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March 1, 2022

Kirsten Hillyer
Environmental Engineer
U.S. Environmental Protection Agency
Office of Resource Conservation and Recovery (ORCR)
Materials Recovery & Waste Management Division (MRWMD)

RE: AB Brown Generating Station - CCR Part A Demonstration, Request for Additional Information

Dear Ms. Hillyer,

We are providing the information contained in this letter in response to U.S. EPA's (EPA's) e-mail dated February 14, 2022, in which EPA requested additional information in order to complete its review of the Part A demonstration SIGECO submitted for the AB Brown Generating Station pursuant to the *Development of Alternative Capacity is Technically Infeasible* requirements of 40 C.F.R. § 257.103(f)(1). Specifically, EPA requested a narrative explaining the progress made and current activities and phase/step at the facility to achieve alternative capacity. EPA further requested additional information if the original date requested to cease receipt of waste is delayed.

SIGECO submitted the Part A demonstration in accordance with the requirements §257.103(f)(1) on November 25, 2020 and requested an extension of the "cease receipt of waste" deadline to October 15, 2023 for the AB Brown Ash Pond. Following submission of the Part A demonstration, SIGECO has continued to actively pursue alternative capacity and has made significant progress towards achieving this alternative capacity for the CCR and non-CCR flows currently managed in the Ash Pond. Given the progress made to date, including completing a hearing in January before the Indiana Utility Regulatory Commission (IURC) seeking authorization from the IURC for expenditures related to the construction of the new lined CCR Pond. SIGECO is currently on schedule to meet the October 15, 2023 deadline requested in its Part A demonstration. Accordingly, an extension of the cease flow deadline beyond what was originally requested in the Part A Demonstration is not being requested at this time.

Summary of Alternative Capacity Project:

The identified "fastest technically feasible" alternative (Alternative 3 in the Part A Demonstration) includes the design and construction of a new lined CCR Pond (compliant with the CCR Rule) to expand the capacity available for treatment of some CCR flows as well as non-CCR flows. The new CCR Pond will be in the same location as and will replace the existing South Side Runoff Pond (SSRP). The proposed footprint will extend into adjacent areas to the north and east of the existing SSRP. The flows managed by the new CCR Pond will include the combined Unit 1 and Unit 2 FGD wastewater. As part of this alternative, the existing water treatment system that aids in mercury treatment, solids settling and heavy metals precipitation will be replaced in kind and located adjacent to the proposed CCR Pond such that treated water flows into the pond by gravity. In addition, non-CCR flows that are currently managed within the SSRP and Ash Pond (primarily coal pile runoff, contact stormwater and leachate from the onsite FGD landfill) will temporarily be managed by the new CCR Pond until such time that a new lined contact stormwater pond is constructed. The new lined contact stormwater pond is proposed to be in operation by October 15, 2023, following which the non-CCR flows will be re-routed from the CCR Pond to the lined contact stormwater pond. Implementation of this project will result in elimination of the FGD wastewater and most non-CCR flows to the Ash Pond by July 1, 2023. Bottom ash and occasional fly ash will continue to be discharged to the existing Ash Pond until retirement of coal-fired boilers by October 15, 2023. Following the cease flow date, the Ash Pond will initiate closure in accordance with the requirements of §257.102.

Progress Made and Current Activities:

The following activities have occurred or are underway towards achieving alternative capacity for the CCR and non-CCR flows currently managed in the Ash Pond:

- Constructed and commissioned pipe conveyor and barge loading system to convey ash materials from the Ash Pond to the Ohio River for beneficial use. Began ash excavation for beneficial use in August 2021.
- Hired engineering consultant to assist with remaining planning, developing design and permitting documents as well as manage construction activities associated alternative capacity project.
- Held multiple meetings with IDEM to discuss Ash Pond closure and alternative capacity strategy.
- Performed laboratory testing to evaluate composition and particle size of proposed flows to support settling calculations for new CCR Pond design.
- Completed conceptual-level design of new CCR Pond and infrastructure necessary to reroute flow to relocated water treatment system. Developed detailed sequence of construction for planning purposes.
- Commencement of detailed design of the new CCR Pond and associated infrastructure to occur in the near-term.
- In progress of preparing new CCR Pond permit application for submittal to Indiana Department of Environmental Management (IDEM).

Changes in Approach from Part A Demonstration:

No significant changes from the selected alternative in the Part A Demonstration are proposed.

This information will be posted to the CCR compliance website pursuant to 40 C.F.R. §257.103(f)(1)(ix)(A), 105(i)(14) and 107(i)(14), as requested in the EPA's email.

Please reach out to the undersigned below for any questions or concerns.

Sincerely,



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cc: Frank Behan (EPA)
Richard Huggins (EPA)
Scott Duhon (CenterPoint)
Jay Mokotoff (AECOM)