

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

March 11, 2026  
File No. 0133274-043

TO: AES Indiana – Petersburg Generating Station

FROM: Haley & Aldrich, Inc.

SUBJECT: Semi-Annual Remedy Selection Progress Report Pursuant to 40 CFR §257.97(a)  
Petersburg Generating Station - Ash Pond System and Type III Restricted Waste Landfill

Indianapolis Power & Light Company d/b/a AES Indiana (AESI) initiated corrective measures for the Ash Pond System and Type III Restricted Waste Landfill (Landfill) at the Petersburg Generating Station (PGS) on April 15, 2019, in response to statistically significant levels (SSL) of Appendix IV constituents (lithium and molybdenum) exceeding Groundwater Protection Standards (GWPS). Pursuant to 40 CFR §257.96(a), a demonstration of the 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 26, 2025, through March 10, 2026. A summary of the progress made in selecting a remedy is provided below.

**SUMMARY OF ACTIONS COMPLETED**

Ash Pond System and Landfill

The following actions have been completed during this reporting period for the Ash Pond System and the Landfill:

- Continued assessment monitoring: Collected groundwater samples from the CCR monitoring wells and evaluated the results of the November 2025 sampling event to ensure the reliability of the results. Final laboratory results were placed in the facility’s CCR operating record.
- Began statistical analysis of the November 2025 sampling results from the CCR monitoring wells for the presence of Appendix IV constituents.
- Completed the nature and extent (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 and Landfill to the PGS public CCR website in December 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.
- AESI held a public meeting in January 2026 to discuss the results of the updated CMA for the Ash Ponds System and Landfill in accordance with §257.96(e).

#### Ash Pond System

The following actions have been completed during this reporting period for the Ash Pond System:

- Following determination of the N&E of the Appendix IV SSLs pursuant to § 257.95(g), groundwater samples were collected from the eighty (80) monitoring wells that constitute the Ash Pond System monitoring well network in November 2025 to monitor the horizontal and vertical extent of Appendix IV constituents.

#### Landfill

The following actions have been completed during this reporting period for the Landfill:

- Following determination of the N&E of the Appendix IV SSLs pursuant to § 257.95(g), groundwater samples were collected from the seventeen (17) monitoring wells that constitute the Landfill monitoring well network in November 2025 to monitor the horizontal and vertical extent of Appendix IV constituents.
- Groundwater samples were collected from the two (2) bedrock monitoring wells (MW-1A and MW-12A) in November 2025. The wells are intended to supplement existing background well MW-1.
- AESI continued installation of a low-permeability capping system at the Landfill in accordance with the Solid Waste Land Disposal Facility Permit Renewal that was approved by Indiana Department of Environmental Management in April 2024.

### **PLANNED ACTIVITIES**

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

- Complete the statistical analysis on the November 2025 sampling results from the CCR monitoring wells for the presence of Appendix IV constituents.
- Complete installation and certification of the low-permeability capping system at the Landfill.
- 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 select N&E monitoring wells (as necessary) which will support selection of remedy.
- Collect a surface water sample within the White River downgradient of the Ash Pond System.
- 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 remedy.