



Submitted to  
Southern Indiana  
Gas & Electric Company  
(SIGECO)  
One Vectren Square  
Evansville, IN 47708

Submitted by  
AECOM  
9400 Amberglen Boulevard  
Austin, Texas 78729  
April 2019

# CCR Certification: Liner Design Criteria §257.71

for the

West Ash Pond

at the

F.B. Culley Generating Station

Revision 0

# 1 Introduction

This Coal Combustion Residuals (CCR) Certification Statement documents the absence of a liner system at the West Ash Pond at the Southern Indiana Gas and Electric Company (SIGECO), F.B. Culley Generating Station (Culley). This document meets the requirements specified in 40 CFR §257.71 (a). The West Ash Pond was previously classified as an “inactive” CCR impoundment as defined by 40 CFR §257.53. SIGECO filed a Notice of Intent (NOI) to initiate closure of the West Ash Pond and placed the NOI in the facility’s operating record on December 17, 2015. The unit is currently in the closure process.

On August 5, 2016, the EPA issued a “Direct Final Rule” (effective on October 4, 2016), constituting a vacatur of 40 CFR §257.100 (the “early closure” provision). The Direct Final Rule applies the requirements of “existing surface impoundments” (§257.102) to ponds that had been previously declared “inactive” (i.e. the West Ash Pond). As a result of this order, owners and operators of inactive CCR surface impoundments must comply with all of the requirements for existing CCR surface impoundments as listed in 40 CFR §257.102 of the CCR Rule. As the unit is currently in the process of closure, it is SIGECO’s position that the requirements for “design criteria” such as the Liner Design Criteria are not applicable to the West Ash Pond. Nevertheless, in consideration of whether completion is reasonable given the current closure activities, this Liner Design Criteria document has been prepared and certified.

## 2 Liner Design Criteria for Existing CCR Surface Impoundments

*Regulatory Citation: 40 CFR §257.71 (a):*

- *(1) No later than October 17, 2016 (extended for former inactive facilities), the owner or operator of an existing CCR surface impoundment must document whether or not such unit was constructed with any one of the following: (i) A liner consisting of a minimum of two feet of compacted soil with a hydraulic conductivity of no more than  $1 \times 10^{-7}$  cm/sec; (ii) A composite liner that meets the requirements of §257.70(b); or (iii) An alternative composite liner that meets the requirements of §257.70(c).*
- *(2) The hydraulic conductivity of the compacted soil must be determined using recognized and generally accepted methods.*
- *(3) An existing CCR surface impoundment is considered to be an existing unlined CCR surface impoundment if either: (i) The owner or operator of the CCR unit determines that the CCR unit is not constructed with a liner that meets the requirements of paragraphs (a)(1)(i), (ii), or (iii) of this section; or (ii) The owner or operator of the CCR unit fails to document whether the CCR unit was constructed with a liner that meets the requirements of paragraphs (a)(1)(i), (ii), or (iii) of this section.*
- *(4) All existing unlined CCR surface impoundments are subject to the requirements of §257.101 (a).*

The presence of a liner in the West Ash Pond was evaluated by reviewing historical data of the impoundment design, performing a geotechnical field investigation, and a visual inspection of the pond.

The existing (inactive) surface impoundment was constructed without a liner that meets the requirements of §257.71 (a)(1). As such, the existing CCR surface impoundment is considered to be unlined and is subject to the requirements of §257.101 (a).

### 3 Certification

This Certification Statement documents the absence of a liner system at the West Ash Pond at the F.B. Culley Generating Station. This document meets the requirements specified in 40 CFR §257.71 (a). The Culley West Ash Pond is an existing (formerly inactive) CCR surface impoundment as defined by 40 CFR §257.53 that is in the process of closure.

**CCR Unit:** Southern Indiana Gas & Electric Company; F.B. Culley Generating Station; West Ash Pond

I, John Priebe, being a Registered Professional Engineer in good standing in the State of Indiana, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above referenced CCR Unit, that the liner design documentation for the existing CCR surface impoundment dated April 2019 meets the requirements of 40 CFR § 257.71 (a).

*John D. Priebe*

Printed Name

*4/11/19*

Date



9400 Amberglen Boulevard  
Austin, Texas 78729  
1-512-454-4797

#### About AECOM

AECOM (NYSE: ACM) is a global provider of professional technical and management support services to a broad range of markets, including transportation, facilities, environmental, energy, water and government. With approximately 45,000 employees around the world, AECOM is a leader in all of the key markets that it serves. AECOM provides a blend of global reach, local knowledge, innovation, and collaborative technical excellence in delivering solutions that enhance and sustain the world's built, natural, and social environments. A Fortune 500 company, AECOM serves clients in more than 100 countries and has annual revenue in excess of \$6 billion.