Gibbons Creek Environmental Redevelopment Group, LLC

2025 GIBBONS CREEK ANNUAL CCR UNIT INSPECTION SITE F LANDFILL

Gibbons Creek Steam Electric Station

Anderson, Texas

February 26, 2025

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BACKGROUND

40 CFR Subpart D § 257.83(b) and 257.84(b) requires that coal combustion residual units (CCR Units) be inspected annually by a qualified professional engineer. Gibbons Creek Environmental Redevelopment Group, LLC (GCERG), a subsidiary of Charah Solutions, Inc., as the owner of the Gibbons Creek Steam Electric Station (GCSES), has retained HDR to inspect the Site F Landfill (SFL), a CCR Unit, at their facility and prepare a written report.

The SFL is located approximately 1.5 miles northeast of the GCSES administration buildings. The landfill area is approximately 95 acres and is registered with the TCEQ as Unit Number 1 with Solid Waste Registration Number 32271. The landfill was constructed with a 3-foot-thick compacted clay liner and contains liquids, sludges, slurries and/or solid process and waste materials resulting from the combustion of lignite and coal.

The SFL stopped receiving waste on December 4, 2023, and a permanent landfill cap has been installed on it. The cap consists of a compacted clay liner overlain with a 40-mil linear low density (LDL) geomembrane liner, geocomposite drainage geosynthetic, an 18-inch-thick infiltration layer and a 6-inch-thick erosion layer.

Inspections of the GCSES SFL occurred on February 18, 2025. The inspections were performed by:

- Mark Newsome, GCERG Environmental Site Lead
- Craig York, GCERG Site Specialist
- Randy Gilleland, Schulze Engineering, LLC.
- Dave Vogt, P.E., HDR Engineering, Inc.

The last formal inspection of Gibbons Creek's CCR Units occurred on February 1, 2024.

The last recorded rainfall event prior to this inspection occurred on February 15, 2025. The site received 0.04 inches of rainfall that day. On the date of inspection, the ground was damp with scattered showers.

Site F Landfill Regulatory Conclusion

§ 257.84 (b) (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 inspection must, at a minimum, include:

(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., the results of inspections by a qualified person, and results of previous annual inspections):

David Vogt, P.E. reviewed the 2024 weekly SFL inspection reports and 2024 Annual CCR Inspection Report prior to inspecting the SFL.

(ii) A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit.

David Vogt, P.E. performed a visual inspection of the SFL on February 18, 2025, to identify signs of distress or malfunction.

(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:

GCERG has completed the installation of the final landfill cap. No other changes to the geometry of the structure were observed.

(ii) The approximate volume of CCR contained in the unit at the time of the inspection:

At the time of inspection, the SFL contained approximately 8,224,601 cy of CCR material.

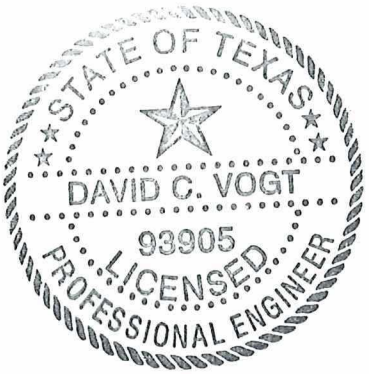
(iii) Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit:

No appearances of actual or potential structural weakness of the Stie F Landfill, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the SFL, were observed.

(iv) Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection.

No other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection were observed.

This inspection report was prepared by:



2-26-25

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