

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

March 13, 2020  
File No. 129342

TO: Indianapolis Power & Light Company

FROM: Haley & Aldrich, Inc.

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

The Indianapolis Power & Light Company (IPL) initiated corrective measures for the Ash Pond System at the Eagle Valley Generating Station (EVGS) on April 15, 2019 in response to a statistically significant level (SSL) of an Appendix IV constituent 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.

Following completion of the CMA, IPL 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 to prepare a semi-annual report describing the progress in selecting and designing the remedy. This report constitutes the first semi-annual remedy selection progress report and is comprised of activities during the period of September 13, 2019 through March 13, 2020. A summary of the progress in selecting a remedy is provided below.

**SUMMARY OF ACTIONS COMPLETED**

The following actions have been completed during this reporting period:

- Efforts to determine the nature and extent (N&E) of the Appendix IV SSLs continued pursuant to § 257.95(g). Groundwater samples were collected from the N&E monitoring wells in September 2019. The analytical results will be used to supplement and enhance the evaluation of the extent of groundwater impacts and assessment of corrective measures. Groundwater characterization of the N&E monitoring wells is ongoing; and
- Pressure transducers continued to be used/monitored for collection of groundwater elevations from select monitoring wells located around the Ash Pond System to provide additional data to support the groundwater conceptual site model (CSM).

## PLANNED ACTIVITIES

Anticipated activities for the upcoming six months include the following:

- Continue efforts to establish N&E:
  - Install three (3) N&E nested monitoring wells (shallow, intermediate, deep) on the adjacent properties located south of the EVGS to confirm whether Appendix IV constituents have migrated off-site, and if so, better define the lateral extent of those constituents;
  - Evaluate the groundwater analytical data collected during the May 2020 semi-annual sampling event that will include any new N&E monitoring wells;
- Continue the use of pressure transducers for collection of groundwater elevations from select monitoring wells located around the Ash Pond System to provide additional data to support the CSM;
- As appropriate, refine CSM and associated groundwater modeling;
- Continue to perform an engineering review of the three (3) potential CMA alternatives. For these reviews, emphases will be placed on understanding and reacting to impacts of newly gathered analytical results, identifying and researching applicability of emerging technologies and their impacts on the selection of remedy process; and
- Provide a semi-annual progress report that summarizes IPL's progress and status regarding a selection of remedy.