AECOM

Submitted to
AES Indiana
Harding Street Station
3700 S Harding Street
Indianapolis, IN 46217

Submitted by
AECOM
1300 E 9th Street
Suite 500
Cleveland, OH 44114

January 9, 2026

CCR Annual Inspection §257.83 (b)

for the

Ash Ponds 1, 2A/2B, 3, Former Pond 2 and Former Pond 4

at the

Harding Street Station

Revision 0

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Executive Summary

This Coal Combustion Residuals (CCR) Annual Inspection for Ash Ponds 1, 2A/2B, 3, Former Pond 2, and Former Pond 4 (herein "Ash Ponds") at the AES Indiana (AESI), Harding Street Station (herein "Harding St.") has been prepared in accordance with the requirements specified in the USEPA CCR Rule under 40 Code of Federal Regulations §257.83 (b). These regulations require that the specified documentation and assessments for an existing CCR surface impoundment be prepared within one year of the placement of the previous inspection report within the facility's operating record. The 2025 inspection report was placed in the Operating Record on January 10, 2025. AES Indiana is placing this year's report in the facility's Operating Record no later than January 10, 2026, which is within one year of the date the previous year's inspection report was placed within the facility's Operating Record.

This Inspection for the Ash Ponds meets the regulatory requirements as summarized in **Table ES-1**.

Table ES-1 – Summary

Report Section	CCR Rule Reference	Requirement Summary	Requirement Met?	Comments
2.1	§257.83 (b)(1)	*Annual Inspection*	Yes	The CCR Unit has met the annual inspection requirements
2.2	§257.83 (b)(2)	*Inspection Report*	Yes	The CCR Unit has met the inspection report requirements
2.3	§257.83 (b)(4)	*Frequency of Inspections*	Yes	The CCR Unit has met the required frequency of inspections
2.4	§257.83 (b)(5)	*No Deficiency Identified*	Yes	No deficiency identified

The Ash Ponds have ceased operations and do not receive waste. All inspection requirements were evaluated, and the ponds were found to meet all requirements within each individual assessment in §257.83 (b).

1 Introduction

1.1 Purpose of this Report

The purpose of the Annual Inspection presented in this report is to document that the requirements specified in 40 Code of Federal Regulations (CFR) §257.83 (b) have been met to support the requirement under each of the applicable regulatory provisions for the Harding Street Station Ash Ponds. The CCR Rule requires that the specified documentation and assessments for an existing CCR surface impoundment be prepared within one year of the placement of the previous inspection report within the facility's operating record. The 2025 inspection report was placed into the facility's Operating Record on January 10, 2025. AES Indiana is placing this year's report in the facility's Operating Record no later than January 10, 2026, which is within one year of the date the previous year's inspection report was placed within the Facility's Operating Record.

The following table summarizes the documentation required within the CCR Rule and the sections that specifically respond to those requirements of this assessment.

Table 1-1 – CCR Rule Cross Reference Table

Report Section	Title	CCR Rule Reference
2.1	Annual Inspection	§257.83 (b)(1)
2.2	Inspection Report	§257.83 (b)(2)
2.3	Frequency of Inspections	§257.83 (b)(4)
2.4	Deficiency Identified	§257.83 (b)(5)

1.2 Brief Description of the Impoundments

The Harding Street Station is located in Marion County, Indiana, just south of Indianapolis, Indiana, and is owned and operated by AES Indiana (AESI). The Harding Street Station is located along the east bank of the White River and is bisected by Lick Creek. The Harding Street Station has three CCR Rule-regulated surface impoundments, identified as Ash Pond 1, 2A/2B and 3. Two additional units, Former Ponds 2 and 4, received CCR material, but are not regulated under the CCR Rule. Former Ponds 2 and 4 are not subject to §257.83 (b) but are included in this report for completeness. The Ash Ponds are located directly south of the Station and are approximately 93 acres in size, cumulatively. Ash Pond 1 is 9 acres, Pond 2A/2B is 6 acres, and Pond 3 is 12 acres. Former Pond 2 is 35 acres and Former Pond 4 is 31 acres.

A site Location Map showing the area surrounding the Station is included as **Figure 1** of **Appendix A**. **Figure 2** in **Appendix A** presents the Harding Street Site Map.

2 Annual Inspection Description

Regulatory Citation: 40 CFR §257.83 Inspection requirements for CCR surface impoundments

The Annual Inspection for the Ash Ponds is described in this section. Information about operational and maintenance procedures was provided by Harding St. plant personnel. The Harding Street Station follows an established maintenance program that quickly identifies and resolves issues of concern.

2.1 Annual Inspection

Regulatory Citation: 40 CFR §257.83 (b) Annual inspections by a qualified professional engineer;

- *(1) If the existing or new CCR surface impoundment or any lateral expansion of the CCR surface impoundment is subject to the periodic structural stability assessment requirements under §257.73 (d) or §257.74 (d), the CCR unit must additionally be inspected on a periodic basis by a qualified professional engineer to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards.*

  The Ash Ponds are subject to the periodic structural stability assessment requirements as mentioned. Thus, the following items were performed to comply with the CCR Rule.

2.1.1 Review of Available Information

Regulatory Citation: 40 CFR §257.83 (b)(1);

- *(i) A review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (e.g., CCR unit design and construction information required by §257.73 (c)(1) and §257.74 (c)(1), previous periodic structural stability assessments required under §257.73 (d) and §257.74 (d), the results of inspections by a qualified person, and results of previous annual inspections).*

  The available information was reviewed for the Harding St. Ash Ponds, including the weekly inspection reports for inspections performed by plant personnel and the previous CCR Rule annual inspection performed by Sargent & Lundy on December 11, 2024.

2.1.2 Visual Inspection

Regulatory Citation: 40 CFR §257.83 (b)(1);

- *(ii) A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit and appurtenant structures.*

  The Ash Ponds were visually inspected by AECOM on November 25, 2025. No significant signs of distress or malfunction of the CCR units and appurtenant structures were identified, as noted in Section 2.4.2.

Regulatory Citation: 40 CFR §257.83 (b)(1);

- *(iii) A visual inspection of any hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation.*

  Hydraulic structures and vaults were inspected, and no signs of structural deficiencies were identified during inspection on November 25, 2025.

2.2 Content of the Inspection Report

Regulatory Citation: 40 CFR §257.83 (b)(2) Inspection report. The qualified professional engineer must prepare a report following each inspection that addresses the following:

- *(i) Any changes in geometry of the impounding structure since the previous annual inspection.*

  No changes were observed.

- *(ii) The location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection.*

  All impounded water has been removed from the Ash Ponds.

- *(iii)The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection.*

  All impounded water has been removed from the Ash Ponds.

  CCR depths range from 0 feet to approximately 75 feet. The ponds were constructed with natural soil liners placed at elevations between 640 and 670.

- *(iv) The storage capacity of the impounding structure at the time of the inspection.*

  The storage capacity of the impounding structure for the entire ash pond system is approximately 5.6 million CY.

- *(v) The approximate volume of the impounded water and CCR at the time of the inspection.*

  At the time of the inspection, there is no impounded water on the Ash Ponds. There is approximately 5.6 million CY of CCR contained within the Ash Ponds.

- *(vi) Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit and appurtenant structures.*

  The visual inspection performed on November 25, 2025, did not reveal any actual or potential structural weaknesses.

- *(vii) Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.*

  There were no changes which might have affected the stability or operation of the impounding structure since the previous annual inspection.

2.3 Frequency of Inspections

Regulatory Citation: 40 CFR §257.83 (b)(4);

- *(i) Except as provided for in paragraph (b)(4)(ii) of this section, the owner or operator of the CCR unit must conduct the inspection required by paragraphs (b)(1) and (2) of this section on an annual basis. The date of completing the initial inspection report is the basis for establishing the deadline to complete the first subsequent inspection. Any required inspection may be conducted prior to the required deadline provided the owner or operator places the completed inspection report into the facility's operating record within a reasonable amount of time. In all cases, the deadline for completing subsequent inspection reports is based on the date of completing the previous inspection report. For purposes of this section, the owner or operator has completed an inspection when the inspection report has been placed in the facility's operating record as required by §257.105 (g)(6).*

  The prior annual inspection report was placed in the operating record on January 10, 2025. AESI will be placing this inspection report in the facility's operating record no later than January 10, 2026.

- *(ii) In any calendar year in which both the periodic inspection by a qualified professional engineer and the quinquennial (occurring every five years) structural stability assessment by a qualified professional engineer required by §257.73 (d) and §257.74 (d) are required to be completed, the annual inspection is not required, provided the structural stability assessment is completed during the calendar year. If the annual inspection is not conducted in a year as provided by this paragraph (b)(4)(ii), the deadline for completing the next annual inspection is one year from the date of completing the quinquennial structural stability assessment.*

  The quinquennial structural stability assessment is not required for this year as it was completed in October 2021. Thus, an annual inspection report was submitted to AESI as stipulated in §257.83 (b)(4)(i).

2.4 Deficiency Identified

Regulatory Citation: 40 CFR §257.83 (b)(5);

- *If a deficiency or release is identified during an inspection, the owner or operator must remedy the deficiency or release as soon as feasible and prepare documentation detailing the corrective measures taken.*

  No areas of concern were identified in the previous inspection as noted in Section 2.4.1. No areas of concern were noted during this year's annual inspection performed on November 25, 2025, as noted in Section 2.4.2.

2.4.1 Previous Inspection

There were no major areas of concern noted during the previous annual inspection performed on December 11, 2024.

2.4.2 Current Inspection

No major areas of concern were noted during the annual inspection performed on November 25, 2025, but minor observations areas are listed below. Locations are shown on **Figure 3** and in **Appendix B** Observation Photo Log.

Ash Pond 1

- No issues observed.

Ash Pond 2A/2B

- Berm erosion (Photo 20,21, & 27)
  - Monitor berm erosion and repair as necessary.
- Vegetation in pond (Photo 26).
  - Monitor and remove vegetation as necessary.

Ash Pond 3

- No issues observed.

Former Pond 2

- No issues observed.

Former Pond 4

- Vegetation in pond (Photo 37 & 39).
  - Monitor and remove vegetation as necessary.

3 Certification

This Certification Statement documents that the annual inspection has been completed for Ash Ponds 1, 2A/2B, 3, Former Pond 2, and Former Pond 4 at the Harding Street Station and that the inspection and this inspection report meet the requirements specified in 40 CFR §257.83 (b).

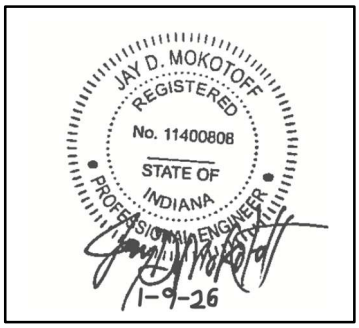
I, Jay Mokotoff, being a Registered Professional Engineer in good standing in the State of Indiana, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this report has been prepared in accordance with the accepted practice of engineering.

Jay D. Mokotoff

Printed Name

January 9, 2026

Date



4 Limitations

Background information, design basis, and other data which AECOM has used in preparation of this report have been furnished to AECOM by AES Indiana. AECOM has relied on this information as furnished and is not responsible for the accuracy of this information. Our recommendations are based on available information from previous and current investigations. These recommendations may be updated as future investigations are performed.

The conclusions presented in this report are intended only for the purpose, site location, and project indicated. The recommendations presented in this report should not be used for other projects or purposes. Conclusions or recommendations made from these data by others are their responsibility. The conclusions and recommendations are based on AECOM's understanding of current plant operations, maintenance, stormwater handling, and ash handling procedures at the Station, as provided by AES Indiana. Changes in any of these operations or procedures may invalidate the findings in this report until AECOM has had the opportunity to review the findings and revise the report if necessary.

This development of the Annual Inspection was performed in accordance with the standard of care commonly used as state-of-practice in our profession. Specifically, our services have been performed in accordance with accepted principles and practices of the engineering profession. The conclusions presented in this report are professional opinions based on the indicated project criteria and data available at the time this report was prepared. Our services were provided in a manner consistent with the level of care and skill ordinarily exercised by other professional consultants under similar circumstances. No other representation is intended.

Appendix A
Figures

Figure 1 – Overall Site Map
Figure 2 – Ash Ponds Map
Figure 3 – Observations Location Map

AECOM

PROJECT

HARDING STREET STATION
ASH POND INSPECTION
CLOSURE ALTERNATIVES
HARDING STREET GENERATING STATION
3700 S HARDING STREET
INDIANAPOLIS, IN 46217

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DRAFT

REGISTRATION

N

0 500 1000 1500
GRAPHIC SCALE (IN FEET)

ISSUE/REVISION

I/R	DATE	DESCRIPTION

AECOM PROJECT NO:	60775954
DRAWN BY:	--
DESIGNED BY:	--
CHECKED BY:	--
PLOT DATE:	01/09/2026
SCALE:	NOTED
AUTOCAD VER:	2025

PROJECT NUMBER

60747920

SHEET TITLE

OVERALL SITE MAP

SHEET NUMBER

001

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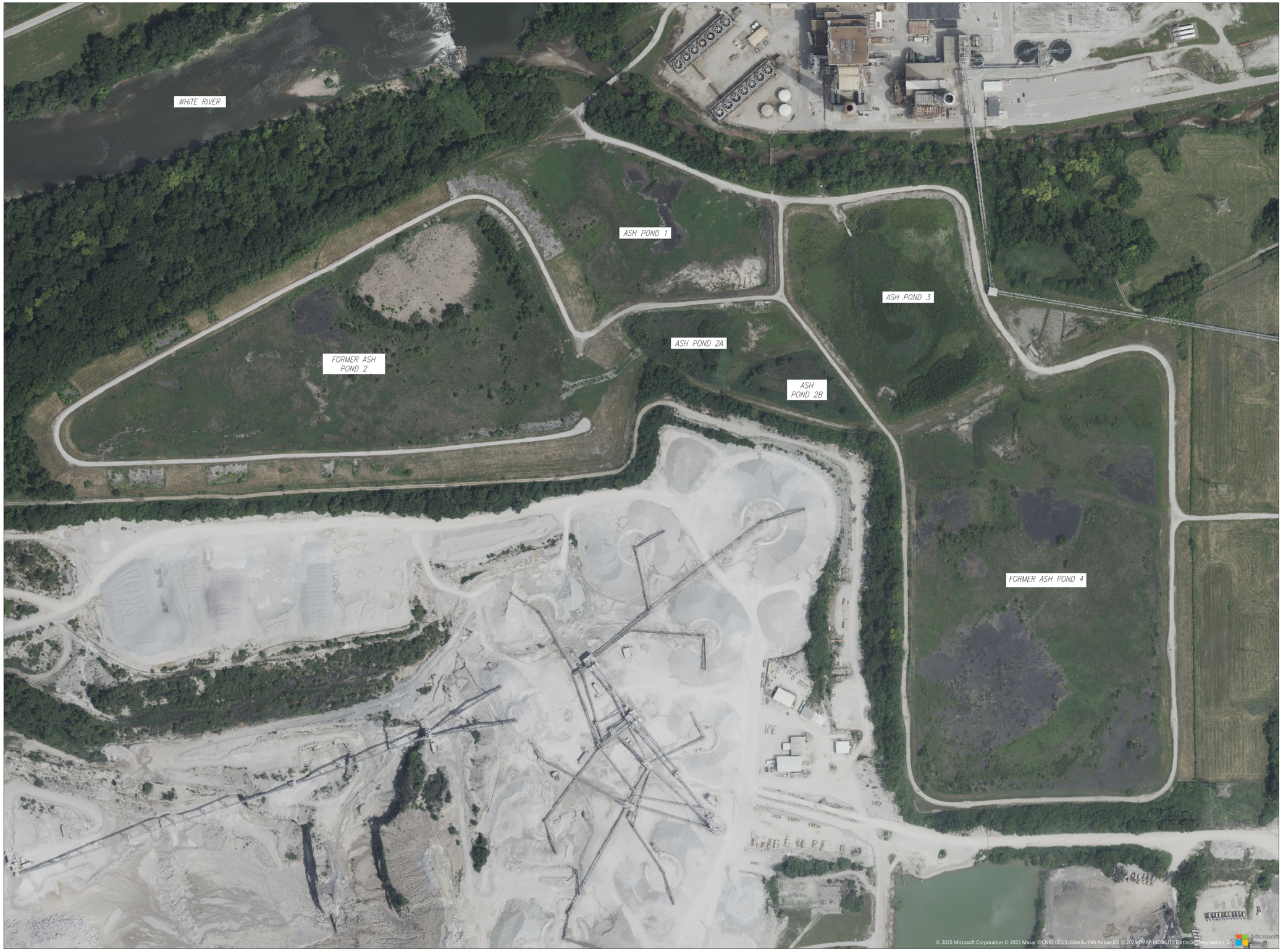

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CHECKED BY:	--
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AUTOCAD VER:	2025

PROJECT NUMBER

60747920

SHEET TITLE

ASH PONDS MAP

SHEET NUMBER

002

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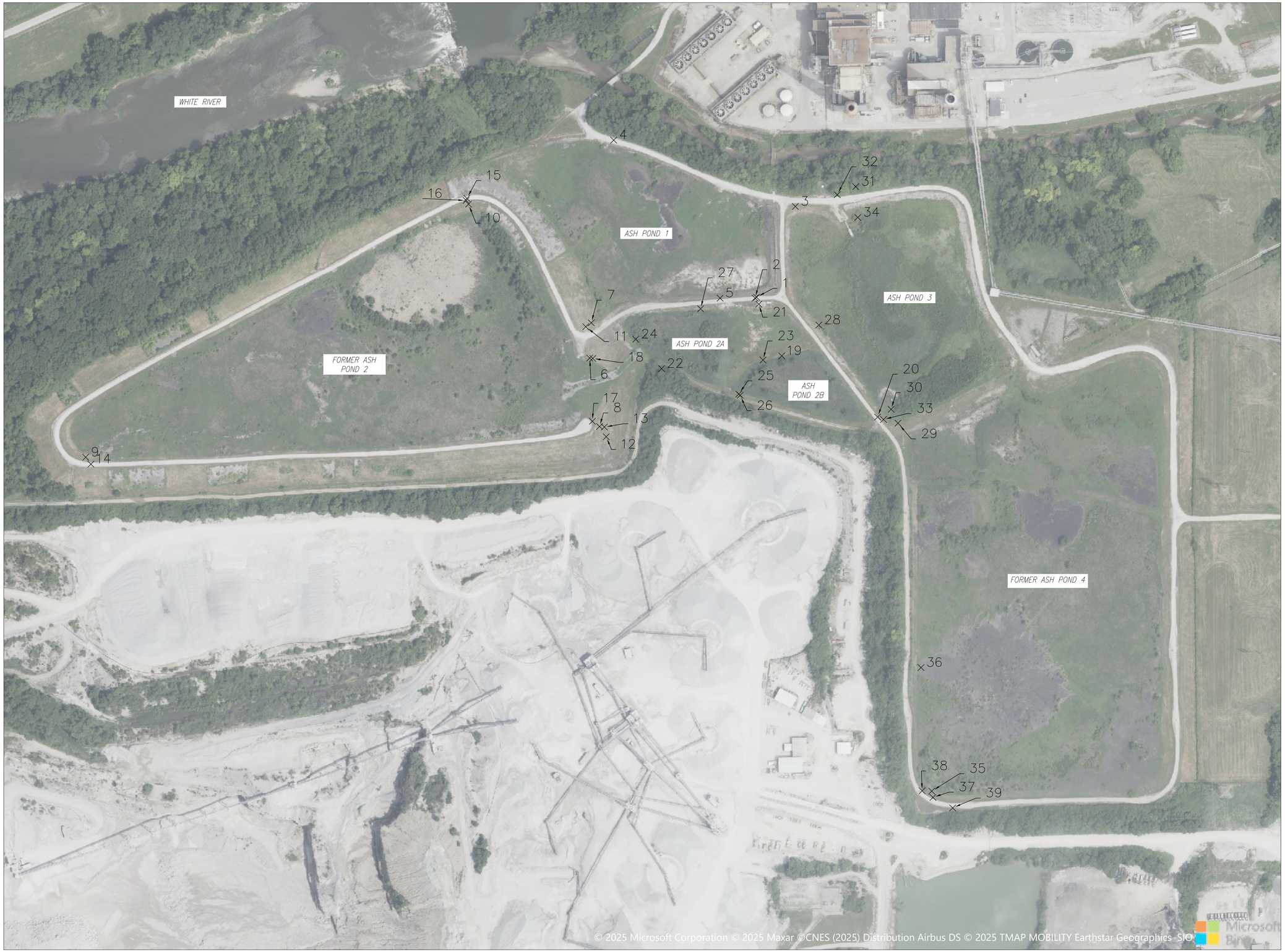

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PROJECT NUMBER

60747920

SHEET TITLE

OBSERVATION LOCATION MAP

SHEET NUMBER

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Project Management Initials: Designer: DMB Checked: BS/JDM Approved: JDM ARCH D 24" x 36"

Appendix B
Observation Photo Log

Photo 1	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 1		
Description: Facing Northeast, plant. No issues observed.		
Photo 2	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 1		
Description: Facing Southwest, pond overview. No issues observed.		

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Photo 3	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 1		
Description: Facing East, pond overview. No issues observed.		
Photo 4	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 1		
Description: Facing Southwest, pond overview. No issues observed.		

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Photo 5	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 1		
Description: Facing Northwest, power lines running through ponds. No issues observed.		
Photo 6	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 2		
Description: Facing South, dike breach. No issues observed.		

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Photo 7	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 2		
Description: Facing Southwest, plant and ponds overview. No issues observed.		
Photo 8	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 2		
Description: Facing East, pond overview. No issues observed.		

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Photo 9	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 2		
Description: Facing West, pond overview. No issues observed.		
Photo 10	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 2		
Description: Facing Northeast, pond overview. No issues observed.		

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Photo 11	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 2		
Description: Facing Southwest, pond overview. No issues observed.		
Photo 12	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 2		
Description: Facing Northeast, Slope to quarry. No issues observed.		

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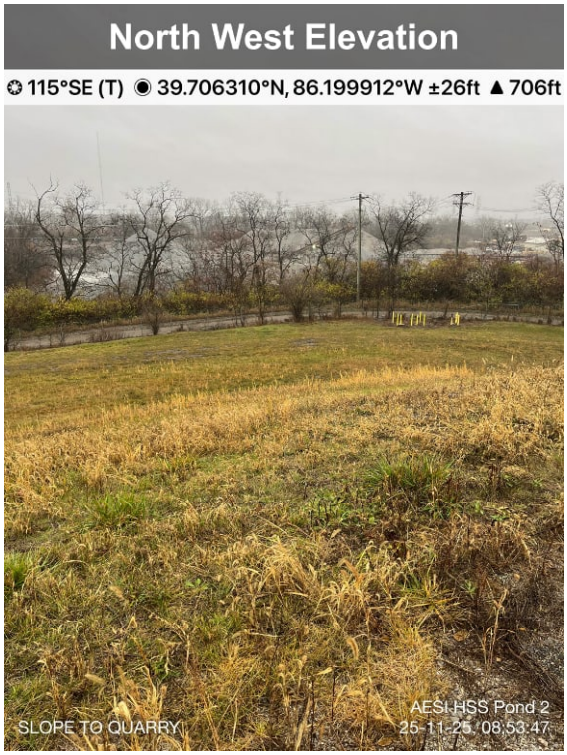
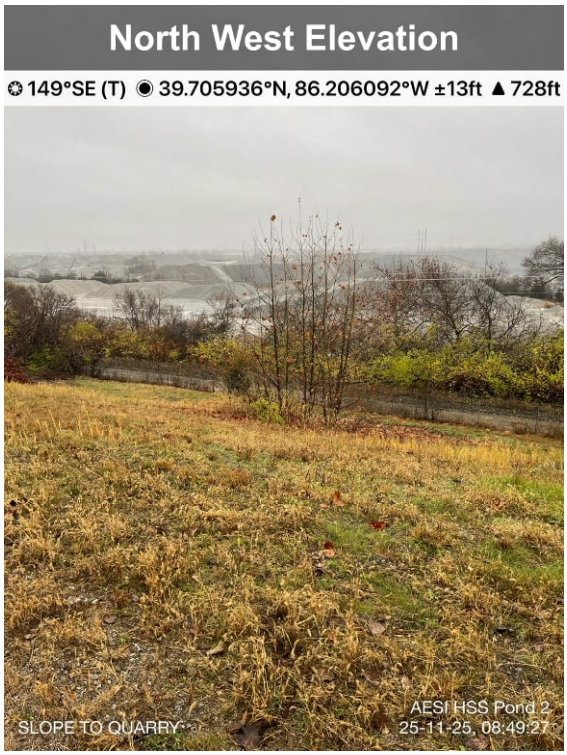
Photo 13	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 2		
Description: Facing Northwest, Slope to quarry. No issues observed.		
Photo 14	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 2		
Description: Facing Northwest, Slope to quarry. No issues observed.		

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Photo 15	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 2		
Description: Facing East, Slope to White River. No issues observed.		
Photo 16	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 2		
Description: Facing Southwest, Slope to White River. No issues observed.		

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Photo 17	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 2		
Description: Facing South, Stabilized berm near breach. No issues observed.		
Photo 18	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 2A/2B		
Description: Facing East, Stormwater channel from Former Pond 2 to 2A/2B. No issues observed.		

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Photo 19	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 2A/2B		
Description: Facing Northwest, (3) Corrugated metal pipes. No issues observed.		
Photo 20	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 2A/2B		
Description: Facing Southwest, Ash berms. Monitor berm erosion and repair as necessary.		

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Photo 21	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 2A/2B		
Description: Facing Southwest, Berm erosion. Monitor berm erosion and repair as necessary.		
Photo 22	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 2A/2B		
Description: Facing West, discharge channel. No issues observed.		

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Photo 23	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 2A/2B		
Description: Facing Northeast, discharge pipe. No issues observed.		
Photo 24	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 2A/2B		
Description: Facing Southwest, discharge pipe. No issues observed.		

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Photo 25	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 2A/2B		
Description: Facing Northeast, Transmission lines in ponds. No issues observed.		
Photo 26	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 2A/2B		
Description: Facing East, vegetation in pond. Monitor and remove vegetation as necessary.		

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Photo 27	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 2A/2B		
Description: Facing East, Ash berms. Monitor berm erosion and repair as necessary.		
Photo 28	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 3		
Description: Facing North, (3) Corrugated metal pipes. No issues observed.		

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Photo 29	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 3		
Description: Facing East, berm with culvert. No issues observed.		
Photo 30	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 3		
Description: Facing Northwest, culvert through ash berm. No issues observed.		

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Photo 31	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 3		
Description: Facing West, outfall to Lick Creek. No issues observed.		
Photo 32	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 3		
Description: Facing Southwest, outfall to Lick Creek. No issues observed.		

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Photo 33	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 3		
Description: Facing North, pond overview. No issues observed.		
Photo 34	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Ash Pond 3		
Description: Facing North, riser with valve. No issues observed.		

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Photo 35	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 4		
Description: Facing Northeast, pond overview. No issues observed.		
Photo 36	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 4		
Description: Facing East, pond overview. No issues observed.		

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Photo 37	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 4		
Description: Facing North, large vegetation in pond. Monitor and remove vegetation as necessary.		
Photo 38	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 4		
Description: Facing North, plant and pond overview. No issues observed.		

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Photo 39	Date: 11/25/2025	
Location: Harding Street Station, Indiana, Former Pond 4		
Description: Facing Northeast, south end vegetation. Monitor and remove vegetation as necessary.		

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