

19 April 2019  
File No. 129420-011

**SUBJECT: F.B. Culley Generating Station Groundwater Monitoring System Certification for the West Ash Pond, Southern Indiana Gas and Electric Company (SIGECO)**

SIGECO operates the existing coal combustion residuals (CCR) management unit referred to as the West Ash Pond (Unit) at F.B. Culley Generating Station located near the communities of Yankeetown and Newburgh, Indiana. The Unit was inactive and scheduled to be closed by October 18, 2018 when the US Environmental Protection Agency's (EPA's) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, 40 CFR Part 257 (Rule) was promulgated (effective 19 October 2015). The Unit was therefore, not considered to be subject to the compliance and schedule requirements in the Rule. However, due to the Rule changes related to a partial vacatur ordered by the DC Circuit Court on June 14, 2016 the Unit must now meet the same requirements as units that were active on the effective date of the Rule. This document addresses the requirements of §257.91 *Groundwater Monitoring Systems*, specifically section §257.91(f), of the Rule. This document serves as certification that the Unit complies with the requirements defined in the Rule as cited below. This certification has been prepared based upon information made accessible by SIGECO pursuant to §257.91(e)(1).

The groundwater monitoring system at the West Ash Pond has been designed to exceed the minimum requirement of one upgradient and three downgradient monitoring wells pursuant to §257.91(c). The actual number of wells used in the groundwater monitoring system is sufficient and appropriate to characterize the quality of groundwater flowing beneath the West Ash Pond based on site-specific conditions.

Pursuant to CFR Title 40 Chapter I Subchapter I Part 257 Subpart D §257.91(f), I certify that the groundwater monitoring system for the West Ash Pond has been designed and constructed to meet the requirements of §257.91. The certification submitted is, to the best of my knowledge, accurate and complete.

Signed:   
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Certifying Engineer

Print Name: Steven F. Putrich, P.E.  
Indiana License No.: PE11200566  
Title: CCR Program Manager  
Company: Haley & Aldrich, Inc.

