

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

March 6, 2026
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 September 8, 2025, through March 5, 2026. 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:

- Continued assessment monitoring: Collected groundwater samples from the CCR monitoring wells and evaluated the results from the November 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 November 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 sixty-four (64) monitoring wells that constitute the site monitoring well network in November 2025 to monitor the horizontal and vertical extent of Appendix IV constituents.

PLANNED ACTIVITIES

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

- Continue assessment monitoring by collecting groundwater samples in May 2026 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.
- Continue sampling of onsite and offsite N&E monitoring wells (as necessary) which will support selection of remedy.
- Evaluate the comments and input gained during the public meeting and begin the selection of remedy evaluation process.
- 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.