

**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)  
Harding Street Generating Station - Ash Pond System

The Indianapolis Power & Light Company (IPL) initiated corrective measures for the Ash Pond System at the Harding Street Generating Station (HSGS) 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). In October 2019, two (2) N&E nested monitoring wells (shallow and deep) were installed off-site at the Hanson Aggregates facility. Groundwater samples were collected from the N&E monitoring wells in December 2019 to define the lateral extent of Appendix IV constituents. 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
- Based on the initial off-site N&E groundwater sampling event, it was determined that groundwater concentrations above applicable groundwater protection standards underlie the Hanson Aggregates property Pursuant to § 257.95(g)(2), IPL provided notification to Hanson Aggregates related to this matter of an off-site contamination plume.

## PLANNED ACTIVITIES

Anticipated activities for the upcoming six months include the following:

- Continue efforts to establish N&E
  - Install three (3) additional N&E nested monitoring wells (shallow, intermediate, deep) at the Hanson Aggregates facility to better define the lateral extent Appendix IV constituents;
  - Evaluate the groundwater analytical data collected during the May 2020 semi-annual sampling event that will include any new N&E monitoring wells;
- As appropriate, refine the conceptual site model and associated groundwater modeling;
- Continue to perform an engineering review of the seven (7) 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.