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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 - 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 third semi-annual remedy selection progress report and documents activities completed during the period of 14 September 2020 through 12 March 2021. 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.
- Source reduction improvements were completed to eliminate bottom ash from being disposed of into the unit thereby providing source reduction and to aid in the eventual closure of the unit.
- Efforts to corroborate 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 2020. 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.
- SIGECO has made preliminary determinations to select closure-by-removal as the anticipated closure method and is progressing with discussions and evaluations to integrate the closure method into the corrective measure;

- Refined the remediation cost estimates and timelines associated with closure alternatives and potential corrective measures included in the CMA as a measure to further evaluate efficiency and feasibility of achieving pond closure and groundwater remedy.
- Reviewed regulatory programs potentially related to closure alternatives, impact of regulatory changes (i.e., CCR Part A rule (published August 2020) and ELG Reconsideration Rule (published October 2020)) on site planning, and potential corrective measures, as well as existing and future environmental permits.
- Continued the evaluation of the potential for beneficial use of CCR contained in the EAP.
- Met with consultant to identify and review considerations/technical implications and potential benefits of reducing the contaminants leaching from the CCR unit prior to unit closure;
- Continued preparations for public meeting;

PLANNED ACTIVITIES

Anticipated activities for the upcoming six months include the following:

- Conduct semiannual groundwater sampling in May 2021 consistent with 257.95(b) and (d)(1).
- Continue evaluation of the potential for beneficial use of CCR contained in the EAP.
- Complete evaluation of engineering aspects of closure alternatives and connectivity to potential corrective measures. Engineering closure design and beneficial use evaluations are to be completed and weighed against remedial alternatives.
- Hold public meeting and begin to evaluate community input provided at meeting as part of the selection of remedy process.