40 CFR Parts 257

2025 Checklist for P.E. Annual Inspection for CCR Surface Impoundments, § 257.83(b)

Sikeston BMU Sikeston Power Station Fly Ash Surface Impoundment Annual Inspection

NOTE – THE FLY ASH POND CLOSURE IS SUBSTANTIALLY COMPLETE AS OF DECEMBER 23, 2025.

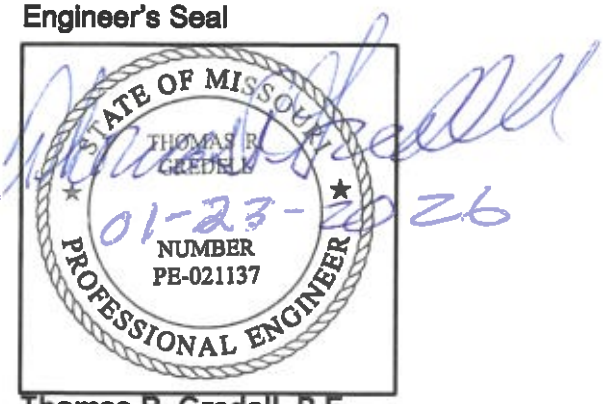
Requirements	Signs of actual or potential structural weakness (257.83(b)(vi))	Disruptions or potential disruption to the operation and safety of the unit (257.83(b)(vi))
CCR Unit and appurtenant structures 257.83(b)(ii)	The closure of the Fly Ash Pond has improved or remediated any actual or potential structural weaknesses. Continue to Monitor.	The closure of the FAP has resolved all real or potential items identified during weekly inspections throughout the year. Continue to monitor the Fly Ash Pond throughout the post-closure maintenance period which will begin in 2026.
CCR Unit and appurtenant structures 257.83(b)(ii)	The need for staff gauges is no longer necessary due to the inactive status of the Fly Ash Pond and pending closure.	The closure of the FAP has resolved all real or potential items identified during weekly inspections throughout the year. Continue to monitor the Fly Ash Pond throughout the post-closure maintenance period which will begin in 2026.

The 2025 Annual Inspection included 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 in general accordance with 257.83(b)(i).

Significant changes were made to the Fly Ash Pond in 2025 resulting from the substantial completion of the in-place closure of the Fly Ash Pond in December 2025. The 2025 closure has significantly improved conditions related to structural stability. Minor maintenance items associated with routine upkeep and items that require continued observation observed during the 2025 Annual Inspection do not impact the structural integrity of the embankment. SBMU agrees to continue to monitor and address these items in a timely manner through normal maintenance.

GREDELL Engineering Resources, Inc.

Engineer's Seal



Thomas R. Gredell, P.E.
Missouri License: PE-021137
Date: January 23, 2026

SIKESTON POWER STATION – FLY ASH POND
2025 ANNUAL INSPECTION CHECK SHEET

SIKESTON POWER STATION
Fly Ash Pond
Annual Inspection Check Sheet

Date	Multiple dates
Inspector	Thomas Gredell, P.E.
Pool Level	Not Applicable
Temperature	Varies
Weather	Varies

1. Date of Previous Annual Inspection:
   a. November 20, 2024
2. Date of Previous Periodic Inspection:
   a. The date of the most recent weekly inspection report reviewed for this Annual Inspection was December 1, 2025.
3. Description of Emergency Conditions (EC) or Immediate Maintenance (IM) conditions observed since the last annual inspection:
   a. No EC conditions were noted for the Fly Ash Pond during the first 8 months of 2025. The FAP closure construction project began in September 2025 and was substantially completed in late December 2025. The closure of the FAP has resolved all real or potential items identified during weekly inspections throughout the year.
   b. One (1) IM condition was noted during the April 6, 2025, weekly inspection for erosion or rutting on gravel top roads or ramps. MM conditions for the same item were noted during the January 12, 2025, and March 9, 2025, weekly inspections. The FAP closure construction project began in September 2025 and was substantially completed in late December 2025. The closure of the FAP has resolved all real or potential items identified during weekly inspections throughout the year. Continued observation of the road surface on the top of the berms should continue in the post-closure care period that will begin in 2026.
4. Describe any action taken to restore or improve safety and integrity of impounding structure:
   a. The FAP closure construction project began in September 2025 and was substantially completed in late December 2025. The closure of the FAP has resolved all real or potential items identified during weekly inspections throughout the year. Figures 1 and 2 are attached to depict the significant improvements made to the Fly Ash Pond in 2025. Figure 1 depicts the Pre-Closure Condition of the Fly Ash Pond prior to September 2025 and the start of the construction project to implement closure of the Fly Ash Pond. Figure 2 depicts the Closed Condition of the Fly Ash Pond upon substantial completion of the closure project in late December 2025.
   b. In response to past observations of potential berm seepage in the southeast FAP berm (indicated by the observation of cattails above the toe of the slope and different type of vegetation), a field investigation and office evaluation was completed in mid-2018 by Reitz & Jens, Inc. as a subconsultant to GREDELL Engineering Resources, Inc. (GER). The conclusion of that evaluation is that the possible seepage did not have a negative impact on the stability of the embankments. Visual field observations of these areas have been made since 2018. Field observations since that time found that potential seepage on the northwest and southeast berms have not resulted in evidence of slumping, seepage flow or erosion and no actions were required. The 2025 closure project has eliminated free water in the pond which reduces seepage potential. Continued monitoring is recommended.

5. Describe any modifications to the geometry of the impounding structure since the previous annual inspection:
   a. Significant changes were made to the Fly Ash Pond in 2025 due to the closure construction project.
   b. SPS hired a contractor to significantly regrade the dewatered CCR material to create a well-drained CCR surface ready for an engineered cover.
   c. In addition, the south end of the Fly Ash Pond was excavated to remove the full depth of CCR material to accumulate and temporarily store ongoing stormwater runoff.
6. Describe any modifications to the operation of the impounding structure since the previous annual inspection:
   a. Closure of the Fly Ash Pond was substantially completed by December 23, 2025. No CCR materials were added or removed from the Fly Ash Pond in 2025.
   b. Approximately 3,300 linear feet of permanent horizontal internal drainpipes were installed in the approximate middle and along the south toe of the Fly Ash Pond, north of the permanent stormwater drainage basin, to collect internal saturation water for removal and treatment through SPS Process Pond.
   c. Permanent internal saturation water and stormwater runoff handling structures and associated pumps and controls have been installed to automatically remove collected internal saturation water and stormwater.
7. List the approximate remaining storage capacity (Cubic Yards) of the impounding structure:
   a. Due to the recent closed status of the Fly Ash Pond, there is no need to estimate the remaining storage capacity for CCR materials. No CCR has been placed into the Fly Ash Pond since early 2021.
   b. Closure operations in 2025 have reshaped the ash surface, but the volume of CCR materials remains unchanged. No CCR materials were added or removed in 2025.
8. List the approximate maximum, minimum and present depth and elevation of the impounded water since the previous annual inspection:
   a. The weekly inspection reports did not indicate an elevation of impounded water because there was not a staff gauge within the Fly Ash Pond. Only direct precipitation enters the Fly Ash Pond. A concrete pump tank and associated pumps and float switches were installed in 2024 to remove stormwater runoff in a timely manner for transport and treatment in the SPS Process Pond.
   b. Significant changes were made to the Fly Ash Pond in 2025 during closure that improved the internal drainage of precipitation and greatly increased the surface water storage capacity and the automation of the stormwater and internal saturation water removal systems.
   c. The graded, in place CCR materials were covered with an impermeable, geosynthetic closure cap (ClosureTurf) which will promote rapid runoff and significantly reduce infiltration of future rainfall into the in place CCR materials.
9. List the approximate maximum, minimum and present depth and elevation of the impounded CCR since the previous annual inspection:
   a. Closure of the Fly Ash Pond was substantially complete on or before December 23, 2025. No CCR materials have been added to the pond in 2025.

b. As designed in the Fly Ash Pond closure construction plans, the depth of in place CCR materials ranges from 0 depth (elevation 302 feet) to an approximate depth of 29 feet (elevation 331 feet).

c. The minimum elevation of CCR materials is approximately 302 +/- and is located within the permanent stormwater basin.

10. Approximate volume of impounded water and CCR at the time of the inspection:

a. In 2024, the surface of the uncovered CCR materials was graded to promote rapid stormwater runoff and the collection and storage of accumulated stormwater in the south end of the Fly Ash Pond. Since 2024, accumulated stormwater has been pumped out of the pond and transported to the SPS Process Pond. The completion of the Fly Ash Pond Closure project improved the stormwater storage and removal system. The storage basin is designed to hold a minimum of 5 million gallons of accumulated stormwater. The stormwater removal system is designed to remove accumulated stormwater within 10 days.

11. Describe any changes to the downstream watershed since the last annual inspection:

a. No changes to the downstream watershed occurred in 2025.

Inlet and Outlet Works		
Item	Condition Code	Comments
Outlet Condition	NI	Due to the 2025 FAP closure project, the original outlet structure has been removed.
Gate Condition/ Operability	NI	Due to the 2025 FAP closure project, the original outlet structure has been removed.
Leakage	NI	Due to the 2025 FAP closure project, the original outlet structure has been removed.
Outfall Condition	NI	Due to the 2025 FAP closure project, the original outlet structure has been removed.
Discharge (color and/or sediment)	OB	Due to the 2025 FAP closure project, the original outlet structure has been removed. The newly installed internal saturation water collection system discharges to the SPS Process Pond. The clean stormwater collection system discharges to east end of the double stormwater culverts southeast of Fly Ash Pond. Therefore, discharged color and sediment are not readily visible.
Obstructions	OB	No obstructions inside the wet well were observed during the November 2024 site inspection. The wet well is designed with a rock filter to minimize suspended solids entering the wet well.
Instrumentation	OB	The sumps associated with the newly installed leachate and stormwater collection systems are fitted with electrical water pumps that are controlled by float switches that work to automatically remove liquids that accumulate within the sumps. The float switches are set to specific elevations to maintain water at the lowest level possible with the pumps installed. The total surface water storage volume in the stormwater collection basin was designed to contain the 25-year, 24-hour rainfall event within the pond. The pumps are designed to remove that volume of water within approximately 10 days of the event. There were four (4) piezometers (installed ~ 2011) constructed within the Fly Ash Pond perimeter berms that served to monitor water or saturation within the pond berms prior to FAP closure. These are identified as P-3, P-4, P-5 and P-9. The total depths of each piezometer are reported to be 25 feet, 25 feet, 14.5 feet and 25 feet, respectively. In the 2025 monthly reports, P-3 water levels ranged from 23.0 to 24.35 feet below the top of casing, P-4 water levels ranged from 22.70 to 25.55 feet below the top of casing, P-5 water levels ranged from 8.85 to 12.10 feet below top of casing, and P-9 water levels ranged from 24.0 to 25.42 feet below top of casing. Piezometer data is only available from January through June, as the piezometers were removed after that time as a part of closure of the FAP. The low water levels noted during 2025 in the 4 piezometers installed within the berms indicate that the overall dry weather in 2024 and 2025, as well as the 2024 dewatering project have resulted in the ponded CCR materials slowly dewatering in preparation for closure.

Inlet and Outlet Works

Item	Condition Code	Comments
Inlet Piping Condition	NI	Due to the 2025 FAP closure project, the original inlet structure has been removed. Fly ash has not routinely been sluiced into the Fly Ash Pond since the CCR rule has been in effect. The buried 30-inch pipe which existed to convey excess water from the Bottom Ash Pond to the Fly Ash Pond (or vice versa) was also removed as a part of the 2025 closure project.
Emergency Spillway	NI	The Fly Ash Pond never had an emergency spillway, but it had outlet structures that prevented the need for an emergency spillway. Based on the design of the 2025 closure project and the addition of an automated surface water pumping system in the south end of the pond, the need for an emergency spillway was eliminated.
Other:		NONE

Earth Embankment

Item	Condition Code	Comments
Vertical & Horizontal Alignment of Crest	GC	No visible evidence of vertical or horizontal deformation of embankment has been observed. As a part of the 2025 Fly Ash Pond Closure project, the top of the embankment was being restored to a consistent grade and elevation.
Seepage/Wetness / Ponding Areas	GC/OB	An area along the exterior of the southeastern berm of the Fly Ash Pond was previously identified as an area of potential seepage from the Fly Ash Pond based on the presence of a small number of cattails and green vegetation present during drought conditions. The area is located upslope from the perimeter stormwater ditch inside of the railroad loop. The area was observed during 2025, and there were no signs of seepage or instability. Closure of the FAP, which included final dewatering, is expected to eliminate future saturation issues that could lead to seepage.
Erosion/Rutting	OB	As a part of the 2025 Fly Ash Pond Closure project, the top of the embankment was being restored to a consistent grade and elevation.
Fencing	GC	Fencing is only adjacent to the Fly Ash Surface Impoundment on the north perimeter along Wakefield Road. The fencing is located within 50 to 100 feet of the toe of the berms. The fencing is in very good condition.

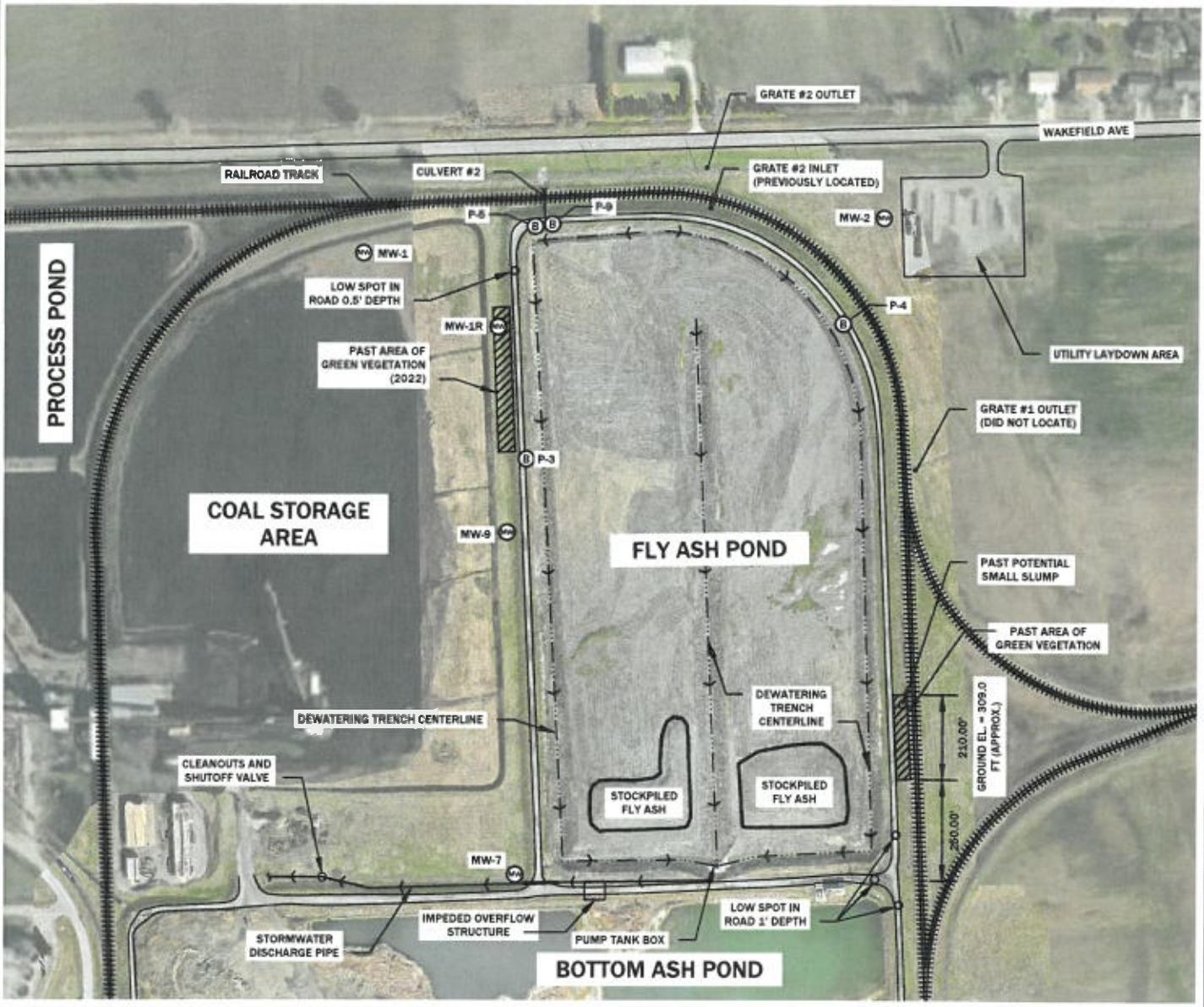
SIKESTON POWER STATION – FLY ASH POND
2025 ANNUAL INSPECTION CHECK SHEET

Earth Embankment		
Item	Condition Code	Comments
Vegetation	NI	Vegetation on exterior slopes was periodically cut and maintained during 2025 as observed during multiple visits to the site and weekly inspection reports prepared by plant personnel. Keeping the exterior berm vegetation cut allows better visual observation of potential future erosion or slumping. NOTE that a specific vegetation requirement was removed from the federal CCR rules in 2016.
Sloughs/Slides/ Cracks	OB	As a part of the 2025 Fly Ash Pond Closure project, the top of the embankment was being restored to a consistent grade and elevation. Continue to monitor during the post-closure period which begins in 2026.
Animal Control	OB	No evidence of burrowing animals was noted in 2025 weekly and monthly inspection reports nor was any observed during multiple visits to the site. SBMU staff should continue to monitor for burrowing animals and attempt to remove such animals from the area.
Other	NONE	

Condition Codes:
- EC Emergency Condition – a serious safety condition exists that requires immediate action.
- IM Immediate Maintenance – an item that requires maintenance within about 30 days to ensure safety or operation.
- MM Minor Maintenance – item needing minor maintenance or repair within 6 months.
- OB Observation – condition requires regular observation to ensure that the condition does not become worse.
- GC Good Condition.
- NE No Evidence of a problem.
- NI Not Inspected. State reason in comments.

Additional Notes:

1. The location of the pre-closure conditions and observations are depicted on attached Figure 1, Pre-Closure Condition, 2025 Annual Inspection.
2. The location of the pre-closure conditions and observations are depicted on attached Figure 2, Closed Condition, 2025 Annual Inspection.



NOTES:

1. MINOR MAINTENANCE ITEMS INCLUDE:
   a. TWO LOW SPOTS IN THE BERM ROAD: ONE NEAR SOUTHEAST CORNER; AND ONE NEAR NORTHWEST CORNER.
2. ITEMS RECOMMENDED FOR CONTINUED OBSERVATION INCLUDE:
   a. GREEN VEGETATION IN THE AREAS ALONG THE SOUTHEAST BERM AND NORTHWEST BERM INDICATES POSSIBLE SEEPAGE. CONTINUED OBSERVATION RECOMMENDED.
3. ITEMS IDENTIFIED DURING THE ANNUAL INSPECTION WHICH DO NOT REQUIRE MAINTENANCE:
   a. THE IMPEDED OVERFLOW STRUCTURE BETWEEN THE BOTTOM ASH POND AND THE FLY ASH POND.
   b. PERMANENTLY CLOSED DISCHARGE STRUCTURE.
4. PIEZOMETER LOCATIONS APPROXIMATED WITH HANDHELD GPS.
5. GRATE #1 INLET NOT IDENTIFIED.
6. IN 2024, THE PONDED CCR WAS GRADED TO PROMOTE CCR DEWATERING AND IMPROVE STORMWATER COLLECTION AND REMOVAL IN PREPARATION FOR CLOSURE.
7. AERIAL IMAGERY PROVIDED BY HAMPTON LENZINI AND RENWICK INC. (HLR), COLLECTED NOVEMBER 11, 2024

LEGEND:

- MONITORING WELLS — MW-1
- FLUSH MOUNT PIEZOMETER (GEOTECHNOLOGY (2011)) — P-5
- PAST AREA OF GREEN VEGETATION
- FLOW INDICATORS
- TRENCH CENTERLINE
- DISCHARGE PIPE

N

SCALE: 1" = 400'
0 200' 400'

FIGURE 1
PRE CLOSURE CONDITION
2025 ANNUAL INSPECTION

FLY ASH POND
SIKESTON POWER STATION

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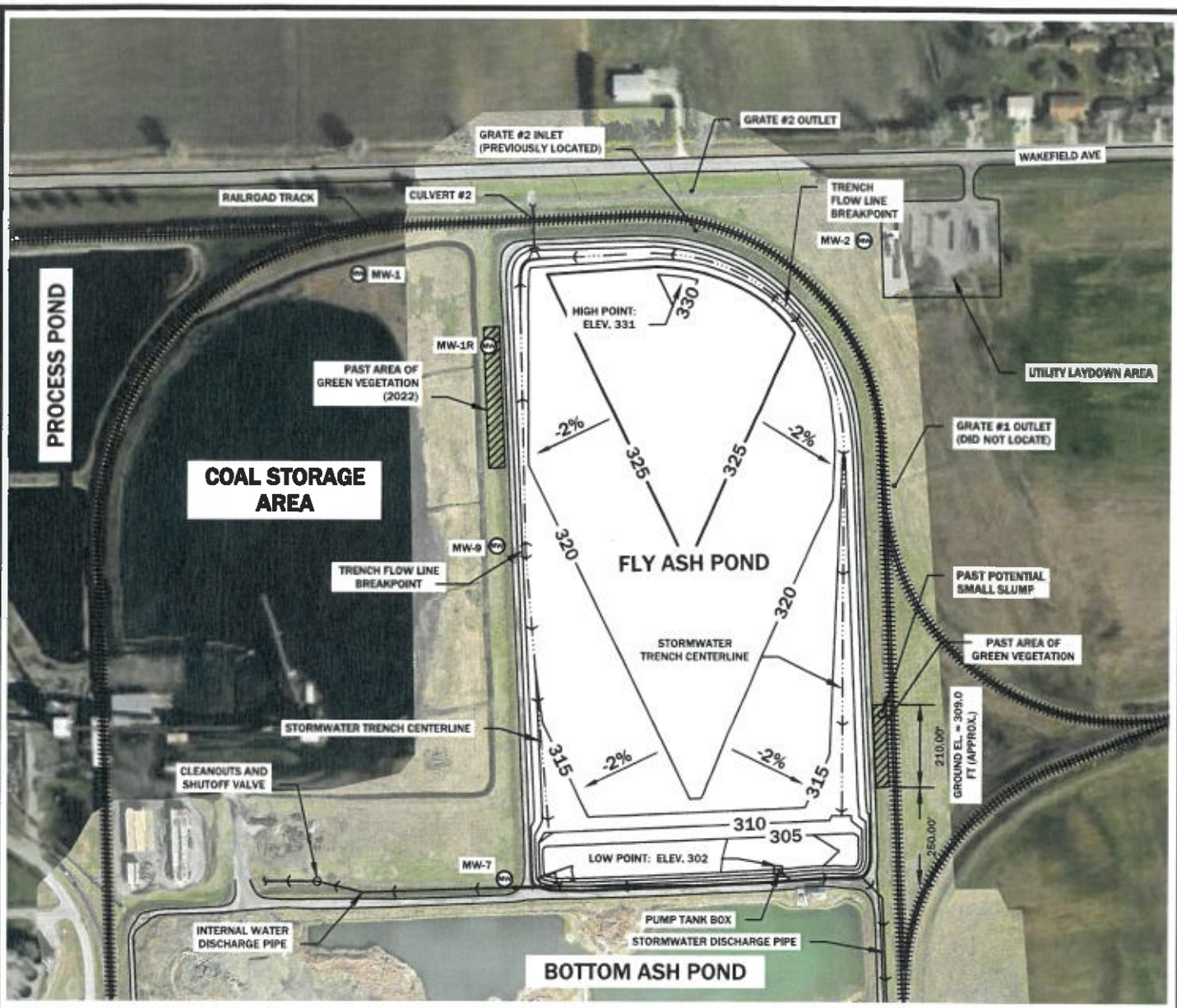
DATE	SCALE	PROJECT NAME	REVISION
01/2026	1" = 400'	SIKESTON - ANNUAL INSPECTION	N/A
DRAWN	APPROVED	FILE NAME	SHEET #
BM	TG	2025 ANNUAL INSPECTION FAP-PRE	1 OF 2



NOTES:

1. ITEMS RECOMMENDED FOR CONTINUED OBSERVATION INCLUDE:
   a. GREEN VEGETATION IN THE AREAS ALONG THE SOUTHEAST BERM AND NORTHWEST BERM INDICATES POSSIBLE SEEPAGE. CONTINUED OBSERVATION RECOMMENDED.
2. ITEMS IDENTIFIED DURING THE ANNUAL INSPECTION WHICH DO NOT REQUIRE MAINTENANCE:
   a. THE IMPEDED OVERFLOW STRUCTURE BETWEEN THE BOTTOM ASH POND AND THE FLY ASH POND HAS BEEN DEMOLISHED.
3. GRATE #1 INLET NOT IDENTIFIED.
4. IN 2024, THE PONDED CCR WAS GRADED TO PROMOTE CCR DEWATERING AND IMPROVE STORMWATER COLLECTION AND REMOVAL IN PREPARATION FOR CLOSURE.
5. CONTOURS REPRESENT CLOSURE TURF SYSTEM GRADES AT TIME OF INSPECTION.
6. AERIAL IMAGERY PROVIDED BY HAMPTON LENZINI AND RENWICK INC. (HLR), COLLECTED NOVEMBER 11, 2024
   a. NO UPDATED AERIAL AVAILABLE THAT REPRESENTS THE FLY ASH POND AS OF DECEMBER 2025.
   b. CLOSURE DESIGN GRADE CONTOURS ARE SHOWN TO REPRESENT THE FLY ASH POND IN DECEMBER 2025.

LEGEND:

- MONITORING WELLS — MW-1
- PAST AREA OF GREEN VEGETATION
- FLOW INDICATORS
- TRENCH CENTERLINE
- DISCHARGE PIPE
- MAJOR 25' CONTOURS
- MINOR 5' CONTOURS

N

SCALE: 1" = 400'
0 200' 400'

FIGURE 2
CLOSED CONDITION
2025 ANNUAL INSPECTION

FLY ASH POND
SIKESTON POWER STATION

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DATE	SCALE	PROJECT NAME	REVISION
01/2026	1" = 400'	SIKESTON - ANNUAL INSPECTION	N/A
DRAWN	**APPROVED**	**FILE NAME**	**SHEET #**
BM	TG	2025 ANNUAL INSPECTION FAP-AT	2 OF 2