From: SOUTH, TROY
To: Martin, Bradley A
Subject: FW: [External Email] SIGECO - A. B. Brown Ash Pond
Date: Friday, June 28, 2024 1:52:40 PM

Hi Brad. Please file this reply in VFC. Thank you.
Solid waste authorization-waste approval
SW program ID 65-07
INX000067207
AI 11785

From: SOUTH, TROY
Sent: Friday, June 28, 2024 1:02 PM
To: Casbon-Scheller, Angela M <Angela.Casbon-Scheller@centerpointenergy.com>
Subject: RE: [External Email] SIGECO - A. B. Brown Ash Pond

Good afternoon. The laboratory data for ash pond samples received by IDEM on April 12, 2024, has been evaluated. IDEM staff noted that each laboratory report included only Level III data instead of the required Level IV data, which is necessary for data validation. The sample results from C13, E11, F8B, F12A, G11A, G12, H11B, I5, J5, J7, J9, K9, L9, and G12 were in the range of Type III for TCLP and NL parameters. However, this is only 14 sample locations out of 38 locations and most of the Type III waste locations are spread out, making delineation unclear. The facility might consider developing a delineation procedure to clearly identify Type III from Type II and nonconforming waste locations.

Your response indicated that Area 1 sample results do not meet the Type III criteria for TCLP selenium from 0 to 15 feet. Therefore, Area 1 from 0 to 15 feet will be disposed at an appropriately permitted landfill. However, Area 2 from 0 to 15 feet was not discussed and according to the TCLP selenium sample results, L8 from 0 to 5 feet is 0.14 ppm, which exceeds the 0.10 ppm Type III criteria, and most of Area 2 from 0 to 15 feet has not been characterized. CenterPoint plans to develop a sampling and analysis plan to characterize the area exceeding 15 feet at Areas 1 and 2. The facility should specify the disposal or further sampling plans in the SAP for Area 2 from 0 to 15 feet as well. The SAP should be submitted to IDEM for approval prior to sampling activities as suggested.

Thanks for your attention to this matter.

From: Casbon-Scheller, Angela M <Angela.Casbon-Scheller@centerpointenergy.com>
Sent: Friday, May 10, 2024 1:29 PM
To: SOUTH, TROY <TSOUTH@idem.IN.gov>
Cc: Freeman, Lori <lfreeman@idem.IN.gov>; Eudaly, Mary Ann <MEudaly@idem.IN.gov>
Subject: RE: [External Email] SIGECO - A. B. Brown Ash Pond

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Mr. South,

Please find attached a memo and figure addressing your comments pertaining to the demarcation of areas containing Type III material. Our consultant is developing a Sampling & Analysis Plan to facilitate further demarcation, and that plan will be provided for IDEM review once it is finalized.

In the meantime, please let me know if there are any questions about the attached memo or the lab reports that were provided on April 12.

Thank you,
Angie