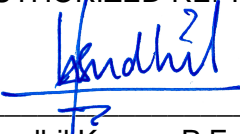


OPERATING RECORD

**Notification of Completion of Closure
Petersburg Generating Station
Ash Pond A / A'**

As required by 40 C.F.R. § 257.102(h), the undersigned, being a qualified professional engineer, as that term is defined under 40 C.F.R. § 257.53, hereby provides notification of the completion of closure of the referenced CCR Unit. The closure activities were completed in accordance with the CCR Closure Plan dated October 11, 2016, amended on June 20, 2020 (certified in accordance with 40 C.F.R. § 257.102(d)(3)(iii)) and the Closure Plan and modifications approved by the Indiana Department of Environmental Management. This notification includes the certification by a qualified professional engineer as required by § 257.102(f)(3).

AUTHORIZED REPRESENTATIVE:



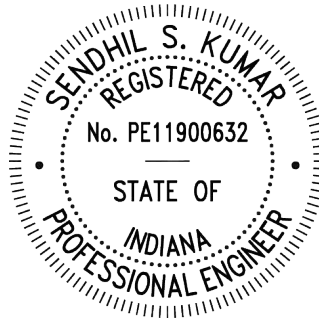
Sendhil Kumar, P.E.

DATE:

November 21, 2023

ADDRESS:

ATC Group Services LLC
7988 Centerpoint Drive, Suite 100
Indianapolis, Indiana 46256



CERTIFICATION STATEMENT
CLOSURE OF CCR UNIT WHEN LEAVING CCR IN PLACE
PETERSBURG GENERATING STATION
CCR UNIT: ASH POND A/A'

ATC Group Services LLC, ("Consultant") has been retained by the Indianapolis Power & Light Company d/b/a AES Indiana ("AES Indiana") to prepare the following certification verifying closure of Ash Pond A/A' at the Petersburg Generating Station. Closure of this CCR unit includes leaving CCR materials in place. The closure performance standard for CCR units in which CCR materials are left in place is described in Section 257.102(d) of the HAZARDOUS AND SOLID WASTE MANAGEMENT SYSTEM; DISPOSAL OF COAL COMBUSTION RESIDUALS FROM ELECTRIC UTILITIES; FINAL RULE, 40 C.F.R. Part 257, subpart D. Presented below are the basis of certification, limitations, and certification.

1.0 BASIS OF CERTIFICATION

40 C.F.R. §257.102(d)(3)(i) requires that the final cover system installed on CCR materials left in place be designed and constructed to meet the following criteria:

- (A) The permeability of the final cover system must be less than or equal to the permeability of any bottom liner system or natural subsoils present, or a permeability no greater than 1×10^{-5} cm/sec, whichever is less.
- (B) The infiltration of liquids through the closed CCR unit must be minimized by the use of an infiltration layer that contains a minimum of 18 inches of earthen material.
- (C) The erosion of the final cover system must be minimized by the use of an erosion layer that contains a minimum of six inches of earthen material that is capable of sustaining native plant growth.
- (D) The disruption of the integrity of the final cover system must be minimized through a design that accommodates settling and subsidence.

Pursuant to 40 C.F.R. §257.102(f)(3), the owner or operator of a CCR unit must obtain a certification from a qualified professional engineer verifying that closure has been completed in accordance with the closure plan specified in 40 C.F.R. §257.102(b) and the requirements of 40 C.F.R. § 257.102. Dewatering, stabilization, and placement of the final cover over the CCR unit were completed in accordance with the closure plan prepared by ATC as specified in 40 C.F.R. §257.102(b), dated October 11, 2016, and amended on June 20, 2020. Accordingly, it is the opinion of consultant that closure of Ash Pond A/A' has been completed in accordance with the requirements of 40 CFR §257.102.

2.0 LIMITATIONS

Consultant's certification is limited to certifying that the final cover placement over Ash Pond A/A' meets the requirements for closure of a CCR unit with CCR materials in place under the Disposal of Coal Combustion Residuals Final Rule under 40 CFR 257, Subpart D. The Consultant has been involved in placement of the final cover as part of the closure process and is familiar with activities associated with the installation of such covers. Consultant's certification is based on information provided to Consultant as of the date of this certification.

Any opinion or decisions by Consultant are made on the basis of Consultant's experience, qualifications, and professional judgment and are not to be construed as warranties or guaranties of any kind.

3.0 CERTIFICATION

I, Sendhil S Kumar, being a Registered Professional Engineer, in accordance with the Indiana Professional Engineer's Registration do hereby certify to the best of my knowledge, information, and belief, that the information contained herein is true and correct and has been prepared in accordance with generally accepted good engineering practices.

SIGNATURE 

DATE November 21, 2023

ADDRESS ATC Group Services LLC
7988 Centerpoint Drive, Suite 100
Indianapolis, IN 46256

