

**SAFETY FACTOR
ASSESSMENT**

SPS INSTRUCTION

OPERATING RECORD DOCUMENT

Required per §257.105(f)(12)

INTERNET POSTING Required per

§257.107(f)(11)



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October 12, 2026

Thomas R. Gredell, P.E.
President / Principal Engineer
GREDELL Engineering Resources, Inc.
1505 East High Street
Jefferson City, Missouri 65101

RE: BMU Sikeston Power Station Bottom Ash Pond
2026 Periodic Safety Factor Assessment

Dear Tom:

This is our report of the Periodic Safety Factor Assessment of the Bottom Ash Pond at BMU Sikeston Power Station ("Owner") in accordance with the CCR Rule §257.73(e). GREDELL Engineering Resources, Inc. (GER) is the lead firm responsible for completing the Periodic Hazard Potential Classification Assessments (CCR Rule §257.73(a)(2)(i)), Periodic Structural Stability Assessment (CCR Rule §257.73(d)), and Periodic Inflow Design Flood Control System Plans (CCR Rule §257.82(c)(1)).

§257.73(e)(1) Periodic Safety Factor Assessment

GER furnished to Reitz & Jens, Inc. (R&J) several documents for our review. These included: 1) comparison of a flyover survey by Surdex from May 6, 2016, with a flyover survey and soundings by HLR dated November 24, 2024; and 2) 2025 Checklist for P.E. Annual Inspection for CCR Surface Impoundments by GER. The checklist by GER did not observe conditions which "impact the structural integrity of the embankment." GER reported that the Bottom Ash Pond ceased receiving waste on June 5, 2023. Since the BAP is not receiving waste, the water level in the BAP has been kept low. The water level observed since 2016 has been at about el. 315.1 along the north side of the BAP. The 2025 report by GER indicated that the water level in December 2025 was below el. 314. A consistently lower water level in the BAP will result in greater factors of safety of the embankment than those for the original design.

For R&J's 2026 Periodic Safety Factor Assessment, Laura A. Sutton, P.E., performed a visual inspection of the BAP on October 1, 2026, to evaluate if there were changed conditions that could reduce the safety factors from the original design of the BAP. Laura walked around the embankment, looking at the crest, the downstream, and the upstream (interior) slopes. She also checked the area downstream of the outlet structure on the west side where some potential seepage had been observed in previous annual inspections and periodic assessments. She walked around the outside of the embankment near the downstream (outside) toe of the slope. The toe by the outlet was moist. The interior slope of the BAP generally has excessive vegetation, so a clear view of the slope was not possible. She did not see evidence of movement or instability of the slope. Laura generally did not

notice areas of seepage or areas that were noticeably greener than the surrounding areas, as was noted on the 2025 Annual Inspection.

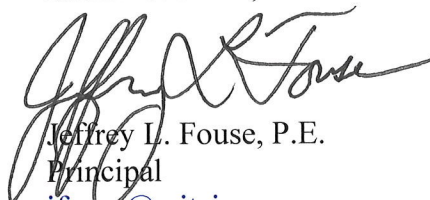
The downstream slope was mowed and clear of woody vegetation. There was an inconsistent slope along the southern berm where the 2025 inspection noted a "hump at the top of slope." There were no obvious signs of slope failure.

Based upon the 2021 Report of the Periodic Structural Stability and Safety Factor Assessments, the documents furnished by GER and the visual inspection by Laura Sutton, P.E., with R&J, we judge that there is no evidence that the safety factors initially calculated for the design of the BAP embankment have been decreased. Due to the stoppage of the pumping and/or placement of waste in the BAP after June 5, 2023, and the lower normal pool water level, and the consolidation of the embankment, the safety factors initially determined for the design of the BAP have stayed the same or possibly increased. Therefore, we conclude that it was not necessary to reanalyze the stability of the embankment for this 2026 Periodic Safety Factor Assessment in accordance with CCR Rule §257.73(e)(1).

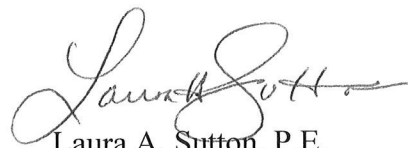
The design of the closure of the BAP is currently underway. It is expected to be closed by 2030.

Please contact the undersigned if you have any questions regarding this report.

Sincerely,
REITZ & JENS, Inc.



Jeffrey L. Fouse, P.E.
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Laura A. Sutton, P.E.
Geotechnical Engineer / Project Manager
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Attach: PE Certification Sheet

TAB 3: PERIODIC SAFETY FACTOR ASSESSMENT

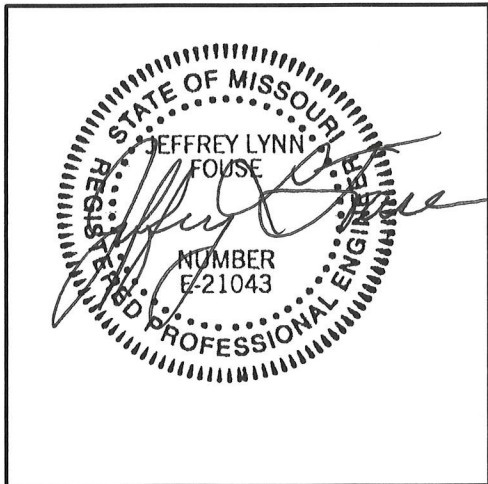
40 CFR Part 257.73

Periodic Safety Factor Assessment for CCR Surface Impoundments §257.73(e)(1)

The initial assessment found that the calculated factors of safety for the critical cross-sections of the Bottom Ash Pond exceed the minimum factors of safety for each loading condition required by 40 CFR §257.73(e).

Based upon the documents furnished by GER and the visual inspection by R&J, I judged that there is no evidence that the safety factors initially calculated for the design of the BAP embankment have been decreased. Due to the stoppage of the pumping, stoppage of placement of waste in the BAP after June 5, 2023, the lower normal pool water level, and the consolidation of the embankment, the safety factors initially determined for the design of the BAP have probably increased. Therefore, I concluded that it was not necessary to reanalyze the stability of the embankment for this 2026 Periodic Safety Factor Assessment in accordance with CCR Rule §257.73(e)(1). The safety factors are judged to be acceptable.

Engineer's Seal



Jeffrey L. Fouse, P.E.
Missouri License: E-21043
Date: October 12, 2026