



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

July 02, 2024

**VIA EMAIL** [Gregory.Dick@centerpointenergy.com](mailto:Gregory.Dick@centerpointenergy.com)

Mr. Gregory Dick  
Manager, Environmental Operations  
Vectren, A Center Point Energy Company  
F.B. Culley West Ash Pond  
3711 Darlington Road  
Newburgh, IN 47630

Re: *Revised Work Plan for Bedrock Characterization – Updated boring locations*

Dated June 28, 2024

VFC # [83661391](#)

F.B. Culley Generating Station

West Ash Pond

Newburgh, Warrick County

SW Program ID 87-UP-14

Dear Mr. Dick:

The facility submitted the *Revised Work Plan for Bedrock Characterization – Updated boring locations* (Letter) to IDEM on June 28, 2024. The following comments are the result of our review of your Letter.

The facility submitted the Letter to IDEM to request approval of alternate bedrock boring locations. Based on field and laboratory hydrogeologic measurements, the facility will either convert the bedrock borings into monitoring wells and include them into the facility's groundwater monitoring system or abandon them properly if the facility determines they are not in hydraulic communication with the uppermost aquifer. Center Point Energy, Haley & Aldrich, and IDEM personnel discussed the updated boring locations during a teleconference meeting on July 1, 2024.

Restriction 1(g) of the environmental restrictive covenant (ERC) dated July 28, 2022 (VFC # [83562732](#)), prohibits excavation or installation of any conduit within the ERC area applied to the West Ash Pond, without approval from IDEM. One of the three bedrock borings is outside the ERC area and is not subject to the ERC restrictions. We find that the proposed alternate locations are acceptable for the other two bedrock borings, which are within the excavated Coal Combustion Residue area of the former West Ash Pond and subjected to the ERC restrictions. These alternate locations and proposed methods appear appropriate for maintaining workers' safety and for achieving the goals of the work plan dated April 18, 2024 (VFC # [83661385](#)). In addition, the



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*We appreciate your input!*



Mr. Gregory Dick  
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proposals described in the Letter and work plan for the bedrock borings within the area defined by the ERC are acceptable.

Thank you for your continuing compliance. If you have questions, please contact Mr. Thierry Liberge of my staff at [tliberge@idem.in.gov](mailto:tliberge@idem.in.gov) or call (317) 234-8712.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Guerrettaz". The signature is fluid and cursive, with a large, stylized initial "J" and a long, sweeping underline.

John A. Guerrettaz, LPG  
Chief, Geology Section  
Permits Branch  
Office of Land Quality

cc: Warrick County Health Department,  
Warrick County Solid Waste Management District  
IDEM Southwest Regional Office  
Ms. Angela Casbon-Scheller, Manager, Environmental Operations, Center Point Energy  
Mr. Todd Plating, Senior Geologist, Haley & Aldrich  
Mr. Neal Kochis, Senior Project Manager, Haley & Aldrich  
Ms. Juliana Fracetti, Solid Waste Permits Section, Permits Branch, OLQ, IDEM

**From:** [McCormick, Debra J](#)  
**To:** [gregory.dick@centerpointenergy.com](mailto:gregory.dick@centerpointenergy.com)  
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**Bcc:** [Liberge, Thierry](#); [WEAVER, TROY](#); [Hummel, Lindsey](#); [Evans, Teresa](#); [Lu, Xuefei \(Michelle\)](#); [RAMAN, SHYAMALA](#)  
**Subject:** 07022024 SW 87-UP-14 Warrick County -Monitoring/Review/public  
**Date:** Tuesday, July 2, 2024 2:42:00 PM  
**Attachments:** [image001.png](#)  
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[image007.png](#)  
[20240702\\_FBCulleyWAP-BedrockEval-LocationChange-47259-FINAL.pdf](#)  
[image008.png](#)  
**Importance:** High

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Attached is the letter for the SW 87-UP-14 for Warrick County. If any questions contact Mr. Liberge, this information is in the last paragraph above Mr. John Guerrettaz signature block.



Debra McCormick  
Administrative Assistant  
Permits Branch / Office of Land Quality  
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**Subject:** Delivered: [External Email] 07022024 SW 87-UP-14 Warrick County -Monitoring/Review/public  
**Date:** Tuesday, July 2, 2024 2:43:58 PM  
**Attachments:** [External Email 07022024 SW 87-UP-14 Warrick County -MonitoringReviewpublic.msg](#)

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