

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

September 14, 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 second semi-annual remedy selection progress report and is comprised of activities during the period of March 14, 2020 through September 12, 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:

- Continued Assessment Monitoring: Evaluated the results of the May 2020 sampling event and any GWPS exceedances. Final laboratory results were placed in the facility’s CCR operating record. The groundwater monitoring data is being evaluated for statistically significant exceedances and compared to GWPS. Any new parameters that exceed GWPS will be considered in selection of the final remedy.
- 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 May 2020. The analytical results will be used to supplement and enhance the evaluation of the extent of groundwater impacts, assessment of corrective measures, and selection of remedy. Groundwater characterization of the N&E monitoring wells is ongoing;
- Pressure transducers continued to be used/monitored for collection of groundwater elevations from select monitoring wells located around the Ash Pond System through March 2020. This

information provided additional data to support the groundwater conceptual site model (CSM); Performed sampling of the facility's production wells and internal wastewaters in order to support CMA and selection of remedy;

- Continued groundwater pumping of the existing production wells required for the operation of Eagle Valley Combined Cycle Gas Turbine (EVCCGT) natural gas plant that hydraulically controls the migration of the contamination plume;
- Indiana Department of Environmental Management (IDEM) continued to review the Ash Pond System Closure Plan / Post Closure Plan; and
- Continued negotiations with adjacent property owners in an effort to gain access for the installation of three (3) N&E nested monitoring wells to determine the extent of the contamination plume.

PLANNED ACTIVITIES

Anticipated activities which will support CMA and selection of remedy for the upcoming six months include the following:

- Continue efforts to establish N&E which will support CMA and selection of remedy:
 - 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, clearly define the lateral extent of those constituents;
 - Evaluate the groundwater analytical data collected during the November 2020 semi-annual assessment monitoring sampling event that will include any new N&E monitoring wells;
- 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 CMA and selection of remedy process;
- Perform sampling efforts related to facility's production wells and wastewater outfall discharge in order to support CMA and selection of remedy; Anticipate receipt of IDEM approval of Ash Pond System Closure Plan / Post Closure Plan. Implementation of the Closure Plan (cap system installation) would reduce infiltration of precipitation to groundwater thereby isolating the source material;
- 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;
- Possibly schedule and hold Public Meeting to discuss the results of the CMA in accordance with §257.96(e); and
- If needed, provide a semi-annual progress report that summarizes IPL's progress and status regarding a selection of remedy.