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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 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 (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 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 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 Coal Combustion Residual (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 constitutes the sixth semi-annual remedy selection progress report and documents activities completed during the period of 15 March 2022 through 14 September 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, Inc. (Haley & Aldrich) and SIGECO representatives pertaining to the construction details and impact of various closure by removal alternatives outlined in the CMA have been ongoing.
- Groundwater samples were collected from the Nature and Extent monitoring wells in May 2022. The analytical results continue to be used to supplement and enhance the groundwater characterization, the refinement of the groundwater flow and solute transport model, and assessment of corrective measures.
- Discussion and follow-up activities between Haley & Aldrich and SIGECO representatives to finalize the evaluation of the details and feasibility of potential remedies identified by the completed CMA and additional site investigative work completed during this reporting period.

- Installed a series of observation wells and a large diameter pumping well in preparation of an aquifer pump test that will provide information for the characterization of aquifer conditions beneath the East Ash Pond in support of groundwater remedy considerations and water management during the excavation of material for closure of the pond.

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).
- Perform the aquifer pump test to collect information for the characterization of unit aquifer conditions and use the results to further evaluate water management alternatives associated with the various remedy options so an appropriate remedy can be selected that, at a minimum meets the standards outlined in §257.97(b).
- Once a remedy has been selected, a final remedy selection report will be generated explaining how the remedy meets the standards outlined in §257.97(b).
- Within 90 days of selecting a remedy under §257.97, SIGECO will initiate remedial activities following the procedures outlined in §257.98.