

LINER DESIGN CRITERIA
CCR SURFACE IMPOUNDMENT: A.B. BROWN STATION
CCR UNIT: LINED CCR POND

AECOM ("Consultant") has been retained by SIGECO to prepare the following assessment of whether the above-referenced new coal combustion residuals ("CCR") surface impoundment meets the design requirements for composite liner or an alternative composite liner as set out in 40 C.F.R. § 257.70(b) or (c). Presented below are the project background, assessment, limitations, and certification.

1.0 BACKGROUND

Pursuant to 40 C.F.R. § 257.72(a), new CCR surface impoundments and lateral expansions of existing and new CCR surface impoundments must be designed, constructed, operated, and maintained with either a composite liner or an alternative composite liner that meets the requirements of § 257.70(b) or (c).

Pursuant to 40 C.F.R. § 257.72(c), prior to construction of the CCR surface impoundment or any lateral expansion of a CCR surface impoundment, the owner or operator must obtain certification from a qualified professional engineer that the design of the composite liner or, if applicable, the design of an alternative composite liner complies with the requirements of § 257.72.

In support of Consultant's assessment, Consultant completed an evaluation of the design criteria for alternative composite liners and determined that sufficient information is available to document the required demonstration.

2.0 ASSESSMENT

Based upon a review of the liner design of the Lined CCR Pond, Consultant concludes as follows:

| CCR Unit | Liner Design Criteria |
|----------------|---|
| Lined CCR Pond | <i>Meets the requirements of 40 C.F.R. § 257.70(c) and § 257.72</i> |

3.0 LIMITATIONS

The signature of Consultant's authorized representative on this document represents that to the best of Consultant's knowledge, information, and belief in the exercise of its professional judgment, it is Consultant's professional opinion that the aforementioned information is accurate as of the date of such signature. Any opinion or decisions by Consultant are made on the basis of Consultant's experience, qualifications, and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data, and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

4.0 CERTIFICATION

I, Jay Mokotoff, being a Registered Professional Engineer, in accordance with the Indiana Professional Engineer's Registration, do hereby certify to the best of my knowledge, information, and belief, that the CCR unit that is the subject of this report dated June 9, 2023 meets the requirements for alternative composite liner pursuant to 40 C.F.R. § 257.70(c), and that this report is true and correct and has been prepared in accordance with generally accepted good engineering practices.

SIGNATURE



DATE June 9, 2023

