

Submitted to Southern Indiana Gas & Electric Company (SIGECO) One Vectren Square Evansville, IN 47708 Submitted by AECOM 9400 Amberglen Boulevard Austin, Texas 78729

November 2021

CCR Certification: Emergency Action Plan §257.73 (a)(3)

for the

Ash Pond

at the

A.B. Brown Generating Station

Revision 5

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Executive Summary

This Coal Combustion Residuals (CCR) Emergency Action Plan (EAP) for the Ash Pond at the Southern Indiana Gas & Electric Company (SIGECO) A.B. Brown Generating Station has been prepared in accordance with the requirements specified in the USEPA CCR Rule under 40 Code of Federal Regulations §257.73 (a)(3). These regulations require that the specified documentation and assessments for an existing CCR surface impoundment be prepared by April 17, 2017 and updated as appropriate.

This Emergency Action Plan for the Ash Pond meets the regulatory requirements as summarized in Table ES-1.

	Table ES-1 –Summary				
Report Section	CCR Rule Reference	Requirement Summary	Requirement Met?	Comments	
2	§257.73 (a)(3)	Development of Plan	Yes	The initial Emergency Action Plan (Revision 0) was prepared based on conditions of the CCR unit as of April 17, 2017. This Revision 5 provides updates based on facility status and changes in emergency contact information.	

The Ash Pond is considered an active surface impoundment that has been previously classified as a "Significant" hazard as described in the CCR Rule, and thus requires that an Emergency Action Plan be developed per the requirements of §257.73 (a)(3).

1 Introduction

1.1 Purpose of this Report

The purpose of the Emergency Action Plan (EAP) for the Ash Pond, as presented in this report, is to document the requirements specified in 40 Code of Federal Regulations (CFR) §257.73 (a)(3) have been met to support each of the applicable regulatory provisions for the A.B. Brown Generating Station (Brown) Ash Pond. The Ash Pond is an existing coal combustion residual (CCR) surface impoundment as defined by 40 CFR §257.53. The CCR Rule requires an EAP be developed for each existing CCR surface impoundment by April 17, 2017.

The Brown station has an interconnected existing CCR surface impoundment, the Ash Pond, which consists of a lower pool and an upper pool. The Ash Pond has been evaluated to determine whether the EAP for the Ash Pond requirements are met. The following table summarizes the documentation required within the CCR Rule and the sections that specifically respond to those requirements of this assessment.

Table 1-1 – CCR Rule Cross Reference Table				
Report Section	Title	CCR Rule Reference		
2.1	Development of Plan	§257.73 (a)(3)(i)		
2.2	Amendment of Plan	§257.73 (a)(3)(ii)		
2.3	Change in Hazard Potential Classification	§257.73 (a)(3)(iii)		
2.4	Certification from Qualified Professional Engineer	§257.73 (a)(3)(iv)		
2.5	Activation of the EAP	§257.73 (a)(3)(v)		

Diligent observation during the normal, daily operations at the plant are vital in recognizing unusual events. Events which could constitute unusual or an emergency event were identified and classified into three levels;

- Emergency Level 3: Non-emergency unusual event, slowly developing
- Emergency Level 2: Potential embankment failure situation, rapidly developing
- Emergency Level 1: Urgent; embankment failure appears imminent or is in progress

The EAP for the Ash Pond provides standard evaluation methods of conditions at the plant, appropriate actions to be taken during emergencies, and contact information for the responsible personnel and applicable emergency responders.

1.2 Brief Description of Impoundment

The Brown station is a coal-fired power plant located approximately 10 miles east of Mount Vernon in Posey County, Indiana and is owned and operated by Southern Indiana Gas & Electric Company (SIGECO). The Brown station is

situated just west of the Vanderburgh-Posey County line and north of the Ohio River with the Ash Pond positioned on the east side of the generating station.

The Ash Pond was commissioned in 1978. An earthen embankment was constructed across an existing valley to create the impoundment. In 2003, a second embankment was constructed east of the original embankment and further up the valley to increase the storage capacity. This temporarily created an upper pool and a lower pool. The upper and lower pools were operated separately until 2016 when the upper embankment was decommissioned. A 10-foot wide breach was installed in the upper embankment and the normal pool elevation was lowered. Currently, the upper pool and the lower pool act as one CCR unit referred to as the Ash Pond, which has a surface area of approximately 159 acres.

The lower pool embankment perimeter is approximately 1,540 feet long, 30 feet high, and has 3 to 1 (horizontal to vertical) side slopes covered with grassy vegetation. The embankment crest elevation is 450.9 feet¹ and has a crest width of 20 feet. An earthen buttress was constructed against the outboard slope of the embankment. The buttress crest extends the length of the embankment, is up to 200 feet wide and varies in elevation from 442 feet to 432 feet. The NID is IN00516 and the State IDNR Dam Number is 65-7 for the Ash Pond.

A site Location Map showing the area surrounding the station is in **Figure 1** of **Appendix A**. **Figure 2** in **Appendix A** presents the Brown Site Map.

¹ Unless otherwise noted, all elevations in this report are in the NAVD88 datum.

2 Emergency Action Plan

Regulatory Citation: 40 CFR §257.73 (a)(3) Emergency Action Plan (EAP)

The EAP for the Ash Pond is described in this section. A publicly available website with the current version of the EAP can be found in the following link: https://www.vectren.com/reporting/ccr. It should always be verified that any hard copy version of this plan is consistent with the latest version available on the website. Information regarding operational and maintenance procedures of the station was provided by Brown plant personnel. The Brown station follows an established emergency action plan that quickly identifies and resolves issues of concern.

2.1 Development of Plan

Regulatory Citation: 40 CFR §257.73 (a)(3) Development of the plan;

 (i) No later than April 17, 2017, the owner or operator of a CCR unit determined to be either a high hazard potential CCR surface impoundment or a significant hazard potential CCR surface impoundment under paragraph (a)(2) of this section must prepare and maintain a written EAP.

The Ash Pond was previously determined to be a CCR surface impoundment with a significant hazard potential under 40 CFR §257.73 (a)(2) as initially certified in October 2016 and recertified in October 2021. Therefore, a written EAP for the Ash Pond has been prepared and will be maintained.

2.1.1 Definitions of Events or Circumstances

Regulatory Citation: 40 CFR §257.73 (a)(3)(i);

(A) Define the events or circumstances involving the CCR unit that represent a safety emergency, along
with a description of the procedures that will be followed to detect a safety emergency in a timely manner.

This section of the EAP for the Ash Pond describes the first step to be followed in the event of the detection of an unusual or emergency event at the Brown station. This section also describes event detection and information to assist SIGECO in determining the appropriate level of response for an event.

Event Level 3 - Non-emergency unusual event, slowly developing

This is an incident that is defined as an unusual, slowly developing situation that has the potential to threaten the operation or structural integrity of the impoundment embankment. The condition of the embankment should be monitored closely, especially during storm events, to detect any development of a potential or imminent failure situation.

Event Level 2 - Potential embankment failure situation, rapidly developing

This is an emergency event defined as rapidly developing and could quickly lead to a failure and flash flooding downstream of the embankment, but there is not an immediate threat of embankment failure. SIGECO should closely monitor the condition of the embankment and periodically report the status of the situation to Indiana Department of Natural Resources and the Indiana Department of Homeland Security (DHS) District 10 Coordinator. If the embankment's condition worsens and failure becomes imminent, Emergency Responders must be notified

immediately via the 911 system of the change in the emergency level to evacuate the people at risk downstream and/or close roads.

If time permits, the Indiana DHS District 10 Coordinator and Indiana Dam Safety Officials should be contacted to evaluate the situation and recommend remedial actions to prevent embankment failure. SIGECO should initiate remedial repairs.

Event Level 1 - Urgent; embankment failure appears imminent or is in progress

This is an extremely urgent situation when an embankment failure is imminent and flash floods will occur downstream of the embankment. The Emergency Responders should be contacted immediately via the 911 system so emergency services can begin evacuations of all at-risk people and close roads as needed.

Table 2-1 defines the various potential events and circumstances that could be observed involving the CCR unit and its corresponding emergency level determination. The table is a guide for determining the appropriate event level and attempts to be all inclusive; however, an event or condition may arise that is not covered. In the circumstance of multiple events occurring at the embankment with conflicting event levels, always designate the higher event level as the governing event level.

Table 2-1 – Event Level Determination Guidance			
Defect	Emergency Level 3*	Emergency Level 2*	Emergency Level 1*
Spillway Flow	Reservoir water surface elevation at spillway crest or spillway is flowing with no active erosion	Spillway flowing with active gully erosion	Spillway flowing with an advancing velocity that is threatening the stability of the spillway and embankment overtopping is imminent
			Spillway flow that is flooding people downstream
Embankment Cracking (Excluding Buttress Area)	New cracks or cracks that have increased in size in the embankment without seepage, indicative of structural instability ¹	Cracks in the embankment with seepage	Cracks in the embankment with noticeable flow of seepage and solids
Seepage	Low flow rate, clear water, small area not associated with poor drainage area or rut that would be normal maintenance.	High or increasing flow rate carrying soil that may cover a large area	-
Embankment Movement	-	Visual movement / slippage of the embankment slope ²	Sudden or rapidly proceeding slides of the embankment slopes ²
Dropping Water Level	Water level in Ash Pond is rapidly falling without apparent cause (no	Whirlpool or other signs of the Ash Pond draining rapidly	_

	increase in pumping rates)	through the impoundment or foundation	
Earthquake	A reported earthquake of 3.0 or greater magnitude or within 50 miles of the embankment (See Figure 5)	Earthquake resulting in visible damage to the embankment or appurtenances	Earthquake resulting in uncontrolled release of water from the embankment
Security Threat	_	Verified bomb threat that, if carried out, could result in damage to the embankment	Detonated bomb that has resulted in damage to the embankment or appurtenances
Sabotage / Vandalism	Damage that could adversely impact the functioning of the embankment	Damage that has resulted in seepage flow	Damage that has resulted in uncontrolled water release
Sinkholes	Observation of new sinkhole in pond area or on embankment	Rapidly enlarging sinkhole	_
Tornado	Tornado resulted in visible damage to the embankment or appurtenances	Tornado resulted in major visible damage to the embankment or appurtenances.	Tornado resulted in uncontrolled release of water from the embankment

- * Emergency Level 3: Non-emergency unusual event, slowly developing
- * Emergency Level 2: Potential embankment failure situation, rapidly developing
- * Emergency Level 1: Urgent; embankment failure appears imminent or is in progress

Notes:

- 1 Shallow desiccation cracks due to dry weather or minor rills due to recent erosion and that will normally be addressed during the weekly inspection and subsequent normal course of repair are not included in this event. Additional evaluation and/or professional input may be warranted prior to determination that an observed "Embankment Cracking" field condition triggers Event Level 3. In questionable case requiring additional input, the Third Party Geotechnical Engineer should be consulted.
- 2 Minor surficial sloughing of material due to lack of vegetation and erosion is not considered within this event. Slipping and slippage refer to structural movement of the embankment of berm and do not refer to erosion issues that will normally be addressed during the weekly inspection and subsequent normal course of repair.

Safety emergencies may be detected by local residents, A.B. Brown employees or City employees. There is no formal information collecting system or warning system to detect an emergency at the embankment. There is no procedure for analyzing data, but emergencies that may occur such as cracking/deformation of the levee embankments, extreme seepage, or other indications of potential failures are expected to be readily apparent to observers.

2.1.2 Responsible Persons and Notification Procedure

Regulatory Citation: 40 CFR §257.73 (a)(3)(i);

(B) Define responsible persons, their respective responsibilities, and notification procedures in the event
of a safety emergency involving the CCR unit.

All defined responsible persons, their respective responsibilities, and notification procedures in the event of a safety emergency involving the CCR unit have been documented. The notification flow chart can be found in **Appendix A Figure 3.1**, **3.2**, and **3.3**.

2.1.3 Contact Information

Regulatory Citation: 40 CFR §257.73 (a)(3)(i);

(C) Provide contact information of emergency responders.

Table 2-2–Emergency Responders Contact Information			
Agency	Contact Person	Address	Phone Number
Indiana DNR Dam Safety Section	Moumita Mukherjee	402 W. Washington Street, Room W264 Indianapolis, IN 46204	317-232-1103 (463-203-3101 after standard working hours)
Posey County Emergency Management Director	Larry Robb	305 Mill St. Mt. Vernon, IN 47620	812-838-1333 (812-319-6975 after standard working hours)
Indiana Department of Homeland Security District 10 Liaison	Tonda Dixon		317-402-6603
911 Dispatch Directory	Jason Knowles	305 Mill St. Mt. Vernon, IN 47620	812-838-1320
Posey County Sheriff's Office	Sheriff Tom Latham	1201 O'Donnell Rd. Mt. Vernon, IN 47620	812-838-1321
Army Corps of Engineers Emergency Manager *	Chuck Oliver	Louisville District 600 Dr. Martin Luther King Pl, Louisville, KY 40202	502-315-6912
U.S. Coast Guard *		Sector Ohio Valley 600 Dr. Martin Luther King Jr. Pl. Louisville, KY 40202	502-779-5300
National Response Center *			800-424-8802

*If flow is sufficient to reach the river

2.1.4 Map of Downstream Area

Regulatory Citation: 40 CFR §257.73 (a)(3)(i);

 (D) Include a map which delineates the downstream area which may be affected in the event of a CCR unit failure and a physical description of the CCR unit.

A map depicting the downstream area that may be affected in the event of the embankment failure is presented in **Figure 4** of **Appendix A.** A map with the location of a possible incident command center and potential roads that would be affected in the event of embankment failure is presented in **Figure 6** in **Appendix A**. The description of the Brown station and also of the Ash Pond is included in Section 1.2 of this certification document.

2.1.5 Annual Face-to-Face Meeting

Regulatory Citation: 40 CFR §257.73 (a)(3)(i);

 (E) Include provisions for an annual face-to-face meeting or exercise between representatives of the owner or operator of the CCR unit and the local emergency responders.

Provisions for an annual face-to-face meeting between representatives of the owner or operator of the Brown station and the local emergency responders have been established as listed below. The owner or operator will review and update the EAP for the Ash Pond as needed, at least once each year.

Within one year of the finalization of the initial EAP for the Ash Pond, the owner of operator shall initiate annual EAP for the Ash Pond face-to-face meetings that, at minimum, consist of the following:

- A review of responsible parties listed in Table 2-2 to confirm names and contact numbers are still accurate
- Confirmation that all personnel in Table 2-2 know where the EAP for the Ash Pond is located and the responsibilities described within the EAP for the Ash Pond
- Review of the EAP for the Ash Pond, notification flowcharts and downstream impact area maps.
- Persons listed on Table 2-2 shall be notified of meeting time and location via certified mail at least 2 weeks prior to meeting date

An annual exercise may be substituted for an annual face-to-face meeting with emergency responders. An annual EAP for the Ash Pond exercise will consist of the following:

- The owner or operator will develop a plan and schedule for EAP for the Ash Pond training.
- The owner or operator, in conjunction with responsible persons and emergency responders, will conduct tabletop and/or field exercises for various emergency events.
- The owner or operator will review the EAP for the Ash Pond in accordance with all responsible persons and update, as necessary, all documentation within the EAP for the Ash Pond to include the notification flowcharts (Figures 3.1-3.3), the EAP for the Ash Pond document, and the downstream area map (Figure 4).

 The results of the annual exercise will be discussed and evaluated to determine if the EAP for the Ash Pond needs to be updated.

Meetings with emergency responders have been conducted on an annual basis and updates/learnings from the these meetings have been incorporated into this plan.

2.2 Amendment of the Plan

Regulatory Citation: 40 CFR §257.73 (a)(3)(ii) Amendment of the Plan:

— (A) The owner or operator of a CCR unit subject to the requirements of paragraph (a)(3)(i) of this section may amend the written EAP at any time provided the revised plan is placed in the facility's operating record as required by § 257.105(f)(6). The owner or operator must amend the written EAP whenever there is a change in conditions that would substantially affect the EAP in effect.

Whenever there is a change in conditions that would substantially affect the EAP for the Ash Pond in affect, an amendment to the written EAP for the Ash Pond will be made and placed in the facility's operating record.

(B) The written EAP must be evaluated, at a minimum, every five years to ensure the information required in paragraph (a)(3)(i) of this section is accurate. As necessary, the EAP must be updated and a revised EAP placed in the facility's operating record as required by § 257.105(f)(6).

The EAP for the Ash Pond will be evaluated, at a minimum, every five years. Any updates and revisions to the EAP for the Ash Pond will be placed in the facility's operating record.

2.3 Changes in Hazard Potential Classification

Regulatory Citation: 40 CFR §257.73 (a)(3)(iii);

(A) If the owner or operator of a CCR unit determines during a periodic hazard potential assessment that the CCR unit is no longer classified as either a high hazard potential CCR surface impoundment or a significant hazard potential CCR surface impoundment, then the owner or operator of the CCR unit is no longer subject to the requirement to prepare and maintain a written EAP beginning on the date the periodic hazard potential assessment documentation is placed in the facility's operating record as required by § 257.105(f)(5).

The Ash Pond is currently classified as a significant hazard potential, CCR impoundment; therefore a written EAP for the Ash Pond has been prepared. If the classification for the Ash Pond changes and the CCR unit is no longer classified as either a high hazard potential CCR surface impoundment or a significant hazard potential CCR surface impoundment, SIGECO will no longer be required to prepare and maintain a written EAP for the Ash Pond.

(B) If the owner or operator of a CCR unit classified as a low hazard potential CCR surface impoundment subsequently determines that the CCR unit is properly re-classified as either a high hazard potential CCR surface impoundment or a significant hazard potential CCR surface impoundment, then the owner or operator of the CCR unit must prepare a written EAP for the CCR unit as required by paragraph (a)(3)(i) of this section within six months of completing such periodic hazard potential assessment.

The Ash Pond is currently classified as a significant hazard potential CCR impoundment; therefore a written EAP for the Ash Pond has been prepared.

2.4 Qualified Professional Engineer Certification

Regulatory Citation: 40 CFR §257.73 (a)(3)(iv);

 The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer stating that the written EAP, and any subsequent amendment of the EAP, meets the requirements of paragraph (a)(3) of this section

A qualified professional engineer has certified this EAP for the Ash Pond in Section 3 of this EAP for the Ash Pond.

2.5 Activation of the EAP

Regulatory Citation: 40 CFR §257.73 (a)(3)(v);

 The EAP must be implemented once events or circumstances involving the CCR unit that represent a safety emergency are detected, including conditions identified during periodic structural stability assessments, annual inspections, and inspections by a qualified person.

The EAP for the Ash Pond will be implemented as soon as events or circumstances involving the CCR unit that represent a safety emergency are detected.

3 Certification

This Certification Statement documents that the Ash Pond at the A.B. Brown Generating Station meets the Emergency Action Plan requirements specified in 40 CFR §257.73 (a)(3). The Ash Pond is an existing CCR surface impoundment as defined by 40 CFR §257.53. The CCR Rule requires that the initial Emergency Action Plan for an existing CCR surface impoundment be prepared by April 17, 2017.

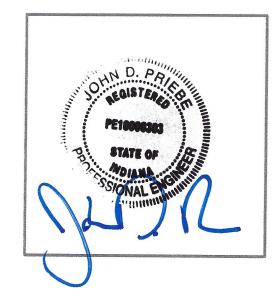
CCR Unit: Southern Indiana Gas & Electric Company; A.B. Brown Generating Station; Ash Pond

I, John Priebe, 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 referenced CCR Unit, that the Emergency Action Plan dated November 1, 2021 meets the requirements of 40 CFR § 257.73 (a)(3).

JOHN D. PEIEBO

Printed Name

Date



4 Limitations

Background information, design basis, and other data which AECOM has used in preparation of this report have been furnished to AECOM by SIGECO. AECOM has relied on this information as furnished, and is not responsible for the accuracy of this information. Our recommendations are based on available information from previous and current investigations. These recommendations may be updated as future investigations are performed.

The conclusions presented in this report are intended only for the purpose, site location, and project indicated. The recommendations presented in this report should not be used for other projects or purposes. Conclusions or recommendations made from these data by others are their responsibility. The conclusions and recommendations are based on AECOM's understanding of current plant operations, maintenance, stormwater handling, and ash handling procedures at the station, as provided by SIGECO. Changes in any of these operations or procedures may invalidate the findings in this report until AECOM has had the opportunity to review the findings, and revise the report if necessary.

This development of the Emergency Action Plan for the Ash Pond was performed in accordance with the standard of care commonly used as state-of-practice in our profession. Specifically, our services have been performed in accordance with accepted principles and practices of the engineering profession. The conclusions presented in this report are professional opinions based on the indicated project criteria and data available at the time this report was prepared. Our services were provided in a manner consistent with the level of care and skill ordinarily exercised by other professional consultants under similar circumstances. No other representation is intended.

Appendix A Figures

Figure 1 – Location Map

Figure 2 - Site Map

Figure 3.1 – Notification Flow Chart Level 3

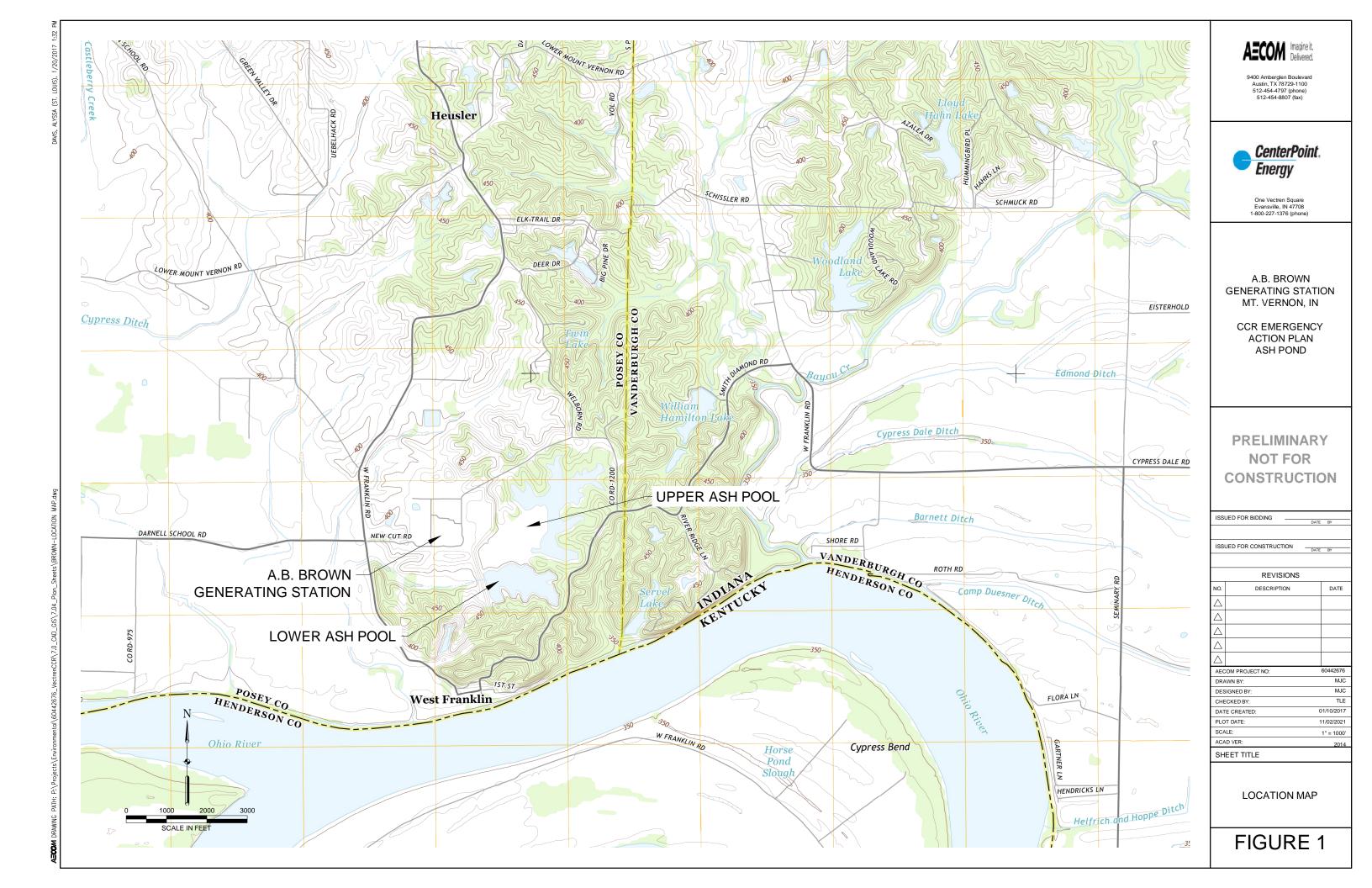
Figure 3.2 - Notification Flow Chart Level 2

Figure 3.3 – Notification Flow Chart Level 1

Figure 4 – Downstream Area Map

Figure 5 – 50 Mile Radius Map

Figure 6 - Road Closure Map





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A.B. BROWN GENERATING STATION MT. VERNON, IN

CCR EMERGENCY ACTION PLAN ASH POND

PRELIMINARY NOT FOR CONSTRUCTION

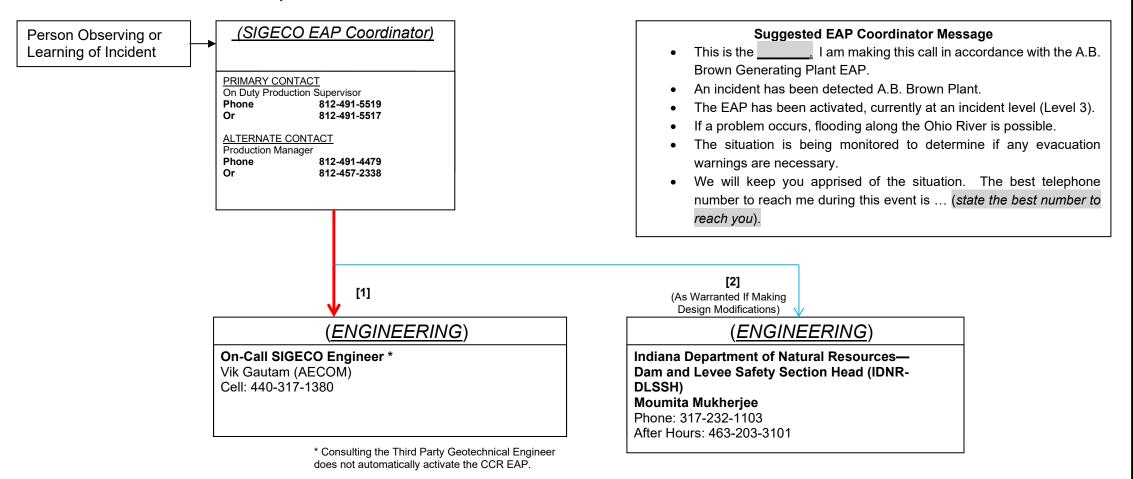
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DRAWN BY: MJC					
DES	DESIGNED BY: MJC				
CHE	CHECKED BY: TLE				
DAT	DATE CREATED: 01/10/2017				
PLO	PLOT DATE: 11/02/2021				
SCA	SCALE: 1" = 300'				
ACAD VED.					

SITE MAP

SHEET TITLE

FIGURE 2

EVENT LEVEL 3 NOTIFICATION INCIDENT, SLOWLY DEVELOPING



NOTE:

1) [1], [2], [3], etc., DENOTES SUGGESTED CALLSEQUENCE

LEGEND:

1) CALLS BY EAP COORDINATOR

A.B. BROWN

GENERATING PLANT

EMERGENCY ACTION PLAN

- 2) SECOND LEVEL CALLS (as warranted)
- 3) THIRD LEVEL CALLS (as warranted)

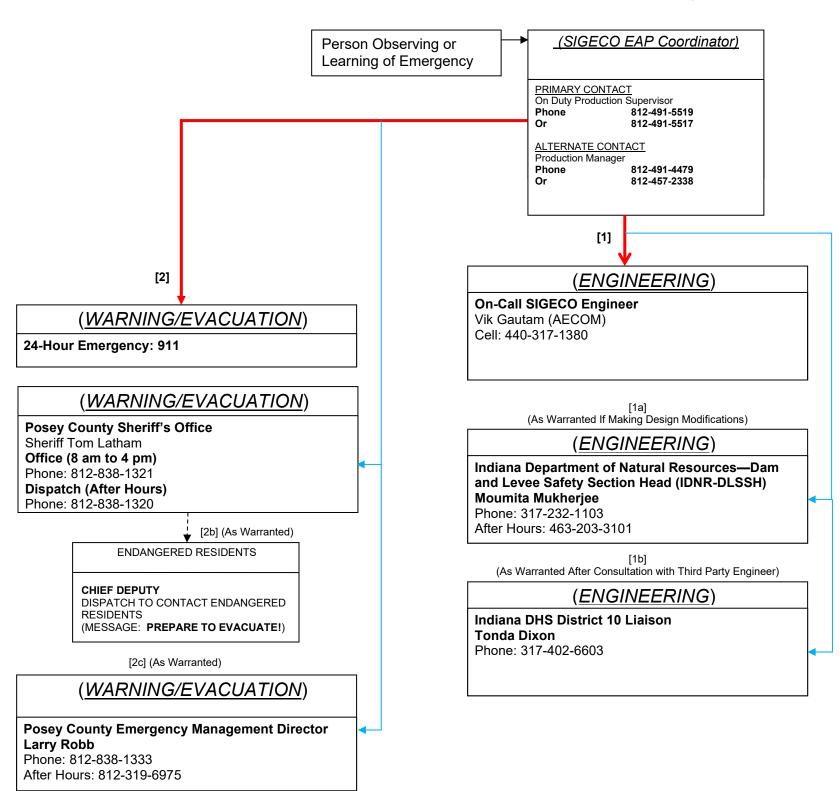
NOTIFICATION FLOW CHART FOR EVENT LEVEL 3

November 2021

FIGURE 3.1

See Table 2.2, *Emergency Responders Contact Information*, *i*n the EAP for additional contact information.

EVENT LEVEL 2 NOTIFICATION EMERGENCY EVENT, RAPIDLY DEVELOPING



Suggested EAP Coordinator Message

- This is the _____. I am making this call in accordance with the A.B. Brown Generating Plant EAP.
- Problems have occurred with A.B. Brown Generating Plant.
- The EAP has been activated, currently at the highest emergency level (Level 2).
- Flooding along the Ohio River is possible.
- Immediately evacuate along the (identify potential evacuees/evacuation limits along Template Creek).
- We will keep you apprised of the situation. The best telephone number to reach me during this event is ... (state the best number to reach you).

NOTE:

1) [1], [2], [3], etc., DENOTES SUGGESTED CALLSEQUENCE

LEGEND:

- 1) CALLS BY EAP COORDINATOR
- 2) **SECOND LEVEL CALLS (as warranted)**
- 3) THIRD LEVEL CALLS (as warranted)

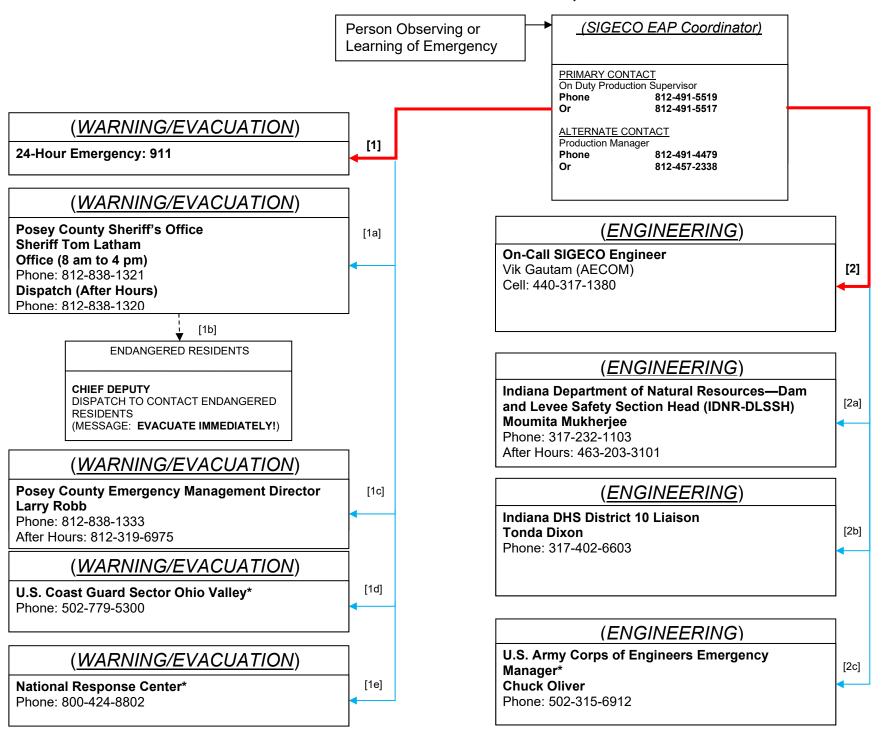
A.B. BROWN GENERATING PLANT EMERGENCY ACTION PLAN NOTIFICATION FLOW CHART FOR EVENT LEVEL 2

November 2021

FIGURE 3.2

See Table 2.2, *Emergency Responders Contact Information*, in the EAP for additional contact information.

EVENT LEVEL 1 NOTIFICATION EMERGENCY EVENT, IMMINENT DAM FAILURE OR FLASH FLOOD



Suggested EAP Coordinator Message

- This is the _____. I am making this call in accordance with the A.B. Brown Generating Plant EAP.
- Problems have occurred with A.B. Brown Generating Plant.
- The EAP has been activated, currently at the highest emergency level (Level 1).
- Flooding along the Ohio River is possible.
- **Immediately evacuate** along the (*identify potential evacuees/evacuation limits along Template Creek*).
- We will keep you apprised of the situation. The best telephone number to reach me during this event is ... (state the best number to reach you).

See Table 2.2, *Emergency Responders Contact Information*, in the EAP for additional contact information.

NOTE:

1) [1], [2], [3], etc., DENOTES SUGGESTED CALLSEQUENCE

LEGEND:

- 1) CALLS BY EAP COORDINATOR
- 2) SECOND LEVEL CALLS (as warranted)
- 3) THIRD LEVEL CALLS (as warranted)

A.B. BROWN
GENERATING PLANT
EMERGENCY ACTION PLAN

NOTIFICATION FLOW CHART FOR EVENT LEVEL 1

November 2021

FIGURE 3.3

* If flow is sufficient to reach the river.

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