

### 2022 VISUAL INSPECTION OF ASH POND EMBANKMENTS AES PETERSBURG ASH POND SYSTEM

AES INDIANA PETERSBURG GENERATING STATION 6925 NORTH STATE ROAD 57 PETERSBURG, INDIANA 47567

ATLAS PROJECT NO. 170LF01359

DECEMBER 23, 2022

PREPARED FOR:

AES INDIANA 6925 NORTH STATE ROAD 57 PETERSBURG, INDIANA 47567

ATTENTION: MR. WILL TEAGUE



Atlas Technical Consultants

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December 23, 2022

Mr. Will Teague Senior Scientist AES Indiana 6925 North State Road 57 Petersburg, Indiana 47567-0436

Re: 2022 Visual Inspection of Ash Pond Embankments Petersburg Ash Basin Pond System AES Indiana Petersburg Generating Station Petersburg, Indiana ATLAS Project No. 170LF01359

Dear Mr. Teague:

Atlas Technical Consultants is pleased to present the findings of the November 17, 2022, Visual Site Inspection of the AES Petersburg Generating Station Ash Pond Embankments of the Ash Ponds A, A', B, C and D. This visual inspection and report were done in accordance with guidelines established by the Coal Combustion Residuals (CCR) Rule published by the Environmental Protection Agency (EPA) on April 17, 2015.

The scope of this inspection was limited to an examination of readily observable surficial features of the ash pond embankments and its appurtenant structures, and a review of information that you provided. Please note that the inspection did not include any test drilling, testing of materials, precise physical measurements of ash pond system features, detailed calculations to verify slope stability, or other engineering analyses. Although the inspection was conducted by competent personnel in accordance with generally accepted methods for ash pond systems, it should not be considered as a warranty or guaranty of the future performance/safety of the ash pond embankments.

The AES Petersburg Generating Station Ash Basin Pond System is located about four (4) miles north of the City of Petersburg in Pike County, Indiana west of State Road 57 (Figure 1). The ash pond system encompasses an area of approximately 157.9 acres (Figure 2).

The ash pond embankments inspection was completed by Bill Paraskevas and Pedro Avellaneda of Atlas Technical Consultants. The weather condition during the inspection were between 33°F and 38°F and sunny. Contained herein is a summary of the engineering observations of the ash pond embankments including condition of the pond embankment side slopes, grading and erosion, vegetation, haul roads, perimeter ditches, downdrain channels, riprap areas, culverts, and other

adjacent structures. A vicinity map and the ash pond limits are shown in Figures 1 and 2 of this report for reference.

The 2022 Annual Inspection was performed to address the standards and guidelines required by the CCR Rule instituted by the Environmental Protection Agency on April 17, 2015. As a result, CCR ash ponds are now required to meet the requirements of 40 C.F.R. §257 to conduct annual inspections of the landfill in accordance with 40 C.F.R. §257.83(b). Listed below are requirements specified within the CCR Rule and the observations made by Bill Paraskevas and Pedro Avellaneda during the annual inspection:

- i. A review of available information regarding the status and condition of the CCR Unit;
- ii. A visual inspection of the CCR Unit to identify signs of distress or malfunction;
- iii. A visual inspection of any hydraulic structures underlying the base of the CCR unit;

## **Inspection Summary**

A site inspection grid map for the ash pond system at the AES Petersburg station is presented in Figure 3. The area occupied by Ash Pond D has been repurposed with the construction of a wastewater treatment plant, Ash Ponds B and C are closed, and Ash Pond A is in the closure process as in-place closure. Ash Pond A' is largely dewatered and will soon be regraded and closed as part of the Ash Pond A closure.

Engineering observations performed on November 17, 2022 are shown in Figure 3, 2022 Visual Site Inspection Grid Map. Atlas visually inspected the embankments for Ash Ponds A, A', B, C, and D and found no areas of instability. However, there were few areas with concerns relating to minor erosion on the east side of Ash Pond A (Figure 3) and missing trash racks in some of the drop inlets of Ash Pond B (locations H-9 and D-7 of Figure 4).

A description of the inspection findings are presented in sections below.

## Changes in Geometry of Ash Pond

Observed geometry changes during the 2022 Petersburg ash basin embankment inspection consisted mainly of grading measures within the limits of Ash Pond A and A' which are in the process of being closed in place. There were no changes to the observed geometry of Ponds B, C & D.

## Ash Pond A and A'

Ash Pond A & A' are approximately 70.1 acres in size and are in the process of being closed in place. Active construction activities were on-going within the limits of the ash pond to regrade and install the approved geocomposite final cover system. The east side of Ash Pond A had been recently stabilized and new vegetation was growing and being established at the date of the inspection. Some observations and areas with minor erosion are noted below.

- 1. New erosion controls have been installed along the east and south sides of Ash Pond A (locations H-13, I-16, I-19, G-23 of Figure 4).
  - o Recommendation: Overseed and add fertilizer as necessary to help establish a full vegetative cover.
- 2. Minor erosion rills were observed along the east section of Ash Pond A (locations H-14, G-16, H-17 of Figure 4).
  - o Recommendation: Repair the soil cover and overseed these areas to establish a protective grass cover.

## Ash Pond B

Ash Pond B is approximately 33.1 acres and was closed with a geomembrane final cover except for the south side slope which was closed with an approved soil final cover. As part of the closure work on Pond A, located to the south of Pond B, the soil final cover along the south slope of Pond B is being replaced with a geomembrane cover. Ash Pond B does not receive ash anymore. In general, this pond has a good soil cover and is well-vegetated along the side slopes and top of the former ash pond basin.

- 1. Trash racks are missing on drop inlets located on the east side of Ash Pond B (location H-9 of Figure 4) and the northeast side of Ash Pond B (location D-7 of Figure 4).
  - Recommendation: Repair or install new trash rack on the tops of the drop inlets.

### Ash Pond C

Ash Pond C is approximately 45.7 acres. It has been recently closed with a geomembrane final cover and does not receive ash anymore. The former ash pond has a good soil cover and vegetation established along the side slopes and upper cover. A minor erosion issue was observed on the west side of Ash Pond C.

- 1. The riprap-lined stormwater channel, located on the west side of Ash Pond C and the north side of Ash Pond B. has lost portions of its riprap and eroded (location G-3 of Figure 4). The affected area is the outlet for the valley drain between Ash Pond B and C.
  - Recommendation: Repair the damaged area and replace the riprap material in the channel to prevent erosion.

### Ash Pond D

The area for Ash Pond D has been repurposed and does not receive ash sluicing anymore. In general, this area has been paved with asphalt and is now entirely occupied by a wastewater treatment plant and a parking facility.

# Structural Integrity

All ash pond embankment slopes appear to be stable with no visual indications or signs of sloughing or subsidence were detected during this inspection.

# Stability and Operation

The ash pond embankments are generally in good condition and the slopes are well vegetated in most places. Areas of localized surficial erosion were found around a few areas of Ash Pond A. Those erosional features did not appear to penetrate through the soil cover, but they should be refilled and revegetated to prevent further damage to the cover or embankments. No other significant deficiencies were noted and operation of the ash pond system at this time is not expected to be adversely affected by any items detected during the 2022 inspection.

We appreciate the opportunity to assist you with this project. If you have any questions concerning information contained in this report, please do not hesitate to call either of the undersigned at 317.849.4990.

Sincerely, Atlas Technical Consultants L.L.C.

Willin Parat

William Paraskevas, P.E. Principal Engineer

Copies: Will Teague

Attachments:

Figure 1Vicinity MapFigure 2CCR Disposal FacilitiesFigure 3Visual Site Inspection Grid MapFigure 4Site Plan for Photo Locations

Attachment A: Dam Inspection Report































Attachment A: Dam Inspection Report

## SUGGESTED DAM INSPECTION REPORT (Refer to pages 5 and 6 for instructions.)

Name of Profession William Paras		Inspection						ional Licens 020880	se No. (li	ndiana)	
Business Address 7988 Ce		Suite 100, Indiar	napolis, IN 4	6256				hone: (day evening)	)	- <u>849</u>	4990
Company Name	Atlas T	echnical Consul	tants								
INSPECTION PR Yes 🛛 No 🗖 Con		Reviewed all perti	nent technic	al documenta	ation re	ated to this	dam and	site in the	State's	and the C	wner's files:
MULTIDISCIPINA properly inspect th hydrologic, structu	is dam and app	urtenant works. Te	chnical discip		-						-
Dam Name AES Petersburg	Ash Pond A				(	Quad. Peters	burg	Date of In:	spection	11/17	/ 2022
State Dam ID N/A	State Dam ID Permit (if unapproved see pg		i. 6) County Pike		Sec. 13	т. , <u>1</u> <u>N</u>	R. , <u>8</u> W	· I		11 / 16	5 / 2021
Owners Name AES Indiana Address/Zip Code								-	wner's Pr 812)60		
6925 North Stat	e Road 57, Pe	tersburg, IN 475		Phone (day)	812	- 601 -	7115	Spillway	Width	F	t. FBD.
Wil Teague Hazard	eague		(evening) 81 Height Crest Length					Top N/	A Bot.	N/A : Up 2.5	N/A
Low	0.16 <sup>MI<sup>2</sup></sup>	81 AC	20 FT	6900	FT	20			Т	Down 2.	5
FIELD CONDITION Water Level - Be Ground Moisture MONITORING	low Dam Crest Condition: Dry_	>20 Ft. WetSno		_Other	□ See	pageWeirs		DRAWDOV ☐ Yes X Comment <u>1</u> urvey Monun	None aken ou	-	
Comments	Scarps	<b>MS NOTED:</b> ⊠ ( ☐ (A-4) Cracks-with des ☐ (A-9) Anin :	n Displaceme		Sinkhol	e 🗖 (A-6	6) Appears	I, Weathered Too Steep I) Other		,	Erosion-with ons or Bulges
B CRES GOOD D ACCEPTABLE DEFICIENT D POOR	□ □ (B-5) Sin	kholes  ☐ (B-6) ☐ (B-10) Trees,	(B-1) None Not Wide End Brush, Briars	•	7) Low /	`	-3) Erosion -8) Misalig	· · ·		ith Displac dequate Si	

Spillway Width refers to the open channel (typically the emergency or auxiliary spillway) at the control section. Ft. FBD. refers to the vertical distance from the emergency (auxiliary) spillway control section to the lowest point of the crest of the dam. Inlet Below Crest refers to the vertical distance from the inlet of the principal spillway to the crest of the dam.

\_STATE DAM I.D.<u>N/A</u>\_\_\_\_\_DATE<u>11\_/17\_/22</u>\_\_\_

C DOWNSTREAM SLOPE GOOD X ACCEPTABLE DEFICIENT DEFICIENT	PROBLEMS NOTED: I (C-1) None       □ (C-2) Livestock Damage       □ (C-3) Erosion or Gullies       □ (C-4) Cracks with         Displacement       □ (C-5) Sinkholes       □ (C-6) Appears too Steep       □ (C-7) Depression or Bulges       □ (C-8) Slide         □ (C-9) Soft Areas       □ (C-10) Trees, Brush, Briars       □ (C-11) Animal Burrows       □ (C-12)Other
D       SEEPAGE         GOOD (NONE)       ⊠         ACCEPTABLE       □         DEFICIENT       □         POOR       □	PROBLEMS NOTED: Image: (D-1) None       (D-2) Saturated Embankment Area       (D-3) Seepage Exits on Embankment         (D-4) Seepage Exits at Point Source       (D-5) Seepage Area at Toe       (D-6) Flow Adjacent to Outlet         (D-7) Seepage       Clear/Muddy         [DRAIN OUTFALLS SEENNoYes       (D-8) Flow Clear/Muddy       (D-9) Dry/Obstructed]         (D-10) OtherDescribe location of drains and indicate amount and quality of discharge.         Comments:
E PRINCIPAL SPILLWAY GOOD ⊠ ACCEPTABLE □ DEFICIENT □ POOR □	DESCRIPTION: PROBLEMS NOTED: A (E-1) None (E-2) Deterioration (E-3) Separation (E-4) Cracking (E-5) Inlet, Outlet Deficiency (E-6) Stilling Basin Inadequacies (E-7) Trash Rack (E-8) Other Comments: Being removed from service as ash pond is closed.
AUXILIARY SPILLWAY       GOOD       ACCEPTABLE       DEFICIENT       POOR	DESCRIPTION: N/A PROBLEMS NOTED:  (F-1) None  (F-2) No Auxiliary Spillway Found  (F-3) Erosion-with Backcutting (F-4) Crack with Displacement  (F-5) Appears to be Structurally Inadequate  (F-6) Appears too Small (F-7) Inadequate Freeboard  (F-8) Flow Obstructed  (F-9) Concrete Deteriorated/Undermined (F-10) Other Comments:
G MAINTENANCE AND REPAIRS GOOD X ACCEPTABLE DEFICIENT DEFICIENT	PROBLEMS NOTED:       Image         G(G-4)       G(G-5)         G(G-4)       Spillway         Obstruction       G(G-5)         G(G-6)       Trees on Upstream Slope, Crest, Downstream Slope         G(G-6)       Trees on Upstream Slope, Crest, Downstream Slope         G(G-6)       Trees on Upstream Slope, Crest, Downstream Slope         G(G-7)       Rodent Activity on Upstream Slope, Crest, Downstream Slope, Toe         G(G-7)       G(G-7)         Rodent Activity on Upstream Slope, Crest, Downstream Slope       G(G-7)         Rodent Activity on Upstream Slope, Crest, Downstream Slope, Crest, Downstream Slope, Toe       G(G-7)         G(G-10)       Other       G(G-10)         Comments:       G(G-10)       G(G-10)
Based on this inspe □ (H-3) Conditionall	ction and recent file review, the overall surficial condition is determined to be: 🛛 (H-1) Satisfactory 🗋 (H-2) Fair y Poor 🗋 (H-4) Poor 📄 (H-5) Unsatisfactory
IMPORTANT: IF THIS I	RATING IS DIFFERENT THAN PREVIOUS IDNR RATING, PLEASE ATTACH EXPLANATION AND REASONS FOR CHANGE ON PAGE 4.

#### RECOMMENDATIONS AND ITEMS REQUIRING ACTION BY OWNER TO IMPROVE THE SAFETY OF THE DAM

TO IMPROVE THE SAFETY OF THE DAM	
MAINTENANCE-MINOR REPAIR-MONITORING	
(1) Provide Additional Erosion Protection:	
□ (2) Mow:	
(3) Clear Trees and/or Brush From:	
(4) Initiate Rodent Control Program and Properly Backfill Existing Holes:	
🗖 (5) Repair:	
(6) Provide Surface Drainage For:	
□ (7) Monitor:	
□ (8) Other:	
□ (9) Other:	
ENGINEERING-EMPLOY AN ENGINEER EXPERIENCED IN DESIGN AND CONSTRUCTION OF DAMS TO:	
(Plans & Specifications must be approved by State prior to construction.)	
□ (10) Prepare Plans and Specifications for the Rehabilitation of the Dam:	
□ (11) Prepare As-Built Drawings of:	
□ (12) Perform a Geotechnical Investigation to Evaluate the Stability of the Dam:	
□ (13) Perform a Hydrologic Study to Determine Required Spillway Size:	
□ (14) Prepare Plans and Specifications for an Adequate Spillway:	
(15) Set up a Monitoring Program:       (16) Refer to Upgenround Status of Dam:	
(16) Refer to Unapproved Status of Dam:       (17) Develop an Emergency Action Plan:	
(17) Develop an Emergency Action Plan:	
□ (18) Other:	
□ (19) Other:	
Recommended schedule for upgrades/comments (Please prioritize and note importance of each item.)	
Photographs  Attachments	
ENCINEED'S INSTRUCTION Instructed owner on the eaferty concerns with the structure and how to monitor and instruct the d	am and annurtanent
ENGINEER'S INSTRUCTION Instructed owner on the safety concerns with the structure and how to monitor and inspect the daworks in the interim period between the regulatory two-year inspections. Yes □ No ⊠ Comment Further inspections as a dam facility will not be needed when ash pond is closed.	am and appurtenant
<u>^</u>	
Professional Engineer's Signature Parashura	Date 12/22/2022
Reviewed By	Date
Owner/Owner's Representative	Build

**EXPLANATION FOR CHANGE IN RATINGS** (Describe all repairs, upgrades or improvements made if dam conditions and rating have improved since the last inspection. Describe deteriorating conditions if ratings have worsened.)

REASONS FOR RATING CHANGE:

Ash Pond A is being removed from service and is being permanently capped with geomembrane final cover.

PREVIOUS RECOMMENDATIONS FOR MAINTENANCE, REPAIRS, AND UPGRADES:

HAVE THEY BEEN PERFORMED X YES D NO (If no, please explain:)

Supporting Documentation

Photographs  $\Box$  Attachments  $\Box$  Calculations  $\Box$  Drawings  $\Box$  Other  $\Box$ 

Comments:

### INSTRUCTIONS FOR COMPLETING DAM VISUAL INSPECTION REPORT

1. Complete all items that are applicable; if not applicable, write in "N/A". For concrete dams, complete all applicable items and use "comments" section to cover items not included in the check boxes. Also indicate that the dam is concrete in the comments section.

2. Use page 6 to determine ratings of each dam component (items A through G) and for Overall Conditions (Item H).

3. Please write legibly and concisely.

4. Inspector must be knowledgeable with the type of dam, materials, and components being inspected. If not, qualified assistance shall be engaged.

5. The inspector shall review the dam owner's and IDNR project files prior to the inspection. Previous inspection reports shall be closely reviewed for previous problems and deficiencies.

6. If the ratings of the components (items A through G) or the Overall Conditions (item H) of the dam have changed since the last inspection, please complete page 4. If a rating has improved, dam repairs, improvements, analyses, or maintenance must have been performed and documented on page 4.

7. For a dam to have a satisfactory "Overall Conditions" rating, it must have no existing or potential dam safety deficiencies recognized. Safe performance is expected under all anticipated loading conditions, including infrequent hydrologic events (PMP for high hazard dams) and seismic events. The dam owner's project files must contain hydrologic and hydraulic analyses of the dam and its spillways to verify performance. The files must also contain slope stability analyses to verify embankment stability under full reservoir conditions and rapid-draw down conditions. The dam and all of its components must meet current IDNR and design standards. "Normal" deficiencies such as minor erosion, minor seepage, or normal concrete aging may not make a dam unsatisfactory or unacceptable. For a satisfactory "Overall Conditions" rating to be assigned, items A through G generally should all have a "good" rating; however, in some cases an "acceptable" rating may be satisfactory if the "Problems Noted" are minor, or "normal" conditions, such as minor erosion rills, small puddles on crest, or if grass needs mowed, but is in good condition.

8. An inspection report form must be submitted to IDNR along with a formal technical inspection report as described in Chapter 4.0 of Part 3 of the Indiana Dam Safety Inspection Manual.

9. Please sign and date this page in the space below to verify that you have read and understand these instructions.

Inspector's Signature:

Date:

#### CONDITIONS OBSERVED - APPLIES TO UPSTREAM SLOPE, CREST, DOWNSTREAM SLOPE, PRINCIPAL SPILLWAY, AUXILIARY SPILLWAY

GOOD	ACCEPTABLE		DEFICIENT		POOR		
In general, this part of the structure has a good appearance, and conditions observed in this area do not appear to threaten the safety of the dam.	tained, surfaces may rutted, spalled, or o condition. Conditior	ross-section is main- be irregular, eroded, therwise not in new is in this area do not hreaten the safety of		tion and/or unusual en the safety of the	Conditions observed in this area appear to threaten the safety of the dam. Conditions observed in this area are unacceptable.		
	CO	NDITIONS OBSERVED	- APPLIES TO SEEPA	AGE			
GOOD (NONE)	ACCEPTABLE		DEFICIENT		POOR		
No evidence of uncontrolled seepage. No unexplained increase in flows from de- signed drains. All seepage is clear. Seep- age conditions do not appear to threaten the safety of the dam.	Some seepage exists at areas other than the drain outfalls, or other designed drains. No unexplained increase in flows from designed drains. All seepage is clear. Seepage conditions observed do not cur- rently appear to threaten the safety of the dam.		Excessive seepage exists at areas other than drain outfalls and other designed drains. Seepage needs to be evaluated. Increased flow and/or continued deterio- ration in seepage conditions may threaten the safety of the dam.		<ul> <li>Excessive seepage conditions observed appear to threaten the safety of the dam and is unacceptable. Examples: 1) Designed drain or seepage flows have increased without increase in reservoir level.</li> <li>2) Drain or seepage flows contain sediment. i.e., muddy water or particles in jar samples. 3) Widespread seepage, concentrated seepage or ponding appears to threaten the safety of the dam.</li> </ul>		
	CONDITIONS	OBSERVED - APPLIE	S TO MAINTENANCE	AND REPAIR			
GOOD	ACCEPTABLE	ACCEPTABLE			POOR		
Dam appears to receive effective on-going maintenance and repair, and only a few minor items may need to be addressed.	Dam appears to receive maintenance, but some maintenance items need to be ad- dressed. No major repairs are required.		significant improveme be required. Continu	e of the dam needs ent. Major repairs may ed neglect of mainte- the safety of the dam.	Dam does not receive adequate mainte nance. One or more items needing mair tenance or repair has begun to threate the safety of the dam. Level of mainte nance is unacceptable.		
		OVERALL C	ONDITIONS				
SATISFACTORY - I dam safety deficien performance is exp pated loading condi events as infreque seismic events. Pro essary hydrologic, a calculations to ve performance. FAIR - No existing cies are recognize conditions. Infrequ	seismic events would probably result in a dam safety deficiency. CONDITIONALLY POOR - A potential safety deficiency is recognized for un- usual loading conditions which may realis- tically occur during the expected life of the structure. CONDITIONALLY POOR may also be used when uncertainties exist as to critical analysis parameters which iden- tify a potential dam safety deficiency; further investigations and studies are necessary.		POOR - A potential dam safety deficiency is clearly recognized for normal loading conditions. Immediate actions to resolve the deficiency are recommended; reser- voir restrictions may be necessary until problem resolution. UNSATISFACTORY - A dam safety defi- ciency exists for normal conditions. Im- mediate remedial action is required for problem resolution.				
	HAZ	ARDCLASSIFICATION	IS OF DAMS (STRUCT	JRE)			
LOW HAZARD- A structure the failure of which may damage farm buildings, agri- cultural land, or local roads		SIGNIFICANT HAZARD- A structure the failure of which may damage isolated homes and highways, or cause the tempo- rary interruption of public utility services.		HIGH HAZARD-A structure the failure of which may cause the loss of life and serious damage to homes, industrial and commercial buildings, public utilities, major highways, or railroads.			

### **UNAPPROVED STATUS OF DAM**

A dam that has been given an unapproved status (see entry for permit) means that plans, construction specifications, hydraulic analyses, and/or a geotechnical investigation on your dam, proving the safety of the structure, have not been received and approved by the Indiana Department of Natural Resources (IDNR). IDNR records indicate that no progress has been made to secure this approval. The fact that the dam is inspected under the Regulation of Dams Act (IC 14-27-7.5) in no way alters the illegal status of the structures.

If your dam is indicated to be unapproved, it is requested that your engineer contact the Indiana Department of Natural Resources,