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December 19, 2025

Annual CCR Inspection  
§257.84 (b)

for the

Type III RWS Landfill

at the

A.B. Brown Generating Station

Revision 0

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## Executive Summary

This Coal Combustion Residuals (CCR) Annual Inspection for the A.B. Brown Generating Station Type III Restricted Waste Site (RWS) Landfill, herein "Landfill", at the Southern Indiana Gas & Electric Company, Inc., A.B. Brown 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 January 3, 2025. SIGECO is placing this year's report in the facility's Operating Record no later than January 3, 2026, 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 Landfill has met the annual inspection requirements
2.2	§257.84 (b)(2)	<i>Inspection Report</i>	Yes	The Landfill has met the inspection report requirements
2.3	§257.84 (b)(4)	<i>Frequency of Inspections</i>	Yes	The Landfill has met the required frequency of inspections
2.4	§257.84 (b)(5)	<i>No Deficiency Identified</i>	Yes	No deficiency identified

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 A.B. Brown Generating Station Type III 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 January 3, 2025. SIGECO is placing this year's report in the facility's Operating Record no later than January 3, 2026, 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 A.B. Brown Generating Station is located in Posey County, Indiana, 10 miles east of Mt. Vernon, Indiana, and is owned and operated by Southern Indiana Gas & Electric Company, Inc. (SIGECO). The Brown station is situated just west of the Vanderburgh-Posey County line and north of the Ohio River with the Landfill positioned on the northeast side of the generating station. A location map showing the AB Brown Generating Station and the Landfill is provided as **Figure 1 in Appendix A**.

As described in closure documentation provided to IDEM in 2015, the northern and southern slopes of the Landfill as well as the perimeter of the eastern half of the Landfill have received soil final cover, consisting of 2 feet of cohesive soil with a 6-inch layer of topsoil. Per closure documentation submitted to IDEM in three reports from 2012 to 2014, the eastern portion of the Landfill has received a composite final cover, consisting of (from bottom to top) 40-mil LLDPE geomembrane, 16 oz/yd<sup>2</sup> nonwoven geotextile, 2.5 feet of protective soil, and 6 inches of topsoil.

## 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 A.B. Brown personnel. A.B. Brown Generating 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 29, 2024.

#### 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 November 24, 2025. No significant signs of distress or malfunction of the CCR unit 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 5,510,074 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 January 3, 2025. SIGECO will be placing this inspection report in the facility's operating record no later than January 3, 2026.

## 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 by ATC on October 29, 2024, but minor areas are summarized below.

**Partial Closure Area (Soil Final Cover and Composite Final Cover – North and West Side-slopes, East Side)**

- One area of sparse vegetation observed.
- Minor debris accumulated around pipe structure and riprap.
- Animal burrow observed on the east side of the Landfill.

**Vertical Expansion Area**

- Two areas of sparse vegetation observed.
- Noted active soil cover placement on the side slope of the Landfill.

**Interim Cover Area**

- Ongoing soil cover placement activities noted.

**Landfill Sedimentation Pond**

- No items noted during prior inspection.

**2.4.2 Current Inspection**

AECOM observed the locations of items noted during the previous inspection and confirmed those items have been addressed. While onsite, SIGECO personnel indicated to AECOM that the soil cover placement activities – as required by the permit and as noted in the previous inspection report – had been recently completed. No areas of significant concern were identified during the current inspection. Relatively insignificant areas of note, primarily associated with the recent completion of soil cover placement activities and subsequent large storm events, are described below. Refer to **Figure 2** within **Appendix A** for the locations of items identified during the current inspection. No action is recommended for locations not specifically described below:

- Animal burrows (Locations 11, 13) – recommend repair and reseeding. For burrow adjacent to the Sedimentation Pond (Location 44), recommend excavation and placement of compacted fill in lifts.
- Trash rack maintenance/replacement – recommend removal of accumulated debris from rack (Location 3). Restore missing trash rack on drop inlet (Location 58).
- Partial blockage of culverts – Recommend removal of riprap (Location 19) and vegetation removal (Location 22) at culvert entrances. Recommend cutting vegetation within detention basin (Location 23).
- Minor areas of sparse vegetation (Locations 17, 29, 31-33, 35-38) – recommend reseeding during growing season. Erosion control matting or straw may be utilized as a temporary measure until seeding can occur.
- Displaced riprap/aggregate in ledges and ditches (Locations 25-26, 28, 53, 55) – recommend repair and replacement of riprap lining where indicated.
- Bank erosion in Capital Pond (Location 48) – recommend repair of minor eroded area and replacement of riprap/geotextile.

- Sediment removal (Location 49-51) – recommend removal of accumulated sediment from landfill perimeter ditches.
- Access road erosion rills (54, 57) – fill rills and replace road aggregate

### 3 Certification

This Certification Statement documents that the annual inspection has been completed for the A.B. Brown Generating Station Type III Restricted Waste Site Landfill and that the inspection and this inspection report meet the requirements specified in 40 CFR §257.84 (b).

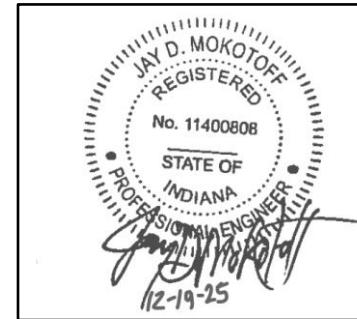
I, Jay Mokotoff, being a Registered Professional Engineer in good standing in the State of Indiana, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this report has been prepared in accordance with the accepted practice of engineering.

Jay D. Mokotoff

*Printed Name*

12/19/2025

*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 SIGECO. 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 operations, maintenance, and stormwater handling procedures at the Landfill, as provided by SIGECO. 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**



A	2025-12-19	Issue for Certification
I/R	DATE	DESCRIPTION

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