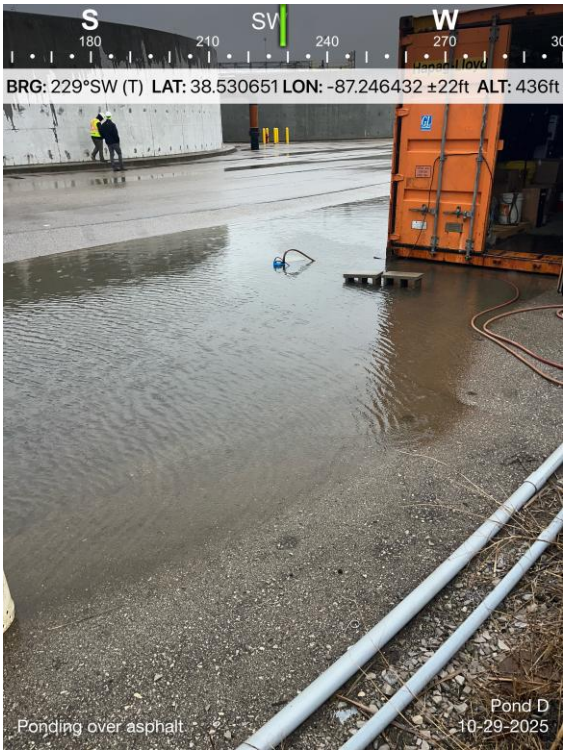


Photo D-4	Date: 10/29/2025
Location: Indiana Petersburg, Ash Pond D	
Description: Facing Northwest, asphalt with cracks and minimal ponding. Recommend sealing cracks and monitoring stormwater ponding.	

About AECOM

AECOM (NYSE: ACM) is a global provider of professional technical and management support services to a broad range of markets, including transportation, facilities, environmental, energy, water and government. With approximately 45,000 employees around the world, AECOM is a leader in all of the key markets that it serves. AECOM provides a blend of global reach, local knowledge, innovation, and collaborative technical excellence in delivering solutions that enhance and sustain the world's built, natural, and social environments. A Fortune 500 company, AECOM serves clients in more than 100 countries and has annual revenue in excess of $6 billion.