



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:
Emergency Action Plan
§257.73 (a)(3)

for the

West Ash Pond

at the

F.B. Culley Generating Station

Revision 0

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Executive Summary

This Coal Combustion Residuals (CCR) Emergency Action Plan (EAP) documents the emergency procedures 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 §257.73 (a)(3). 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 the Emergency Action Plan are not applicable to the West Ash Pond. Nevertheless, in consideration of whether the completion is reasonable given the current closure activities, this Emergency Action Plan document has been prepared and certified.

This EAP for the West Ash Pond meets the regulatory requirements as summarized in **Table ES-1**.

Table ES-1 –Summary				
Report Section	CCR Rule Reference	Requirement Summary	Requirement Met?	Comments
2	§257.73 (a)(3)	<i>Development of Plan</i>	Yes	This Emergency Action Plan (Revision 0) was prepared based on conditions of the CCR unit as of April 2019.

The West Ash Pond is considered an inactive surface impoundment that has been previously classified as a “Significant” hazard as described in the CCR Rule, and as such requires an Emergency Action Plan be developed per the requirements of §257.73 (a)(3).

1 Introduction

1.1 Purpose of this Report

The purpose of the Coal Combustion Residuals (CCR) Emergency Action Plan (EAP) is to document the emergency procedures 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 §257.73 (a)(3). 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.

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The following table identifies the five components of the EAP which are discussed in §257.73.

Report Section	Title	CCR Rule Reference
2.1	<i>Development of Plan</i>	§257.73 (a)(3)(i)
2.2	<i>Amendment of Plan</i>	§257.73 (a)(3)(ii)
2.3	<i>Change in Hazard Potential Classification</i>	§257.73 (a)(3)(iii)
2.4	<i>Certification from Qualified Professional Engineer</i>	§257.73 (a)(3)(iv)
2.5	<i>Activation of the EAP</i>	§257.73 (a)(3)(v)

Diligent observation during the normal, daily operations at the plant are vital in recognizing unusual events. Events which could constitute unusual or an emergency event were identified and classified into three levels;

- Emergency Level 3: Non-emergency unusual event, slowly developing
- Emergency Level 2: Potential embankment failure situation, rapidly developing
- Emergency Level 1: Urgent; embankment failure appears imminent or is in progress

The EAP provides standard evaluation methods of conditions at the plant, appropriate actions to be taken during emergencies, and contact information for the responsible personnel and applicable emergency responders.

1.2 Brief Description of Impoundment

The Culley station is located in Warrick County, Indiana, southeast of Newburgh, Indiana, and is owned and operated by SIGECO. The Culley station is located along the north bank of the Ohio River and has two CCR surface impoundments, identified as the West Ash Pond and East Ash Pond. However, only the East Ash Pond is actively receiving CCR materials. The Culley West Ash Pond hazard potential has been classified as "significant" under the definitions provided in the CCR Rule (certification under separate cover). The West Ash Pond is located west of the coal storage pile and is approximately 32 acres in size.

Original design plans indicate that the West Ash Pond was constructed in the 1950's by placing fill along the south side (i.e., adjacent to the Ohio River) and the east side, and tying into existing high ground at the north and west sides. The bottom elevation of the pond was set approximately at 365' but followed the natural topography and gradually increased in elevation as the pond extended north. The Little Pigeon Creek originally coursed through the footprint of the West Ash Pond before being re-routed east of the Culley station at the time of the original construction in the 1950's. As such, portions of the east and west embankments of the West Ash Pond extend to the bottom of the creek bed which is at an approximate elevation of 340'. The top of the embankment was constructed to an approximate elevation of 393' with a small portion in the northeast corner extending to an elevation of 402'. Interior side slopes of the pond vary, but original design documents indicate that the slopes are 2H:1V along the south embankment and 2.5H:1V on the east and west embankments. The original construction drawings indicated that the sub-base of the pond was composed of native soils.

Current conditions of the south embankment at the West Ash Pond indicate that the crest of the south embankment is approximately 40' wide and is covered with crushed stone that forms the existing gravel access road and is in good condition. The interior riprap lined slope is sparsely vegetated with brush and weeds and is relatively steep. The exterior slope is mostly covered with riprap and concrete rubble, with brush and large trees encroaching upon the toe of the existing slope. Based upon topographic mapping provided, the exterior slope of the embankment varies between approximate slopes of 2.5H:1V to 1.9H:1V. The normal pool elevation in the West Ash Pond was previously maintained at an operating level of 390' by a pumping station. However, as of January 2016, SIGECO began passive dewatering measures in the West Ash Pond and has maintained the water level at approximately 370' since the fall of 2017 by using a localized sump adjacent to the existing pumping station. It is SIGECO's stated intent that they plan on maintaining this lower water level until closure construction has been initiated. The unit is currently in the closure process.

A Site Location Map showing the area surrounding the station is in **Figure 1 of Appendix A**. **Figure 2 in Appendix A** presents the Culley Site Map.

2 Emergency Action Plan

Regulatory Citation: 40 CFR §257.73 (a)(3) Emergency Action Plan (EAP)

The EAP for the West Ash Pond is described in this section. A publicly available website with the current version of the EAP can be found in the following link: <https://www.vectren.com/assets/downloads/planning/ccr/Culley-West-EAP-Initial-2017.pdf> Information regarding operational and maintenance procedures of the station was provided by Culley station personnel. Those personnel follow an established emergency action plan that quickly identifies and resolves issues of concern at the Culley station.

2.1 Development of Plan

Regulatory Citation: 40 CFR §257.73 (a)(3) Development of the plan;

- (i) No later than April 17, 2017 (extended for formerly inactive facilities), the owner or operator of a CCR unit determined to be either a high hazard potential CCR surface impoundment or a significant hazard potential CCR surface impoundment under paragraph (a)(2) of this section must prepare and maintain a written EAP.

The West Ash Pond was determined to be a CCR surface impoundment with a significant hazard potential under 40 CFR §257.73 (a)(2). Therefore, a written EAP has been prepared and will be maintained.

2.1.1 Definitions of Events or Circumstances

Regulatory Citation: 40 CFR §257.73 (a)(3)(i);

- (A) Define the events or circumstances involving the CCR unit that represent a safety emergency, along with a description of the procedures that will be followed to detect a safety emergency in a timely manner.

This section of the EAP describes the first step to be followed in the event of the detection of an unusual or emergency event at Culley station. The section also describes event detection and information to assist SIGECO in determining the appropriate level of response for an event.

Event Level 3 – Non-emergency unusual event, slowly developing

This is an incident that is defined as an unusual, slowly developing situation that has the potential to threaten the operation or structural integrity of the embankment. The condition of the embankment should be monitored closely, especially during storm events, to detect any development of a potential or imminent failure situation.

Event Level 2 – Potential embankment failure situation, rapidly developing

This is an emergency event defined as rapidly developing and could quickly lead to a failure of the embankment, but there is not an immediate threat of embankment failure. SIGECO should closely monitor the condition of the embankment and periodically report the status of the situation to the Indiana DHS District 10 Coordinator. If the embankment's condition worsens and failure becomes imminent, Emergency Responders must be notified immediately via the 911 system of the change in the emergency level to evacuate the people at risk downstream.

If time permits, the Indiana DHS District 10 Coordinator should be contacted to evaluate the situation and recommend remedial actions to prevent embankment failure. SIGECO should initiate remedial repairs.

Event Level 1 – Urgent; Embankment failure appears imminent or is in progress

This is an extremely urgent situation when an embankment failure is imminent. The Emergency Responders should be contacted immediately via the 911 system so emergency services can begin evacuations of all at-risk people as needed.

Table 2-1 defines the various potential events and circumstances that could be observed involving the CCR unit and its corresponding emergency level determination. The table is a guide for determining the appropriate event level and attempts to be all inclusive; however, an event or condition may arise that is not covered. In the circumstance of multiple events occurring at the embankment with conflicting event levels, always designate the higher event level as the governing event level.

Table 2-1 – Event Level Determination Guidance			
Defect / Event	Emergency Level 3*	Emergency Level 2*	Emergency Level 1*
Embankment Cracking	New cracks or cracks that have increased in size in the embankment without seepage, indicative of structural instability ¹	Cracks in the embankment with seepage	Cracks in the embankment with noticeable flow of seepage and solids
Seepage	Low flow rate, clear water, small area not associated with poor drainage area or rut that would be normal maintenance	High or increasing flow rate carrying soil that may cover a large area	–
Embankment Movement	–	Visual movement / structural slippage of the embankment slope ²	Sudden or rapidly proceeding slides of the embankment slope ²
Dropping Water Level	Water level in West Ash Pond is rapidly falling without apparent cause (no increase in pumping rates)	Whirlpool or other signs of the West Ash Pond draining rapidly through the impoundment or foundation	–
Earthquake	A reported earthquake of 3.0 or greater magnitude within 50 miles of the embankment (see Figure 5 – 50 Mile Radius Map for reference)	Earthquake resulting in visible damage to the embankment or appurtenances	Earthquake resulting in uncontrolled release of water from the embankment
Security Threat	–	Verified bomb threat that, if carried out, could result in damage to the	Detonated bomb that has resulted in damage to the embankment or

Table 2-1 – Event Level Determination Guidance			
Defect / Event	Emergency Level 3*	Emergency Level 2*	Emergency Level 1*
		embankment	appurtenances
Sabotage / Vandalism	Damage that could adversely impact the functioning of the embankment	Damage that has resulted in seepage flow	Damage that has resulted in uncontrolled water release
Sinkholes	Observation of new sinkhole in pond area or on embankment	Rapidly enlarging sinkhole	–
Tornado	Tornado resulting in visible damage to the embankment or appurtenances	Tornado resulting in major visible damage to the embankment or appurtenances	Tornado resulting in uncontrolled release of water from the embankment

*Emergency Level 3: Non-emergency unusual event, slowly developing

*Emergency Level 2: Potential embankment failure situation, rapidly developing

*Emergency Level 1: Urgent; embankment failure appears imminent or is in progress

Notes:

1 – Shallow desiccation cracks due to dry weather or minor due to recent erosion and that will normally be addressed during the weekly inspections and subsequent normal course of repair are not included in this event. Additional evaluation and/or professional input may be warranted prior to determination that an observed “Embankment Cracking” field condition triggers Emergency Level 3. In questionable cases requiring additional input, the Third Party Geotechnical Engineer should be consulted.

2 – Minor surficial sloughing of material due to lack of vegetation and erosion is not considered within this event. Slipping and slippage refer to structural movement of the embankment or berm and do not refer to erosion issues that will normally be addressed during the weekly inspections and subsequent normal course of repair.

Safety emergencies may be detected by local residents, F.B. Culley employees, or City employees. There is no formal information collecting system or warning system to detect an emergency at the embankment. In addition, there is no procedure for analyzing data, but emergencies such as cracking/deformation of the levee embankments, extreme seepage, or other indications of potential failures, are expected to be readily apparent to observers.

2.1.2 Responsible Persons and Notification Procedure

Regulatory Citation: 40 CFR §257.73 (a)(3)(i);

- (B) Define responsible persons, their respective responsibilities, and notification procedures in the event of a safety emergency involving the CCR unit.

All defined responsible persons, their respective responsibilities, and notification procedures in the event of a safety emergency involving the CCR unit have been documented. The notification flow chart can be found in **Appendix A, Figures 3.1, 3.2 and 3.3.**

2.1.3 Contact Information

Regulatory Citation: 40 CFR §257.73 (a)(3)(i);

- (C) Provide contact information of emergency responders.

Table 2-2 – Emergency Responders Contact Information

Agency	Contact Person	Address	Phone Number
Warrick County Emergency Management Director	David Woolen	107 W. Locust St. Room 307 Boonville, IN 47601	812-897-6178
Indiana Department of Homeland Security District 10 Coordinator	Tonda Dixon		317-402-6603
Indiana DNR (Boat Launch Operator) *	Division of Water	Indianapolis, IN	317-232-4160
911 Dispatch Directory	Chief Deputy	100 W. S.R. 62 P.O. Box 487 Boonville, Indiana 47601	812-897-1200
Warrick County Sheriff's Office	Sheriff Michael Wilder	100 W. S.R. 62 P.O. Box 487 Boonville, Indiana 47601	812-897-6180
U.S. Army Corps of Engineers Emergency Manager **	Chuck Oliver	Louisville District P.O. Box 59 Louisville, Kentucky 40201	502-315-6912

U.S. Coast Guard **		Sector Ohio Valley 600 Dr. Martin Luther King Jr. Pl. Louisville, KY 40202	502-779-5300
National Response Center **			800-424-8802
Inland Marina **		Waterworks Rd Evansville, IN 47711	812-422-8180

*If flow is sufficient to reach Little Pigeon Creek and/or boat ramp

**If flow is sufficient enough to reach the Ohio River

2.1.4 Map of Downstream Area

Regulatory Citation: 40 CFR §257.73 (a)(3)(i);

- (D) Include a map which delineates the downstream area which would be affected in the event of a CCR unit failure and a physical description of the CCR unit.

A map depicting the downstream area that would be affected in the event of embankment failure is presented in **Figure 4 of Appendix A**. A map with the location of a possible incident command center and potential roads that would be affected in the event of embankment failure is presented in **Figure 6 in Appendix A**. The description of the Culley station and of the Culley West Ash Pond CCR unit is included in **Section 1.2** of this certification document.

2.1.5 Annual Face-to-Face Meeting

Regulatory Citation: 40 CFR §257.73 (a)(3)(i);

- (E) Include provisions for an annual face-to-face meeting or exercise between representatives of the owner or operator of the CCR unit and the local emergency responders.

Provisions for an annual face-to-face meeting between representatives of the owner or operator of the Culley station and the local emergency responders have been established and are listed below. The owner or operator will review and update the EAP for the West Ash Pond as at least every five years as required by the rule.

Within one year of the finalization of the initial EAP, the owner or operator shall initiate annual EAP face-to-face meetings that, at a minimum, consist of the following:

- A review of responsible parties listed in **Table 2-2** to confirm names and contact numbers are still accurate.
- Confirmation that all personnel in **Table 2-2** know where the EAP is located and the responsibilities described within the EAP.
- Review of the EAP, notification flowcharts and downstream impact area maps.

- Persons listed on **Table 2-2** shall be notified of the meeting time and location via certified mail at least two weeks prior to meeting date.

An annual exercise may be substituted for an annual face-to-face meeting with emergency responders. The annual EAP exercise will consist of the following:

- The owner or operator will develop a plan and schedule for EAP training.
- The owner or operator, in conjunction with responsible persons and emergency responders, will conduct tabletop and/or field exercises for various emergency events.
- The owner or operator will review the EAP in accordance with all responsible persons and update, as necessary, all documentation within the EAP to include the notification flowcharts (**Figures 3.1-3.3** in **Appendix A**), the EAP document, and the downstream area map (**Figure 4** in **Appendix A**).
- The results of the annual exercise will be discussed and evaluated to determine if the EAP needs to be updated.

2.2 Amendment of the Plan

Regulatory Citation: 40 CFR §257.73 (a)(3)(ii) Amendment of the Plan:

- *(A) The owner or operator of a CCR unit subject to the requirements of paragraph (a)(3)(i) of this section may amend the written EAP at any time provided the revised plan is placed in the facility's operating record as required by § 257.105(f)(6). The owner or operator must amend the written EAP whenever there is a change in conditions that would substantially affect the EAP in effect.*

Whenever there is a change in conditions that would substantially affect the EAP, an amendment to the written EAP will be made and placed in the facility's operating record.

- *(B) The written EAP must be evaluated, at a minimum, every five years to ensure the information required in paragraph (a)(3)(i) of this section is accurate. As necessary, the EAP must be updated and a revised EAP placed in the facility's operating record as required by § 257.105(f)(6).*

The EAP will be evaluated, at a minimum, every five years as required by the rule. Any updates and revisions to the EAP will be placed in the facility's operating record.

2.3 Changes in Hazard Potential Classification

Regulatory Citation: 40 CFR §257.73 (a)(3)(iii);

- *(A) If the owner or operator of a CCR unit determines during a periodic hazard potential assessment that the CCR unit is no longer classified as either a high hazard potential CCR surface impoundment or a significant hazard potential CCR surface impoundment, then the owner or operator of the CCR unit is no longer subject to the requirement to prepare and maintain a written EAP beginning on the date the periodic hazard potential assessment documentation is placed in the facility's operating record as required by § 257.105 (f)(5).*

The West Ash Pond is currently classified as a significant hazard potential CCR impoundment; therefore, a written EAP has been prepared. If the classification for the West Ash Pond changes and the CCR unit is no longer classified as either a high hazard potential CCR surface impoundment or a significant hazard potential CCR surface impoundment, SIGECO will no longer be required to prepare and maintain a written EAP.

- *(B) If the owner or operator of a CCR unit classified as a low hazard potential CCR surface impoundment subsequently determines that the CCR unit is properly re-classified as either a high hazard potential CCR surface impoundment or a significant hazard potential CCR surface impoundment, then the owner or operator of the CCR unit must prepare a written EAP for the CCR unit as required by paragraph (a)(3)(i) of this section within six months of completing such periodic hazard potential assessment.*

The West Ash Pond is currently classified as a significant hazard potential CCR impoundment; therefore, a written EAP has been prepared.

2.4 Qualified Professional Engineer Certification

Regulatory Citation: 40 CFR §257.73 (a)(3);

- *(iv) The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer stating that the written EAP, and any subsequent amendment of the EAP, meets the requirements of paragraph (a)(3) of this section*

A qualified professional engineer's certification is provided in **Section 3** of this EAP.

2.5 Activation of the EAP

Regulatory Citation: 40 CFR §257.73 (a)(3);

- *(v) The EAP must be implemented once events or circumstances involving the CCR unit that represent a safety emergency are detected, including conditions identified during periodic structural stability assessments, annual inspections, and inspections by a qualified person.*

The EAP will be implemented as soon as events or circumstances involving the CCR unit that represent a safety emergency are detected.

3 Certification

This Certification Statement documents that the West Ash Pond at the F.B. Culley Generating Station meets the Emergency Action Plan requirements specified in 40 CFR §257.73 (a)(3). The West Ash Pond was classified as an "inactive" CCR impoundment as defined by 40 CFR §257.53 and is currently in the process of closure. The Direct Final Rule requires owners and operators of inactive CCR surface impoundments comply with all of the requirements for existing CCR surface impoundments as listed in 40 CFR §257.102 of the CCR Rule. Therefore, SIGECO has prepared this Emergency Action Plan in accordance with 40 CFR §257.73(a)(3).

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

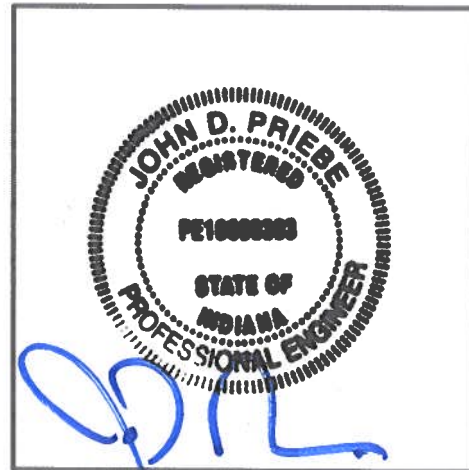
I, John Priebe, being a Registered Professional Engineer in good standing in the State of Indiana, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above referenced CCR Unit, that the Emergency Action Plan dated April 2019 meets the requirements of 40 CFR § 257.73 (a)(3).

John D. Priebe

Printed Name

4/11/19

Date



4 Limitations

Background information, design basis, and other data which AECOM has used in preparation of this report have been furnished to AECOM by SIGECO. AECOM has relied on this information as furnished, and is not responsible for the accuracy of this information. Our recommendations are based on available information from previous and current investigations. These recommendations may be updated as future investigations are performed.

The conclusions presented in this report are intended only for the purpose, site location, and project indicated. The recommendations presented in this report should not be used for other projects or purposes. Conclusions or recommendations made from these data by others are their responsibility. The conclusions and recommendations are based on AECOM's understanding of current plant operations, maintenance, stormwater handling, and ash handling procedures at the station, as provided by SIGECO. Changes in any of these operations or procedures may invalidate the findings in this report until AECOM has had the opportunity to review the findings, and revise the report if necessary.

This development of the Emergency Action Plan for the West Ash Pond was performed in accordance with the standard of care commonly used as state-of-practice in our profession. Specifically, our services have been performed in accordance with accepted principles and practices of the engineering profession. The conclusions presented in this report are professional opinions based on the indicated project criteria and data available at the time this report was prepared. Our services were provided in a manner consistent with the level of care and skill ordinarily exercised by other professional consultants under similar circumstances. No other representation is intended.

Appendix A Figures

Figure 1 – Location Map

Figure 2 – Site Map

Figure 3.1 – Notification Flow Chart Level 3

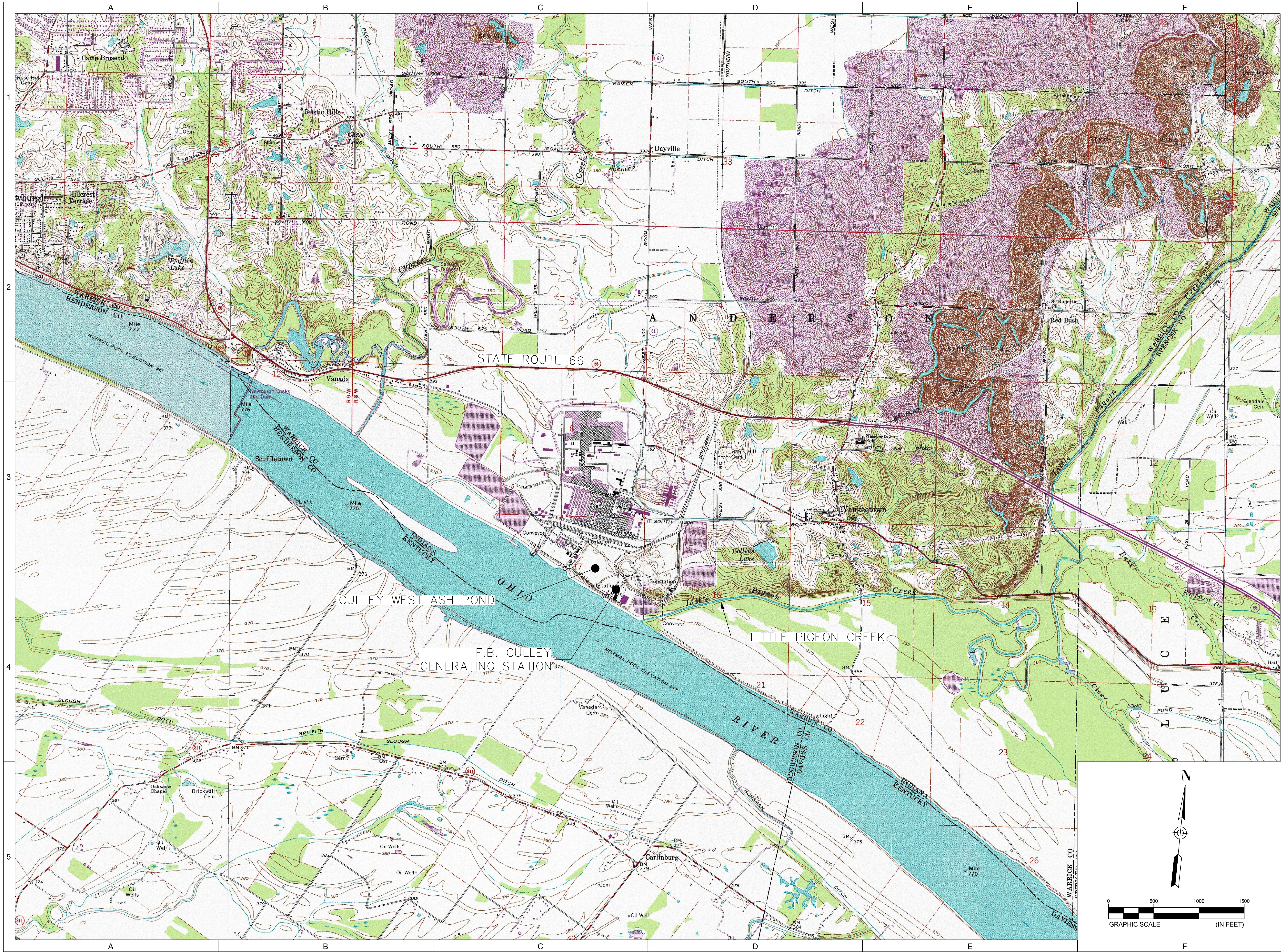
Figure 3.2 – Notification Flow Chart Level 2

Figure 3.3 – Notification Flow Chart Level 1

Figure 4 – Downstream Area Map

Figure 5 – 50 Mile Radius Map

Figure 6 – Road Closure Map



9400 AMBERGLEN BOULEVARD
 AUSTIN, TX 78729-1100
 512-454-4797 (phone)
 512-454-8807 (fax)

**SOUTHERN INDIANA
 GAS AND ELECTRIC
 COMPANY**

ONE VECTREN SQUARE
 EVANSVILLE, IN 47708
 1-800-227-1376 (phone)

**F. B. CULLEY
 GENERATING STATION
 NEWBURGH, IN**

**CCR CERTIFICATION
 WEST ASH POND**

**ISSUED FOR
 CERTIFICATION**

ISSUED FOR BIDDING _____ DATE BY _____

ISSUED FOR CONSTRUCTION _____ DATE BY _____

REVISIONS

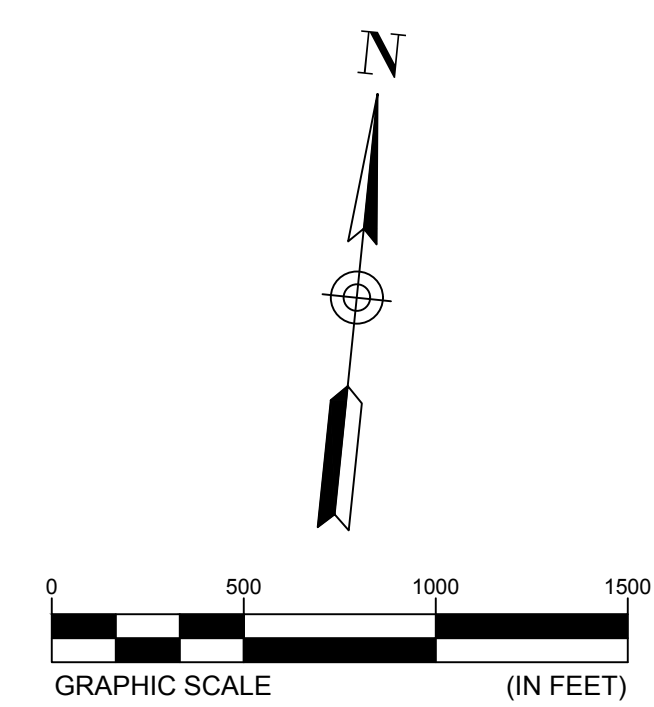
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AECOM PROJECT NO:	60442676
DRAWN BY:	JMW
DESIGNED BY:	JMW
CHECKED BY:	RJB
DATE CREATED:	12/19/2018
PLOT DATE:	12/19/2018
SCALE:	AS SHOWN
ACAD VER:	CIVIL 3D 2018

SHEET TITLE

LOCATION MAP

FIGURE 1





9400 AMBERGLEN BOULEVARD
 AUSTIN, TX 78729-1100
 512-454-4797 (phone)
 512-454-8807 (fax)

**SOUTHERN INDIANA
 GAS AND ELECTRIC
 COMPANY**

ONE VECTREN SQUARE
 EVANSVILLE, IN 47708
 1-800-227-1376 (phone)

**F.B. CULLEY
 GENERATING STATION
 NEWBURGH, IN**

**CCR CERTIFICATION
 WEST ASH POND**

**ISSUED FOR
 CERTIFICATION**

ISSUED FOR BIDDING _____ DATE BY _____

ISSUED FOR CONSTRUCTION _____ DATE BY _____

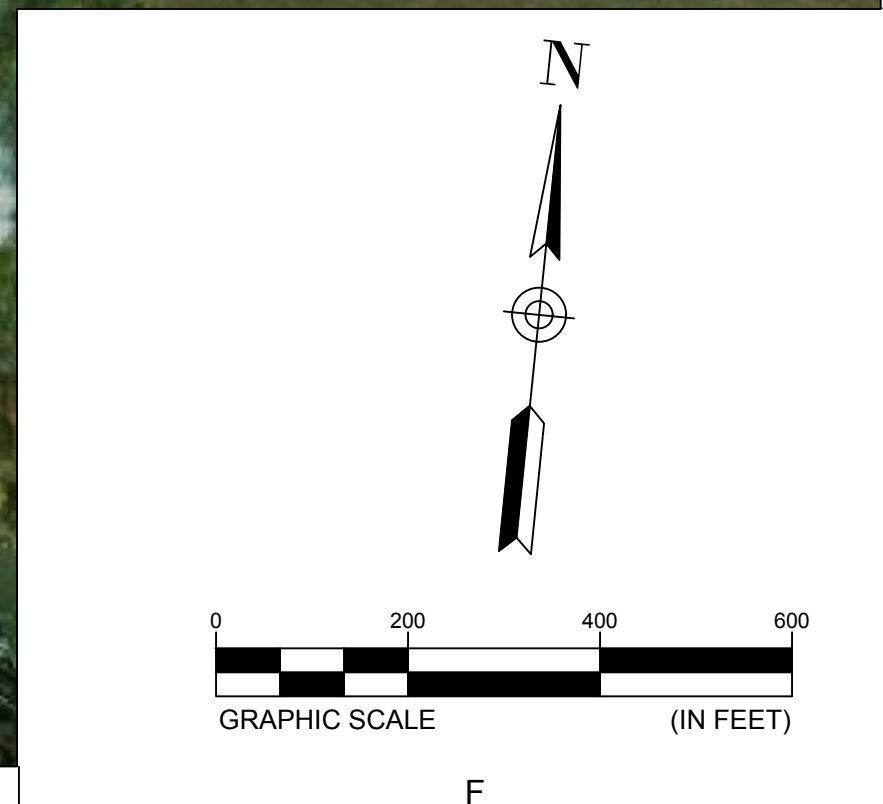
REVISIONS		
NO.	DESCRIPTION	DATE
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AECOM PROJECT NO:	60442676
DRAWN BY:	JMW
DESIGNED BY:	JMW
CHECKED BY:	RJB
DATE CREATED:	12/19/2018
PLOT DATE:	12/19/2018
SCALE:	AS SHOWN
ACAD VER:	CIVIL 3D 2018

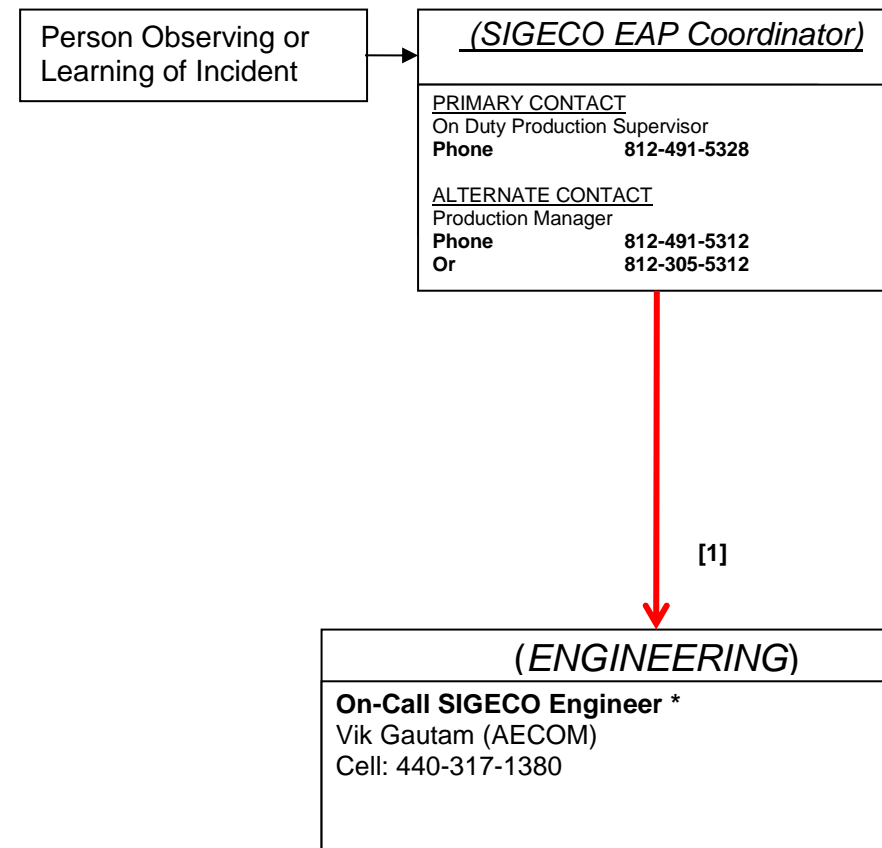
SHEET TITLE

SITE MAP

FIGURE 2



EVENT LEVEL 3 NOTIFICATION INCIDENT, SLOWLY DEVELOPING



* Consulting the Third Party Geotechnical Engineer does not automatically activate the CCR EAP.

Suggested EAP Coordinator Message

- This is the [redacted]. I am making this call in accordance with the F.B. Culley Generating Plant EAP.
- An incident has been detected at the F.B. Culley Plant.
- The EAP has been activated, currently at an incident level (Level 3).
- If a problem occurs, Ohio River may be impacted.
- The situation is being monitored to determine if any evacuation warnings are necessary.
- We will keep you apprised of the situation. The best telephone number to reach me during this event is ... (state the best number to reach you).

NOTE:

1) [1], [2], [3], etc., DENOTES SUGGESTED CALLSEQUENCE

LEGEND:

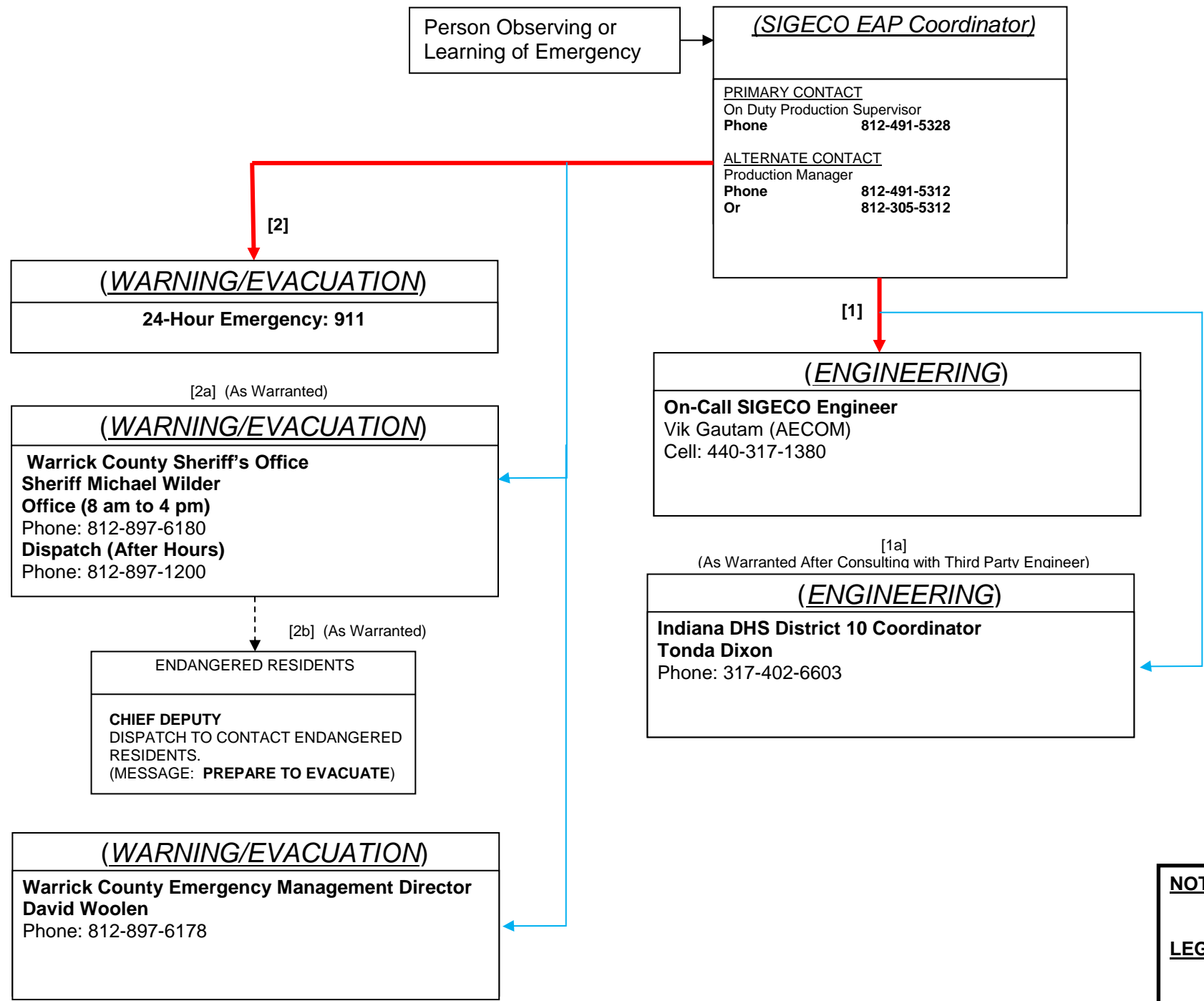
1) CALLS BY EAP COORDINATOR —————

2) SECOND LEVEL CALLS (as warranted) —————

3) THIRD LEVEL CALLS (as warranted) - - - - -

See Table 2.2, *Emergency Responders Contact Information*, in the EAP for additional contact information.

EVENT LEVEL 2 NOTIFICATION EMERGENCY EVENT, RAPIDLY DEVELOPING



Suggested EAP Coordinator Message

- This is the [redacted]. I am making this call in accordance with the F.B. Culley Generating Plant EAP.
- Problems have occurred with F.B. Culley Generating Plant.
- The EAP has been activated, currently at the emergency level (Level 2).
- Impact to the Ohio River is possible.
- Flooding along the Ohio River is possible.
- **Prepare to evacuate** along the Ohio River.
- We will keep you apprised of the situation. The best telephone number to reach me during this event is ... (state the best number to reach you).

NOTE:
1) [1], [2], [3], etc., DENOTES SUGGESTED CALLSEQUENCE

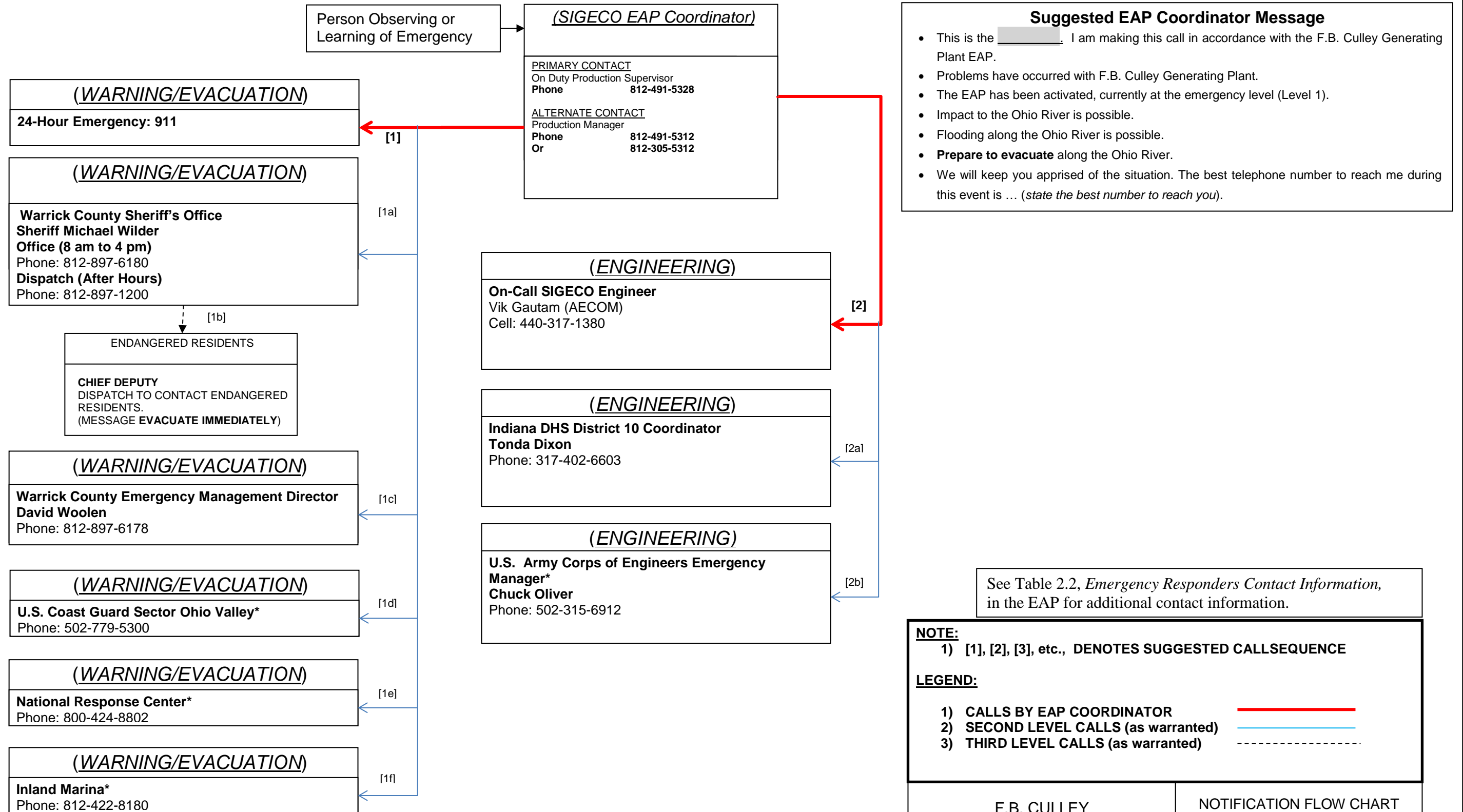
LEGEND:

1) CALLS BY EAP COORDINATOR	—
2) SECOND LEVEL CALLS (as warranted)	—
3) THIRD LEVEL CALLS (as warranted)	- - - - -

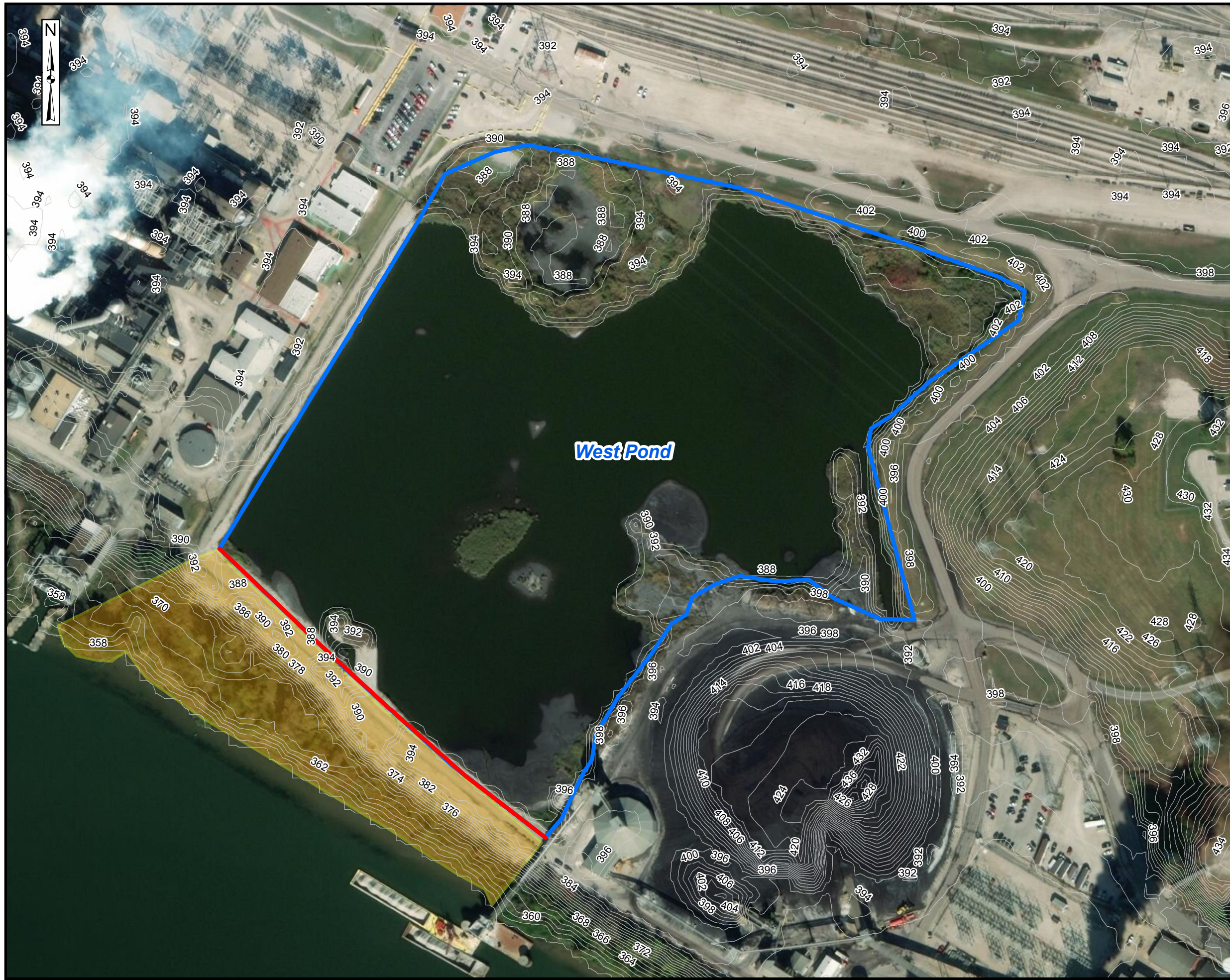
See Table 2.2, *Emergency Responders Contact Information*, in the EAP for additional contact information.

EVENT LEVEL 1 NOTIFICATION

EMERGENCY EVENT, IMMINENT DAM FAILURE OR FLASH FLOOD

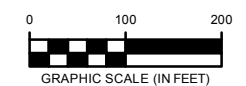


* If flow is sufficient to reach the Ohio River.

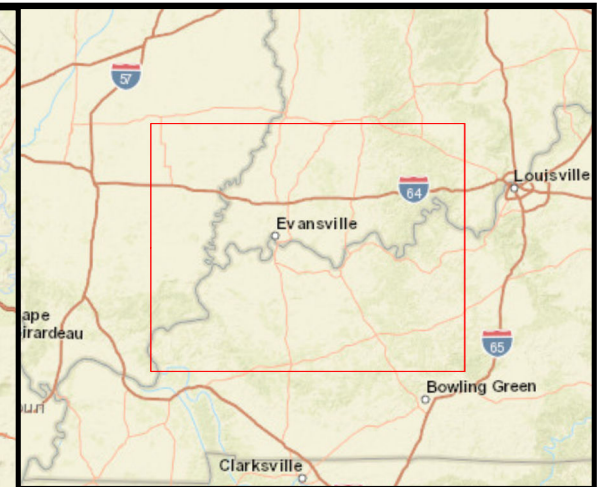
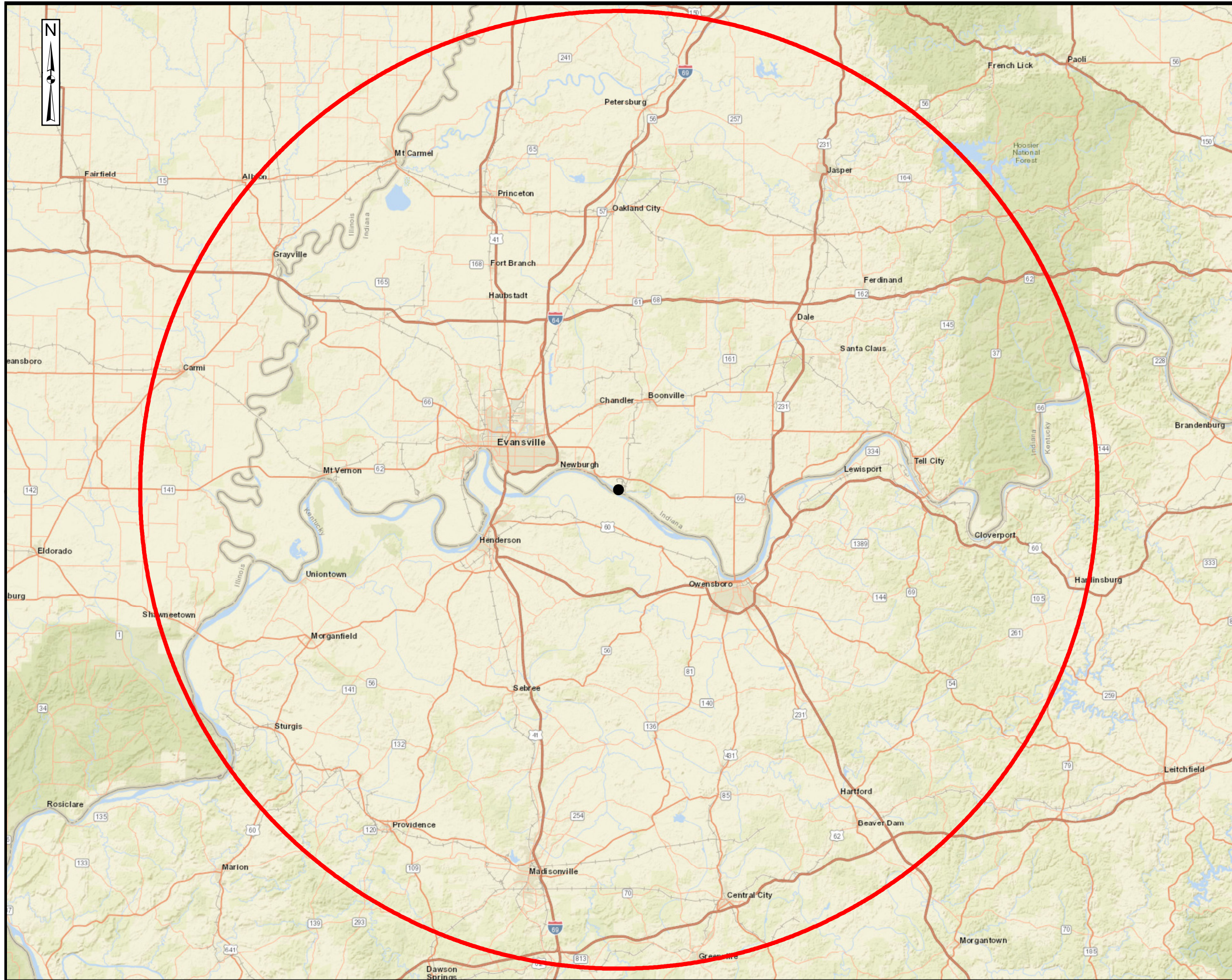


LEGEND

- Aboveground Dike
- Approximate Culley West Pond Limits
- Surface Elevation Contour (2')
- Contour Analysis for Dike Failure



TITLE		CULLEY WEST ASH POND DOWNSTREAM AREA MAP	
FOR		SIGECO YANKEETOWN, INDIANA	
FOR		F.B. CULLEY GENERATING STATION	
	SCALE: 1" = 100'	DES:	
	DWG TYPE: GIS	DFTR: SF	
	JOB NO. 60442676	CHKD: AS	
	DATE: 3/4/2019	ENGR: JP	
		APPD: JP	
DWG SIZE	DRAWING NO.	REVISION	
11"x17"	4	0	



- Attorney/Client Communication/Work Product
 - Prepared in Anticipation of Litigation

LEGEND

- Culley West Embankment
- ◻ 50-Mile Radius of Culley West Embankment



Note: The area depicted within the orange dashed line was interpolated due to an anomaly with the LIDAR data. The raw elevation data exhibited a signature resembling the outline of a steam plume and the resulting contours did not reflect actual site conditions.



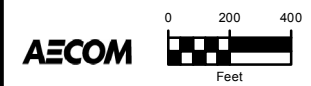
TITLE		
50-MILE RADIUS FROM CULLEY WEST EMBANKMENT		
SIGECO		
FOR		
F.B. CULLEY GENERATING STATION		
	SCALE: 1" = 10 miles	DES:
	DWG TYPE: GIS	DFTR: KB
	JOB NO. 60442676	CHKD: AS
	DATE: 3/4/2019	ENGR: JP
FILENAME: Culley_50mile radius embankment.mxd		APPD: JP
DWG SIZE	DRAWING NO.	REVISION
11"X17"	5	0



LEGEND

-  Possible Incident Command Center
-  Potential Road Closure

Note: The area depicted within the orange dashed line was interpolated due to an anomaly with the LIDAR data. The raw elevation data exhibited a signature resembling the outline of a steam plume and the resulting contours did not reflect actual site conditions.



TITLE		
ROAD CLOSURE MAP		
SIGECO		
FOR		
F.B. CULLEY GENERATING STATION		
SCALE: 1" = 200 feet	DES:	
DWG TYPE: GIS	DFTR: JV	
JOB NO. 60442676	CHKD: AS	
DATE: 3/4/2019	ENGR: JP	
FILENAME: Road Closure Map.mxd	APPD: JP	
DWG SIZE	DRAWING NO.	REVISION
11"X17"	6	0

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