

**MEMORANDUM**

July 2019  
Project No. 133274-003

**SUBJECT: Demonstration for 60-Day Extension – Corrective Measures Assessment (CMA)**  
Indianapolis Power & Light (IPL) – Petersburg Generating Station  
Ash Ponds A, A' & C  
Pike County, Indiana

Pursuant to CFR Title 40 Chapter 257 Subpart D §257.96(a) (CCR Rule), I certify that IPL has demonstrated the need for an additional 60-days beyond the regulatory time period of 90 days to complete the assessment of corrective measures for Ash Ponds A, A' & C due to site-specific conditions and the evaluation of remedial treatment alternatives in support of an informed CMA process.

In the case of the assessment for Ash Ponds A, A' & C, the site has complex hydrogeology and nature and extent (N&E) investigations are ongoing in support of the CMA process. Nature and extent information is an important component of the CMA. This supplemental N&E work has experienced delays due to high river levels preventing drilling access. IPL is also in the process of reviewing possible groundwater remedies and is evaluating potential closure strategies as well as implementation of critical steps in the groundwater treatment and remedy assessment process. Based on these site-specific conditions and related groundwater treatment alternatives evaluations in support of the CMA by IPL, a 60-day extension is needed to complete the CMA process.

This certification as submitted, is to the best of my knowledge, accurate and complete.

Signed: 

Certifying Engineer  
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Professional Engineer's Seal

