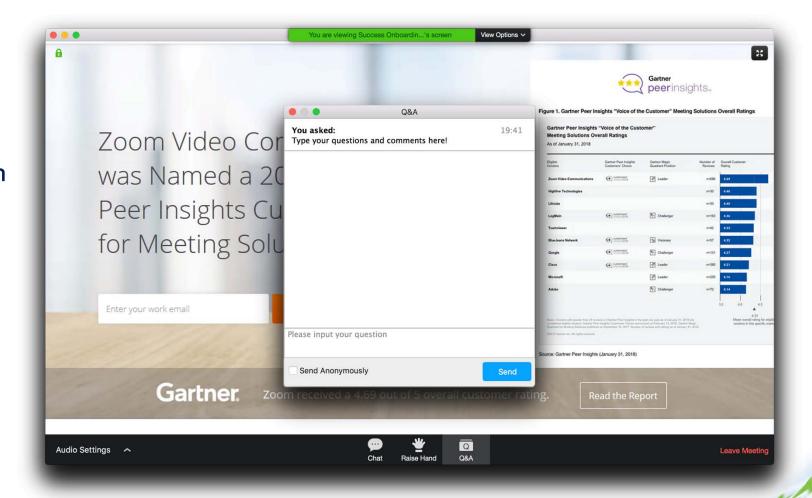


IPL EAGLE VALLEY ASH POND CLOSURE PLAN PUBLIC MEETING Indianapolis Power & Light Company

December 9, 2020



Participating in Today's Webinar





AGENDA

Topic	Presenter
IPL Overview	Justin Sufan, IPL Director, Regulatory & RTO Policy
IPL Eagle Valley	Kevin Cook, IPL Plant Manager
Environmental Regulations	Angelique Collier, IPL Director of Environmental Affairs
Eagle Valley Ash Pond	Tom Dehlin, Sargent & Lundy
Closure Plan	Professional Engineer
IDEM Public Process	Angelique Collier, IPL Director of Environmental Affairs
Comments & Questions	



IPL OVERVIEW

Justin Sufan, IPL

Director, Regulatory & RTO Policy







IPL BY THE NUMBERS

- Over 500,000 customers
- Approximately 1,500 employees
- Approximately 11,400 miles of transmission, distribution and underground lines
- Total power generation capacity of 3,500+MW
- Merged in 1927 from Indianapolis Light and Heat Company & Merchant's Heat and Light Company into Indianapolis Power & Light Company, located in the Electric Building in downtown Indianapolis
- Became part of The AES Corporation in 2000







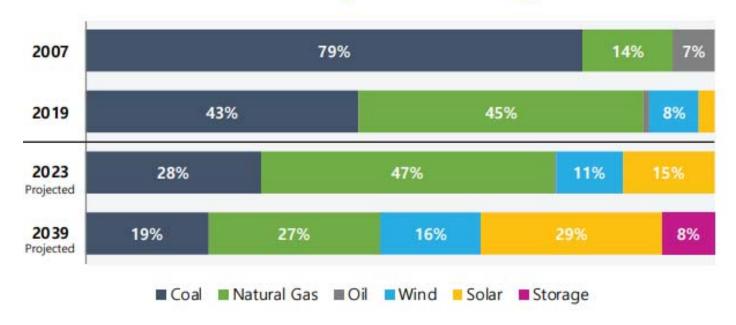
IPL SERVICE TERRITORY & RESOURCES





IPL RESOURCE MIX

IPL has been a leader in moving toward cleaner energy resources.



Resources based on maximum summer rated capacity for thermal units and nameplate capacity for wind and solar. Includes both owned assets and those under long-term power purchase agreements. The 2039 projections are based on IPL's most recent Integrated Resource Plan and are subject to change.



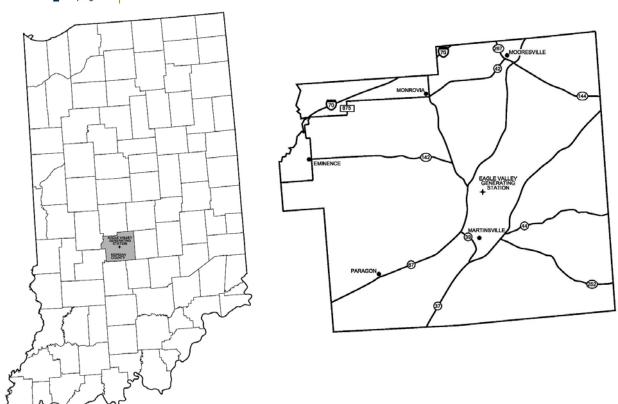
IPL EAGLE VALLEY

Kevin Cook, IPL

Plant Manager



EAGLE VALLEY GENERATING STATION

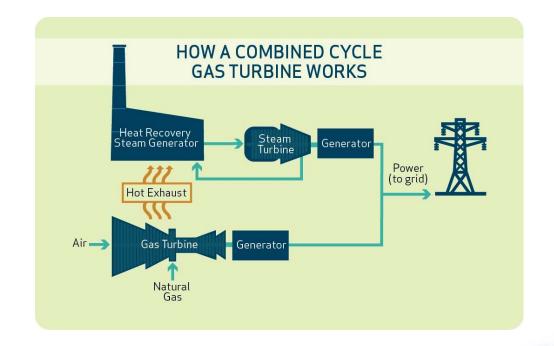






IPL EAGLE VALLEY GENERATING STATION

- Located in Martinsville, IN
- Stopped coal use and coal combustion residuals (CCR) production in April 2016
- CCGT commercial operation began in 2018
- Significant reductions in air emissions





ENVIRONMENTAL REGULATIONS

Angelique Collier, IPL

Director of Environmental Affairs



APPLICABLE ENVIRONMENTAL REGULATIONS SUMMARY - STATE AND FEDERAL

- 329 IAC 10 Solid Waste Land Disposal Facilities
 - Groundwater monitoring requirements
 - Closure specifications for existing ash ponds in Indiana
 - Written closure plan detailing steps to close ash ponds is required (submitted and pending IDEM approval)
 - Closure Plan Public Meeting
 - Incorporates requirement of EPA's CCR Rule
- 40 CFR 257, Subpart D Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments
 - Groundwater monitoring requirements
 - Corrective Measures Assessment (published in 2019)
 - Nature and Extent Evaluation (ongoing)
 - Public Meeting (future)
 - Selection of Groundwater Remedy (future following public meeting)
 - o Public CCR Website: https://ccr-eaglevalley.com



EAGLE VALLEY ASH POND CLOSURE PLAN

Tom Dehlin, Sargent & Lundy

Professional Engineer (P.E.)



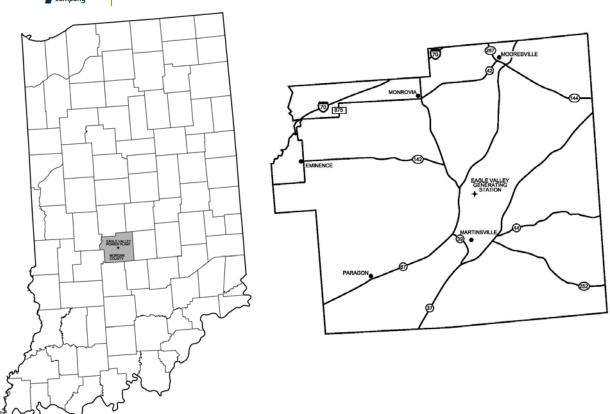


- Eagle Valley Generating Station
- Eagle Valley Ash Ponds



EAGLE VALLEY GENERATING STATION

Sargent & Lundy

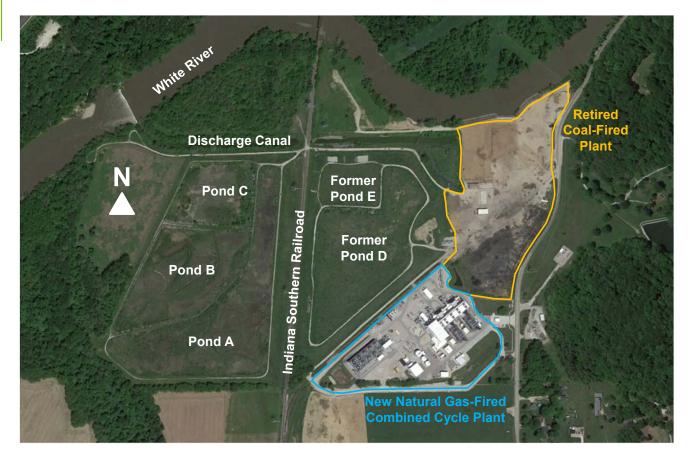






EAGLE VALLEY GENERATING STATION

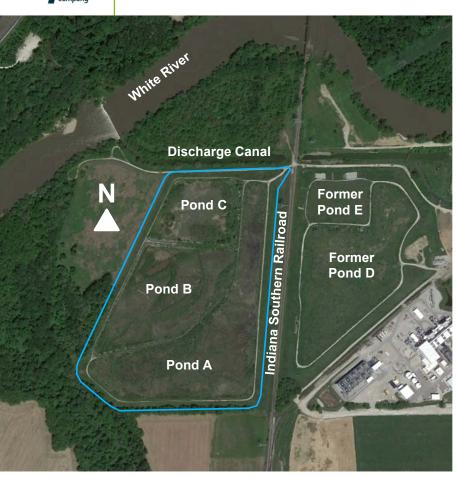
Sargent & Lundy











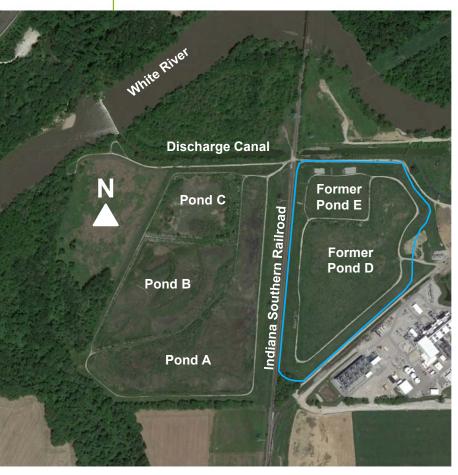
Ponds A, B, & C:

- Until 2016: Managed ash sluice water, low volume wastewater, and other approved wastewaters including stormwater
- After 2016: Managed primarily low volume wastewater and other approved wastewaters including stormwater
- April 2019: Last receipt of waste
- Regulated by EPA CCR Rule and IDEM solid waste disposal rules



EAGLE VALLEY ASH PONDS





Former Ponds D & E:

- Primarily managed ash sluice water and low volume wastewater
- Liquid-free as of October 16, 2015
- Regulated by IDEM solid waste disposal rules



IPL'S CLOSURE PLAN



- Closure Method
- Closure Design
 - Final Cover System
 - Stormwater Control
 - Local Ash Removal





CLOSURE METHOD



All five ash ponds will be closed by the Closure in Place method:

- Leaving the CCR in place
- Installing a highly impermeable final cover system

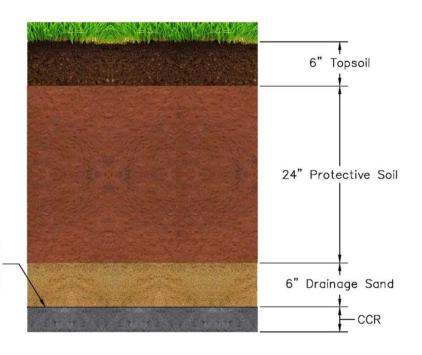
Two separate final cover systems will be installed: an east system and a west system.

Ash in Pond A in potential contact with the seasonal-high groundwater table will be removed and replaced with native soil fill.



CLOSURE DESIGN: FINAL COVER SYSTEM





Final cover system (cap) is designed to:

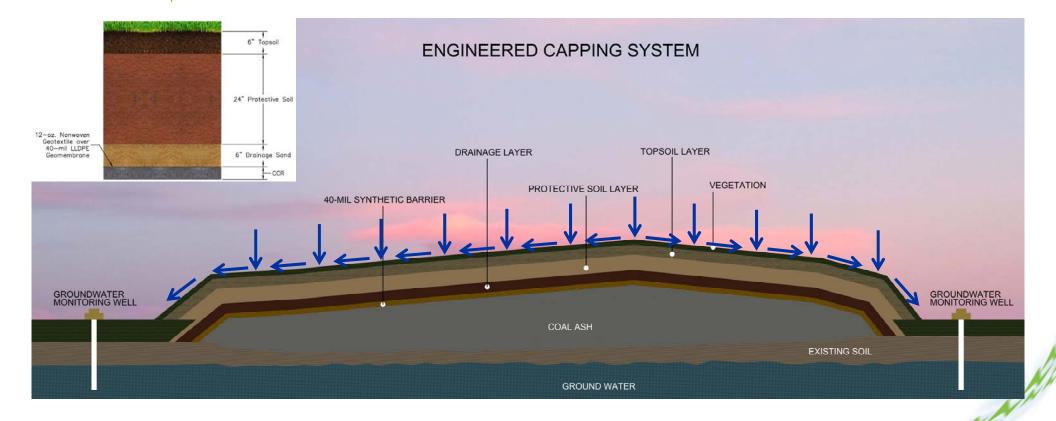
- Minimize seepage of stormwater through the cap into CCR,
- Prevent future ponding of liquids,
- Minimize erosion of the cap, and
- Accommodate settling/movement.

12-oz. Nonwoven Geotextile over 40-mil LLDPE Geomembrane



CLOSURE DESIGN: STORMWATER CONTROL







CLOSURE DESIGN: STORMWATER CONTROL







CLOSURE DESIGN: STORMWATER CONTROL







IMPLEMENTATION SCHEDULE



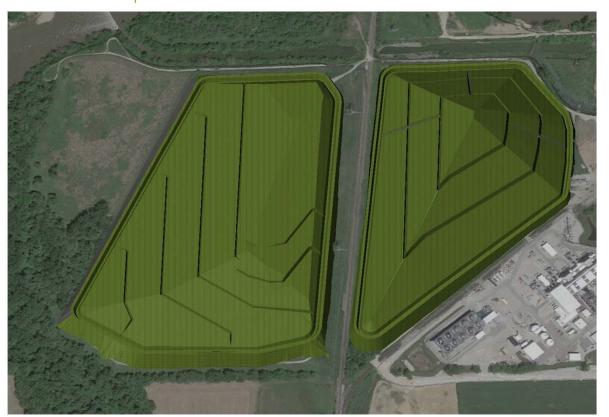


- 2021: Obtain Necessary Approvals and Permits to Proceed with Closure
- 2021-2022: Dewater (if Necessary), Stabilize, Remove Vegetation, & Consolidate Ash Ponds
- 2023-2024: Install Final Cover Systems
- 2024: Certify Closure & Commence Post-Closure Care Program



POST-CLOSURE CARE PROGRAM





IPL will conduct post-closure care of the Eagle Valley ash ponds for at least 30 years:

- Final cap maintenance
- Semiannual inspections
- Groundwater monitoring

IPL will record a notation on the property deed that will prohibit any disruption to the final cover systems without approval by IDEM.



IDEM PUBLIC PROCESS

Angelique Collier, IPL

Director of Environmental Affairs



IDEM PUBLIC PROCESS - COMMENT SUBMITTAL

- The ash pond closure plan is located at:
 - o Morgan County Public Library Martinsville Branch: 110 S. Jefferson Street, Martinsville, Indiana 46151; and
 - o IDEM Virtual File Cabinet https://vfc.idem.in.gov/DocumentSearch.aspx Document ID 82928191
- All comments are due 30 days after the public meeting
- Comments to be addressed to *John Hale* the Solid Waste Permit Manager assigned to IPL Eagle Valley at jhale@idem.in.gov and the following address:

John Hale, Permit Manager
Indiana Department of Environmental Management
Office of Land Quality, Solid Waste Permit
IGCN 1101, 100 North Senate Avenue
Indianapolis, IN 46204-2251

- Questions may be directed to John Hale at jhale@idem.in.gov
- When IDEM makes a final decision about the ash pond closure plan, a Notice of Decision will be mailed to landowners within one mile of the facility and individuals who submitted comments or requested notification
- IDEM's IPL Eagle Valley Generating Station Surface Impoundment Closure Fact Sheet is available at: https://www.in.gov/idem/files/factsheet_olq_permits_ipl_eagle_valley.pdf