



Submitted to
AES Indiana
Petersburg Generating Station
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Submitted by
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December 9, 2025

Annual CCR Inspection
§257.84 (b)

for the

Restricted Waste Landfill

at the

Petersburg Generating Station

Revision 0

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Executive Summary

This Coal Combustion Residuals (CCR) Annual Inspection for the Petersburg Generating Station Restricted Waste Site Landfill, herein "Landfill", 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 §257.84 (b). These regulations require that the specified documentation and assessments for an existing CCR landfill 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 December 9, 2024. AES Indiana is placing this year's report in the facility's Operating Record no later than December 9, 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 Landfill 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	§257.84 (b)(1)	<i>Annual Inspection</i>	Yes	The CCR Landfill has met the annual inspection requirements
2.2	§257.84 (b)(2)	<i>Inspection Report</i>	Yes	The CCR Landfill has met the inspection report requirements
2.3	§257.84 (b)(4)	<i>Frequency of Inspections</i>	Yes	The CCR Landfill has met the required frequency of inspections
2.4	§257.84 (b)(5)	<i>No Deficiency Identified</i>	Yes	No deficiency identified

The Landfill has ceased operations and is currently being closed under an IDEM approved closure plan. All inspection requirements were evaluated, and the landfill was found to meet all requirements within each individual assessment in §257.84 (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) §257.84 (b) have been met to support the requirement under each of the applicable regulatory provisions for the Petersburg Generating Station Restricted Waste Site Landfill (Landfill). The CCR Rule requires that the specified documentation and assessments for an existing CCR landfill 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 December 9, 2024. AES Indiana is placing this year's report in the facility's Operating Record no later than December 9, 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	§257.84 (b)(1)
2.2	Inspection Report	§257.84 (b)(2)
2.3	Frequency of Inspections	§257.84 (b)(4)
2.4	Deficiency Identified	§257.84 (b)(5)

1.2 Brief Description of the Landfill

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. Petersburg Station has an 80.1-acre CCR landfill that is not operating and has not received waste since 2009.

As of April 2025, the Landfill is currently undergoing closure construction. This inspection was unique because all previous observations have been repaired and are no longer visible because of the updated grading and ongoing placement of geosynthetics.

2 Annual Inspection Description

Regulatory Citation: 40 CFR §257.84 Inspection requirements for CCR landfills

The Annual Inspection for the Landfill 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 §257.84 (b) Annual inspections by a qualified professional engineer;

- (1) *Existing and new CCR landfills and any lateral expansion of a CCR landfill must 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 Landfill is 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 §257.84 (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 Landfill, including the weekly inspection reports for inspections performed by plant personnel and the previous CCR Rule annual inspection performed by Atlas on October 1, 2025.

2.1.2 Visual Inspection

Regulatory Citation: 40 CFR §257.84 (b)(1);

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

The Landfill was visually inspected by AECOM on October 29, 2025. No significant signs of distress or malfunction of the CCR units were identified, as noted in Section 2.4.2.

2.2 Content of the Inspection Report

Regulatory Citation: 40 CFR §257.84 (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 structure since the previous annual inspection.*

No changes were observed.

- (ii) *The approximate volume of CCR contained in the unit at the time of the inspection.*

There is approximately 7.05 million CY of CCR in the Landfill.

- (iii) *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*

No structural weaknesses were observed on the Landfill.

- (iv) *Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection*

No changes were observed.

2.3 Frequency of Inspections

Regulatory Citation: 40 CFR §257.84 (b)(4);

- (i) *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)(9).*

The prior annual inspection report was placed in the operating record on December 9, 2024. AESI will be placing this inspection report in the facility's operating record no later than December 9, 2025.

2.4 Deficiency Identified

Regulatory Citation: 40 CFR §257.84 (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.

2.4.1 Previous Inspection

There were no major areas of concern noted during the previous annual inspection performed on October 1, 2024, but minor areas are listed below.

Zone A Partial Closure Area – North and West Side-slopes

- Good vegetation exists overall in most of the north and west side partial closure areas other than some bare spots observed.
- Erosion of side slope observed on the north side of the landfill.
- Animal burrow observed on the north side slope of the landfill.
- Overgrown vegetation observed on riprap channel section located on the northeast side of the landfill.
- Down drainpipes on the northwest slope of the landfill are covered with debris and vegetation.

Zone B Intermediate Cover Area – Top East and South Side slopes

- Good vegetation exists along much of the south end of the landfill, the top of landfill, and the east slope other than a few bare spots.
- Overgrown vegetation observed on riprap channel section located on the northeast side of the landfill.
- Downdrain pipes on the east slope of the landfill are covered with debris and vegetation.
- Animal burrows were observed on the north side of the landfill.

2.4.2 Current Inspection

Based on the current status of the Landfill (closure construction ongoing), it is apparent that items noted during the previous inspection have been addressed or are in the process of being addressed as part of the closure construction. See **Appendix A Photo Log Figure** and **Appendix B Photo Log** for progress photos of the landfill construction and hatch of the landfill closure cap installation progress. No new inspection observations were identified during the current inspection of the CCR landfill.

3 Certification

This Certification Statement documents that the annual inspection has been completed for the Petersburg Generating Station Restricted Waste Site Landfill and that the inspection and this inspection report meet the requirements specified in 40 CFR §257.84 (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

12/09/2025

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 Photo Log Figure

Appendix B Photo Log

Photo 1	Date: 11/19/2025	
Location: Indiana, Petersburg Generating Station		
Description: Facing North, southeast portion of the landfill that is not under closure construction.		
Photo 2	Date: 11/19/2025	
Location: Indiana, Petersburg Generating Station		
Description: Facing North, southeast to south central portion of the landfill that is not under closure construction.		

Photo 3	Date: 11/19/2025	
Location: Indiana, Petersburg Generating Station		
Description: Facing North, south central portion of the landfill that is not under closure construction.		
Photo 4	Date: 11/19/2025	
Location: Indiana, Petersburg Generating Station		
Description: Facing North, south central portion of the landfill that is not under closure construction.		

Photo 5	Date: 11/19/2025	 11/19/2025
Location: Indiana, Petersburg Generating Station		
Description: Facing North, south central portion of the landfill that is not under closure construction.		
Photo 6	Date: 11/19/2025	 11/19/2025
Location: Indiana, Petersburg Generating Station		
Description: Facing East, western portion of the landfill that is not under closure construction.		

Photo 7	Date: 11/19/2025	 11/19/2025
Location: Indiana, Petersburg Generating Station		
Description: Facing East, western portion of the landfill that is not under closure construction.		
Photo 8	Date: 11/19/2025	 11/19/2025
Location: Indiana, Petersburg Generating Station		
Description: Facing Southeast, down access road in southern portion of landfill.		

Photo 9	Date: 11/01/2025	 11/01/2025
Location: Indiana, Petersburg Generating Station Indiana Petersburg, Ash Pond B		
Description: East slope facing northwest, view of sand blowing in progress.		
Photo 10	Date: 10/29/2025	 11/14/2025
Location: Indiana Petersburg, Ash Pond B		
Description: Northeast slope facing east, View of rip rap installation progress.		

Photo 11	Date: 11/05/2025	 A photograph showing the northeast slope of a landfill hill. The hill is covered in green grass. Several construction workers in yellow vests and hard hats are working on the slope. A red utility vehicle is parked on the hill. The sky is blue with some wispy clouds. A timestamp '11/05/2025' is visible in the bottom right corner of the image.
Location: Indiana, Petersburg Generating Station		
Description: Northeast slope of landfill facing west, view of hydro-binder being installed.		
Photo 12	Date: 10/01/2025	 A photograph showing the north slope of a landfill hill. The hill is covered in green grass. Construction workers in yellow vests and hard hats are working on the slope. A yellow excavator is visible on the left side. In the background, there is a factory with several tall smokestacks emitting smoke. A timestamp '10/01/2025' is visible in the bottom right corner of the image.
Location: Indiana, Petersburg Generating Station		
Description: North slope facing west. View of turf installation in progress.		

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Photo 13	Date: 11/07/2025	 A photograph showing a steep, brown, textured slope of earth. Several construction workers in high-visibility yellow vests and hard hats are scattered across the slope, some walking and some standing. The top of the slope is covered with a dark, textured material, likely a geomembrane. The sky is overcast. A timestamp '11/07/2025' is in the bottom right corner of the image.
Location: Indiana, Petersburg Generating Station		
Description: West slope facing northeast, view of geomembrane installation in progress.		
Photo 14	Date: 11/14/2025	 A photograph showing a large, green, rolling slope of earth. A single construction worker in a high-visibility vest and hard hat is walking across the slope. In the background, there are industrial structures, power lines, and a large electrical pylon. The sky is blue with some white clouds. A timestamp '11/14/2025' is in the bottom right corner of the image.
Location: Indiana, Petersburg Generating Station		
Description: West slope facing south, View of air blowing of sand in progress.		

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