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15 March 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 15 April 2019 in response to a statistically significant level of an Appendix IV constituent exceeding Groundwater Protection Standards. Pursuant to 40 Code of Federal Regulations (CFR) §257.96(a), a demonstration of need for a 60-day extension for the assessment of corrective measures was completed on 12 July 2019. The Corrective Measures Assessment (CMA) Report was completed and placed in the facility operating record on 13 September 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 14 September 2024 through 15 March 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 13 to 16 May 2024 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);
- Updated geochemical evaluation and flow and transport model to assist in the selection of a remedy;
- Prepared a Draft Selection of Remedy Report including a schedule for implementing remedial activities; and,
- Developed preliminary pilot study work plan in preparation of anticipated remedy selection implementation.

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 May 2025 consistent with 40 CFR §257.95(b) and (d)(1);
- Design and implement a pilot study of proposed remedial technology;
- Select and certify the remedy; and,
- 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 March/2025-0312_HAI_ABB_AP-Semiannual_SOR_F.docx](https://haleyaldrich.sharepoint.com/sites/VectrenCorporation/Shared%20Documents/0129420.AB%20Brown/Deliverables/2_SoR%20Progress%20Reports/2025%20March/2025-0312_HAI_ABB_AP-Semiannual_SOR_F.docx)

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

MARCH 2025 A.B. BROWN GENERATING STATION ASH POND SELECTION OF REMEDY SCHEDULE																									
		2024												2025											
#	Description of Task	Jan	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.	Jan	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
1	Selection of Remedy (257.97)																								
1.1	In-situ horizontal treatment well technology Evaluation (completed in 2023)																								
1.2	MNA 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 (257.98)																								
2.1	Establish and Implement Corrective Action Groundwater Monitoring Program (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																								