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September 12, 2025
File No. 0129420

TO: Southern Indiana Gas and Electric Company

FROM: Haley & Aldrich, Inc.

SUBJECT: Semi-Annual Remedy Selection Progress Report Pursuant to 40 CFR §257.97(a)
A.B. Brown Generating Station – Ash Pond

The Southern Indiana Gas and Electric Company (SIGECO) initiated an evaluation of the nature and extent of contamination and an assessment of corrective measures for the Ash Pond at the A.B. Brown Generating Station on April 15, 2019, in response to a statistically significant level (SSL) of an Appendix IV constituent exceeding Groundwater Protection Standards (GWPS). Pursuant to Title 40 Code of Federal Regulations (40 CFR) §257.96(a), a demonstration of need for a 60-day extension for the assessment of corrective measures was completed on July 12, 2019. The Corrective Measures Assessment (CMA) Report was completed and placed in the facility operating record on September 13, 2019.

Following completion of the CMA, SIGECO must, as soon as feasible, select a remedy that meets the standards listed in 40 CFR §257.97(b). Pursuant to 40 CFR §257.97(a), the owner or operator of a coal combustion residual management unit that has completed a CMA for groundwater shall prepare a semi-annual report describing the progress made in selecting and designing the remedy. This report documents activities completed in support of selecting and designing a remedy during the period from March 15, 2025, through September 12, 2025. A summary of the progress in selecting a remedy is provided below.

Summary of Actions Completed

The following actions have been completed during this reporting period:

- Collected groundwater samples on May 6 and 7, 2025, from monitoring wells at the Ash Pond for laboratory analysis in accordance with 40 CFR §257.95.
- Completed statistical analysis to determine if Appendix IV SSLs are present downgradient from the Ash Pond above the GWPS (consistent with 40 CFR §257.95).
- Prepared a draft Selection of Remedy Report including a schedule for implementing remedial activities.
- Designed and began implementation of a pilot study of the proposed remedial technology.

Planned Activities

A conceptual schedule for completion of the Selection of Remedy process is included in Attachment A. Anticipated activities for the upcoming six months include the following:

- Conduct semi-annual groundwater sampling in November 2025 consistent with 40 CFR §257.95(b) and (d)(1).
- Monitor and assess the performance of the proposed remedial technology pilot study.
- Select and certify the remedy.
- Establish and implement a Corrective Action Groundwater Monitoring Program.

Enclosures:

Attachment A – A.B. Brown Ash Pond Selection of Remedy Schedule

https://haleyaldrich.sharepoint.com/sites/VectrenCorporation/Shared Documents/0129420.AB Brown/Deliverables/2_SoR Progress Reports/2025 September/2025-0912_HAI_ABB_AP-Semiannual_SOR_F.docx

ATTACHMENT A
A.B. Brown Ash Pond Selection of Remedy Schedule

ATTACHMENT A
A.B. BROWN ASH POND SELECTION OF REMEDY SCHEDULE

SEPTEMBER 2025 A.B. BROWN GENERATING STATION																											
								2025														2026					
#	Description of Task	July	Aug.	Sept.	Oct.	Nov.	Dec.	Jan	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.	Jan	Feb.	Mar.	Apr.	May	June		
1	Selection of Remedy (40 CFR §257.97)																										
1.1	In-situ horizontal treatment well technology Evaluation (completed in 2023)																										
1.2	Monitored Natural Attenuation Focused Feasibility Evaluation																										
1.3	Supplemental Corrective Measures Evaluation																										
1.4	Prepare Draft Selection of Remedy Report																										
1.5	Specify a schedule for implementing and completing remedial activities																										
1.6	CenterPoint Selection of Remedy Review																										
1.7	Finalize Selection of Remedy Report and Certify the Selected Remedy																										
2	Implementation of the Corrective Action Program (40 CFR §257.98)																										
2.1	Establish and Implement Corrective Action Groundwater Monitoring Program (CAGWMP)							Establish CAGWMP												Implement CAGWMP							
2.2a	Implement Remedy - Source Control (Closure by Removal via dewatering & CCR excavation)																										
2.2b	Implement Remedy - Groundwater Treatment (ISRM Pilot Study)																										
2.3	Remedy performance monitoring					★		Assessment monitoring				★						★		Performance monitoring				★			