

## MEMORANDUM – Operating Record (40 CFR 257.105(h)(12))

March 18, 2024  
File No. 0133274-014

TO: AES Indiana – Harding Street Generating Station

FROM: Haley & Aldrich, Inc.

SUBJECT: Semi-Annual Remedy Selection Progress Report Pursuant to 40 CFR §257.97(a)  
Harding Street Generating Station - Ash Pond System

Indianapolis Power & Light Company d/b/a AES Indiana (AESI) initiated corrective measures for the Ash Pond System at the Harding Street Generating Station (HSGS) on April 15, 2019, in response to statistically significant levels (SSL) of Appendix IV constituents (antimony, arsenic, lithium and molybdenum) exceeding Groundwater Protection Standards (GWPS). Pursuant to 40 CFR §257.96(a), a demonstration of need for a 60-day extension for the assessment of corrective measures was completed on July 12, 2019. The Corrective Measures Assessment (CMA) Report was completed and placed in the facility operating record on September 13, 2019, and subsequently amended on October 11, 2019.

In accordance with the Federal CCR Rule, following completion of the CMA, AES Indiana must, as soon as feasible, select a remedy that meets the standards listed in 40 CFR §257.97(b). Pursuant to §257.97(a), the owner or operator of a Coal Combustion Residual (CCR) management unit that has completed a CMA for groundwater is required to prepare a semi-annual report describing the progress made in selecting and designing the remedy. This report documents activities completed in support of selecting and designing a remedy during the period from September 20, 2023, through March 17, 2024. A summary of the progress made in selecting a remedy is provided below.

### SUMMARY OF ACTIONS COMPLETED

The following activities have been completed during this reporting period:

- Completed the statistical analysis of the May 2023 sampling results from the CCR monitoring wells for the presence of Appendix IV constituents to be present at concentrations above GWPS.
- Continued Assessment Monitoring: Collected groundwater samples from the CCR monitoring wells and evaluated the results from the November 2023 sampling event in support of ongoing groundwater monitoring compliance and nature and extent (N&E) evaluations. Final laboratory results were placed in the facility's CCR operating record. The groundwater monitoring data for the November 2023 sampling event is being evaluated for statistically significant levels compared to GWPS. Any new constituents that exceed GWPS will be considered in selection of the final remedy.
- AESI continued to further establish nature and extent (N&E) of the Appendix IV SSLs pursuant to § 257.95(g):
  - Groundwater samples were collected from onsite monitoring wells (MW-21L, MW-2D1, MW-4I, MW-4D, MW-5D, MW-6I, MW-6D, MW-7D1, MW-8D, MW-12D1, MW-14I,

MW-14IL, MW-14D1) in November 2023 to further delineate the horizontal and vertical extent of constituents in groundwater downgradient of the Ash Pond System;

- Groundwater samples were collected from onsite well clusters (MW-16, MW-17, MW-18) in November 2023 and from well cluster (MW-18) in February 2024 to further delineate the horizontal and vertical extent of constituents in groundwater along the western property boundary;
  - Groundwater samples were collected from the eleven (11) well clusters in November 2023 that were installed offsite at the Harding Street Quarry formerly known as Hanson Aggregates (Quarry) to further delineate the horizontal and vertical extent of constituents in groundwater;
  - The N&E of CCR affected groundwater has been sufficiently characterized to support a CMA public meeting and subsequent selection of remedy.
- Collected supplemental soil samples near CCR monitoring wells (MW-7S, MW-13S, MW-14D) and groundwater samples from CCR monitoring wells (MW-1S, MW-1D, MW-7S, MW-8S, MW-14D, MW-15D) and N&E monitoring well (MW-7D1) to further evaluate groundwater treatment technologies.
  - Incorporated the May 2023 groundwater analytical results into the groundwater flow and constituent fate and transport modeling.
  - Continued preliminary closure by removal beneficial use considerations.

## PLANNED ACTIVITIES

Anticipated activities which will support CMA and selection of remedy for the upcoming six months include the following (subject to change):

- Complete the statistical analysis of the November 2023 groundwater samples from the CCR monitoring wells to evaluate groundwater for the presence of SSLs above GWPS downgradient of the Ash Pond System.
- Continue Assessment Monitoring by collecting groundwater samples in May 2024 from the CCR monitoring wells. The groundwater data will be evaluated for statistically significant levels compared to GWPS. Any new constituents that exceed GWPS will be considered in selection of the final remedy.
- Continue sampling of onsite and offsite N&E wells (as necessary) which will support CMA and selection of remedy.
- Evaluate the groundwater analytical data collected during the May 2024 semi-annual assessment monitoring sampling event.
- Complete the N&E Report which will provide a comprehensive summary of data evaluation and the groundwater SCM.
- Prepare an updated CMA report to account for the supplemental information collected since 2019 which will include additional groundwater monitoring data, groundwater N&E investigations, conceptual site model development, geochemical and site-specific investigations, groundwater modeling updates, and potential corrective measures evaluations.

- Continue to perform an engineering review of the potential CMA remedial alternatives. For these reviews, emphasis will be placed on integrating recent analytical results, and on identifying and evaluating applicability of emerging technologies and their potential applicability to the CMA and selection of remedy process.
- Estimate quantity of Appendix IV material released as required under 40 CFR §257.95(g)(1)(ii) and place in the facility's CCR operating record.
- Prepare, schedule and hold a Public Meeting to discuss the results of the updated CMA in accordance with §257.96(e).
- Evaluate the comments and input gained during the public meeting and begin the selection of remedy evaluation process.
- Provide a semi-annual progress report that summarizes AESI's progress and status regarding a selection of remedy.