

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

September 3, 2025
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 Ponds A, B, and C

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 7, 2025, through September 2, 2025. 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:

- Continued Assessment Monitoring: Collected groundwater samples from the CCR monitoring wells and evaluated the results of the April 2025 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 2025 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 (70) monitoring wells that constitute the site monitoring well network in April 2025 to monitor the horizontal and vertical extent of Appendix IV constituents.

- AESI evaluated comments and input gained during the May 2024 public meeting and is continuing with the selection of remedy evaluation process for Ash Ponds A, B, and C.
- Collected and analyzed groundwater samples from select monitoring wells to assist in the understanding of discharge permitting requirements for future extracted groundwater.
- AESI began hybrid closure in place activities for Ash Ponds A, B, and C in accordance with the Closure/Post Closure Plan that was approved by Indiana Department of Environmental Management in January 2025.

PLANNED ACTIVITIES

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

- Continue Assessment Monitoring by collecting groundwater samples in October 2025 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 2025 semi-annual assessment monitoring sampling event that will include all site monitoring wells.
- Continue collection and analysis of groundwater samples from select monitoring wells to assist in the understanding of discharge permitting requirements for future extracted groundwater.
- Begin preparation of a Selection of Remedy Report in accordance with 40 CFR §257.97(a) that will include a schedule for implementing and completing remedial activities as required under 40 CFR §257.97(d).
- 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.
- Provide a semi-annual progress report that summarizes AESI's progress and status regarding a selection of a remedy.