



Submitted to
Southern Indiana
Gas & Electric Company
dba Vectren Power
Supply, Inc. (SIGECO)
One Vectren Square
Evansville, IN 47708

Submitted by
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9400 Amberglen Boulevard
Austin, Texas 78729

October 13, 2016

CCR Certification:
Liner Design Criteria
§ 257.71

for the

East Ash Pond

at the

F.B. Culley Generating Station

Revision 0

1 Introduction

This Certification Statement documents the absence of a liner system at the East Ash Pond at the F.B. Culley Generating Station (Culley). This document meets the requirements specified in 40 CFR §257.71 (a). The East Ash Pond is an existing CCR surface impoundment as defined by 40 CFR §257.53. The CCR Rule requires that certification of the requirements of CFR§257.71 (a) for an existing CCR surface impoundment be prepared by October 17, 2016.

2 Liner Design Criteria for Existing CCR Surface Impoundments

Regulatory Citation: 40 CFR §257.71 (a):

- *(1) No later than October 17, 2016, 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 1×10^{-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 East 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 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 Statement

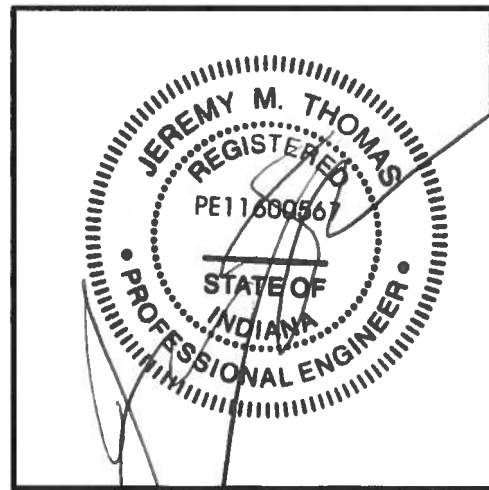
This Certification Statement documents the absence of a liner system at the East Ash Pond at the F.B. Culley Generating Station. This document meets the requirements specified in 40 CFR §257.71 (a). The Culley East Ash Pond is an existing CCR surface impoundment as defined by 40 CFR §257.53. The CCR Rule requires that certification of the requirements of CFR§257.71 (a) for an existing CCR surface impoundment be completed by October 17, 2016.

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

I, Jeremy Thomas, 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 October 13, 2016 meets the requirements of 40 CFR § 257.71 (a).

Jeremy Thomas
Printed Name

10-13-16
Date



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