SCS ENGINEERS

February 17, 2016 File No. 25211357.32

Ms. Jennifer Hatfield, PE Indianapolis Power & Light Harding Street Generating Station 3700 South Harding Street Indianapolis, IN 46217-3333

Subject: 2015-2 Dike Inspection-Harding Street Generating Station Ash Pond Facilities

Dear Ms. Hatfield:

SCS Engineers (SCS) is pleased to submit this dike and pond inspection report for the Indianapolis Power & Light (IPL) Harding Street Generating Station Ash Pond Facilities. Mr. David M. Hendron, PE, of SCS made the inspection and prepared this report. This report presents a Summary of Visual Observations, and Conclusions and Recommendations. Mr. Hendron performed the inspection, and a presentation summarizing the findings was given to IPL on November 11, 2015.

At the Harding Street Generating Station there are several active ash disposal ponds identified by number. The ash ponds inspected were Pond 1; Ponds 2A and 2B; and Pond 3. The general location of each is given on **Figure 1**. The inspections were performed by Ms. Jennifer Hatfield of IPL and Mr. Hendron. The weather during the inspection was cloudy and cool. Results of the inspection were discussed with Ms. Hatfield at the conclusion of the inspection. A brief summary of the findings was prepared and given to the attendees at the meeting after the completion of the field inspection.

SUMMARY OF VISUAL OBSERVATIONS

The IPL Dike Field Review Checklist form was completed to document the results of the inspection. The completed form is given in **Attachment A** to this letter report. The photographs taken during the inspection of all of the ponds are in **Attachment B**. A summary of our visual observations follows.

Flow Pipes Between Ponds

The observations at the time of the inspection and the inventory shows that all flow pipes between the active ash ponds are in satisfactory condition. Pond 1 was active during this inspection, handling ash and FGD slurry streams from plant operations.

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Future slurry waste processing operations at the plant will use Pond 1 (primary sedimentation), Pond 2A/B (secondary sedimentation), and Pond 3 (tertiary sedimentation).

Pond 1

- 1. Pond 1 continues to be used as the primary sedimentation basin for ash handling at the plant and will remain so for the foreseeable future. Pond 1 dredging was discussed in the previous inspection report (15-1).
- 2. The low area on the west end of the North dike of Pond 1 that was filled to increase the level of the rest of Pond 1 since the 14-2 inspection appeared to be in good condition.

Ponds 2A and 2B

- 1. Ponds 2A and 2B were being used for ash processing at the time of the inspection and appear to continue to be in satisfactory condition. Previous repairs to the exterior dikes for these ponds continue to appear to be in satisfactory condition.
- 2. Ponds 2A and 2B water levels were reasonably low at the time of the inspection.
- 3. The west end of intermediate dike between Ponds 2A and 2B was breached by excavation to allow flow between the two formerly separated pond areas. The newly created pond will be identified as Pond 2A/B in the future.
- 4. There appears to be some erosion of the South perimeter dike of Pond 2A/B where the breach was excavated. This erosion should be repaired by placement of suitably designed rip-rap as soon as practical. An alternate may be to excavate a breach somewhere internal on the dike separating Ponds 2A and 2B and filling the breach created at the westernmost point of this dike.

Pond 3

- 1. Pond 3's location is shown on **Figure 1**. During the inspection, this pond was being actively used as a tertiary settling basin for ash, and slurry-handling activities at the plant. Given the decommissioning activities described earlier for Pond 2, Pond 3 will also be required to handle tertiary sedimentation of all storm water flows from Pond 2.
- 2. There does not appear to be any hydrologic or hydraulic calculations to support the diversion of surface water flows from Pond 2 into Pond 3.
- 3. The completed repairs to the discharge pipe from Pond 3 to Lick Creek continued to appear to be in satisfactory condition.
- 4. The water level in Pond 3 was about normal at the time of the inspection. There was discharge from Pond 3 to Lick Creek at the time of the inspection.

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5. It was possible to observe seepage conditions on the downstream slope of the Northern perimeter dike of Pond 3. There were no observations of seepage or instability of the area during this inspection.

CONCLUSIONS AND RECOMMENDATIONS

Flow Pipes Between Ponds

The flow of fluids between all active ponds was observed to be occurring on a satisfactory basis during this inspection. We recommend that the flow conditions be a specific observation during all future inspections and that the inventory be updated on an annual basis. If the inspection or inventory indicate flow conditions are damaged or obstructed, we recommend repairs be made immediately.

There have been significant changes to the flow between ponds since the last inspection. There have been no calculations provided to document the design of the excavation features created to make these changes or to document the hydraulic and hydrologic conditions that will arise during storm water flows into the active ponds. We recommend that these calculations be provided as soon as practical.

Staff Gages in Ponds

IPL has installed staff gages in all ponds at the Harding Street Generating Station. Water levels in the ponds are being documented during each weekly inspection by IPL staff. It is recommended that IPL document the algorithm used to calculate the water level in each pond and that the water level be documented each time that IPL makes a staff gage reading.

Pond 1

1. There are no recommendations for Pond 1 at this time.

Ponds 2A and 2B

1. There appears to be some erosion of the south perimeter dike of Ponds 2A/B where the breach was excavated. This erosion should be repaired by placement of suitably designed rip-rap as soon as practical. An alternate may be to excavate a breach somewhere internal on the dike separating Ponds 2A and 2B and filling the breach created at the westernmost point of this dike.

Pond 3

- 1. The downstream slope of Pond 3 appeared stable at the time of the inspection.
- 2. The recommended repair of the discharge pipe from Pond 3 into Lick Creek contained in the 12-1 Inspection Report continued to appear to be in satisfactory condition.

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3. There does not appear to be any hydrologic or hydraulic calculations to support the diversion of surface water flows from Pond 2 into Pond 3. It is recommended that these calculations be made as soon as possible and that alterations to Pond 3 be made as necessary to provide the necessary freeboard and stability.

SCS appreciates the opportunity to perform this inspection and looks forward to assisting IPL in future inspection of their ash disposal facilities. If you have any questions with regard to this report, please do not hesitate to contact me at (312) 286-9397.

Sincerely,

David M. Hendron, PE Indiana PE 10000050 SCS ENGINEERS

DMH/AJV

Enclosures: Figure 1 – Site Plan

Attachment A – IPL Dike Field Review Checklist Form

Attachment B – Photographs

I:\3573\Inspection Reports\Harding Street - 15-2 Inspection Report\Final\Inspection_Report_Text_15-2 - Ponds 1, 2a, 2b, and 3 - final.doc

FIGURE 1

Site Plan

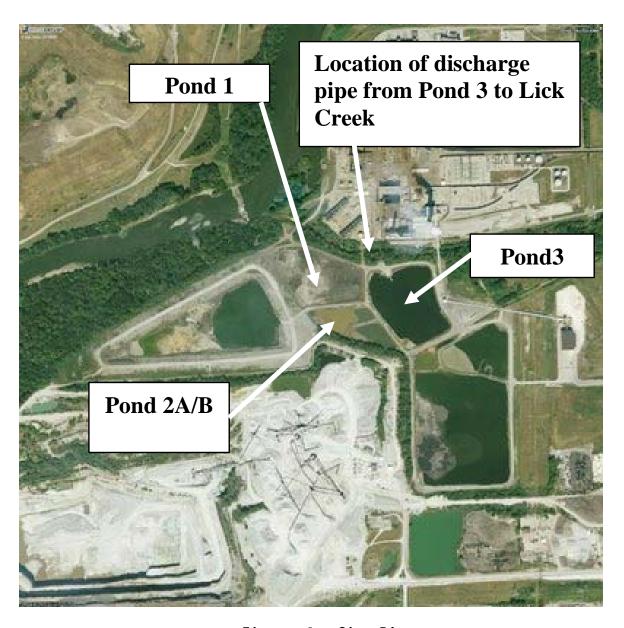


Figure 1. Site Plan

ATTACHMENT A

IPL Dike Field Review Checklist Form

IPL Dike Field Review Checklist-Inspection 15-2 - Harding Street Station

1)	Complete all Portions of this Section (Pre-review)
-,	Date of Review: November 11, 2015
	Name of Dike: Ash Ponds 1, 2A, 2B, and 3 Project Number: 25211357.32
2)	Review Inventory – Highlight missing information (Pre-review)
•	Owner(s) Name(s): Indianapolis Power & Light Company (IPL)
	Address: 3700 South Harding Street
	City: Indianapolis State: Indiana Zip (+4) 46217-3333
	Telephone (Home): Telephone (Work): 317-261-3603
	Contact Person: Ms. Jennifer Hatfield and Mr. Juan Hummel
	Designed By: IPL
	Constructed By: IPL
	Year Completed: Various Plans Available (Yes, No) (Location): For some of the dikes
	Purpose of Dike: Ash processing
	Age of Dike: Various
3)	General Information
	Mowing (times per year): Twice
	Prior problems (wet areas, erosion, slides): Specified in previous inspection reports.
	All significant prior problems specified in previous inspection reports have been corrected.
Rep	air or modification (what & when): Installation of the staff gages is completed in all ponds.
	Failure/Incident/Breach (max. pool): None
	Downstream hazard status (recent changes): None since last inspection.
	Dike Embankment Material: These are given for each of the ash ponds in the action plan report
	submitted in April 2012.
	Slope Erosion Control:
4)	Field Information (while at site)
4)	Pool Elevation (during review): Pond water levels for Pond 1, Pond 2A/B and Pond 3 at the
doc	ign water levels for these ponds.
<u>ues</u>	Site Conditions (temp., weather, ground moisture): Sunny and cool
	one conditions (temp., weather, ground moisture). Summy and cool
	Review Party: Mr. Dave Hendron, Ms. Jennifer Hatfield, Mr. Juan Hummel. Review party
	briefed on results of the inspection after completion.
	witered on troduction independent actor completions

X

5)	INSIDE SLOPES Gradient: Horizontal: <u>Varies from about 2.5 to 3.0</u> Vertical: <u>1.0</u> (est. meas.)
	x VEGETATION [no problem] Trees: Quantity: (<5, sparse, dense) Diameter: (<6", 6-12", >12") Location: Notes:
	□ Brush: Quantity: (spare, dense) Location: Notes:
	Ground Cover: Type: (grass, crown vetch) Other: Quantity: (bare, sparse, adequate, dense) Appearance: (too tall, too short, good) Notes:
	x SLOPE PROTECTION [no problem, could not inspect thoroughly] None Riprap: Average Diameter: (adequate, sparse, displaced, weathered, vegetation) (bedding/fabric noted-yes, no) Notes:
	□ Wave Berm: Vegetation: (adequate, bare, sparse, improper vegetation) Notes:
slop	x Other: Slope protection continues present on all of the perimeter inside es for all of the ponds where required by the observance of previous active erosion. Notes:
	x□ EROSION [no problem, could not inspect thoroughly] □ Wave Erosion (beaching): Scarp: Length: Height: Location: Notes_
	□ Runoff Erosion (Gullies): Quantity: Depth: Width: Length: Location: Notes/Causes:
	x INSTABILITIES [no problem, could not inspect thoroughly] Slides: Transverse Length: Longitudinal Length: Location: Location: Depth: Notes/Causes
	□ Cracks: □ Transverse □ Longitudinal □ Other Quantity: Length: Width: Depth: Location: Notes/Causes:

{Inside Slope, Crest, Outside Slope, Outlet/Inlet Structures, Pond Drain}

		Required Action
	□ Cracks: □ Transverse □ Longitudinal □ Other Quantity: Length: Width: Depth: Location: Notes/Causes:	None □ Monitor □ Maintenance □ Engineer
	□ Bulges □ Depressions □ Hummocky Size: Height: Depth: Location: Notes/Causes:	-
	□ Bulges □ Depressions □ Hummocky Size: Height: Depth: Location: Notes/Causes:	- - -
	x OTHER [no problem, could not inspect thoroughly] Rodent Burrows: (few, numerous) Location: Notes/Causes:	- _
6)	Other: Notes: NA CREST Length: Width: (est. meas.)	- - 0000
	x VEGETATION [no problem] Trees: Quantity: (<5, sparse, dense) Diameter: (<6", 6-12", >12") Location: Notes:	
	□ Brush: Quantity: (spare, dense) Location: Notes:	- - -
	Ground Cover: Type: (grass, crown vetch) Other: Quantity: (bare, sparse, adequate, dense) Appearance: (too tall, too short, good) Notes:	- -
	x□ EROSION [no problem, could not inspect thoroughly] x□ Runoff Erosion (Gullies): Quantity: Depth: Width: Length: Location: Notes:	_
	Inside Stone Crest Outside Stone Outlet/Inlet Structures Pond Drain	

		None Monitor YOY Maintenance uoinba Engineer
	x□ WIDTH [no problem]	No Mc Ma
	□ Too Narrow	
	Location:Notes/Causes:	
	x□ INSTABILITIES [no problem, could not inspect thoroughly]	
	□ Cracks: □ Transverse □ Longitudinal □ Other Quantity: Length: Width: Depth:	
	Location:	
	Notes/Causes:	
	□ Cracks: □ Transverse □ Longitudinal □ Other Quantity: Length: Width: Depth:	
	Location:Notes/Causes:	
	□ Bulges: □ Depressions □ Hummocky Size: Height: Depth:	
	Location:Notes/Causes:	
	x□ OTHER [no problem, could not inspect thoroughly]	
	□ Rodent Burrows: (few, numerous) Location: Notes:	
		
	□ Other: Road level on the west side of the North perimeter dike for Pond 1 thas been regarded to provide freeboard for Pond 1 appears satisfactory. Continue	X
to n	nonitor. Notes: Roadway appeared to be stable at the time of the inspection.	
7)	OUTSIDE SLOPES Gradient: Horizontal: 2.0 to 3.0 Vertical: 1.0 (est. meas.)	
	x□ VEGETATION [no problem] x□ Trees: Quantity: (<5, sparse, moderate, dense) Generally been removed Diameter: (<6", 6-12", >12") Location:	□ X □ □ □
	Notes: The trees mentioned in previous reports have generally been removed.	
	x□ Brush: Quantity: (spare, dense) Location:	
	Notes:	
	x□ Ground Cover: Type: (grass, crown vetch) Other:	
	Quantity: (bare, sparse, adequate, dense) Appearance: (too tall, too short, good) Throughout the system.	
	Notes:	Φ
		itor ntenance ineer

	Require Action
	None Monitor Maintenance
x □ EROSION [no problem, could not inspect thoroughly]	N N N
x□ Runoff Erosion (Gullies): Quantity: Depth: Width: Length:	
Location:	
Notes/Causes:	
x□ INSTABILITIES [no problem, could not inspect thoroughly]	
□ Slides: Transverse Length: Longitudinal Length: Scarp: Width:	
Scarp: Width: Length:	
Location: Length:	
Notes/Causes:	
□ Cracks: □ Transverse □ Longitudinal □ Other	
Quantity: Length: Width: Depth:	
Location:	
Notes/Causes:	
☐ Cracks: ☐ Transverse ☐ Longitudinal ☐ Other	
Quantity: Length: Width: Depth:	
Location:	
Notes/Causes:	
□ Bulges: □ Depressions □ Hummocky Size: Height: Depth: Location:	
Notes/Causes:	
x□ OTHER [no problem, could not inspect thoroughly]	
□ Rodent Burrows: (few, numerous)	
Location:	X □ □
Notes:	
□ Other:	
Notes:	
. 15.65.	
x□ SEEPAGE [no problem, could not inspect thoroughly]	
□ Wet Area □ Flow □ Boil □ Sinkhole	
Flow Rate Size: Location:	
Location:	
□ Aquatic Vegetation □ None	X □ □
□ Aquatic Vegetation □ None □ Rust Colored Deposits □ None □ Sediment in Flow □ None	
□ Sediment in Flow □ None	
□ Other:	
Notes/Causes: Area of downstream slope of Pond 3 was inspected. No	
age observed. Continue to monitor this area for seepage.	

{Inside Slope, Crest, **Outside Slope**, Outlet/Inlet Structures, Pond Drain}

	None Monitor Maintenance Engineer
□ Wet Area □ Flow □ Boil □ Sinkhole Flow Rate Size: Location: □ Aquatic Vegetation □ None □ Rust Colored Deposits □ None □ Sediment in Flow □ None □ Other: Notes/Causes:	
 OUTLET/INLET STRUCTURES X GENERAL INLET [no problem, could not inspect thoroughly] Inlet Pipe Dimensions: (adequate, too small) Type: (steel, concrete, aluminum, stainless steel, corrugated metal wood, other): Location: Deterioration: (missing sections, rusted, collapsed) In Use: (Yes, No) 	
 □ Pond Erosion at Inlet: (Describe) □ Other x□ OUTLET STRUCTURES [no problem, could not inspect thoroughly] □ Number of Outlet Structures: Numerous – Most occur between the individual 	x -
ponds. All outlet structures appeared stable and in good working condition at the time of this (15-2) inspection. Since last inspection, Pond 2B has been eliminated. x Description/Location of Outlet Structures:	
x□ Outlet Structures between Ponds : Type: (steel, concrete, aluminum, stainless steel, corrugated metal, wood, other):	□ X □ □ □
Notes:	

{Inside Slope, Crest, Outside Slope, Outlet/Inlet Structures, Pond Drain}

	None Monitor Maintenance A Maintenance Engineer
x□ Outlet Structure on the North end of Pond 3 xType: (steel, concrete, aluminum, stainless steel, corrugated metal wood, other):	None Monitc Mainte Engin
Deterioration: (missing section, collapsed, rusted): Erosion at Outlet Structure: (soil piping, seep collar, etc.) Debris: (leaves, trash, logs, ice, etc.)	- x
Notes:	
☐ Outlet Structure 3 Dimensions: Type: (steel, concrete, aluminum, stainless steel, corrugated metal wood, other):	
Deterioration:(missing section, collapsed, rusted):	
Erosion at Outlet Structure: (soil piping, seep collar, etc.)	
Debris: (leaves, trash, logs, ice, etc.)	
Notes:	
9) POND DRAIN	
x□ GENERAL □ None Found □ Does not have one □ Type of Pond Drain (isolated control/intake tower, valve vault w/outlet conduit, valve in riser/drop inlet, siphon) Notes: The outlet pipe from Pond 3 is available for drainage of pond fluids. □ Operated During Inspection (yes, no)	
Notes: This valve is operated on a frequent basis as part of normal IPL operations of Pond 3 and appears to be in good working condition.	
□ ACCESS TO VALVE/SLUICE GATE [no problem, could not inspect thoroughly] □ Type (not accessible, from shore, boat, walkway, other) Notes:	
□ Walkway/Platform: □ Concrete Deterioration □ Cracks (platform, piers, end supports, railing) Location: Note:	
Notes:	
{Inside Slope, Crest, Outside Slope, Outlet/Inlet Structures, Pond Drain}	

None Monitor Maintenance Pengineer

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	900	Monitor	Maintenance	Engineer
□ Wood Deterioration Notes:	<u>-</u>] [
□ Metal Deterioration (minor, moderate, extensive, other) Notes:	- -] [
□ POND DRAIN COMPONENTS [no problem, could not inspect thoroughly] □ Concrete Structure Locations: Description: (deterioration, misalignment, cracks):] [
Notes/Causes:	- - -			
 □ Valve Control (Operating Device) □ No Operating Device □ No Stem □ Bent/Broken Stem □ Other Notes/Operability: 	- -			
 ☐ Metal Deterioration: (surface rust, minor, moderate, extensive, other) Location: Flow Rate: Notes/Causes: 	- -			ı 🗆
□ Mis-alignment Notes/Causes:	- -			
□ Leakage – Flow Rate: Notes/Causes:	- -] [
 ☐ Outlet Conduit ☐ Metal: (loss of coating/paint, surface rust, corrosion (pitting, scaling), rusted out) Location:	- -			
□ Concrete (bug holes, hairline crack, efflorescence) (spalling, popouts, honeycombing, scaling, craze/map cracks) (isolated crack, exposed rebar, disintegration, other) Dimensions/Location: Notes/Causes:	_			l 🗆
□ Plastic: (deterioration, cracking) Location: Notes/Causes:	-] [l 🗆

	None	Monitor	Maintenance Engineer
□ Conduit Deformation □ Mis-Alignment: Location: Notes/Causes:	_ - -		
□ Separated Joint □ Loss of Joint Material Location/Description: Notes/Causes:] [
□ Undermining Location/Description: Notes/Causes:	- -] [
□ Vegetation (trees, brush) Notes:] [
□ Other Notes:	-] [
□ Discharge Outlet □ Type (pipe outlet, concrete channel, rock-lined channel, none) Notes:] [
□ Riprap: Average Diameter: (adequate, sparse, displaced, weathered, vegetation) bedding/fabric noted – yes, no)) Notes:] [
□ Concrete (bug holes, hairline crack, efflorescence) (spalling, popouts, honeycombing, scaling, craze/map cracks) (isolated crack, exposed rebar, disintegration, other) Dimensions/Location: Notes/Causes:	-] [
□ Mis-alignment Location/Description: Notes/Causes:] [
□ Separated Joint □ Loss of Joint Material Location/Description: Notes/Causes:	- -		
□ Undermining Location/Description: Notes/Causes:] [
□ Other Notes:	_	Monitor Maintenance	ær
{Inside Slope, Crest, Outside Slope, Outlet/Inlet Structures, Pond Drain }	None	Monitor Mainten	Engineer

Required Action

ATTACHMENT B

Photographs



Photo 1: Pond 1, looking south.



Photo 2: Pond 1, looking west.



Photo 3: Crest Road condition on North side of Pond 1.



Photo 4: Pond 1, looking northeast from the Pond 1 area.



Photo 5: Pond 2A, looking east from the Pond 1 area.



Photo 6: Pond 2A, looking east from Northwest corner of Pond 2A.



Photo 7: Discharge conditions occurring from Pond 2 into Pond 2A.



Photo 8: Discharge conditions occurring from Pond 1 into Pond 2A.



Photo 9: FGD slurry discharge into Pond 1.



Photo 10: Breach excavated in the South abutment of the intermediate dike between former Pond 2A and Pond 2B. Some erosion of the interior slope in the abutment.



Photo 11: Pond 2A, looking northwest from the intermediate dike between former Pond 2A and Pond 2B.



Photo 12: Former Pond 2B, looking northwest from the Northeast corner of Pond 2B.



Photo 13: Pond 3, looking north from the Southwest corner of Pond 3.



Photo 14: Same as Photo 13, looking east.



Photo 15: Close up of Southwest corner of Pond 3.



Photo 16: Pond 3, looking west.



Photo 17: Pond 3, looking north from the Southeast corner of Pond 3.



Photo 18: Pond 3, looking east from the Southwest corner of Pond 3.



Photo 19: Same as Photo 18, looking south.



Photo 20: Same as Photo 18, looking west.



Photo 21: Outfall of Pond 3 to Lick Creek.



Photo 22: Conditions of the exterior slope of the North perimeter dike of Pond 3, looking west from the outfall structure. No seepage observed.



Photo 23: Same as photo 22, looking north.



Photo 24: Same as Photo 22, looking east.