



HALEY & ALDRICH, INC.
400 Augusta Street
Suite 130
Greenville, SC 29601
864.214.8750

MEMORANDUM

30 October 2020
File No. 129420-025

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 – West Ash Pond

The 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 West Ash Pond (WAP), located in Warrick County near the communities of Yankeetown and Newburgh, Indiana. The WAP was previously classified as an “inactive” surface impoundment as defined by 40 CFR § 257.53. SIGECO filed a Notice of Intent (NOI) to initiate closure of the WAP and placed the NOI in the facility’s operating record on 17 December 2015. The unit is currently in the closure process.

SIGECO has constructed a CCR Rule compliant groundwater monitoring system consistent with 40 CFR § 257.91 and completed detection and assessment monitoring for the WAP. The statistical analysis of the assessment monitoring results for this unit, completed on July 2, 2020, identified Appendix IV constituents at statistically significant levels above Groundwater Protection Standards (GWPS) at the WAP. An alternate source was not identified for the WAP 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 WAP.

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 WAP consistent with 40 CFR § 257.96.