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11 September 2024
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 16 March 2024 through 13 September 2024. 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 1 to 14 May 2024 from monitoring wells at the EAP for laboratory analysis in accordance with 40 CFR § 257.95(b) and(d)(1);
- Evaluated groundwater analytical results and developed a geochemical conceptual site model to evaluate potential remedial methods;
- Evaluated groundwater level monitoring data and updated the groundwater conceptual site model with hydrogeological information collected from additional aquifer testing in support of remedy selection; and,
- Completed statistical analysis to determine if Appendix IV SSLs are present downgradient from the EAP above the GWPS (consistent with 40 CFR § 257.95).

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 2024 consistent with 40 CFR §257.95(b) and (d)(1);
- Prepare a Selection of Remedy Report including a schedule for implementing remedial activities;
- 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

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

SEPTEMBER 2024 F.B. CULLEY GENERATING STATION EAST ASH POND SELECTION OF REMEDY SCHEDULE		2024												2025																			
		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)													Establish CAGWMP		Implement 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													★		Assessment monitoring				★						★		Performance monitoring				★	
3	Post Closure (257.98)																																
3.1	Certify Closure Completion (compliance with GWPS)																																
3	Post Closure Groundwater Monitoring																									Post closure monitoring				★			