

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

September 8, 2025
File No. 0133274-042

TO: AES Indiana – Harding Street Station

FROM: Haley & Aldrich, Inc.

SUBJECT: Semi-Annual Remedy Selection Progress Report Pursuant to 40 CFR §257.97(a)
Harding Street Station - Ash Pond System

Indianapolis Power & Light Company d/b/a AES Indiana (AESI) initiated corrective measures for the Ash Pond System at the Harding Street Station (HSS) on April 15, 2019, in response to statistically significant levels (SSL) of Appendix IV constituents (antimony, 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 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 completed in support of selecting and designing a remedy during the period from March 12, 2025, through September 7, 2025. A summary of the progress made 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 November 2024 and May 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.
- Continued Assessment Monitoring: Collected groundwater samples from the CCR monitoring wells and evaluated the results from the May 2025 sampling event to ensure the reliability of the results. Final laboratory results were placed in the facility's CCR operating record.
- 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 May 2025 to monitor the horizontal and vertical extent of Appendix IV constituents.
- Completed the N&E Report which provided a comprehensive summary of data evaluation and the groundwater conceptual site model (CSM).

- Completed an update of the CMA Report to account for the supplemental information collected since 2019.
- AESI posted an updated CMA Report for the Ash Ponds System to the HSS public CCR website in August 2025. The updated CMA Report accounts for supplemental information collected since 2019 which includes additional groundwater monitoring data, groundwater N&E investigations, CSM development, geochemical and site-specific investigations, groundwater modeling updates, and potential corrective measures evaluations.

PLANNED ACTIVITIES

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

- Prepare for and hold a Public Meeting to discuss the results of the updated CMA in accordance with §257.96(e).
- Evaluate the comments and input gained during the public meeting and begin the selection of remedy evaluation process.
- Continue Assessment Monitoring by collecting groundwater samples in November 2025 from the CCR monitoring wells. The groundwater data will be evaluated for statistically significant levels compared to GWPS. Any new constituents that exceed GWPS will be considered in selection of the final remedy.
- Complete the statistical analysis on the November 2025 sampling results from the CCR monitoring wells for the presence of appendix IV constituents.
- Continue sampling of onsite and offsite N&E wells (as necessary) which will support CMA and selection of remedy.
- 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.