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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, F.B. Culley Generating Station – East 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 F.B. Culley Generating Station – East Ash Pond, located in Warrick 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 East Ash Pond. The statistical analysis of the assessment monitoring results for this unit, completed on January 14, 2019, identified Appendix IV constituents at statistically significant levels above Groundwater Protection Standards (GWPS) at the East Ash Pond. An alternate source was not identified for the East Ash Pond at this time 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 East Ash Pond. It should be noted that an Alternate Source Demonstration (ASD) has been initiated for the East Ash Pond. However, due to high river levels which caused flooding of the planned sampling area and drilling company resource constraints, the ASD could not be completed within 90-days of completing the statistical analysis and the required timing to initiate an assessment of corrective measures.

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 East Ash Pond consistent with 40 CFR § 257.96.