

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

September 8, 2024
File No. 0133274-041

TO: AES Indiana – Eagle Valley Generating Station

FROM: Haley & Aldrich, Inc.

SUBJECT: Semi-Annual Remedy Selection Progress Report Pursuant to 40 CFR §257.97(a)
Eagle Valley 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 Eagle Valley Generating Station (EVGS) on April 15, 2019, in response to statistically significant levels (SSL) of Appendix IV constituents (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 addition, an updated CMA Report for Ash Ponds A, B, and C was posted to the EVGS public CCR website on April 5, 2024.

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 conducted in support of selecting and designing a remedy during the period from March 12, 2024, through September 7, 2024. A summary of the progress 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 October 2023 sampling results from the CCR monitoring wells for the presence of Appendix IV constituents. No new Appendix IV constituents were identified at SSL above GWPS.
- Continued Assessment Monitoring: Collected groundwater samples from the CCR monitoring wells and evaluated the results of the April 2024 sampling event to ensure the reliability of the results. Final laboratory results were placed in the facility’s CCR operating record.
- Completed the statistical analysis of the April 2024 sampling results from the CCR monitoring wells for the presence of Appendix IV constituents. No new Appendix IV constituents were identified at SSL above GWPS.

- Following determination of the nature and extent (N&E) of the Appendix IV SSLs pursuant to § 257.95(g), groundwater samples were collected from the seventy-one (71) monitoring wells that constitute the site monitoring well network in April 2024 to monitor the horizontal and vertical extent of Appendix IV constituents.
- AESI posted an updated CMA Report for Ash Ponds A, B, and C to the EVGS public CCR website in April 2024. The updated CMA Report accounts for the supplemental information collected since 2019 which is sourced from additional monitoring data, groundwater N&E investigations, conceptual site model development, geochemical and site-specific investigations, groundwater modeling updates, and potential corrective measures evaluations.
- AESI held a public meeting in May 2024 to discuss the results of the updated CMA for Ash Ponds A, B, and C in accordance with §257.96(e).

PLANNED ACTIVITIES

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

- Evaluate the comments and input gained during the May 2024 public meeting and begin the selection of remedy evaluation process for Ash Ponds A, B, and C.
- Continue Assessment Monitoring by collecting groundwater samples in October 2024 from the site monitoring well network. The groundwater data will be evaluated for statistically significant levels compared to GWPS. Any new constituent that exceeds GWPS will be considered in selection of the final remedy.
- Evaluate the groundwater analytical data collected during the October 2024 semi-annual assessment monitoring sampling event that will include all site monitoring wells.
- 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.
- Continue to work with IDEM to gain approval of the November 2023 C&PC Plan for Ponds A, B and C.
- Provide a semi-annual progress report that summarizes AESI's progress and status regarding a selection of remedy.