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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 - West Ash Pond

The Southern Indiana Gas and Electric Company (SIGECO) initiated an assessment of corrective measures for the West Ash Pond at the F.B. Culley Generating Station (FBC) on 30 October 2020 in response to a statistically significant level (SSL) of an Appendix IV constituent exceeding Groundwater Protection Standards (GWPS). Pursuant to 40 CFR §257.96(a), a demonstration of need for a 60-day extension for the assessment of corrective measures was certified by a qualified professional engineer. The Corrective Measures Assessment (CMA) Report was completed and placed in the facility operating record on 26 February 2021.

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 40 CFR §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 fourth semi-annual remedy selection progress report and is comprised of activities during the period of 26 August 2022 thru 25 February 2023. Progress in selecting a remedy is summarized below.

SUMMARY OF ACTIONS COMPLETED

The following actions have occurred during this reporting period:

- SIGECO is in communication with the adjacent property owner to the west of the WAP (down-gradient) to pursue an off-site Right-of-Entry (ROE) access agreement.
- Completed semiannual groundwater sampling in November 2022 consistent with 40 CFR §257.95(b) and (d)(1).
- Developed potentiometric surface maps, isoconcentration maps, and trend analysis to confirm the nature and extent (N&E) of Appendix IV SSLs pursuant to 40 CFR § 257.95(g) has been defined (where possible) and assessment of corrective measures findings remain appropriate.
- Completed statistical testing to determine if Appendix III constituent SSIs were identified at the boundary of the Closed in Place (CiP) unit and if Appendix IV constituent SSLs are present downgradient of the former operating unit above GWPS (consistent with 40 CFR § 257.95).

Releases from the former operating unit pre-date construction of the CiP unit, therefore an intra-well statistical analysis is used to independently evaluate the CiP unit. Inter-well statistical analysis for assessment monitoring of the former operating unit continues.

PLANNED ACTIVITIES

Anticipated activities for the upcoming six months include the following:

- Conduct semiannual groundwater sampling in May 2023 consistent with 257.95(b) and (d)(1).
- Obtain ROE access agreement from adjacent property owner west of the WAP.
- After obtaining a ROE, implement an off-site N&E field investigation to determine if Appendix IV constituents extend off-site.
- Develop a surface water sampling plan for the Ohio River south of the WAP.
- Continue to evaluate groundwater flow conditions, the N&E of Appendix IV constituents greater than a GWPS, and the potential for off-site migration.
- Evaluate analytical data to identify groundwater quality changes that may exist as a result of the pond closure and whether those changes impact the potential corrective measures.