

HOOSIER ENERGY COAL COMBUSTION RESIDUALS MANAGEMENT PROGRAM

INITIAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT
REVISION 0

FORMER FRANK E. RATTS GENERATING STATION
PIKE COUNTY, INDIANA
CCR LEGACY SURFACE IMPOUNDMENTS

Prepared by:



CTI and Associates, Inc.
34705 West 12 Mile Road, Suite 230
Farmington Hills, MI 48331

Prepared for:



Hoosier Energy
2501 S Cooperative Way
Bloomington, IN 47403
May 4, 2026

Table of Contents

1	INTRODUCTION.....	1
1.1	Facility Description	1
1.2	Regulatory Requirements	1
1.3	Purpose and Scope.....	2
2	HAZARD POTENTIAL CLASSIFICATION ASSESSMENT	3
2.1	General.....	3
2.2	Hazard Potential Classification	3
3	CERTIFICATION.....	5
4	REFERENCES.....	6

Tables

Table 1: Hazard Potential Classification Damage Criteria per Federal CCR Rule 3

Table 2: Summary of Hazard Potential Classification by CTI..... 4

APPENDIX A - FIGURES

Figure 1: Vicinity Map

1 INTRODUCTION

Hoosier Energy Rural Electric Cooperative, Inc (Hoosier Energy) ceased operation of the former Frank E. Ratts (Ratts) Generating Station (retired) in March 2015, and the buildings associated with the generating facilities have been demolished. The Ash Pond System that received Coal Combustion Residuals (CCR) from the coal power generation consists of Ponds 1, 2, 3, 4 South and 4 North is considered inactive.

The former Ratts Generating Station's Ash Pond System is located in Pike County, about two (2) miles northeast of Petersburg, Indiana, as shown in Figure 1 (Vicinity Map) included in **Appendix A**. The ash pond system encompasses an area of approximately 97.33 acres.

1.1 Facility Description

Ash Pond 1 is an incised impoundment that discharge flows through an outfall in accordance to an NPDES permit to a perimeter pipe that generally drains southwest and west. The receiving drainage system for Ash Pond 1 is not connected to the rest of the Station's ash pond system, as the flows are conveyed to a perimeter ditch that connects to a drainage system that flows to the White River.

Ash Ponds 2 and 3 are filled areas that do not pond water, with the surface grass cover draining to a perimeter ditch that flows to Ash Pond 4 North. Ash Pond 4 South is also a filled area that is hydraulically connected to a perimeter ditch along the west and south sides via storm pipes that discharge flows that drain to the Ash Pond 4 North.

Ash Pond 4 North, which serves as a settling pond for the drainage received from Ash Ponds 2, 3 and 4 South, consists of high embankment on the north side of the pond with a crest elevation of approximately 430.0 ft msl. Ash Pond 4 North has a concrete outfall structure and 18-inch pipe that discharges through an outfall in accordance to an NPDES permit to an area on the north side that drains to the White River.

1.2 Regulatory Requirements

CTI prepared this Initial Hazard Potential Classification Assessment for the Ratts Generating Station (retired) Ash Pond System in accordance with Part 257.73(a)(2) of the CCR Rule, paragraphs (i), and (ii) listed below:

- (i) The owner or operator must document the hazard potential classification of each CCR unit as either high hazard potential CCR surface impoundment, a significant hazard potential CCR surface impoundment, or a low hazard potential CCR surface impoundment.
- (ii) The owner or operator of the CCR unit must obtain a certification from a qualified Indiana-registered Professional Engineer stating that the initial hazard potential classification and

each subsequent periodic classification specified in this section was conducted in accordance with the requirements of this section.

1.3 Purpose and Scope

This report documents the initial hazard potential classification assessment for the Ash Pond System at Ratts Station, conducted and completed in accordance with the Federal CCR Rule. This report:

- Provides relevant background information,
- Defines the hazard potential classifications applicable to CCR surface impoundments as promulgated by the Federal CCR Rule,
- Discusses the methods followed to determine the initial hazard potential classification for Ash Pond System,
- Provides the initial hazard potential classification for the Ash Pond System in accordance with 40 CFR 257.74(a)(2) and the basis for that classification.

2 HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

2.1 General

The Hazard Potential Classification of a surface impoundment is based on the potential for loss of human life, economic losses, environmental damage, and/or disruption to lifelines caused by failure or mis-operation of the surface impoundment.

The Federal CCR Rule requires the owner or operator of a CCR surface impoundment to determine which of the following three hazard potential classifications characterize their CCR unit:

- High Hazard Potential Classification - A diked surface impoundment where failure or mis-operation will probably cause loss of human life.
- Significant Hazard Potential Classification - A diked surface impoundment where failure or mis operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of livelihood facilities, or impact other concerns.
- Low Hazard Potential Classification - A diked surface impoundment where failure or mis-operation results in no probable loss of life, and low economic and/or environmental losses. Losses are principally limited to the surface impoundment's owner's property.

Table 1 summarizes the Federal CCR Rule's hazard potential classifications for the CCR surface impoundments and corresponding damage criteria as defined above.

Table 1: Hazard Potential Classification Damage Criteria per Federal CCR Rule

Hazard Potential Classification Level	Loss of Human Life	Economic, Environmental, Livelihood Losses and/or Disruptions
Low	Not Probable	Low and Principally Limited to Owner
Significant	Not Probable	Yes
High	Probable	Yes

2.2 Hazard Potential Classification

Based on observations during our previous site visit and review of available information, CTI classified the Ash Pond System as indicated in Table 2 included below. The design storm event listed is based on the hydrologic and hydraulic capacity requirements for CCR surface impoundments, 40 CFR 257.82.

Table 2: Summary of Hazard Potential Classification by CTI

Pond ID	Hazard Potential	Reasoning for Hazard Rating	Design Storm Event
Ash Pond 1	Low	Incised pond	25-year flood
Ash Pond 2	Low	Filled pond, graded to drain to perimeter ditch	100-year flood
Ash Pond 3	Low	Filled pond, graded to drain to perimeter ditch	100-year flood
Ash Pond 4 North	Significant	Closed proximity to White River, increased likelihood of contamination	1,000-year flood
Ash Pond 4 South	Low	Filled pond, graded to drain to perimeter ditch	100-year flood

CTI classified Ash Pond 4 North as a Significant Hazard Potential in accordance with the Federal CCR Rule. The Significant Hazard Potential Classification is due to the potential for economic impacts and potential environmental damage due to potential impact on White River through a breach of the embankment(s) of Ash Pond 4 North. Due to the limited amount of water in the unit and the surrounding environs, and based on previous engineering analysis, CTI's Dam Breach and Inundation Map Development report dated April 13, 2026, no probable loss of human life exists with minor flooding expected to areas immediately downstream of Ratts Generating Station.

Ash Ponds 1, 2, 3, and 4 South are classified as Low Hazard potential as these ponds have been filled and graded to drain to a perimeter ditch or are considered incised (Ash Pond 1).

3 CERTIFICATION

CCR Unit: Hoosier Energy; Frank E. Ratts Generating Station (retired); Ash Pond System

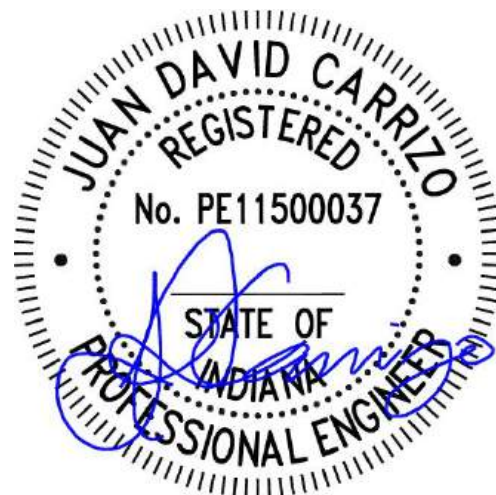
I, Juan D. Carrizo, being a Registered Professional Engineer in good standing in the State of Indiana, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above reference CCR Unit, that the Initial Hazard Potential Classification was conducted in accordance with the requirements of 40 CFR § 257.73 (a)(2).

Juan D. Carrizo

Printed Name

5-4-2026

Date



4 REFERENCES

1. U.S. Environmental Protection Agency. “Standards for Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments.” 40 CFR Part 257 Subpart D. <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-I/part-257/subpart-D>. Accessed August 12, 2025.
2. CTI and Associates, Inc., February 9, 2026, CCR Unit History of Construction Report, Former Frank E. Ratts Generating Station, Pike County, Indiana, CCR Legacy Surface Impoundments
3. CTI and Associates, Inc., March 27, 2026, Revised Closure/Post-Closure Plan of Former F.E. Ratts Generating Station, Ash Pond System, Pike County, Indiana, Hoosier Energy Rural Electric Cooperative, Inc.
4. CTI and Associates, Inc., April 13, 2026, Hoosier Energy Coal Combustion Residuals Management Program, Dam Breach Analyses and Inundation Map Development, Rev. 0, Former Frank E. Ratts Generating Station, Pike County, Indiana, CCR Legacy Surface Impoundments
5. AMEC Earth & Environmental, Inc., September 2010, Report of Dam Safety Assessment of Coal Combustion Surface Impoundments, Hoosier Energy – Frank E. Ratts Generating Station, prepared for EPA, File No. 3-2106-0177.0005

APPENDIX A - FIGURES

Figure 1: Vicinity Map

