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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)  
F.B. Culley Generating Station – East 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 East Ash Pond (EAP) at the F.B. Culley Generating Station on 15 April 2019 in response to a statistically significant level (SSL) of an Appendix IV constituent exceeding Groundwater Protection Standards (GWPS). 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.

Pursuant to the Federal Coal Combustion Residual (CCR) Rule, 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 §257.97(a), the owner or operator of a CCR 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 from 13 November 2024 to 24 January 2025 from monitoring wells at the EAP for laboratory analysis in accordance with 40 CFR § 257.95(b) and(d)(1);
- Completed statistical analysis to determine if Appendix IV SSLs are present downgradient from the EAP above the GWPS (consistent with 40 CFR § 257.95);
- Updated geochemical evaluation, flow and transport model, risk assessment, and CMA alternative assessment analysis to incorporate more recent data and updated site conceptual model to assist in the selection of remedy; and,
- Prepared a Draft Selection of Remedy Report including a schedule for implementing remedial activities.

## 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.

Enclosure:

Attachment A – F.B. Culley Generating Station East Ash Pond Selection of Remedy Schedule

[https://haleyaldrich.sharepoint.com/sites/VectrenCorporation/Shared Documents/0129420.Culley/Deliverables/East Ash Pond/2\\_SOR\\_Progress\\_Reports/2025-March/2025-0312-HAI-CulleyEAP\\_Semi-annual\\_SOR\\_F.docx](https://haleyaldrich.sharepoint.com/sites/VectrenCorporation/Shared Documents/0129420.Culley/Deliverables/East Ash Pond/2_SOR_Progress_Reports/2025-March/2025-0312-HAI-CulleyEAP_Semi-annual_SOR_F.docx)

**ATTACHMENT A**  
**F.B. Culley Generating Station East Ash Pond Selection  
of Remedy Schedule**

March 2025 F.B. CULLEY GENERATING STATION EAST 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	MNA effectiveness confirmation																								
1.2	Run laboratory analysis (completed in 2023)																								
1.3	Evaluate supplementary GW remedy																								
1.4	Evaluate results																								
1.5	Prepare Draft Selection of Remedy Report																								
1.6	Specify a schedule for implementing and completing remedial activities																								
1.7	CenterPoint Selection of Remedy review																								
1.8	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																								
2.3	Remedy performance monitoring																								
3	Post Closure (257.98)																								
3.1	Certify Closure Completion (compliance with GWPS)																								
3	Post Closure Groundwater Monitoring																								