

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

March 12, 2021
File No. 129342

TO: AES Indiana – Eagle Valley Generating Station

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

Indianapolis Power & Light Company d/b/a AES Indiana (AES Indiana)) initiated corrective measures for the Ash Pond System at the Eagle Valley Generating Station (EVGS) on April 15, 2019 in response to statistically significant levels (SSL) of Appendix IV constituents (arsenic, lithium and molybdenum) 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, AES Indiana 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 third semi-annual remedy selection progress report and is comprised of activities during the period of September 13, 2020 through March 11, 2021. 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 November 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 levels compared to GWPS. Any new constituents 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 November 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;
- Indiana Department of Environmental Management (IDEM) continued to review the Ash Pond System Closure Plan / Post Closure Plan;

- Conducted a virtual Public Meeting (via Zoom) in December 2020, to provide a summary of environmental regulations, closure methods, closure design and responded to questions and comments related to the Ash Pond System Closure Plan / Post Closure Plan. Public comment period ended on February 7, 2021 and IDEM is evaluating comments received;
- Held meeting with off-site property owners regarding installation of off-site N&E wells; and
- Completed negotiations with adjacent property owners 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 Assessment Monitoring: Collect groundwater samples in May 2021 from the CCR well network. The groundwater data will be evaluated for statistically significant levels compared to GWPS. Any new constituent that exceed GWPS will be considered in selection of the final remedy;
- 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 May 2021 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;
- Respond to IDEM questions/comments received following the Ash Pond System Closure Plan Public Meeting comment period and review draft approval of closure plan;
- 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; and
- Provide a semi-annual progress report that summarizes AES Indiana's progress and status regarding a selection of remedy.