

**From:** [Casbon-Scheller, Angela M](#)  
**To:** [Fracetti, Juliana](#)  
**Cc:** [Dick, Gregory A](#); [Mokotoff, Jay](#); [Harkin, Julie](#)  
**Subject:** Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley East Ash Pond \\ SW ID No 87-016 \\ CCR Removal Verification Memo  
**Date:** Monday, June 10, 2024 11:09:35 AM  
**Attachments:** [image003.png](#)  
[CCR Removal Verification Process Update Submittal June 2024.pdf](#)

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Dear Ms. Fracetti,

Please find attached a memo regarding the progress of CCR Removal and the verification of removal at the Southern Indiana Gas and Electric Company (SIGECO) East Ash Pond (SW ID No. 87-016).

If there are any questions or any additional information is needed, I can be contacted via phone or email.

Thank you,



**Angie Casbon-Scheller**  
Director, Generation Compliance and Carbon Policy

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**CenterPoint Energy** | Environmental Department  
812.491.4787 w  
CenterPointEnergy.com



P.O. Box 209  
Evansville, IN 47702-0209

June 7, 2024

Submitted via email to [JFracett@idem.IN.gov](mailto:JFracett@idem.IN.gov)

Ms. Juliana Fracetti, Permit Manager  
Indiana Department of Environmental Management  
Solid Waste Permits

RE: CCR Removal Verification Process  
F.B. Culley Generating Station East Ash Pond  
Warrick County  
SW Program ID 87-016

Dear Ms. Fracetti,

The Southern Indiana Gas and Electric Company (SIGECO) East Ash Pond closure is currently underway, with CCR material excavation and removal progressing. Some areas will soon be excavated to the point of achieving bottom of excavation grades, thereby exposing native underlying soils. At that point the project will need to progress to the removal verification process, which is detailed in the enclosed letter and is a combination of requirements taken from the previously submitted Closure Construction Specifications, Construction CQA Plan, and the SIGECO responses to two IDEM Requests for Additional Information (response dates 12/15/2022 and 7/14/2023). Additionally, the closure verification described complies with the CCR Rule that was published in the Federal Register on May 8, 2024, which states "Closure by removal is complete when CCR has been removed; any areas affected by releases from the CCR unit have been removed or decontaminated..." In accordance with the latest revision to the CCR rule, as stated in 257.102(c)(2), SIGECO plans on closing the Culley East Ash Pond by first completing all removal of CCR during the current period and will complete groundwater corrective action during the post-closure care period, pursuant to the procedures identified in 257.102(c)(2)(i) through (vi).

SIGECO appreciates productive dialogue with IDEM to achieve a sound closure-by-removal plan that is in compliance with applicable regulations and facilitates timely completion of the removal of CCR material and pond closure.

Please contact me at 812-491-4787 or [Angela.Casbon-Scheller@centerpointenergy.com](mailto:Angela.Casbon-Scheller@centerpointenergy.com) with any questions regarding the CCR Removal Verification Process, or previously submitted documents pertaining to the East Ash Pond Closure Plan.

Sincerely,

A handwritten signature in blue ink that reads "Angela Casbon-Scheller".

Angela Casbon-Scheller  
Director, Generation Compliance and Carbon Policy  
Environmental Affairs

Enclosures: AECOM Letter Regarding CCR Removal Verification Process



AECOM  
9398 Amberglen Boulevard  
Austin, TX 78729  
aecom.com

March 28, 2024

F.B. Culley East Ash  
Pond

CCR Removal  
Verification Process

SW PROGRAM ID 87-016

**TO: CENTERPOINT ENERGY**  
**ANGELA CASBON-SHELLER**  
**CRAIG KAISER**

## **Background**

Closure of the F.B. Culley East Ash Pond (EAP) is currently underway, and construction operations are removing CCR material from the EAP. As CCR excavation and removal advances, bottom of excavation grades will soon be achieved and native underlying soils will be exposed. Once native soils are encountered, the removal verification process will begin in accordance with the CCR Removal Verification Process.

The CCR Removal Verification Process detailed in the following section is a combination of requirements taken from the Closure Construction Specifications, Construction CQA Plan, and our responses to both of IDEM's Request for Additional Information (response dates 12-15-2022 & 7-14-2023). Specifically, in response to RAI #1 Engineering Enclosure comment #1, our proposed method of visual inspection and the use of PLM was provided in detail. In the following RAI #2, our response to Engineering Enclosure comment #1 included the additional commitment to include excavating an additional 2-ft of underlying soils. For reference, the response from the RAI #2 stated: "SIGECO is agreeable to IDEM's proposal ("to excavate the two additional feet of underlying soils before implementing the proposed PLM evaluation"), with the understanding that no further backfill material (soil cover) or capping system will be placed once two feet of underlying soils have been removed and passing PLM results are obtained (less than 5% CCR by weight)." Items 3-6 in the CCR Removal Verification Process are largely based on the information provided in these RAI responses.

## **CCR Removal Verification Process**

1. Excavate all CCR materials within the East Ash Pond Limits of CCR as indicated on the Contract Drawings. CCR materials extending beyond the East Ash Pond Limits of CCR or historic (bottom of CCR) elevations shown on the Contract Drawings, if encountered, will be removed as directed by the CQA Consultant. The Subcontractor is responsible for the physical verification of the limits of ash and for informing the CQA Consultant if any differences exist between the approximate waste boundary shown on the Contract Drawings and the limits of ash encountered in the field. CCR materials will be removed until native soils below the existing CCR materials are encountered.

2. Once native soils are encountered, a visual inspection will be conducted by the CQA Consultant to evaluate the presence or absence of CCR materials. The visual inspection will verify that all CCR materials have been removed without any evidence of residue and/or visible contamination. Any areas that are determined by the CQA Consultant to not pass visual inspection will require additional soil to be removed at the direction of the CQA Consultant until all areas pass visual inspection.
3. Following a passing visual inspection, The Subcontractor will excavate and remove an additional 2-feet of underlying native soils previously in contact with CCR material. Excavation of CCR materials is completed following the removal of 2-ft of underlying native soils.
4. Once excavation of CCR materials is completed as described above, soil samples will be collected from the bottom and side slopes of the pond on an established sampling grid for purposes of performing PLM analysis. The dimensions of the sampling grid will be 150-ft x 150-ft. and will include the side slopes and pond bottom. Each sample location will be photographed and will include sample location coordinates (based on GPS methodology).
5. The PLM samples will be sent to a qualified laboratory for analysis of CCR content. Passing PLM results criteria are samples that have less than or equal to 5% of CCR by weight.
6. PLM results indicating greater than 5% by weight of CCR will require additional soil removal as directed by the CQA Consultant.

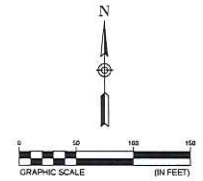
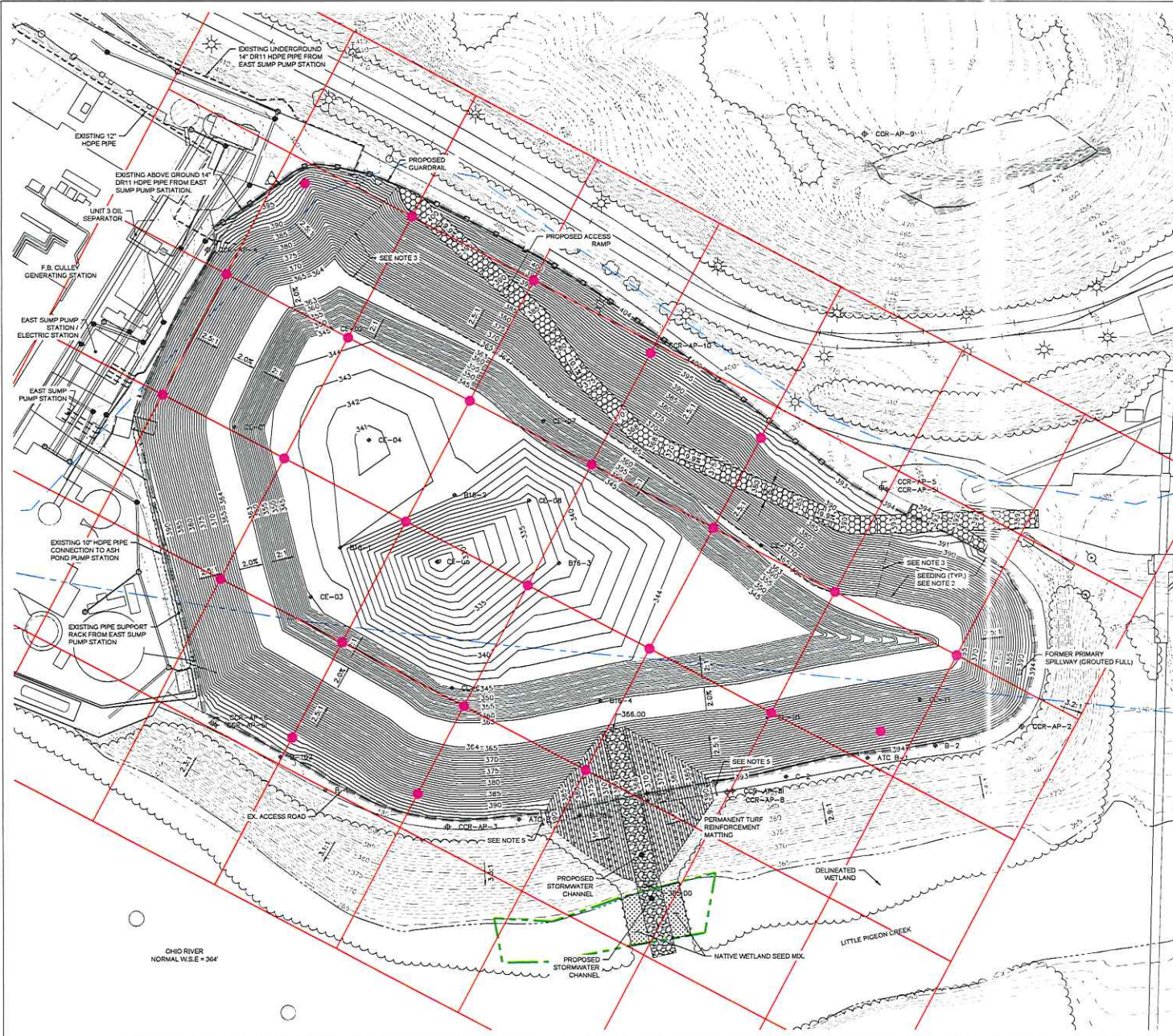
Yours sincerely,



Julie Haskin

AECOM





**LEGEND**

- ASH POND LIMITS OF CDN (APPROX.)
- - - - EXISTING MAJOR CONTOUR (5 FT)
- - - - EXISTING MINOR CONTOUR (1 FT)
- PROPOSED MAJOR CONTOUR (5 FT)
- PROPOSED MINOR CONTOUR (1 FT)
- - - - P.L. PROPERTY LINE
- - - - DELINEATED WETLAND
- [Hatched Box] PROPOSED ACCESS RAMP
- [Hatched Box] OUTLET CHANNEL PROTECTION
- [Hatched Box] PERMANENT TURF REINFORCEMENT MATTING
- [Hatched Box] WETLAND SEED MIX
- [Line with Squares] PROPOSED GUARD RAIL
- [Pink Dot] PLM SAMPLE LOCATION

**AECOM**

**PROJECT**  
NEW LINED POND & EAST ASH POND CLOSURE

F.B. CULLEY GENERATING STATION  
3711 Darlington Rd  
Newburgh, IN 47630



**CLIENT**  
CenterPoint Energy

P.O. Box 200  
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AECOM Process Technologies  
13640 Branck Drive, Suite 200  
Austin, TX 78753  
512.464.4707 ext 512.418.6004 fax  
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**REGISTRATION**

**ISSUE/REVISION**

NO.	DATE	DESCRIPTION

**PROJECT NUMBER**

60586569

**SHEET TITLE**

PLM SAMPLE LOCATIONS

**SHEET NUMBER**

FIGURE-1