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January 30, 2020

Mr. David M. Heger Senior Counsel AES US Services, LLC One Monument Circle, Suite 701A Indianapolis, Indiana 46204-2901

Re: 2019 CCR Annual Groundwater Monitoring and Corrective Action Report Indianapolis Power & Light Company Harding Street Generating Station Indianapolis, Indiana ATC Project No. 170LF00707

Dear Mr. Heger:

ATC Group Services LLC (ATC) has prepared this 2019 CCR Annual Groundwater Monitoring and Corrective Action Report for the ash pond system at Indianapolis Power & Light Company's (IPL) Harding Street Generating Station in Indianapolis, Marion County, Indiana. This report has been prepared to comply with reporting requirements described in the United States Environmental Protection Agency's (USEPA) Coal Combustion Residuals (CCR) Rule § 257.90(e). This annual report documents the status of the groundwater monitoring and corrective action program for the ash pond system and summarizes information required by § 257.90(e)(1) through § 257.90(e)(5).

Federal CCR Rule § 257.90(e) specifies the following:

For existing CCR landfills and existing CCR surface impoundments, no later than January 31, 2019, and annually thereafter, the owner or operator must prepare an annual groundwater monitoring and corrective action report. For new CCR landfills, new CCR surface impoundments, and all lateral expansions of CCR units, the owner or operator must prepare the initial annual groundwater monitoring and corrective action report no later than January 31 of the year following the calendar year a groundwater monitoring system has been established for such CCR unit as required by this subpart, and annually thereafter. For the preceding calendar year, the annual report must document the status of the groundwater monitoring and corrective action program for the CCR unit, summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and project key activities for the upcoming year. For purposes of this section, the owner or operator has prepared the annual report when the report is placed in the facility's operating record as required by 257.105(h)(1).

The following key actions have been completed in 2019 to comply with the CCR Rule:

- Statistically Significant Level (SSL) notification pursuant to § 257.95(g) was completed in January 2019.
- Background sampling events at the MW-15 upgradient nest was performed in order to obtain a minimum of 8 independent background samples as required by § 257.94(b).
- In accordance with § 257.96(a), an assessment of corrective measures was initiated in April 2019. A certified Demonstration for 60-Day Extension Corrective Measures Assessment pursuant to § 257.96(a) was issued in July 2019 (Attachment A). A Corrective Measures Assessment (CMA) report was completed and placed in the facility's operating record in September 2019, with an amended version posted to the facility's publicly available website in October 2019.
- Nature and extent (N&E) characterization were initiated with installation of monitoring wells as required by § 257.95(g) (1).
- Semi-annual assessment monitoring sampling events were conducted as required by § 257.95(b) and § 257.95(d)(1). Subsequent SSLs evaluation of 2019 data were performed within 90-days of completing each sampling event pursuant to § 257.93(h)(2).

To report on the activities conducted during the prior calendar year and document compliance with the CCR Rule, the specific requirements listed in § 257.90(e)(1) through § 257.90(e)(5) are provided below in bold/italic type followed by a short narrative addressing how that specific requirement has been met.

At a minimum, the annual groundwater monitoring and corrective action report must contain the following information, to the extent available:

§ 257.90(e)(1) A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit;

IPL operates the Harding Street Station located in Indianapolis, Indiana. It is located at 3700 South Harding Street. A Site Location Map is provided as Figure 1. A map showing the location of each CCR management unit, associated upgradient and downgradient CCR monitoring wells, and nature and extent (N&E) monitoring equipment installed in 2019, is provided as Figure 2.

§ 257.90(e)(2) Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;

The CCR ash pond groundwater monitoring system at the Harding Street Station consists of twenty-seven (27) monitoring wells: MW-1S, MW-1D, MW-2S, MW-2D, MW-3S, MW-3D, MW-4S,

MW-5S, MW-6S, MW-7S, MW-7D, MW-8S, MW-9S, MW-9I, MW-9D, MW-10S, MW-10D, MW-11S, MW-11D, MW-12S, MW-12D, MW-13S, MW-13D, MW-14D, MW-15S, MW-15I, and MW-15D. Monitoring wells MW-15S, MW-15I, and MW-15D represent upgradient/background wells, while the remaining represent downgradient wells. The wells were installed in accordance with the requirements of Federal CCR Rule § 257.91 between September 25, 2015 and August 17, 2018.

The groundwater monitoring system was re-certified in 2019 in accordance with the requirements of Federal CCR Rule § 257.91 to account for the utilization of MW-15S, MW-15I, and MW-15D as the upgradient/background monitoring wells for the CCR well network. Sampling of the background wells was completed in February, March, and July 2019; however, the facility has yet to complete the eight background samples as required pursuant to § 257.90(b)(iii). The CCR monitoring network semi-annual assessment monitoring events were conducted in May and November 2019, respectively.

To characterize the nature and extent (N&E) of the release and any relevant site condition that may affect the remedy ultimately selected, as required by § 257.95(g)(1), additional investigation activities were initiated. These investigation activities included but are not limited to the installation of additional ash pond piezometers and wells to evaluate site conditions that may affect the remedy ultimately selected. One existing piezometer (M-4), located at the facility boundary in the direction of contaminant migration, was redeveloped and converted to an N&E well. Fourteen temporary N&E piezometers (P1 PZ-1D, P1 PZ-1S, P2 A/B PZ-1D, P2 A/B PZ-1S, P2 A/B PZ-2D, P2 A/B PZ-2S, P2 PZ-1D, P2 PZ-1S, P2 PZ-2D, P2 PZ-2S, P2 PZ-3D, P2 PZ-3S, P3 PZ-1D, and P3 PZ-1S) were installed at the site in order to better understand the hydraulic relationships between the ash ponds and underlying aquifer as part of the development of the CMA. The piezometers may also be sampled from a water quality perspective, in the future to support the CMA.

IPL initiated N&E investigative work at the Hanson Aggregates site (adjacent downgradient property) in 2019 to determine the extent of the contamination plume and to support the CMA Report. Four N&E piezometers (PZ-100S, PZ-100D, PZ-101S, and PZ-101D) were installed. Groundwater samples were collected from these locations in December 2019 in accordance with § 257.95(g)(1) (iv); however, the analytical results were not received and validated in 2019 and are not included with this report.

The location of the CCR groundwater monitoring well network, N&E wells, and N&E piezometers are depicted on Figure 2. No monitoring wells were abandoned during this reporting period.

§ 257.90(e)(3) In addition to all the monitoring data obtained under § 257.90 through § 257.98, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs;

Table 1 provides a summary of the number of samples collected at each CCR monitoring well and N&E monitoring equipment, sampling dates, and designation of whether samples were required by the detection or assessment monitoring program. Groundwater elevation data is provided in Table 2. Assessment Monitoring groundwater analytical results for the May 2019 semi-annual assessment monitoring sampling event are summarized in Table 3. Groundwater results for the November 2019

semi-annual assessment monitoring sampling event were not finalized in 2019 and therefore are not included with this submittal.

Groundwater analytical results for the February, March, and July 2019 MW-15 nest background sampling events are summarized in Table, 4, Table 5, and Table 6 respectively.

Groundwater analytical results for the August 2019 on-site N&E sampling event (M-4) are summarized in Table 7.

§ 257.90(e)(4) A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels);

Pursuant to § 257.94(e)(2), 257.94(e)(3) and 257.95(b), the facility established an Assessment Monitoring Program in accordance with the requirements of § 257.95 on July 16, 2018 as denoted in the 2018 Annual Groundwater Monitoring and Corrective Action report. IPL Harding Street continues assessment monitoring in accordance with § 257.95.

A statistical evaluation of the 2018 analytical data in order to determine whether there was a SSL of an Appendix IV constituent detected above the relevant groundwater protection standards (GWPS) in accordance with § 257.95(g) and 257.93(h) was completed in January 2019. GWPS were developed pursuant to § 257.95(d)(2) and (h) and exceedances of the established GWPS were identified. Appendix IV constituents that exceeded the GWPS include antimony, arsenic, lithium, and molybdenum. Completion of a notification identifying the Appendix IV constituents that exceeded GWPS in accordance with § 257.95(g) was completed in January 2019 and was placed in the facility's CCR operating record pursuant to § 257.95(g).

A statistical evaluation of the May 2019 analytical data was performed in order to determine whether there was a SSL of an Appendix IV constituent detected above the relevant GWPS in accordance with § 257.95(g) and 257.93(h). This evaluation was completed in September 2019. Based on this evaluation, it was determined that there were no new Appendix IV constituent SSLs; therefore, an additional notification was not triggered pursuant to 40 CFR 257.95(g) as no new SSLs were identified.

§ 257.90(e)(5) Other information required to be included in the annual report as specified in § 257.90 through § 257.98.

Table 8 summarizes the groundwater protection standards established in accordance with $\$ 257.95(d)(2) and $\$ 257.95(h).

Projected key activities for the upcoming year include the following:

- Assessment monitoring sampling events in accordance with § 257.95.
- Remaining background sampling events at the MW-15 upgradient nest will be completed in order to obtain a minimum of 8 independent background samples as required by § 257.94(b).

- Finalize November 2019 analytical data. Completion of statistical evaluation of November 2019 analytical data to determine whether there is a SSL above GWPS for Appendix IV constituents in accordance with § 257.95(g) and 257.93(h). Perform SSL evaluations of final 2020 assessment monitoring analytical data.
- Continue N&E work pursuant to § 257.95(g).
- Conduct public meeting to discuss the results of the corrective measures assessment at least 30 days prior to the selection of remedy pursuant to § 257.96(e).
- Prepare semi-annual report(s) describing progress in selecting and designing the remedy pursuant to § 257.97(a).
- Following remedy selection, if feasible, prepare and certify final report describing the selected remedy and how it meets the standards specified in § 257.97(b).

We appreciate the opportunity to assist with IPL's CCR Rule groundwater monitoring program at Harding Street Station's ash pond system. Please contact any of the undersigned at 317.849.4990 if you have any questions regarding this report.

Sincerely,

Kundra Keringa

Kendra Reininga Staff Geologist

Mark E. Breting

Mark E. Breting, L.P.G. Senior Project Geologist

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Robert T. Duncan, L.P.G. Senior Project Geologist

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Table 8:	Groundwater Protection Standards Summary
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Table 1Well Sampling SummaryMultiunit Ash Pond SystemIndianapolis Power and Light CompanyHarding Street Generating StationIndianapolis, IndianaATC Project No. 170LF00707

Identification	Date Installed	Upgradient/Background, Downgradient, or Nature & Extent	Number of Samples	Sample Date	Detection or Assessment Monitoring Program	
MW-1S	9/25/2015	Downgradient	2	5/15/2019	Assessment	
				11/7/2019		
MW-1D	9/25/2015	Downgradient	2	5/15/2019	Assessment	
		č		11/7/2019		
MW-2S	9/29/2015	Downgradient	2	5/14/2019	Assessment	
				11/5/2019		
MW-2D	2/9/2016	Downgradient	2	5/15/2019	Assessment	
				11/5/2019		
MW-3S	9/28/2015	Downgradient	2	5/14/2019	Assessment	
				11/5/2019		
MW-3D	2/10/2016	Downgradient	2	5/15/2019	Assessment	
		-		11/6/2019		
MW-4S	9/28/2015	Downgradient	1	5/14/2019	Assessment	
		-		NS		
MW-5S	10/1/2015	Downgradient	1	5/14/2019	Assessment	
		-		NS		
MW-6S	9/28/2015	Downgradient	1	5/14/2019	Assessment	
MW-7S	9/30/2015	Downgradient	2	5/15/2019	Assessment	
		-		F/15/2019		
MW-7D	2/17/2016	Downgradient	2	11/6/2019	Assessment	
				5/15/2019		
MW-8S	10/1/2015	Downgradient	2	11/7/2019	Assessment	
				5/16/2019		
MW-9S	2/11/2016	Downgradient	1	NS	Assessment	
				5/16/2019		
MW-9I	2/24/2016	Downgradient	2	11/6/2019	Assessment	
				5/16/2019		
MW-9D	2/11/2016	Downgradient	2	11/6/2019	Assessment	
N/N/ 400	0/40/0040	Daving and dia at	0	5/16/2019	A +	
MVV-105	2/16/2016	Downgradient	2	11/5/2019	Assessment	
	2/16/2016	Downgradiant	2	5/16/2019	Accomment	
IVIVV-10D	2/10/2010	Downgradient	2	11/5/2019	Assessment	
M/M/ 119	2/17/2016	Downgradiont	2	5/15/2019	Accoccmont	
10100-115	2/17/2010	Downgradient	2	11/7/2019	Assessment	
	2/18/2016	Downgradiont	2	5/14/2019	Assossment	
	2/10/2010	Downgradient	2	11/7/2019	Assessment	
M\\/_12S			1	5/16/2019	Assessment	
10100-120	2/19/2010	Downgradient	I	NS	Assessment	
MW-12D	2/18/2016	Downgradient	2	5/16/2019	Assessment	
	2/10/2010	Downgradient	2	11/6/2019	//00000110110	
M\N/_13S	2/15/2016	Downgradient	2	5/15/2019	Assessment	
10100	2/10/2010	Downgradient	2	11/7/2019	//00000110110	
MW-13D	2/12/2016	Downgradient	2	5/16/2019	Assessment	
	_,, _0 10	Loungradon		11/6/2019	,	
MW-14D	2/23/2016	Downgradient	2	5/15/2019	Assessment	
	2,20,2010	Berngradon	<u> </u>	11/7/2019	, 1000001110111	

Table 1Well Sampling SummaryMultiunit Ash Pond SystemIndianapolis Power and Light CompanyHarding Street Generating StationIndianapolis, IndianaATC Project No. 170LF00707

Identification	Date Installed	Upgradient/Background, Downgradient, or Nature & Extent	Number of Samples	Sample Date	Detection or Assessment Monitoring Program		
				2/4/2019			
				3/25/2019			
MW-15S	8/17/2018	Upgradient/Background	5	5/14/2019	Detection		
				7/24/2019			
				11/5/2019			
				2/4/2019			
				3/25/2019			
MW-15I	8/17/2018	Upgradient/Background	5	5/14/2019	Detection		
				7/24/2019			
				11/5/2019			
				2/4/2019	-		
				3/25/2019			
MW-15D	8/17/2018	Upgradient/Background	5	5/14/2019	Detection		
				7/24/2019			
				11/5/2019			
NA 4	10/10/1006	Noturo 8 Extent	2	9/10/2019	Accoment		
IVI-4	12/10/1900	Nature & Extern	2	11/6/2019	Assessment		
PZ-100S	10/24/2019	Nature & Extent	1	12/10/2019	Assessment		
PZ-100D	10/23/2019	Nature & Extent	1	12/10/2019	Assessment		
PZ-101S	10/29/2019	Nature & Extent	1	12/10/2019	Assessment		
PZ-101D	10/25/2019	Nature & Extent	1	12/10/2019	Assessment		

NS = Not sampled due to insufficient water volume (dry)

Monitoring Well/Piezometer Location	Gauging Date	TOC Elevation (ft-MSL)	Depth to Water (ft)	Water Elevation (ft-MSL)
	5/13/2019		11.99	663.34
	7/3/2019		12.33	663.00
MW-1S	7/17/2019	675.33	12.43	662.90
	9/20/2019		13.70	661.63
	11/4/2019		13.53	661.80
	5/13/2019		11.73	663.60
	7/3/2019		12.08	663.09
MW-1D	7/17/2019	675.17	12.18	662.99
	9/20/2019		13.41	661.76
	11/4/2019		13.27	661.90
	5/13/2019		17.86	667.13
	7/3/2019		18.32	666.67
MW-2S	7/17/2019	684.99	17.96	667.03
	9/20/2019		19.99	665.00
	11/4/2019		19.96	665.03
	5/13/2019		18.36	666.84
MW-2D	7/3/2019		18.53	666.67
	7/17/2019	685.20	18.16	667.04
	9/20/2019		20.19	665.01
	11/4/2019		20.16	665.04
	5/13/2019		22.47	666.51
	7/3/2019		21.97	667.01
MW-3S	7/17/2019	688.98	23.11	665.87
	9/20/2019		25.33	663.65
	11/4/2019		25.75	663.23
	5/13/2019		22.42	666.40
	7/3/2019		21.86	666.96
MW-3D	7/17/2019	688.82	22.98	665.84
	9/20/2019		25.29	663.53
	11/4/2019		25.71	663.11
	5/13/2019		25.38	663.91
	7/3/2019		24.79	664.50
MW-4S	7/17/2019	689.29	26.14	663.15
	9/20/2019		30.42	658.87
	11/4/2019		35.43	653.86
	5/13/2019		26.69	662.74
	7/3/2019		26.36	663.07
MW-5S	7/17/2019	689.43	27.69	661.74
	9/20/2019		30.82	658.61
	11/4/2019		32.03	657.40

Monitoring Well/Piezometer Location	Gauging Date	TOC Elevation (ft-MSL)	Depth to Water (ft)	Water Elevation (ft-MSL)
	5/13/2019		32.82	662.85
	7/3/2019		32.75	662.92
MW-6S	7/17/2019	695.67	33.09	662.58
	9/20/2019		34.60	661.07
	11/4/2019		32.47	663.20
	5/13/2019		37.69	659.07
	7/3/2019		37.64	659.12
MW-7S	7/17/2019	696.76	38.71	658.05
	9/20/2019		39.94	656.82
	11/4/2019		40.08	656.68
	5/13/2019		37.26	659.03
	7/3/2019		37.24	659.05
MW-7D	7/17/2019	696.29	38.27	658.02
	9/20/2019		39.52	656.77
	11/4/2019		39.63	656.66
	5/13/2019		13.95	658.83
MW-8S	7/3/2019		14.53	658.25
	7/17/2019	672.78	15.33	657.45
	9/20/2019		16.99	655.79
	11/4/2019		16.76	656.02
	5/13/2019		26.48	662.54
	7/3/2019		26.62	662.40
MW-9S	7/17/2019	689.02	28.10	660.92
	9/20/2019		32.45	656.57
	11/4/2019		34.98	654.04
	5/13/2019		26.49	662.62
	7/3/2019		26.68	662.43
MW-9I	7/17/2019	689.11	28.13	660.98
	9/20/2019		32.48	656.63
	11/4/2019		34.25	654.86
	5/13/2019		26.65	662.62
	7/3/2019		26.86	662.41
MW-9D	7/17/2019	689.27	28.34	660.93
	9/20/2019		32.67	656.60
	11/4/2019		34.47	654.80
	5/13/2019		26.00	665.10
	7/3/2019		21.93*	669.17
MW-10S	7/17/2019	691.10	26.16	664.94
	9/20/2019		28.17	662.93
	11/4/2019		28.14	662.96

Monitoring Well/Piezometer Location	Gauging Date	TOC Elevation (ft-MSL)	Depth to Water (ft)	Water Elevation (ft-MSL)
	5/13/2019		26.20	665.08
	7/3/2019		26.12	665.16
MW-10D	7/17/2019	691.28	26.33	664.95
	9/20/2019		28.34	662.94
	11/4/2019		28.32	662.96
	5/13/2019		28.53	657.64
	7/3/2019		28.16	658.01
MW-11S	7/17/2019	686.17	30.18	655.99
	9/20/2019		33.69	652.48
	11/4/2019		34.05	652.12
	5/13/2019		27.94	658.23
	7/3/2019		28.12	658.05
MW-11D	7/17/2019	686.17	29.39	656.78
	9/20/2019		31.13	655.04
	11/4/2019		21.12	665.05
	5/13/2019		28.00	660.82
MW-12S	7/3/2019		27.93	660.89
	7/17/2019	688.82	29.51	659.31
	9/20/2019		33.67	655.15
	11/4/2019		36.57	652.25
	5/13/2019		28.92	659.81
	7/3/2019		27.85	660.88
MW-12D	7/17/2019	688.73	29.48	659.25
	9/20/2019		33.70	655.03
	11/4/2019		34.97	653.76
	5/13/2019		25.49	670.59
	7/3/2019		35.38	660.70
MW-13S	7/17/2019	696.08	36.17	659.91
	9/20/2019		37.34	658.74
	11/4/2019		37.40	658.68
	5/13/2019		36.19	660.59
	7/3/2019		36.10	660.68
MW-13D	7/17/2019	696.78	36.90	659.88
	9/20/2019		38.06	658.72
	11/4/2019		38.15	658.63
	5/13/2019		39.29	658.59
	7/3/2019		39.74	658.14
MW-14D	7/17/2019	697.88	40.89	656.99
	9/20/2019		42.27	655.61
	11/4/2019		42.33	655.55

Monitoring Well/Piezometer Location	Gauging Date	TOC Elevation (ft-MSL)	Depth to Water (ft)	Water Elevation (ft-MSL)
	2/4/209		14.93	670.53
	3/25/2019		16.15	669.31
	5/13/2019		15.78	669.68
NUN 450	7/3/2019	005.40	15.34	670.12
MW-155	7/17/2019	685.46	16.50	668.96
	7/24/2019		16.54	668.92
	9/20/2019		18.20	667.26
	11/4/2019		18.58	666.88
	2/4/2019		16.37	669.22
	3/25/2019		15.77	669.82
	5/13/2019		15.40	670.19
	7/3/2019		14.99	670.60
1010-151	7/17/2019	000.09	16.00	669.59
	7/24/2019		16.10	669.49
	9/20/2019		17.81	667.78
	11/4/2019		18.18	667.41
	2/4/2019		16.10	669.10
	3/25/2019		15.61	669.59
MW-15D	5/13/2019		15.18	670.02
	7/3/2019	695 20	14.71	670.49
	7/17/2019	005.20	15.73	669.47
	7/24/2019		15.86	669.34
	9/20/2019		17.54	667.66
	11/4/2019		17.91	667.29
	5/13/2019		34.69	658.56
	7/3/2019		34.73	658.52
M-4	7/17/2019	693.25	35.82	657.43
	9/20/2019		37.25	656.00
	11/4/2019		37.37	655.88
PZ-100S	12/10/2019	681.79	28.22	653.57
PZ-100D	12/10/2019	681.84	44.90	636.94
PZ-101S	12/10/2019	689.36	41.85	647.51
PZ-101D	12/10/2019	689.40	81.23	608.17
	5/13/2019		NM	NM
	7/3/2019		12.44	674.86
P1 PZ-1S	7/17/2019	687.30	NM	NM
	9/20/2019		17.10	670.20
	11/4/2019		14.37	672.93
	5/13/2019		NM	NM
	7/3/2019		21.74	665.51
P1 PZ-1D	7/17/2019	687.25	21.67	665.58
	9/20/2019		23.56	663.69
	11/4/2019		23.47	663.78

Monitoring Well/Piezometer Location	Gauging Date	TOC Elevation (ft-MSL)	Depth to Water (ft)	Water Elevation (ft-MSL)
	5/13/2019		NM	NM
	7/3/2019		49.07	668.09
P2 PZ-1S	7/17/2019	717.16	48.94	668.22
	9/20/2019		52.79	664.37
	11/4/2019		50.95	666.21
	5/13/2019		NM	NM
	7/3/2019		55.12	661.21
P2 PZ-1D	7/17/2019	716.33	55.57	660.76
	9/20/2019		50.10	666.23
	11/4/2019		56.75	659.58
	5/13/2019		NM	NM
	7/3/2019		35.82	671.33
P2 PZ-2S	7/17/2019	707.15	45.70	661.45
	9/20/2019		37.20	669.95
	11/4/2019		38.50	668.65
	5/13/2019		NM	NM
	7/3/2019		47.71	659.21
P2 PZ-2D	7/17/2019	706.92	48.45	658.47
	9/20/2019		49.67	657.25
	11/4/2019		49.74	657.18
	5/13/2019		NM	NM
	7/3/2019		51.94	666.27
P2 PZ-3S	7/17/2019	718.21	52.56	665.65
	9/20/2019		54.12	664.09
	11/4/2019		54.73	663.48
	5/13/2019		NM	NM
	7/3/2019		59.81	658.38
P2 PZ-3D	7/17/2019	718.19	60.95	657.24
	9/20/2019		62.63	655.56
	11/4/2019		62.48	655.71
	5/13/2019		NM	NM
	7/3/2019		22.23	669.32
P2 A/B PZ-1S	7/17/2019	691.55	19.57	671.98
	9/20/2019		26.73	664.82
	11/4/2019		24.90	666.65
	5/13/2019		NM	NM
	7/3/2019		25.24	665.95
P2 A/B PZ-1D	7/17/2019	691.19	25.20	665.99
	9/20/2019		27.46	663.73
	11/4/2019		27.41	663.78

Groundwater Elevation Data Ash Pond System Indianapolis Power and Light Company Harding Street Generating Station, Indianapolis, Indiana ATC Project No. 170LF00707

Monitoring Well/Piezometer Location	Gauging Date	TOC Elevation (ft-MSL)	Depth to Water (ft)	Water Elevation (ft-MSL)
	5/13/2019		NM	NM
	7/3/2019		19.88	669.61
P2 A/B PZ-2S	7/17/2019	689.49	16.75	672.74
	9/20/2019		25.66	663.83
	11/4/2019		24.18	665.31
	5/13/2019		NM	NM
P2 A/B PZ-2D	7/3/2019		23.47	665.59
	7/17/2019	689.06	23.40	665.66
	9/20/2019		25.66	663.40
	11/4/2019		25.55	663.51
	5/13/2019		NM	NM
	7/3/2019		10.02	670.50
P3 PZ-1S	7/17/2019	680.52	10.03	670.49
	9/20/2019		10.02	670.50
	11/4/2019		10.05	670.47
	5/13/2019		NM	NM
	7/3/2019		14.58	666.57
P3 PZ-1D	7/17/2019	681.15	14.43	666.72
	9/20/2019		16.52	664.63
	11/4/2019		16.54	664.61

Notes:

TOC = Top of Casing

ft-MSL = feet above Mean Sea Level

ft-bgs = feet below ground surface

Summary of Monitoring Results - May 2019 (Semi Annual CCR Wells) Multiunit Ash Pond System Indianapolis Power and Light Company Harding Street Generating Station Indianapolis, Indiana ATC Project No. 170LF00707

Well ID		MW-1D	MW-1S	MW-2D	MW-2S	MW-3D	MW-3S	MW-4S	MW-5S	MW-6S	MW-7D	MW-7S	MW-8S	MW-9D	MW-9I	MW-9S
Pace Lab ID		50225396002	50225396001	50225396004	50225396003	50225396006	50225396005	50225396007	50225396008	50225396009	50225396011	50225396011	50225396012	50225396015	50225396014	50225396013
Sample Date		5/15/2019	5/15/2019	5/15/2019	5/14/2019	5/15/2019	5/14/2019	5/14/2019	5/14/2019	5/14/2019	5/15/2019	5/15/2019	5/15/2019	5/16/2019	5/16/2019	5/16/2019
Static Water Elevation (ft MSL)		663.44	663.34	666.84	667.13	666.40	666.51	663.91	662.74	662.85	659.03	659.07	658.83	662.62	662.62	662.54
Field Parameters																
Temperature	°C	17.37	17.42	13.18	11.47	14.18	11.87	11.42	17.76	17.92	18.31	18.58	12.87	14.77	14.59	14.28
Dissolved Oxygen, Field	mg/L	0.42	0.02	0.46	0.01	0.30	2.82	8.59	0.07	0.08	8.89	9.31	0.09	0.90	0.09	0.06
Conductivity, Field	uS/cm	1456.0	1014.8	1999.3	1361.2	1249.5	905.87	778.66	2184.6	2375.6	3.35	5.29	2353.5	1146.4	1043.1	1286.9
ORP, Field	mV	-73.6	-79.8	15.6	-12.4	-55.8	38.6	49.6	9.4	75.4	-70.5	120.5	37.0	-65.3	-66.0	96.7
pH, Field	Std. Units	7.27	7.39	7.58	7.63	7.35	7.43	7.47	7.52	6.95	7.42	7.18	7.24	7.52	7.45	7.36
Analytical Data																
Antimony, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0	7.3	<1.0	<1.0	1.2	<1.0	<1.0	<1.0	<1.0	<1.0	9.2
Arsenic, Total	ug/L	4.7	13.5	2.2	12.5	2.9	2.3	<1.0	<1.0	11.4	471	345	<1.0	2.1	3.8	<1.0
Barium, Total	ug/L	61.8	63.5	76.6	123	68.8	36.0	60.0	28.8	103	43.4	37.3	37.7	44.6	57.3	55.4
Beryllium, Total	ug/L	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20
Boron, Total	ug/L	3070	825	2630	541	829	777	4180	5360	9860	17400	15400	11600	1530	1600	4920
Cadmium, Total	ug/L	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Calcium, Total	ug/L	139000	94100	154000	99100	122000	114000	102000	180000	346000	242000	231000	187000	972000	97000	145000
Chloride	mg/L	128	101	248	176	115	52.2	29.2	208	112	215	273	176	110	110	71.3
Chromium, Total	ug/L	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0
Cobalt, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	1.2	<1.0	<1.0	1.1	<1.0	<1.0	<1.0	<1.0
Fluoride	mg/L	0.34	0.50	1.6	0.96	0.24	0.27	0.12	2.5	0.55	0.32	0.50	0.17	0.44	0.68	0.16
Lead, Total	ug/L	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0
Lithium, Total	ug/L	53.4	23.7	45.2	<20.0	21.8	<20.0	<20.0	59.9	117	125	106	124	44.4	38.4	70.3
Mercury	ug/L	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Molybdenum, Total	ug/L	54.5	50.5	106	36.7	12.4	43.2	<10.0	231	65.6	616	575	329	50.4	96.8	118
Selenium, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0	16.5	16.1	<1.0	1.7	<1.0	<1.0	1.6	<1.0	<1.0	2.0
Sulfate	mg/L	229	57.9	318	107	189	72.9	81.6	532	640	659	663	490	122	101	266
Thallium, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Total Dissolved Solids	mg/L	936	571	1330	753	771	506	450	1440	1870	1780	1800	1400	716	646	900
Total Radium	pCi/L	0.934	1.76	1.89	2.12	1.63	0.938	1.18	1.49	1.98	0.334	1.83	0.625	1.02	1.73	1.34
pH at 25 Degrees C	Std. Units	7.2	7.3	7.4	7.6	7.3	7.2	7.2	7.4	6.9	7.5	7.4	7.1	7.3	7.3	7.2

Notes:

ft MSL: Elevation, feet mean sea level

°C: Degrees celcius

uS/cm: microsiemen per centimeter

umhos/cm: micromhos per centimeter

mV: millivolt

Std. Units: standard units

mg/L: milligram per liter

ug/L: microgram per liter pCi/L: picoCurie per liter

Static water elevation listed for a well may have

been collected on a date different than date of well

sampling.

Summary of Monitoring Results - May 2019 (Semi Annual CCR Wells) Multiunit Ash Pond System Indianapolis Power and Light Company Harding Street Generating Station Indianapolis, Indiana ATC Project No. 170LF00707

Well ID		MW-10D	MW-10S	MW-11D	MW-11S	MW-12D	MW-12S	MW-13D	MW-13S	MW-14D	MW-15S	MW-15I	MW-15D
Pace Lab ID		50225396017	50225396016	50225396019	50225396018	50225396021	50225396020	50225396023	50225396022	50225396024	50225396025	50225396026	50225396027
Sample Date		5/16/2019	5/16/2019	5/14/2019	5/15/2019	5/16/2019	5/16/2019	5/16/2019	5/15/2019	5/15/2019	5/14/2019	5/14/2019	5/14/2019
Static Water Elevation (ft MSL)		665.08	665.10	658.23	657.64	659.81	660.82	660.59	660.59	658.59	669.68	670.19	670.02
Field Parameters													
Temperature	°C	16.80	16.27	15.14	15.08	18.00	18.29	17.44	18.93	15.88	11.80	13.44	13.57
Dissolved Oxygen, Field	mg/L	0.07	0.12	0.39	9.91	0.11	1.74	0.14	8.52	10.31	5.57	0.06	0.17
Conductivity, Field	uS/cm	2952.8	3160.0	1634.3	0.26	2246.0	1774.4	2365.5	1.92	0.61	802.67	865.60	822.07
ORP, Field	mV	-115.7	-111.0	-98.5	147.0	-116.6	9.8	-137.8	28.9	-63.9	175.8	167.7	-44.2
pH, Field	Std. Units	7.77	7.77	7.41	7.47	7.69	7.70	7.80	7.43	7.37	7.48	7.34	7.43
Analytical Data													
Antimony, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0	4.4	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Arsenic, Total	ug/L	313	349	14.3	3.1	210	30	225	324	108	<1.0	<1.0	1.0
Barium, Total	ug/L	30.0	42.6	31.0	81.1	25.1	27.8	26.6	30.9	46.6	42.8	78.1	65.6
Beryllium, Total	ug/L	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20
Boron, Total	ug/L	1570	2650	8750	430	8430	8670	14400	12200	43300	210	185	167
Cadmium, Total	ug/L	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Calcium, Total	ug/L	164000	243000	197000	46800	194000	185000	217000	213000	371000	99400	113000	106000
Chloride	mg/L	528	485	82.9	19.2	255	211	353	373	168	33.4	25.4	26.3
Chromium, Total	ug/L	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0
Cobalt, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Fluoride	mg/L	2.4	2.5	0.47	1.4	1.3	1.5	0.49	0.83	0.28	0.10	<0.10	<0.10
Lead, Total	ug/L	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0
Lithium, Total	ug/L	69.4	69.5	128	<20.0	104	127	105	99.7	567	<20.0	<20.0	<20.0
Mercury	ug/L	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Molybdenum, Total	ug/L	99.0	93.4	<10.0	73.2	219	241	1090	782	188	<10.0	<10.0	<10.0
Selenium, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0	1.4	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Sulfate	mg/L	465	684	504	95.7	603	598	629	615	1690	40.8	38.8	83.1
Thallium, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Total Dissolved Solids	mg/L	1850	2060	1200	453	1580	1430	1720	1800	3110	423	458	468
Total Radium	pCi/L	1.14	1.03	0.927	0.933	0.592	1.22	1.59	1.38	1.33	1.03	1.63	2.06
pH at 25 Degrees C	Std. Units	7.6	7.6	7.2	7.9	7.5	7.6	7.5	7.4	7.5	7.3	7.2	7.3

Notes:

ft MSL: Elevation, feet mean sea level °C: Degrees celcius uS/cm: microsiemen per centimeter umhos/cm: micromhos per centimeter mV: millivolt Std. Units: standard units mg/L: milligram per liter ug/L: microgram per liter pCi/L: picoCurie per liter Static water elevation listed for a well may have been collected on a date different than date of well sampling.

Summary of Monitoring Results - February 2019 (MW-15 Nest Event) Multiunit Ash Pond System Indianapolis Power and Light Company Harding Street Generating Station Indianapolis, Indiana ATC Project No. 170LF00707

Well ID		MW-15S	MW-15I	MW-15D
Pace Lab ID		50216228001	50216228002	50216228003
Sample Date		2/4/2019	2/4/2019	2/4/2019
Static Water Elevation (ft MSL)		670.53	669.22	669.10
Field Parameters				
Temperature	°C	13.15	13.63	13.14
Dissolved Oxygen, Field	mg/L	3.54	0.07	0.14
Conductivity, Field	uS/cm	606.56	711.80	673.56
ORP, Field	mV	238.5	85.35	-12.35
pH, Field	Std. Units	-2.08	7.05	6.93
Analytical Data				
Antimony, Total	ug/L	<1.0	<1.0	<1.0
Arsenic, Total	ug/L	<1.0	<1.0	1.3
Barium, Total	ug/L	54.5	77.1	69.6
Beryllium, Total	ug/L	<0.20	<0.20	<0.20
Boron, Total	ug/L	110	121	130
Cadmium, Total	ug/L	<2.0	<2.0	<2.0
Calcium, Total	ug/L	109000	113000	110000
Chloride	mg/L	30.5	22.5	28.7
Chromium, Total	ug/L	<10.0	<10.0	<10.0
Cobalt, Total	ug/L	<1.0	<1.0	<1.0
Fluoride	mg/L	0.11	0.12	0.12
Lead, Total	ug/L	<10.0	<10.0	<10.0
Lithium, Total	ug/L	<20.0	<20.0	<20.0
Mercury	ug/L	<2.0	<2.0	<2.0
Molybdenum, Total	ug/L	<10.0	<10.0	<10.0
Selenium, Total	ug/L	<1.0	2.1	<1.0
Sulfate	mg/L	44.3	39.4	85.9
Thallium, Total	ug/L	<1.0	<1.0	<1.0
Total Dissolved Solids	mg/L	473	483	511
Total Radium	pCi/L	0.496	0.849	1.06
pH at 25 Degrees C	Std. Units	7.3	7.3	7.4

Notes:

ft MSL: Elevation, feet mean sea level °C: Degrees celcius uS/cm: microsiemen per centimeter umhos/cm: micromhos per centimeter mV: millivolt Std. Units: standard units mg/L: miligram per liter ug/L: microgram per liter pCi/L: picoCurie per liter Static water elevation listed for a well may have been collected on a date different than date of well sampling.

Summary of Monitoring Results - March 2019 (MW-15 Nest Event) Multiunit Ash Pond System Indianapolis Power and Light Company Harding Street Generating Station Indianapolis, Indiana ATC Project No. 170LF00707

Well ID	MW-15S	MW-15I	MW-15D					
Pace Lab ID		50220329003	50220329002	50220329001				
Sample Date		3/25/2019	3/25/2019	3/25/2019				
Static Water Elevation (ft MSL)		669.31	669.82	669.59				
Field Parameters								
Temperature	°C	11.30	13.44	13.05				
Dissolved Oxygen, Field	mg/L	5.55	0.04	0.15				
Conductivity, Field	uS/cm	344.90	339.91	333.18				
ORP, Field	mV	148.5	148.5 87.3 7.24 7.14					
pH, Field	Std. Units	7.24	7.14	7.24				
Analytical Data								
Antimony, Total	ug/L	<1.0	<1.0	<1.0				
Arsenic, Total	ug/L	<1.0	<1.0	1.1				
Barium, Total	ug/L	50.4	78.8	68.4				
Beryllium, Total	ug/L	<0.20	<0.20	<0.20				
Boron, Total	ug/L	104	119	128				
Cadmium, Total	ug/L	<2.0	<2.0	<2.0				
Calcium, Total	ug/L	108000	109000	108000				
Chloride	mg/L	45.4	20.1	32.5				
Chromium, Total	ug/L	<10.0	<10.0	<10.0				
Cobalt, Total	ug/L	<1.0	<1.0	<1.0				
Fluoride	mg/L	0.12	0.13	0.13				
Lead, Total	ug/L	<10.0	<10.0	<10.0				
Lithium, Total	ug/L	<20.0	<20.0	<20.0				
Mercury	ug/L	<2.0	<2.0	<2.0				
Molybdenum, Total	ug/L	<10.0	<10.0	<10.0				
Selenium, Total	ug/L	<1.0	1.9	<1.0				
Sulfate	mg/L	41.2	38.8	114				
Thallium, Total	ug/L	<1.0	<1.0	<1.0				
Total Dissolved Solids	mg/L	495	498	490				
Total Radium	pCi/L	0.885	1.65	1.46				
pH at 25 Degrees C	Std. Units	7.2	7.2	7.3				

Notes:

ft MSL: Elevation, feet mean sea level °C: Degrees celcius uS/cm: microsiemen per centimeter umhos/cm: micromhos per centimeter mV: millivolt Std. Units: standard units mg/L: milligram per liter ug/L: microgram per liter pCi/L: picoCurie per liter Static water elevation listed for a well may have been collected on a date different than date of well sampling.

Summary of Monitoring Results - July 2019 (MW-15 Nest Event) Multiunit Ash Pond System Indianapolis Power and Light Company Harding Street Generating Station Indianapolis, Indiana ATC Project No. 170LF00707

Well ID		MW-15S	MW-15I	MW-15D		
Pace Lab ID		50231188001	50231188002	50231188003		
Sample Date		7/24/2019	7/24/2019	7/24/2019		
Static Water Elevation (ft MSL)		668.92	669.49	669.34		
Field Parameters						
Temperature	°C	15.24	14.13	15.80		
Dissolved Oxygen, Field	mg/L	5.11	0.08	1.00		
Conductivity, Field	uS/cm	1041.6	747.06	808.42		
ORP, Field	mV	27.9	27.9 32.8			
pH, Field	Std. Units	7.21	7.06	7.27		
Analytical Data						
Antimony, Total	ug/L	<1.0	<1.0	<1.0		
Arsenic, Total	ug/L	<1.0	<1.0	1.1		
Barium, Total	ug/L	60.7	66.2	1.1 64.6 <0.20 125		
Beryllium, Total	ug/L	<0.20	<0.20	<0.20		
Boron, Total	ug/L	127	108	125		
Cadmium, Total	ug/L	<2.0	<2.0	<2.0		
Calcium, Total	ug/L	118000	104000	108000		
Chloride	mg/L	83.1	14.6	27.0		
Chromium, Total	ug/L	<10.0	<10.0	<10.0		
Cobalt, Total	ug/L	<1.0	<1.0	<1.0		
Fluoride	mg/L	<0.10	<0.10	<0.10		
Lead, Total	ug/L	<10.0	<10.0	<10.0		
Lithium, Total	ug/L	<20.0	<20.0	<20.0		
Mercury	ug/L	<2.0	<2.0	<2.0		
Molybdenum, Total	ug/L	<10.0	<10.0	<10.0		
Selenium, Total	ug/L	1.1	<1.0	<1.0		
Sulfate	mg/L	49.0	34.9	89.6		
Thallium, Total	ug/L	<1.0	<1.0	<1.0		
Total Dissolved Solids	mg/L	602	462	504		
Total Radium	pCi/L	1.03	1.62	1.45		
pH at 25 Degrees C	Std. Units	7.2	7.2	7.3		

Notes:

ft MSL: Elevation, feet mean sea level °C: Degrees celcius uS/cm: microsiemen per centimeter umhos/cm: micromhos per centimeter mV: millivolt Std. Units: standard units mg/L: miligram per liter ug/L: microgram per liter pCi/L: picoCurie per liter Static water elevation listed for a well may have been collected on a date different than date of well sampling.

Summary of Monitoring Results - September 2019 (N and E Well Event) Multiunit Ash Pond System Indianapolis Power and Light Company Harding Street Generating Station Indianapolis, Indiana

ATC Project No. 170LF00707

Well ID		M-4
Pace Lab ID		50235404001
Sample Date		9/10/2019
Static Water Elevation (ft MSL)		656.18
Field Daramators		
Tomporaturo	°C	16 72
Dissolved Ovygon, Field	C	10.75
Conductivity Field	Ilig/L	.32
	us/cm	2401.0
ORP, Field	mv	-146.7
pH, Field	Std. Units	7.53
Analytical Data		
Antimony, Total	ug/L	<1.0
Arsenic, Total	ug/L	895
Barium, Total	ug/L	154
Beryllium, Total	ug/L	<0.20
Boron, Total	ug/L	30500
Cadmium, Total	ug/L	<2.0
Calcium, Total	ug/L	380000
Chloride	mg/L	118
Chromium, Total	ug/L	<10.0
Cobalt, Total	ug/L	<1.0
Fluoride	mg/L	0.20
Lead, Total	ug/L	<10.0
Lithium, Total	ug/L	303
Mercury	ug/L	<2.0
Molybdenum, Total	ug/L	234
Selenium, Total	ug/L	<1.0
Sulfate	mg/L	1080
Thallium, Total	ug/L	<1.0
Total Dissolved Solids	mg/L	1900
Total Radium	pCi/L	1.580
pH at 25 Degrees C	Std. Units	7.5

Notes:

ft MSL: Elevation, feet mean sea level °C: Degrees celcius uS/cm: microsiemen per centimeter umhos/cm: micromhos per centimeter mV: millivolt Std. Units: standard units mg/L: milligram per liter ug/L: microgram per liter pCi/L: picoCurie per liter Static water elevation listed for a well may have been collected on a date different than date of well sampling.

Page 1 of 1

Groundwater Protection Standards Multiunit Ash Pond System Indianapolis Power and Light Company Harding Street Generating Station Indianapolis, Indiana ATC Project No. 170LF00707

Parameter	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Fluoride	Lead	Lithium	Mercury	Molybdenum	Selenium	Thallium	Radium 226/228 Combined
Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	mg/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	pCi/L
Shallow Zone GWPS	6	10	2000	4	5	100	6	4	15	40	2	100	50	2	5
Deep Zone GWPS	6	10	2000	4	5	100	6	4	15	40	2	100	50	2	5

Notes:

ug/L = micrograms per liter (ppb)

mg/L = milligrams per liter (ppm)

pCi/L = picoCuries per liter

GWPS = Groundwater Protection Standard

FIGURES

- Figure 1: Figure 2: Site Location Map
- Groundwater Monitoring System CCR Network Wells and N&E Wells/Piezometers





ATTACHMENT A

Demonstration for 60-Day Extension – Corrective Measures Assessment



HALEY & ALDRICH, INC. 6500 Rockside Road Suite 200 Cleveland, OH 44131 216.739.0555

MEMORANDUM

July 2019 Project No. 133274-005

SUBJECT: **Demonstration for 60-Day Extension – Corrective Measures Assessment (CMA)** Indianapolis Power & Light (IPL) – Harding Street Generating Station Ponds 1, 2A, 2B, and 3 Indianapolis, Marion 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 Ponds 1, 2A, 2B & 3 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 Ponds 1, 2A, 2B, and 3, 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 Print Name: Indiana License No.: Title: Company:

Steven F. Putrich, P.E. PE11200566 CCR Practice Lead, Senior Consulting Engineer Haley & Aldrich, Inc.

Professional Engineer's Seal

