From: FISCHER, RON
To: Hummel, Lindsey

Cc: GUERRETTAZ, JOHN; McCormick, Debra J; RAMAN, SHYAMALA; Lu, Xuefei (Michelle)

Subject: SIGECO AB Brown Station ash pond//SW Indiana Program ID 65-015//2024 Work Plan to Install Six Piezometers

Date: Wednesday, June 26, 2024 7:33:53 PM

Attachments: <u>image001.png</u>

image002.png image004.png image005.png image006.png image007.png image008.png

2024 Work Plan to Install Six Piezometers
Dated May 22, 2024
VFC # 83656255
Cayuga Ash Pond System
Vermillion County
SW Program ID 83-UP-01

Dear Lindsey:

I reviewed the 2024 Work Plan to Install Six Piezometers (Work Plan) in the Ash Pond Disposal Area #1 dated May 22, 2024. IDEM received the Work Plan from Duke Energy Indiana LLC (Duke) on May 22, 2024. The site is following Duke's Proposed Modification to Existing Closure and Post-Closure Plan dated December 21, 2016 (VFC # 80399269) and IDEM's Approval of Modified Closure/Post-Closure Plan (January 2020 IDEM Approval) dated January 17, 2020 (VFC # 82895272).

The Work Plan provides information for installing six piezometers. These piezometers are not required by IDEM Geology Section, or rule 329 IAC 10-29 Groundwater Monitoring Requirements or the January 2020 IDEM Approval. The Work Plan states they will follow 329 IAC 10-21-4 for the construction of the piezometers which is deemed adequate by our section. Three of the six piezometers PZ24-2, PZ24-3, and PZ-24-4 will drill into the limit of the completed Lined Ash Pond's cap or cover. If the Cap were damaged enough to cause leachate to go into the Ash Pond Area #1, the groundwater monitoring system is adequate to monitor the area where the damage from these three piezometers are located. I will not have any recommendations for this Work Plan and will be deferring this issue to engineering.

Geology staff will not have a request for additional information.

Recommendation

We do not have any recommendations for the Work Plan; however, consult with the Engineering Section to verify the adequacy of the Work Plan with respect to engineering comments.

If you would like to discuss my review further, please contact me.

Sincerely,



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Geology Task ID # 47725

cc: VFC\Cayuga Ash Disposal System\SW Site\Technical Review\Geology