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File No. 129420

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 - West Ash Pond

The Southern Indiana Gas and Electric Company (SIGECO) initiated an assessment of corrective measures for the West Ash Pond at the F.B. Culley Generating Station (FBC) on 30 October 2020 in response to a statistically significant level (SSL) of an Appendix IV constituent exceeding Groundwater Protection Standards (GWPS). Pursuant to 40 CFR §257.96(a), a demonstration of need for a 60-day extension for the assessment of corrective measures was certified by a qualified professional engineer. The Corrective Measures Assessment (CMA) Report was completed and placed in the facility operating record on 26 February 2021.

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 Coal Combustion Residual (CCR) management unit that has completed a CMA for groundwater shall prepare a semi-annual report describing the progress in selecting and designing the remedy. This report constitutes the third semi-annual remedy selection progress report and is comprised of activities during the period of 26 February 2022 thru 25 August 2022. 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:

- Discussions between Haley & Aldrich and SIGECO representatives to further evaluate the details and feasibility of potential corrective measures identified by the completed CMA.
- Conducted semiannual groundwater sampling in May 2022 consistent with 257.95(b) and (d)(1).
- Efforts to determine the nature and extent (N&E) of the Appendix IV SSLs continued pursuant to § 257.95(g). Groundwater samples were collected from the N&E monitoring wells in May 2022. The analytical results are being used to supplement and enhance the evaluation of the extent of groundwater impacts and assessment of corrective measures. Groundwater characterization of the N&E monitoring wells is ongoing, as the results of each sampling event inform what additional step, if any, is necessary in order to fully delineate nature & extent. Furthermore, SIGECO is in communication with the adjacent property owner to the west of the WAP (down-gradient) to determine whether water quality data exists or other steps will be necessary to

obtain the necessary data, and more specifically, to identify whether the N&E of SSLs extends off-site.

- Conducted statistical tests to determine if SSLs of Appendix III constituents were identified at the boundary of the Closed in Place (CiP) unit and if SSLs of Appendix IV groundwater monitoring constituents are present downgradient of the former operating unit above GWPS (consistent with the requirements outlined in 40 CFR § 257.95). Since releases from the former operating unit pre-date construction of the CiP unit, the only way to independently evaluate the CiP unit via detection monitoring is through an intra-well statistical analysis. Interwell statistical analysis for assessment monitoring of the former operating unit continue.

PLANNED ACTIVITIES

Anticipated activities for the upcoming six months include the following:

- Conduct semiannual groundwater sampling in November 2022 consistent with 257.95(b) and (d)(1).
- Continue to evaluate groundwater flow conditions and the N&E of Appendix IV constituents exceeding GWPS and the potential for off-site migration.
- Continue to evaluate engineering aspects of the closure that was completed in December 2020 and its connectivity to potential corrective measures.