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## MEMORANDUM

15 May 2019  
File No. 129420-011

TO: Southern Indiana Gas and Electric Company

FROM: Haley & Aldrich, Inc.

SUBJECT: Assessment of Corrective Measures Notification Pursuant to 40 CFR § 257.95(g)(3)(i) and 40 CFR § 257.96, A.B. Brown Generating Station – Ash Pond

Southern Indiana Gas and Electric Company (SIGECO) is implementing the 17 April 2015 U.S. Environmental Protection Agency (U.S. EPA) Federal Coal Combustion Residuals (CCR) Rule (40 CFR § 257 and 261) for the A.B. Brown Generating Station Ash Pond, located in Posey County, Indiana. SIGECO has constructed a CCR Rule compliant groundwater monitoring system consistent with 40 CFR § 257.91 and completed detection and assessment monitoring for the three CCR units regulated under the Rule (Ash Pond, Landfill, and Sedimentation Pond). The statistical analysis of the assessment monitoring results for these units, completed on January 14, 2019, identified Appendix IV constituents at statistically significant levels above Groundwater Protection Standards (GWPS) at the Ash Pond and the Landfill. Consistent with 40 CFR § 257.95(g)(3)(ii), a certified Alternate Source Demonstration (ASD) has been completed for the Landfill demonstrating that a source other than the Landfill caused the Appendix IV SSL. However, an alternate source was not identified for the Ash Pond and as a result an assessment of corrective measures pursuant to 40 CFR § 257.95(g)(3)(i) and 40 CFR § 257.96 is required for the Ash Pond.

This memorandum serves as notification required by 40 CFR § 257.95(g)(3)(i) that an assessment of corrective measures has been initiated within 90-days of identifying Appendix IV constituents at statistically significant levels above Groundwater Protection Standards (GWPS) downgradient of the Ash Pond consistent with 40 CFR § 257.96.