PLACEMENT ABOVE THE UPPERMOST AQUIFER
CCR SURFACE IMPOUNDMENT: F.B.CULLEY STATION
CCR UNIT: WEST ASH POND

AECOM ("Consultant") has been retained by Vectren to prepare the following assessment of whether the above-referenced existing coal combustion residuals ("CCR") surface impoundment meets the requirements for placement above the uppermost aquifer set out in 40 C.F.R. § 257.60(a). Presented below are the project background, summary of findings, limitations, and certification.

1.0 BACKGROUND

Pursuant to 40 C.F.R. § 257.60(a), new CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must be constructed with a base that is located no less than 1.52 meters (five feet) above the upper limit of the uppermost aquifer, or must demonstrate that there will not be an intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table).

Pursuant to 40 C.F.R. § 257.60(b) and (c)(1), for an existing CCR surface impoundment, the owner or operator must obtain a certification from a qualified professional engineer stating that the owner or operator has demonstrated that the CCR unit meets the requirements for placement above the uppermost aquifer no later than October 17, 2018. Due to the partial vacatur of the Final CCR Rule, with regards to inactive surface impoundments, the EPA extended compliance deadlines (by 547 days) for inactive CCR impoundments by means of issuing a direct final action which included 40 CFR 257.100(e) Timeframes for Certain Inactive CCR Surface Impoundments. In accordance with this action, the due date for completing the Location Restriction Demonstrations (§257.60 - §257.64) for inactive CCR surface impoundments was extended to April 16, 2020.

In support of Consultant's assessment, Consultant completed a desktop evaluation of the location restriction for placement above the uppermost aquifer and determined that sufficient information is available to document the required demonstration.

2.0 ASSESSMENT

Based upon a review of applicable information, Consultant concludes as follows:

The CCR unit does not meet the requirements of 257.60 (a) and in accordance with Section 257.60 (c)(4), Vectren has ceased placing CCR and non-CCR waste streams into the unit and has initiated closure. The closure plan approval for the West Ash Pond was received from IDEM on December 20, 2019.

CCR Unit	Placement above the uppermost aquifer
West Ash Pond	*Does Not Meet the requirements of* 40 C.F.R. *§ 257.60(a)*

3.0 LIMITATIONS

The signature of Consultant's authorized representative on this document represents that to the best of Consultant's knowledge, information, and belief in the exercise of its professional judgment, it is Consultant's professional opinion that the aforementioned information is accurate as of the date of such signature. Any opinion or decisions by Consultant are made on the basis of Consultant's experience, qualifications, and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data, and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

4.0 CERTIFICATION

I, Jay Mokotoff, being a Registered Professional Engineer, in accordance with the Indiana Professional Engineer's Registration, do hereby certify to the best of my knowledge, information, and belief, that the CCR unit that is the subject of this report dated April 16, 2020 does not meet the requirements for placement above the uppermost aquifer pursuant to 40 C.F.R. § 257.60(a), and that this report is true and correct and has been prepared in accordance with generally accepted good engineering practices.

SIGNATURE _____ DATE 04-16-2020