

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

September 7, 2026
File No. 0133274-048

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 addition, an updated CMA Report was posted to the PGS public CCR website on December 12, 2025.

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 11, 2026, through September 6, 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 Spring 2026 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 Spring 2026 sampling results from the CCR monitoring wells for the presence of Appendix IV constituents.
- Collected a surface water sample within the White River on August 14, 2026. Sampling was performed in accordance with the Indiana Department of Environmental Management

approved *Groundwater Nature and Extent Investigation Surface Water Sampling and Analysis Plan*.

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 sixty-five (65) monitoring wells that constitute the Ash Pond System monitoring well network during the Spring 2026 sampling event 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 during the Spring 2026 sampling event 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) during the Spring 2026 sampling event. The wells are intended to supplement existing background well MW-1.
- AESI completed 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 Spring 2026 sampling results from the Ash Pond System and Landfill CCR monitoring wells for the presence of Appendix IV constituents.
- Continue assessment monitoring by collecting groundwater samples in November 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.
- Continue evaluation of comments and input gained during the public meeting and advance 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.