

2026 ANNUAL CCR UNIT INSPECTION REPORT

**SITE F LANDFILL
FORMER GIBBONS CREEK STEAM ELECTRIC STATION
12824 FM 244
ANDERSON, TEXAS 77830**

Prepared for:

Gibbons Creek Environmental Redevelopment Group, LLC

12824 FM 244
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PN: 1248.001.002



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FORMER GIBBONS CREEK STEAM ELECTRIC STATION

SITE F LANDFILL

1 LOCATION

The former Gibbons Creek Steam Electric Station (GCSES) is located adjacent-west of the Gibbons Creek Reservoir near the City of Anderson in Grimes County, Texas. The Site F Landfill (SFL) is approximately 95 acres in size and is located on an approximately 118-acre tract of land located approximately 1.5 miles northeast of the former GCSES power-generating area. The landfill layout is shown on Figure 1.

2 CCR UNIT HISTORY

The SFL is identified as Coal Combustion Residuals (CCR) Unit Number 1 (SFL CCR Unit) in the GCSES CCR Registration Number CCR113, that was issued 14 November 2025. The CCR113 Registration allows the registrant (Gibbons Creek Environmental Redevelopment Group, LLC [GCERG]) to “dispose of and/or manage CCR generated from the combustion of coal at electric utilities and independent power producers” (TCEQ, 2025).

Additional background information regarding the SFL CCR Unit is provided in the Construction Completion and Construction Quality Assurance Report dated 6 June 2025 that was prepared by HDR Engineering. As described in the report, the SFL CCR Unit stopped receiving waste on 4 December 2023 and was permanently closed following the installation of a landfill cap that was completed in 2024. The landfill cap consists of compacted clay, overlain by a 40-milimeter linear low-density polyethylene (LLDPE) geomembrane liner, overlain by a composite drainage geosynthetic, overlain by an 18-inch-thick infiltration layer, overlain by a 6-inch-thick layer of vegetated topsoil for erosion control.

3 WORK PERFORMED

Under 40 CFR Subpart D § 257.83(b) and 257.84(b), CCR Units are to be inspected annually by a qualified professional engineer. GCERG, a subsidiary of Charah Solutions, Inc., as the owner of the GCSES, has retained SQ Environmental, LLC (SQE) to perform the 2025 annual inspection of the SFL CCR Unit and prepare a written report. The last annual inspection of the SFL CCR Unit occurred on 18 February 2025 and was conducted by David C. Vogt, P.E., with HDR Engineering (HDR, 2025).

The annual inspection of the SFL CCR Unit was conducted by SQE personnel which included Susan T. Litherland, P.E. (Engineer of Record) and Trevor Cole, P.G. on 11 February 2026. SQE personnel were joined by Craig York (GCERG) for portions of the inspections. The weather at the time of the inspection was clear and cool in the morning and warming as the inspection progressed. The last measurable rainfall prior to the inspection was 0.33 inches on 24 January 2026, according to an on-site rain gauge.

Prior to the annual inspection on 11 February 2026, the Engineer of Record (Ms. Litherland) reviewed weekly inspections reports that occurred since the previous annual inspection was performed on 18 February 2025.

4 REGULATORY REQUIREMENTS AND COMPLIANCE

The annual inspection was performed to meet conditions put forth in 40 CFR § 257.84(b). Parts 1 and 2 of 40 CFR § 257.84(b) are presented below in italicized text. Results of work performed by SQE documenting that the conditions have been met, or other relevant information, is inserted in bold text.

(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); and

As required in 40 CFR § 257.84(a), the SFL CCR Unit was inspected on a weekly basis by a qualified person (generally by SQE staff members) for the year prior to the Annual Inspection, and results of the weekly inspections were recorded in the facility's operating record. Susan T. Litherland, P.E. reviewed the 2025 and 2026 weekly SFL inspection reports and 2025 Annual CCR Inspection Report, among other project documents, prior to conducting the 2026 inspection of the SFL CCR Unit.

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

Susan T. Litherland, P.E. performed a visual inspection of the SFL CCR Unit on 11 February 2026, to identify signs of distress or malfunction. No signs of distress or malfunction of the SFL CCR Unit that would compromise the containment of the CCR materials were observed. Areas for routine maintenance were identified.

(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, and there have been no changes to the geometry of the structure since the previous annual inspection.

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

At the time of the inspection, the SFL CCR Unit contained approximately 8,224,601 cubic yards (cy) of CCR material based on facility records. No additional CCR material has been added to the landfill since the December 2023.

(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; and

No appearance of actual or potential structural weakness of the SFL CCR Unit were observed. In addition, no existing conditions that are disruptive of, or have the potential to disrupt, the operation and safety of the SFL CCR Unit were observed. Areas for routine maintenance were identified.

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

No changes which may have affected the stability of operation of the SFL CCR Unit since the previous annual inspection were observed.

This Annual Inspection Report has been prepared to meet the conditions of 40 CFR § 257.84(b)(2). Requirements of 40 CFR § 257.84(b)(3) regarding the initial inspection are not applicable to this report. As required in 40 CFR § 257.84(b)(4), the inspection was completed on an annual basis. This Annual Inspection Report is dated no more than one year from the date of the previous Annual Inspection Report (26 February 2025). The previous inspection occurred on 18 February 2025 and was performed by David C. Vogt with HDR Engineering (HDR, 2025). A deficiency or release was not identified during the inspection. As such, requirements included in 40 CFR §257.84(b)(5) are not applicable to this report. Based on the information reviewed, GCERG is complying with the recordkeeping requirements of 40 CFR § 257.84(c).

Based on observations made during the Annual Inspection, vegetation appears to present over at least 90% of the protective topsoil covering the landfill. As such, it is SQE's professional opinion that vegetation is considered to be established, the protective topsoil layer is stable, and the SFL CCR Unit is eligible to begin Post-Closure care.

5 PROFESSIONAL ENGINEER'S CERTIFICATION

I hereby certify that I have inspected the Site F Landfill in conformance with 40 CFR § 257.84(b). I further certify that the inspection findings presented in this report indicate that no signs of distress or malfunction of the CCR Unit were observed, and that the CCR Unit is well maintained at the current time. The information provided in this document is true, accurate, and completed to the best of my knowledge.

Susan T. Litherland, P.E.
SQ Environmental, LLC
Texas P.E. License No. 57428
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Sealed electronically on 2/23/2026

