

**40 CFR §257.102(f)(2)(i) Extension of Closure Timeframe
AESI Petersburg Type III Restricted Waste Landfill
April 12, 2025**

Indianapolis Power & Light Company d/b/a AES Indiana (AESI) hereby submits this notice of extension of the closure timeframe for the above-referenced coal combustion residuals (CCR) landfill as set out in 40 CFR 257.102(f)(2)(i). The project background, discussion of the extension of the closure timeframe, revised closure schedule, and certification are presented below.

1.0 BACKGROUND

AESI's Petersburg Generating Station Type III Restricted Waste Landfill is located about four miles north of the City of Petersburg in Pike County, Indiana, west of State Road 57. The Landfill was permitted to operate in 1983 by the Indiana Department of Environmental Management (IDEM) with a footprint of 80.1 acres. A permit modification was made in 1996 for a 43-acre expansion area east of the Landfill in anticipation of the receipt of additional CCR materials. A minor permit modification obtained in 2017 was made to revise the Landfill's design in undeveloped portions of the landfill to maintain the facility's readiness to receive CCR materials (and thereby continue the generating station's operations) if other off-site disposal locations ceased operation. However, in early 2023, AESI decided that the additional disposal space within the expansion area was no longer necessary. A permit modification and permit renewal were obtained from IDEM on April 23, 2024, which returned the Landfill's footprint to the original 80.1 acres. A Notification of Intent to Close for the Landfill was submitted on October 12, 2023. Construction of the landfill closure is scheduled to begin this month (April 2025). Further detail regarding the timeline of the Landfill's closure is presented below.

2.0 EXTENSION OF CLOSURE TIMEFRAME

40 CFR 257.102(f)(2)(i) provides:

The timeframes for completing closure of a CCR unit specified under paragraphs (f)(1) of this section may be extended if the owner or operator can demonstrate that it was not feasible to complete closure of the CCR unit within the required timeframes due to factors beyond the facility's control.

AESI placed in the facility operating record "Extension Request Documentation for "Idle" Units" on October 13, 2017, October 7, 2020, and October 1, 2021. This documentation indicated that while the landfill had only been operated within the original 80.1-acre permitted footprint, there was a potential need to dispose additional CCR materials in the 43-acre expansion area (permitted in 1994) that had not yet been constructed. The documentation further indicated that due to requirements contained in the CCR Rule, AESI had submitted a request for a minor permit modification to IDEM on October 6, 2017, to revise the design of the landfill to utilize a liner system, leachate collection system, and closure system compliant with the CCR Rule. In early 2023, AESI determined that the previously proposed 43-acre expansion area would not be needed and no further CCR materials would be disposed in the original footprint of the landfill. Thereafter, AESI placed in the facility operating record, a Notification of Intent to Close, dated October 12, 2023, in accordance with 40 CFR 257.102(g).

Under 40 CFR 257.102(f)(1)(i), closure of existing CCR landfills must be complete within six months of commencing closure activities. As such, commencement of closure activities occurred

on October 12, 2023. Before commencing these closure activities, AESI contracted with an engineering consultant (AECOM) to prepare the engineering documents required to submit a permit modification application to the IDEM. The permit modification application was submitted to IDEM on May 18, 2023, and requested elimination of the previously proposed 43-acre expansion area, reestablishment of the original 80.1-acre permitted landfill footprint and revisions to the final cover grades and final cover system. On March 22, 2024, AESI submitted a response to IDEM's request for additional information (RAI) and included an addendum to the permit modification application that included engineering design documents in support of a revised landfill closure cap design. IDEM approved the permit modification request and renewed the solid waste land disposal facility permit on April 23, 2024.

Immediately following receipt of IDEM's permit renewal and approval of the landfill closure design, detailed landfill closure design activities were initiated and construction bidding documents were prepared. In late 2024, AESI began procurement of closure construction materials and procured a construction contractor to perform the landfill closure construction in March 2025. Construction of the landfill closure is scheduled to begin in April 2025. It is because of the activities described in this timeline of events that it has not been feasible to complete the closure of the landfill within the required timeframe.

3.0 REVISED CLOSURE SCHEDULE

40 CFR 257.102(f)(2)(i) also provides:

If the owner or operator is seeking a time extension beyond the time specified in the written closure plan as required by paragraph (b)(1) of this section, the demonstration must include a narrative discussion providing the basis for additional time beyond that specified in the closure plan.

The Closure Plan Modification 1 (ATC, November 22, 2016) included in the facility's operating record identifies a 6 month construction schedule in accordance with 40 CFR 257.102(f)(1)(i). In the previous notice of extension of the closure timeframe (placed in the operating record on April 12, 2024), AESI provided a revised projected closure schedule indicating the landfill closure construction would be completed by December 2025. Now that the permit modification has been approved by IDEM, the necessary closure construction materials have been obtained and the construction contractor has been procured, AESI is in a better position to re-evaluate the duration required to successfully close the Petersburg Landfill. Following is a revised closure schedule for the Petersburg Landfill:

Table 1. Revised Closure Schedule for the Petersburg Landfill

Landfill Closure Activity	Anticipated Timeframe
IDEM Review and Approval of Closure Design and Permit Modification	May 2023 – April 2024
Detailed Design of Closure System	May – November 2024
Procurement of Construction Contractor	December 2024 – February 2025
Procurement of Construction Materials	October 2024 – March 2025
Construction: Earthwork and Subgrade Preparation	April – October 2025
Construction: Geosynthetics and Cover Materials Installation	May 2025 – December 2025
Construction: Stormwater Management Controls and Site Stabilization	August 2025 – February 2026
Certification of Closure by Professional Engineer	March 2026

4.0 CERTIFICATION

As required by 40 CFR 257.102(e)(2)(iii), AESI's undersigned authorized representative certifies the following:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."


REPRESENTATIVE'S SIGNATURE

4/10/2025

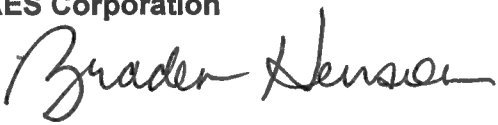
DATE

Mandy Snyder

REPRESENTATIVE'S NAME (TYPED)

If you have any questions regarding this submittal, please contact the undersigned at 812.601.7115.

Sincerely,
AES Corporation


Braden Henson
Environmental Compliance Team Leader

cc:
Pilar Cuadra (AES)
Gregory Ellis (AES)
David Heger (AES)
Jay D. Mokotoff (AECOM)