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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)
A.B. Brown Generating Station - 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 Ash Pond at the A.B. Brown Generating Station 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.

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 fifth semi-annual remedy selection progress report and documents activities completed during the period of 15 September 2021 through 14 March 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 November 2021. The analytical results were used to supplement and enhance the evaluation of the extent of groundwater impacts and assessment of corrective measures. Ongoing groundwater characterization included the following during this reporting period:
 - Sampling/analysis and evaluation of groundwater from CCR-AP-2IR, FD-PZ-1, FD-PZ-2, FD-PZ-3A, FD-PZ-3B, FD-PZ-4, the French drain manhole (MH-1), and one additional down-gradient manhole (MH-2) near train tracks to evaluate the hydraulic connection between the Ash Pond and the French drain and the control the French drain has on groundwater flow;

- Ash Pond cross-sections were modified to update the hydrogeologic framework; groundwater flow mapping was refined to document the influence of the French drain; and
- This information was used to update and refine the groundwater flow and solute transport model for the Ash Pond which showed that the French drain captured shallow groundwater plume downgradient of the Ash Pond.
- Discussion and follow-up activities between Haley & Aldrich and SIGECO representatives to finalize the evaluation of the details and feasibility of potential corrective measures identified by the completed CMA.
- Held the public meeting on 18 October 2021;
- Haley & Aldrich prepared a preliminary selection of remedy report document for SIGECO review and comment to support SIGECO in its final remedy selection process;

PLANNED ACTIVITIES

Anticipated activities for the upcoming six months include the following:

- Conduct semiannual groundwater sampling in May 2022 consistent with §257.95(b) and (d)(1).
- SIGECO will select a remedy 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.