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15 March 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 14 September 2023 through 15 March 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 on 2 November 2023 from monitoring wells at the EAP for laboratory analysis in accordance with 40 CFR § 257.95(b) and(d)(1);
- supplemented and enhanced the site conceptual model and groundwater characterization, refined the groundwater flow and solute transport model, and assessed potential corrective measures following evaluation of groundwater analytical results; 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 May 2024 consistent with 40 CFR §257.95(b) and (d)(1);
- evaluate groundwater and solid phase analytical results in support of remedy selection; and
- evaluate groundwater level monitoring program data in support of remedy selection.

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**

MARCH 15, 2024 F.B. CULLEY GENERATING STATION EAST ASH POND SELECTION OF REMEDY SCHEDULE		2023												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.	Jan	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
1	Selection of Remedy (257.97)	[Gantt bar spanning all months from Jan 2023 to Jul 2024]																																			
1.1	MNA effectiveness confirmation	[Gantt bar from Apr 2023 to May 2024]																																			
1.2	Run laboratory analysis	[Gantt bar from May 2023 to Oct 2023]																																			
1.3	Evaluate supplementary GW remedy	[Gantt bar from May 2023 to May 2024]																																			
1.4	Evaluate results	[Gantt bar from Aug 2023 to May 2024]																																			
1.5	Prepare Selection of Remedy Report	[Gantt bar from Apr 2024 to May 2024]																																			
1.6	Specify a schedule for implementing and completing remedial activities	[Gantt bar from May 2024 to Jun 2024]																																			
1.7	CenterPoint Selection of Remedy review	[Gantt bar from Jun 2024 to Jul 2024]																																			
1.8	Certify the selected remedy	[Star icon in Jul 2024]																																			
2	Implementation of the Corrective Action Program (257.98)	Initiate source removal with ash pond dewatering and excavation																																			
2.1	Establish and Implement Corrective Action Groundwater Monitoring Program	[Gantt bar from Apr 2023 to Dec 2025]																																			
2.2	Remedy performance monitoring	[Star icons: Apr 2023, Nov 2023, May 2024, Nov 2024, May 2025, Nov 2025]																																			
2.3	Evaluate Results	[Star icons: Apr 2023, Nov 2023, May 2024, Nov 2024, May 2025, Nov 2025]																																			
3	Post Closure (257.98)	[Gantt bar from May 2025 to Dec 2025]																																			
3.1	Certify Closure Completion (compliance with GWPS)	[Gantt bar from May 2025 to Jun 2025]																																			
3	Post Closure Groundwater Monitoring for 30 Years	[Star icons: May 2025, Nov 2025]																																			