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13 March 2020
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 - East Ash Pond

The Southern Indiana Gas and Electric Company (SIGECO) initiated corrective measures for the East Ash Pond at the F.B. Culley Generating Station (FBC) on 15 April 2019 in response to a statistically significant level (SSL) of an Appendix IV constituent exceeding Groundwater Protection Standards. Pursuant to 40 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 §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 first semi-annual remedy selection progress report and is comprised of activities during the period of 13 September 2019 through 13 March 2020. 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.
- 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 November 2019. The analytical results will be 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.
- Refined the remediation cost estimates and timelines associated with closure alternatives and potential corrective measures included in the CMA.
- Reviewed regulatory programs potentially related to closure alternatives and potential corrective measures, as well as existing environmental permits.
- Initiated an evaluation of the potential for beneficial use of CCR contained in the EAP.

PLANNED ACTIVITIES

Anticipated activities for the upcoming six months include the following:

- Conduct semiannual groundwater sampling in May consistent with 257.95(b) and (d)(1).
- Continue to evaluate the potential for beneficial use of CCR contained in the EAP.
- Continue to evaluate engineering aspects of closure alternatives and connectivity to potential corrective measures.