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Re: **2020 CCR Annual Groundwater Monitoring and  
Corrective Action Report**  
Indianapolis Power & Light Company  
Harding Street Generating Station  
Indianapolis, Indiana  
ATC Project No. 170LF00872

Dear Mr. Heger:

ATC Group Services LLC (ATC) has prepared this 2020 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 includes information required by § 257.90(e)(1) through § 257.90(e)(6).

Federal CCR Rule § 257.90(e)(6) specifies the following:

*A section at the beginning of the annual report that provides an overview of the current status of groundwater monitoring and corrective action programs for the CCR unit. At a minimum, the summary must specify all of the following: (i) At the start of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in § 257.94 or the assessment monitoring program in § 257.95; (ii) At the end of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in § 257.94 or the assessment monitoring program in § 257.95; (iii) If it was determined that there was a statistically significant increase over background for one or more constituents listed in appendix III to this part pursuant to § 257.94(e): (A) Identify those constituents listed in appendix III to this part and the names of the monitoring wells associated with such an increase; and (B) Provide the date when the assessment monitoring program was initiated for the CCR*

*unit. (iv) If it was determined that there was a statistically significant level above the groundwater protection standard for one or more constituents listed in appendix IV to this part pursuant to § 257.95(g) include all of the following: (A) Identify those constituents listed in appendix IV to this part and the names of the monitoring wells associated with such an increase; (B) Provide the date when the assessment of corrective measures was initiated for the CCR unit; (C) Provide the date when the public meeting was held for the assessment of corrective measures for the CCR unit; and (D) Provide the date when the assessment of corrective measures was completed for the CCR unit. (v) Whether a remedy was selected pursuant to § 257.97 during the current annual reporting period, and if so, the date of remedy selection; and (vi) Whether remedial activities were initiated or are ongoing pursuant to § 257.98 during the current annual reporting period.*

## **Overview of 2020 Groundwater Monitoring and Corrective Action**

At the beginning and end of the 2020 reporting period, the CCR units were operating under the Assessment Monitoring Program in § 257.95. Pursuant to 40 CFR 257.94(e)(2), 257.94(e)(3) and 257.95(b), the facility had previously established an Assessment Monitoring Program in accordance with the requirements of § 257.95 on July 16, 2018. Therefore, evaluation of statistically significant increase over background for one or more constituents listed in appendix III to this part pursuant to § 257.94(e) was not performed.

At the end of the 2020 reporting period, associated with the May 2020 monitoring event as November 2020 sampling data was not finalized in 2020, it was determined that the following Appendix IV constituents were at statistically significant levels (SSLs) above the associated groundwater protection standards (GWPS) pursuant to § 257.95(g). The May 2020 SSLs are as follows:

### Antimony

Shallow: MW-3S, MW-9S

### Arsenic

Shallow: MW-2S, MW-6S, MW-7S, MW-10S, MW-12S, MW-13S

Deep: MW-7D, MW-10D, MW-11D, MW-12D, MW-13D, MW-14D

### Lithium

Shallow: MW-5S, MW-6S, MW-7S, MW-8S, MW-9S, MW-10S, MW-12S, MW-13S

Deep: MW-7D, MW-10D, MW-11D, MW-12D, MW-13D, MW-14D

### Molybdenum

Shallow: MW-5S, MW-7S, MW-8S, MW-12S, MW-13S

Deep: MW-7D, MW-12D, MW-13D, MW-14D

The above listed May 2020 SSLs are not new constituent SSLs and were previously identified. Therefore, no new SSL notification was required pursuant to § 257.94(e).

The assessment of corrective measures was initiated for the CCR units on April 15, 2019 in response to SSLs of Appendix IV constituents exceeding 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. A public meeting was not held for the assessment of corrective measures for the CCR units in 2020 as nature and extent work is still ongoing at the facility in order to characterize the extent of the contamination plume and further support the CMA. A remedy was not selected pursuant to § 257.97 during the 2020 reporting period. Remedial activities were not initiated pursuant to § 257.98 during the 2020 reporting period.

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 2020 to comply with the CCR Rule:

- A background sampling event at the MW-15 upgradient nest was performed in January 2020 in order to obtain a minimum of 8 independent background samples as required by § 257.94(b).
- Efforts to determine the nature and extent (N&E) of the Appendix IV SSLs continued pursuant to § 257.95(g) including but not limited to initiating off-site installation of additional monitoring equipment and associated gauging and sampling at the Hanson Aggregates facility, review of groundwater analytical results/data to improve the groundwater site conceptual model, and modeling to support the CMA.
- Based on the initial off-site N&E groundwater sampling event completed in December 2019, it was determined that groundwater concentrations above applicable GWPSs 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 on February 10, 2020.

- Semi-annual assessment monitoring sampling events were conducted in 2020 as required by § 257.95(b) and § 257.95(d)(1). Subsequent SSLs evaluation of the November 2019 and May 2020 data were performed within 90 days of completing the sampling and analysis pursuant to § 257.93(h)(2).
- Semi-Annual Remedy Selection Progress Reports pursuant to § 257.97(a) for the period of September 13, 2019 through March 13, 2020, and for the period of March 14, 2020 through September 12, 2020 were completed and placed in the facility's operating record and posted to IPLs CCR Website.

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 N&E monitoring equipment installed in 2019 and 2020, 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.

To characterize the 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 are still ongoing.

IPL initiated N&E investigative work at the Hanson site in late 2019 to determine the extent of the contamination plume and to support the CMA Report. Four N&E monitoring wells (PZ-100S, PZ-100D, PZ-101S, and PZ-101D) were installed in October 2019 and sampled in December 2019.

Based on the identification of groundwater concentrations above applicable GWPSs at the PZ-100 and PZ-101 well nests, efforts to determine the N&E of the Appendix IV SSLs continued pursuant to § 257.95(g). Seven off-site (Hanson) N&E monitoring wells (MW-102S, MW-102D, MW-103S, MW-103I, MW-103D, MW-104S, and MW-104D) were installed in April 2020 in order to further evaluate the lateral extent of the off-site plume.

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 the 2020 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 November 2019 semi-annual assessment monitoring sampling event are summarized in Table 3; these results were not finalized by the end of 2019 for inclusion in the associated 2020 Annual Report. Groundwater analytical results for the December 2019 off-site N&E well sampling event is summarized in Table 4. Groundwater analytical results for the January 2020 MW-15 nest background sampling event are summarized in Table 5; with this event, the facility obtained the eight background samples as required pursuant to § 257.90(b)(iii). Groundwater analytical results for the May 2020 combined semi-annual assessment monitoring sampling event and on-site and off-site N&E sampling event are summarized in Table 6. Groundwater analytical results for the August 2020 on-site and off-site N&E sampling event are summarized in Table 7. Groundwater results for the November 2020 combined semi-annual assessment monitoring sampling event and on-site and off-site N&E event were not finalized in 2020 and therefore are not included with this submittal.

***§ 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);***

IPL Harding Street operated under the assessment monitoring program in accordance with § 257.95. No transition between monitoring programs was conducted in 2020.

During 2020, statistical evaluations of the November 2019 and May 2020 analytical data were performed in order to determine whether there was a SSL of a new Appendix IV constituent detected above the relevant GWPS in accordance with § 257.95(g) and 257.93(h). The evaluations were completed in March 2020 and September 2020, respectively. Based on the evaluations, it was

determined that the Appendix IV constituents that exceeded the GWPS include antimony, arsenic, lithium, and molybdenum; however, these are the same constituent SSLs previously identified. Since there were no new Appendix IV constituent SSLs identified, an additional notification was not triggered pursuant to 40 CFR 257.95(g).

***§ 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) associated with both the November 2019 and May 2020 semi-annual assessment monitoring events.

Projected key activities for the upcoming year include the following:

- Assessment monitoring sampling events in accordance with § 257.95.
- Finalize November 2020 analytical data. Completion of statistical evaluation of November 2020 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 May 2021 assessment monitoring analytical data.
- Continue N&E work including further evaluation of off-site impacts at Hanson Aggregates pursuant to § 257.95(g).
- Potentially 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).

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,  
**ATC Group Services LLC**

*Mark E. Breting*

Mark E. Breting, L.P.G.  
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**Table 1**  
 Well Sampling Summary  
 Multiunit Ash Pond System  
 Indianapolis Power and Light Company  
 Harding Street Generating Station  
 Indianapolis, Indiana  
 ATC Project No. 170LF00872

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	5/26/2020 11/6/2020	Assessment
MW-1D	9/25/2015	Downgradient	2	5/26/2020 11/6/2020	
MW-2S	9/29/2015	Downgradient	2	5/19/2020 11/4/2020	Assessment
MW-2D	2/9/2016	Downgradient	2	5/19/2020 11/4/2020	
MW-3S	9/28/2015	Downgradient	2	5/18/2020 11/3/2020	Assessment
MW-3D	2/10/2016	Downgradient	2	5/18/2020 11/3/2020	
MW-4S	9/28/2015	Downgradient	2	6/5/2020 11/3/2020	Assessment
MW-5S	10/1/2015	Downgradient	2	5/18/2020 11/5/2020	
MW-6S	9/28/2015	Downgradient	2	5/28/2020 11/9/2020	Assessment
MW-7S	9/30/2015	Downgradient	2	5/27/2020 11/17/2020	
MW-7D	2/17/2016	Downgradient	2	5/27/2020 11/17/2020	Assessment
MW-8S	10/1/2015	Downgradient	2	5/26/2020 11/9/2020	
MW-9S	2/11/2016	Downgradient	2	5/29/2020 11/9/2020	Assessment
MW-9I	2/24/2016	Downgradient	2	5/19/2020 11/4/2020	
MW-9D	2/11/2016	Downgradient	2	5/19/2020 11/4/2020	Assessment
MW-10S	2/16/2016	Downgradient	2	5/19/2020 11/5/2020	
MW-10D	2/16/2016	Downgradient	2	5/19/2020 11/5/2020	Assessment
MW-11S	2/17/2016	Downgradient	2	5/27/2020 11/5/2020	Assessment
MW-11D	2/18/2016	Downgradient	2	5/27/2020 11/5/2020	
MW-12S	2/19/2016	Downgradient	2	5/29/2020 11/5/2020	Assessment
MW-12D	2/18/2016	Downgradient	2	5/18/2020 11/5/2020	
MW-13S	2/15/2016	Downgradient	2	5/19/2020 11/5/2020	Assessment
MW-13D	2/12/2016	Downgradient	2	5/19/2020 11/5/2020	

**Table 1**  
 Well Sampling Summary  
 Multiunit Ash Pond System  
 Indianapolis Power and Light Company  
 Harding Street Generating Station  
 Indianapolis, Indiana  
 ATC Project No. 170LF00872

Identification	Date Installed	Upgradient/Background, Downgradient, or Nature & Extent	Number of Samples	Sample Date	Detection or Assessment Monitoring Program
MW-14D	2/23/2016	Downgradient	2	5/26/2020	Assessment
				11/5/2020	
MW-15S	8/17/2018	Upgradient/Background	3	1/29/2020	Detection/Assessment
				5/27/2020	
				11/3/2020	
MW-15I	8/17/2018	Upgradient/Background	3	1/29/2020	Detection/Assessment
				5/27/2020	
				11/3/2020	
MW-15D	8/17/2018	Upgradient/Background	3	1/29/2020	Detection/Assessment
				5/27/2020	
				11/3/2020	
M-4	12/18/1986	Nature & Extent	2	5/28/2020	Assessment
				11/5/2020	
MW-102S	4/15/2020	Nature & Extent	0	NS	-
MW-102D	4/15/2020	Nature & Extent		5/20/2020	Assessment
				8/18/2020	
				11/4/2020	
MW-103S	4/8/2020	Nature & Extent	3	5/20/2020	Assessment
				8/18/2020	
				11/4/2020	
MW-103I	4/8/2020	Nature & Extent	3	5/20/2020	Assessment
				8/18/2020	
				11/4/2020	
MW-103D	4/8/2020	Nature & Extent	3	5/20/2020	Assessment
				8/19/2020	
				11/4/2020	
MW-104S	4/17/2020	Nature & Extent	2	8/19/2020	Assessment
				11/4/2020	
MW-104D	4/16/2020	Nature & Extent	3	5/20/2020	Assessment
				8/19/2020	
				11/4/2020	
PZ-100S	10/24/2019	Nature & Extent	3	5/20/2020	Assessment
				8/18/2020	
				11/4/2020	
PZ-100D	10/23/2019	Nature & Extent	3	5/20/2020	Assessment
				8/18/2020	
				11/4/2020	

**Table 1**  
 Well Sampling Summary  
 Multiunit Ash Pond System  
 Indianapolis Power and Light Company  
 Harding Street Generating Station  
 Indianapolis, Indiana  
 ATC Project No. 170LF00872

Identification	Date Installed	Upgradient/Background, Downgradient, or Nature & Extent	Number of Samples	Sample Date	Detection or Assessment Monitoring Program
PZ-101S	10/29/2019	Nature & Extent	3	5/20/2020	Assessment
				8/18/2020	
				11/4/2020	
PZ-101D	10/25/2019	Nature & Extent	3	5/20/2020	Assessment
				8/18/2020	
				11/4/2020	

Notes

NS: MW-102S was effectively dry in 2020 and not sampled.

**Table 2**  
**Groundwater Elevation Data**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station, Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Monitoring Well/Piezometer Location	Gauging Date	TOC Elevation (ft-MSL)	Depth to Water (ft)	Water Elevation (ft-MSL)
MW-1S	5/11/2020	675.33	13.34	661.99
	8/17/2020		13.42	661.91
	11/2/2020		13.54	661.79
MW-1D	5/11/2020	675.17	13.09	662.08
	8/17/2020		13.26	661.91
	11/2/2020		13.27	661.90
MW-2S	5/11/2020	684.99	19.72	665.27
	8/17/2020		19.87	665.12
	11/2/2020		20.32	664.67
MW-2D	5/11/2020	685.20	19.93	665.27
	8/17/2020		19.89	665.31
	11/2/2020		20.45	664.75
MW-3S	5/11/2020	688.98	25.68	663.30
	8/17/2020		25.30	663.68
	11/2/2020		26.64	662.34
MW-3D	5/11/2020	688.82	25.67	663.15
	8/17/2020		25.29	663.53
	11/2/2020		26.66	662.16
MW-4S	6/5/2020	689.29	30.31	658.98
	8/17/2020		30.65	658.64
	11/2/2020		33.60	655.69
MW-5S	5/18/2020	689.43	31.64	657.79
	8/17/2020		30.59	658.84
	11/2/2020		32.58	656.85
MW-6S	5/28/2020	695.67	33.20	662.47
	8/17/2020		34.44	661.23
	11/2/2020		35.04	660.63
MW-7S	5/11/2020	696.76	39.42	657.34
	8/17/2020		39.68	657.08
	11/2/2020		40.35	656.41
MW-7D	5/11/2020	696.29	38.96	657.33
	8/17/2020		39.29	657.00
	11/2/2020		39.92	656.37

**Table 2**  
**Groundwater Elevation Data**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station, Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Monitoring Well/Piezometer Location	Gauging Date	TOC Elevation (ft-MSL)	Depth to Water (ft)	Water Elevation (ft-MSL)
MW-8S	5/11/2020	672.78	15.98	656.80
	8/17/2020		16.37	656.41
	11/2/2020		16.43	656.35
MW-9S	5/29/2020	689.02	32.87	656.15
	8/17/2020		32.26	656.76
	11/2/2020		36.14	652.88
MW-9I	5/11/2020	689.11	34.88	654.23
	8/17/2020		32.33	656.78
	11/2/2020		36.18	652.93
MW-9D	5/11/2020	689.27	35.08	654.19
	8/17/2020		32.52	656.75
	11/2/2020		36.33	652.94
MW-10S	5/11/2020	691.10	28.07	663.03
	8/17/2020		28.05	663.05
	11/2/2020		28.81	662.29
MW-10D	5/11/2020	691.28	28.26	663.02
	8/17/2020		28.24	663.04
	11/2/2020		29.00	662.28
MW-11S	5/11/2020	686.17	32.03	654.14
	8/17/2020		33.71	652.46
	11/2/2020		34.83	651.34
MW-11D	5/11/2020	686.17	30.13	656.04
	8/17/2020		30.74	655.43
	11/2/2020		31.10	655.07
MW-12S	5/18/2020	688.82	35.70	653.12
	8/17/2020		33.27	655.55
	11/2/2020		36.47	652.35
MW-12D	5/11/2020	688.73	36.80	651.93
	8/17/2020		33.18	655.55
	11/2/2020		36.41	652.32
MW-13S	5/11/2020	696.08	36.98	659.10
	8/17/2020		37.18	658.90
	11/2/2020		37.78	658.30

**Table 2**  
**Groundwater Elevation Data**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station, Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Monitoring Well/Piezometer Location	Gauging Date	TOC Elevation (ft-MSL)	Depth to Water (ft)	Water Elevation (ft-MSL)
MW-13D	5/11/2020	696.78	37.72	659.06
	8/17/2020		37.92	658.86
	11/2/2020		38.51	658.27
MW-14D	5/11/2020	697.88	41.51	656.37
	8/17/2020		41.94	655.94
	11/2/2020		42.40	655.48
MW-15S	1/29/2020	685.46	16.27	669.19
	5/11/2020		17.56	667.90
	8/17/2020		17.89	667.57
	11/2/2020		19.09	666.37
MW-15I	1/29/2020	685.59	16.00	669.59
	5/11/2020		17.23	668.36
	8/17/2020		17.47	668.12
	11/2/2020		18.62	666.97
MW-15D	1/29/2020	685.20	15.72	669.48
	5/11/2020		16.90	668.30
	8/17/2020		17.10	668.10
	11/2/2020		18.35	666.85
M-4	5/11/2020	693.25	36.69	656.56
	8/17/2020		36.96	656.29
	11/2/2020		14.28	678.97
PZ-100S	5/11/2020	681.79	29.07	652.72
	8/17/2020		26.73	655.06
	11/2/2020		29.53	652.26
PZ-100D	5/11/2020	681.84	45.59	636.25
	8/17/2020		43.97	637.87
	11/2/2020		46.10	635.74
PZ-101S	5/11/2020	689.36	43.15	646.21
	8/17/2020		38.80	650.56
	9/22/2020		40.61	648.75
	10/20/2020		42.02	647.34
	11/2/2020		42.48	646.88
	11/10/2020		42.54	646.82
	12/16/2020		44.16	645.20

**Table 2**  
**Groundwater Elevation Data**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station, Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Monitoring Well/Piezometer Location	Gauging Date	TOC Elevation (ft-MSL)	Depth to Water (ft)	Water Elevation (ft-MSL)
PZ-101D	5/11/2020	689.40	83.28	606.12
	8/17/2020		82.21	607.19
	9/22/2020		82.31	607.09
	10/20/2020		82.84	606.56
	11/2/2020		83.16	606.24
	11/10/2020		83.42	605.98
	12/16/2020		84.23	605.17
MW-102S	5/11/2020	677.10	60.70	616.40
	8/17/2020		60.84	616.26
	11/2/2020		61.01	616.09
MW-102D	5/11/2020	677.48	60.46	617.02
	8/17/2020		60.81	616.67
	11/2/2020		60.59	616.89
MW-103S	5/11/2020	701.27	35.00	666.27
	8/17/2020		35.22	666.05
	9/22/2020		35.35	665.92
	10/20/2020		35.56	665.71
	11/2/2020		35.61	665.66
	11/10/2020		35.63	665.64
	12/16/2020		35.73	665.54
MW-103I	5/11/2020	701.26	87.39	613.87
	8/17/2020		87.75	613.51
	9/22/2020		89.27	611.99
	10/20/2020		90.29	610.97
	11/2/2020		90.00	611.26
	11/10/2020		90.27	610.99
	12/16/2020		90.77	610.49
MW-103D	5/11/2020	701.54	90.60	610.94
	8/17/2020		90.93	610.61
	9/22/2020		92.29	609.25
	10/20/2020		93.22	608.32
	11/2/2020		92.93	608.61
	11/10/2020		93.16	608.38
	12/16/2020		93.60	607.94

**Table 2**  
**Groundwater Elevation Data**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station, Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Monitoring Well/Piezometer Location	Gauging Date	TOC Elevation (ft-MSL)	Depth to Water (ft)	Water Elevation (ft-MSL)
MW-104S	5/11/2020	676.60	dry	#VALUE!
	8/17/2020		52.06	624.54
	9/22/2020		52.22	624.38
	10/20/2020		52.37	624.23
	11/2/2020		52.39	624.21
	11/10/2020		52.45	624.15
	12/16/2020		53.50	623.10
MW-104D	5/11/2020	677.00	86.85	590.15
	8/17/2020		87.24	589.76
	9/22/2020		86.71	590.29
	10/20/2020		86.92	590.08
	11/2/2020		87.24	589.76
	11/10/2020		87.29	589.71
	12/16/2020		87.74	589.26

Notes:

TOC = Top of Casing

ft-MSL = feet above Mean Sea Level

ft-bgs = feet below ground surface

**Table 3**  
**Summary of Monitoring Results - November 2019**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

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		50241165002	50241165001	50241165004	50241165003	50241165006	50241165005				50241165008	50241165007	50241165009	50241165011	50241165010	
Sample Date		11/7/2019	11/7/2019	11/5/2019	11/5/2019	11/6/2019	11/5/2019				11/6/2019	11/6/2019	11/7/2019	11/6/2019	11/6/2019	
Static Water Elevation (ft MSL)		661.90	661.80	665.04	665.03	663.11	663.23				656.66	656.68	656.02	654.80	654.86	
<b>Field Parameters</b>	<b>Units</b>															
Temperature	°C	13.94	13.29	16.59	17.31	13.81	15.34				15.94	14.67	14.9	14.38	14.1	
Dissolved Oxygen, Field	mg/L	0.04	0.06	0.18	0.24	0.15	0.28				0.33	1.66	0.07	0.16	0.15	
Conductivity, Field	uS/cm	1082.5	1059.5	2.63	3.2	1174.2	918.48				2.15	2.09	2200	1088	947.57	
ORP, Field	mV	-88.1	-91.8	-62.4	-94.2	-48.1	121.2				-135.8	-119.4	123.1	-82.7	-52.4	
pH, Field	Std. Units	7.11	7.25	7.09	7.21	7.02	6.77				7.63	7.61	7.02	7.12	7.05	
<b>Analytical Data</b>																
Antimony, Total	ug/L	<1.0	6.3	<1.0	<1.0	<1.0	8.7				<1.0	<1.0	<1.0	<1.0	<1.0	
Arsenic, Total	ug/L	5.2	50.6	3.1	14.6	2.9	1.8				432	439	<1	3.2	4	
Barium, Total	ug/L	55.5	140	114	195	50.8	51.9				44.3	49.7	37.8	46.4	56.8	
Beryllium, Total	ug/L	NA	NA	NA	NA	NA	NA				NA	NA	NA	NA	NA	
Boron, Total	ug/L	1270	367	3110	512	926	620				16400	15400	15200	1410	1900	
Cadmium, Total	ug/L	NA	NA	NA	NA	NA	NA				NA	NA	NA	NA	NA	
Calcium, Total	ug/L	113000	99900	230000	219000	118000	111000				238000	229000	224000	103000	104000	
Chloride	mg/L	109	129	459	585	120	93.3				253	265	164	103	71.1	
Chromium, Total	ug/L	<20.0	<20.0	<20.0	<20.0	<20.0	<20.0				<20.0	<20.0	<20.0	<20.0	<20.0	
Cobalt, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0				<1.0	1.6	<1.0	<1.0	<1.0	
Fluoride	mg/L	0.31	0.42	1.3	0.7	0.21	0.24				0.35	0.46	0.13	0.44	0.69	
Lead, Total	ug/L	NA	NA	NA	NA	NA	NA				NA	NA	NA	NA	NA	
Lithium, Total	ug/L	29.3	<20.0	65.0	26.1	<20.0	<20.0				95.5	89.8	174	33.6	30.2	
Mercury	ug/L	NA	NA	NA	NA	NA	NA				NA	NA	NA	NA	NA	
Molybdenum, Total	ug/L	47.8	28.9	79.6	31.4	11.9	41.6				617	608	530	53.3	91.2	
pH at 25 Degrees C	Std. Units	7.2	7.3	7.4	7.5	7.3	7.3				7.4	7.4	7.2	7.4	7.3	
Selenium, 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	
Sulfate	mg/L	102	102	508	704	137	40.8				733	668	852	118	105	
Thallium, Total	ug/L	NA	NA	NA	NA	NA	NA				NA	NA	NA	NA	NA	
Total Dissolved Solids	mg/L	653	610	1750	2210	694	493				1680	1600	1740	672	562	
Total Radium	pCi/L	1.41	5.38	3.15	2.69	3.98	<0.874				1.6	1.87	1.58	0.95	<0.479	

Notes:

ft MSL: Elevation, feet mean sea level

°C: Degrees celcius

uS/cm: microsiemen per centimeter

umhos/cm: micromhos per centimeter

NA: Not analyzed

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.

**Table 3**  
**Summary of Monitoring Results - November 2019**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

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	M-4
Pace Lab ID		50241165013	50241165012	50241165017	50241165016	50241165018		50241165022	50241165019	50241165023	50241165024	50241165025	50241165026	50241180001
Sample Date		11/5/2019	11/5/2019	11/7/2019	11/7/2019	11/6/2019		11/6/2019	11/7/2019	11/7/2019	11/5/2019	11/5/2019	11/5/2019	11/6/2019
Static Water Elevation (ft MSL)		662.96	662.96	655.05	652.12	653.76		658.63	658.68	655.55	666.88	667.41	667.29	655.88
<b>Field Parameters</b>	<b>Units</b>													
Temperature	°C	15.08	15.22	11.1	9.11	17.45		16.5	16.46	12.75	15.67	14.29	14.26	15.45
Dissolved Oxygen, Field	mg/L	.35	0.15	0.91	2.73	0.13		0.59	0.05	0.71	3.79	0.09	0.16	0.13
Conductivity, Field	uS/cm	2.6	2.83	1.46	0.01	2253.1		1.93	2.03	2.55	980.85	612.39	881.15	2088.1
ORP, Field	mV	-112.2	-108.1	-89.2	-61.6	-131.1		-145.2	-101	-143.6	100.7	76.4	-35.5	-151.6
pH, Field	Std. Units	7.48	7.5	7.26	7.84	7.39		7.69	7.45	7.76	6.9	7.11	7.04	7.33
<b>Analytical Data</b>														
Antimony, 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
Arsenic, Total	ug/L	275	385	15.4	2.5	232		219	352	111	<1	<1	1.1	818
Barium, Total	ug/L	29.7	51.1	33.1	76.7	27.8		24.2	27.7	54.3	69.4	59	65.3	155
Beryllium, Total	ug/L	NA	NA	NA	NA	NA		NA	NA	NA	NA	NA	NA	<0.20
Boron, Total	ug/L	1800	2790	9920	465	11400		14100	12400	30700	181	138	162	25600
Cadmium, Total	ug/L	NA	NA	NA	NA	NA		NA	NA	NA	NA	NA	NA	3.3
Calcium, Total	ug/L	163000	262000	229000	50200	233000		174000	180000	378000	124000	99000	107000	347000
Chloride	mg/L	495	462	87.2	21.7	185		285	294	160	63.4	10.4	26.7	120
Chromium, Total	ug/L	<20.0	<20.0	<20.0	<20.0	<20.0		<20.0	<20.0	<20.0	<20.0	<20.0	<20.0	<20.0
Cobalt, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0		<1.0	<1.0	1.1	<1.0	<1.0	<1.0	<1.0
Fluoride	mg/L	2.3	2.1	0.41	1.4	1.2		0.49	0.78	0.21	<0.1	<0.1	<0.1	0.19
Lead, Total	ug/L	NA	NA	NA	NA	NA		NA	NA	NA	NA	NA	NA	<10.0
Lithium, Total	ug/L	61.6	60.5	128	<20.0	104		85	75.1	479	<20.0	<20.0	<20.0	258
Mercury	ug/L	NA	NA	NA	NA	NA		NA	NA	NA	NA	NA	NA	<2
Molybdenum, Total	ug/L	76.5	93.4	<10.0	75.9	218		880	809	267	<10.0	<10.0	<10.0	200
pH at 25 Degrees C	Std. Units	7.6	7.6	7.2	7.6	7.5		7.6	7.5	7.5	7.1	7.4	7.4	7.4
Selenium, 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
Sulfate	mg/L	448	683	574	112	809		492	501	1430	49.6	38.1	87.7	857
Thallium, Total	ug/L	NA	NA	NA	NA	NA		NA	NA	NA	NA	NA	NA	<1.0
Total Dissolved Solids	mg/L	1690	2040	1200	384	1620		1400	1470	2540	541	376	464	1800
Total Radium	pCi/L	1.39	0.629	0.817	0.749	1.36		0.979	1.33	1.73	0.751	<0.492	1.1	1.32

Notes:

ft MSL: Elevation, feet mean sea level

\*C: Degrees celcius

uS/cm: microsiemen per centimeter

umhos/cm: micromhos per centimeter

NA: Not analyzed

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.

**Table 4**  
**Summary of Monitoring Results - December 2019**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		PZ-100S	PZ-100D	PZ-101S	PZ-101D
Pace Lab ID		50244109005	50244109006	50244109001	50244109002
Sample Date		12/10/2019	12/10/2019	12/10/2019	12/10/2019
Static Water Elevation (ft MSL)		653.57	636.94	647.51	608.17
<b>Field Parameters</b>	<b>Units</b>				
Temperature	°C	14.05	12.95	11.18	11.1
Dissolved Oxygen, Field	mg/L	0.00	0.06	0.08	0.13
Conductivity, Field	uS/cm	1885.2	1690	1114.8	841.18
ORP, Field	mV	-66.6	-139.5	-75.7	-56.2
pH, Field	Std. Units	7.28	7.70	7.19	7.30
<b>Analytical Data</b>					
Alkalinity, Total as CaCO <sub>3</sub>	mg/L	253	190	261	237
Alkalinity,Bicarbonate (CaCO <sub>3</sub> )	mg/L	253	190	261	237
Alkalinity,Carbonate (CaCO <sub>3</sub> )	mg/L	<2.0	<2.0	<2.0	<2.0
Antimony, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Arsenic, Total	ug/L	1.9	18.3	24.3	3.5
Barium, Total	ug/L	43.3	65.3	157	45.5
Boron, Total	ug/L	2230	8700	3080	1850
Calcium, Total	ug/L	164000	227000	161000	115000
Chloride	mg/L	443	264	111	99.0
Chromium, Total	ug/L	<20.0	<20.0	<20.0	<20.0
Cobalt, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Fluoride	mg/L	2.1	0.26	0.27	0.20
Iron, Total	ug/L	2540	3210	7290	2100
Lithium, Total	ug/L	60.8	76.8	<20	26.4
Magnesium, Total	ug/L	58700	51800	48900	34100
Molybdenum, Total	ug/L	173	196	36.6	65.5
pH at 25 Degrees C	Std. Units	7.4	7.5	7.2	7.4
Potassium, Total	ug/L	12000	12700	5360	5580
Selenium, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Sodium, Total	ug/L	303000	193000	73700	70600
Sulfate	mg/L	429	650	389	223
Total Dissolved Solids	mg/L	1590	1560	941	633
Total Radium	pCi/L	1.32	1.96	1.03	0.679

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.

**Table 5**  
**Summary of Monitoring Results - January 2020**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		MW-15S	MW-15I	MW-15D
Pace Lab ID		50248392001	50248392002	50248392003
Sample Date		1/29/2020	1/29/2020	1/29/2020
Static Water Elevation (ft MSL)		669.19	669.59	669.48
<b>Field Parameters</b>	<b>Units</b>			
Temperature	°C	11.89	13.28	12.87
Dissolved Oxygen, Field	mg/L	5.38	1.87	0.19
Conductivity, Field	uS/cm	778.21	702.69	869.93
ORP, Field	mV	92.80	75.10	96.30
pH, Field	Std. Units	7.13	7.18	7.04
<b>Analytical Data</b>				
Antimony, Total	ug/L	<1.0	<1.0	<1.0
Arsenic, Total	ug/L	<1.0	<1.0	1.1
Barium, Total	ug/L	51.1	56.6	65.2
Beryllium, Total	ug/L	<0.20	<0.20	<0.20
Boron, Total	ug/L	109	109	133
Cadmium, Total	ug/L	<1.0	<1.0	<1.0
Calcium, Total	ug/L	107000	96800	110000
Chloride	mg/L	34.1	11.2	28.4
Chromium, Total	ug/L	<20.0	<20.0	<20.0
Cobalt, Total	ug/L	<1.0	<1.0	<1.0
Fluoride	mg/L	0.11	0.12	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	<0.20	<0.20	<0.20
Molybdenum, Total	ug/L	<10.0	<10.0	<10.0
pH at 25 Degrees C	Std. Units	7.4	8.1	8.0
Selenium, Total	ug/L	<1.0	1.7	<1.0
Sulfate	mg/L	43.4	37.1	83.4
Thallium, Total	ug/L	<1.0	<1.0	<1.0
Total Dissolved Solids	mg/L	454	387	493
Total Radium	pCi/L	<0.16	0.57	0.834

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.

**Table 6**  
**Summary of Monitoring Results - May 2020**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		MW-1D	MW-1S	MW-2D	MW-2S
Pace Lab ID		50258199002; 50258205002	50258199001; 50258205001	50257654002; 50257661002	50257654001; 50257661001
Sample Date		5/26/2020	5/26/2020	5/19/2020	5/19/2020
Static Water Elevation (ft MSL)		662.08	661.99	665.27	665.27
<b>Field Parameters</b>	<b>Units</b>				
Temperature	°C	17.37	16.78	11.99	10.81
Dissolved Oxygen, Field	mg/L	1.66	0.00	0.00	0.03
Conductivity, Field	uS/cm	1224.10	980.97	1915.90	920.32
ORP, Field	mV	-90.30	-111.90	-69.10	34.90
pH, Field	Std. Units	7.31	7.44	7.54	7.81
<b>Analytical Data</b>					
Alkalinity,Bicarbonate (CaCO <sub>3</sub> )	mg/L	326	275	329	218
Antimony, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Arsenic, Dissolved	ug/L	3.7	7.2	1.6	7.9
Arsenic, Total	ug/L	7.4	12.4	1.9	9.0
Barium, Total	ug/L	71.0	69.8	65.3	86.1
Beryllium, Total	ug/L	<0.20	<0.20	<0.20	<0.20
Boron, Total	ug/L	1620	810	2270	322
Cadmium, Total	ug/L	<2.0	<2.0	<2.0	<2.0
Calcium, Total	ug/L	137000	96500	184000	71100
Chloride	mg/L	136	116	245	122
Chromium, Total	ug/L	<10.0	<10.0	<10.0	<10.0
Cobalt, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Dissolved Organic Carbon	mg/L	1.8	2.0	2.6	2.0
Fluoride	mg/L	0.26	0.36	1.2	0.58
Iron, Dissolved	ug/L	3000	1800	1300	573
Iron, Ferrous	mg/L	<0.20	<0.20	<0.20	<0.20
Iron, Total	ug/L	4770	4430	1430	915
Lead, Total	ug/L	<10.0	<10.0	<10.0	<10.0
Lithium, Dissolved	ug/L	34.8	<20.0	37.0	<20.0
Lithium, Total	ug/L	37.7	<20.0	42.8	<20.0
Magnesium, Total	ug/L	31500	25000	58000	23600
Manganese, Dissolved	ug/L	264	274	358	324
Manganese, Total	ug/L	276	294	366	327
Mercury	ug/L	<2.0	<2.0	<2.0	<2.0
Molybdenum, Dissolved	ug/L	40.4	34.9	83.2	26.2
Molybdenum, Total	ug/L	44.9	37.2	89.3	27.8
pH at 25 Degrees C	Std. Units	7.5	7.6	7.7	7.9
Potassium, Total	ug/L	6950	5010	8740	3400
Selenium, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Sodium, Total	ug/L	88400	75300	188000	95700
Sulfate	mg/L	124	56.7	417	72.6
Sulfide	mg/L	<0.10	<0.10	<0.10	<0.10
Thallium, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Total Dissolved Solids	mg/L	722	534	2720	537
Total Organic Carbon	mg/L	1.7	1.9	1.9	1.9
Total Radium	pCi/L	1.17	0.938	1.82	1.36

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.

**Table 6**  
**Summary of Monitoring Results - May 2020**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		MW-3D	MW-3S	MW-4S	MW-5S
Pace Lab ID		50257505002; 50257498002	50257505001; 50257498001	50259084001; 50259085001	50257505003; 50257498003
Sample Date		5/18/2020	5/18/2020	6/5/2020	5/18/2020
Static Water Elevation (ft MSL)		663.15	663.30	658.98	657.79
<b>Field Parameters</b>	<b>Units</b>				
Temperature	°C	13.61	12.58	16.26	16.65
Dissolved Oxygen, Field	mg/L	0.03	0.92	6.51	9.37
Conductivity, Field	uS/cm	1140.10	824.84	863.81	2.39
ORP, Field	mV	-1.40	3.50	76.10	153.90
pH, Field	Std. Units	7.12	7.16	7.27	7.31
<b>Analytical Data</b>					
Alkalinity,Bicarbonate (CaCO <sub>3</sub> )	mg/L	259	261	273	266
Antimony, Total	ug/L	<1.0	7.1	<1.0	<1.0
Arsenic, Dissolved	ug/L	2.9	1.3	<1.0	<1.0
Arsenic, Total	ug/L	3.3	1.5	1.2	<1.0
Barium, Total	ug/L	49.8	40.6	86.0	28.6
Beryllium, Total	ug/L	<0.20	<0.20	<0.20	<0.20
Boron, Total	ug/L	840	165	7980	3500
Cadmium, Total	ug/L	<2.0	<2.0	<2.0	<2.0
Calcium, Total	ug/L	115000	98700	142000	173000
Chloride	mg/L	113	80.0	42.9	267
Chromium, Total	ug/L	<10.0	<10.0	<10.0	<10.0
Cobalt, Total	ug/L	<1.0	<1.0	<1.0	1.0
Dissolved Organic Carbon	mg/L	1.4	1.1	2.5	4.0
Fluoride	mg/L	0.23	0.26	<0.1	2.4
Iron, Dissolved	ug/L	1560	<100	<100	<100
Iron, Ferrous	mg/L	<0.20	<0.20	<0.20	<0.20
Iron, Total	ug/L	1720	138	932	<100
Lead, Total	ug/L	<10.0	<10.0	<10.0	<10.0
Lithium, Dissolved	ug/L	<20.0	<20.0	<20.0	51.4
Lithium, Total	ug/L	<20.0	<20.0	<20.0	54.9
Magnesium, Total	ug/L	30200	20600	28700	56200
Manganese, Dissolved	ug/L	244	<10	<10.0	804
Manganese, Total	ug/L	269	45.9	36.9	853
Mercury	ug/L	<2.0	<2.0	<2.0	<2.0
Molybdenum, Dissolved	ug/L	10.8	46.4	<10.0	206
Molybdenum, Total	ug/L	11.0	49.2	<10.0	218
pH at 25 Degrees C	Std. Units	7.6	7.7	7.7	7.5
Potassium, Total	ug/L	4160	1880	2130	9310
Selenium, Total	ug/L	<1.0	8.2	12.4	<1.0
Sodium, Total	ug/L	89600	52000	35000	212000
Sulfate	mg/L	141	38.0	170	443
Sulfide	mg/L	<0.10	<0.10	<0.10	<0.10
Thallium, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Total Dissolved Solids	mg/L	661	449	593	1290
Total Organic Carbon	mg/L	1.2	1.2	<1.0	2.1
Total Radium	pCi/L	<1.54	<1.57	<1.89	0.864

Notes:

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Static water elevation listed for a well may have been collected on a date different than date of well sampling.

**Table 6**  
**Summary of Monitoring Results - May 2020**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		MW-6S	MW-7D	MW-7S	MW-8S
Pace Lab ID		50258509001	50258335002; 50258337002	50258335001; 50258337001	50258199003; 50258205003
Sample Date		5/28/2020	5/27/2020	5/27/2020	5/26/2020
Static Water Elevation (ft MSL)		662.47	657.33	657.34	656.80
<b>Field Parameters</b>	<b>Units</b>				
Temperature	°C	19.89	20.52	20.04	13.79
Dissolved Oxygen, Field	mg/L	0.09	0.71	0.15	2.55
Conductivity, Field	uS/cm	2507.70	2367.50	2057.50	1770.80
ORP, Field	mV	-41.40	-155.40	-142.40	50.80
pH, Field	Std. Units	6.57	7.32	7.22	7.10
<b>Analytical Data</b>					
Alkalinity,Bicarbonate (CaCO <sub>3</sub> )	mg/L	523	206	218	312
Antimony, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Arsenic, Dissolved	ug/L	3.7	437	331	<1.0
Arsenic, Total	ug/L	23.8	467	367	<1.0
Barium, Total	ug/L	141	43.7	36.8	36.0
Beryllium, Total	ug/L	<0.20	<0.20	<0.20	<0.20
Boron, Total	ug/L	6280	15900	14800	11800
Cadmium, Total	ug/L	<2.0	<2.0	<2.0	<2.0
Calcium, Total	ug/L	330000	236000	219000	231000
Chloride	mg/L	253	231	232	110
Chromium, Total	ug/L	<10.0	<10.0	<10.0	<10.0
Cobalt, Total	ug/L	2.4	<1.0	<1.0	<1.0
Dissolved Organic Carbon	mg/L	3.8	4.3	4.3	2.8
Fluoride	mg/L	1.0	0.39	0.57	0.11
Iron, Dissolved	ug/L	5910	2050	3020	<100
Iron, Ferrous	mg/L	0.30	<0.20	<0.20	<0.20
Iron, Total	ug/L	9020	2140	3150	<100
Lead, Total	ug/L	<10.0	<10.0	<10.0	<10.0
Lithium, Dissolved	ug/L	68.3	103	83.7	122
Lithium, Total	ug/L	84.5	104	87.1	124
Magnesium, Total	ug/L	93900	51100	51000	77300
Manganese, Dissolved	ug/L	2340	548	466	94.0
Manganese, Total	ug/L	2330	569	486	99.2
Mercury	ug/L	<2.0	<2.0	<2.0	<2.0
Molybdenum, Dissolved	ug/L	146	701	680	286
Molybdenum, Total	ug/L	146	736	705	306
pH at 25 Degrees C	Std. Units	7.3	7.8	7.7	7.5
Potassium, Total	ug/L	13500	16500	15100	17400
Selenium, Total	ug/L	3.7	<1.0	<1.0	2.4
Sodium, Total	ug/L	207000	205000	200000	120000
Sulfate	mg/L	704	720	634	598
Sulfide	mg/L	<0.10	<0.10	<0.10	<0.10
Thallium, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Total Dissolved Solids	mg/L	1960	1550	1570	1360
Total Organic Carbon	mg/L	2.9	2.0	2.2	NA
Total Radium	pCi/L	<2.02	1.11	0.929	1.16

Notes:

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**Table 6**  
**Summary of Monitoring Results - May 2020**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		MW-9D	MW-9I	MW-9S	MW-10D
Pace Lab ID		50257654004; 50257661004	50257654003; 50257661003	50258506001	50257654006; 50257661006
Sample Date		5/19/2020	5/19/2020	5/29/2020	5/19/2020
Static Water Elevation (ft MSL)		654.19	654.23	656.15	663.02
<b>Field Parameters</b>	<b>Units</b>				
Temperature	°C	14.23	13.87	17.48	16.53
Dissolved Oxygen, Field	mg/L	0.03	0.02	4.61	1.43
Conductivity, Field	uS/cm	1139.90	999.15	1484.20	2815.70
ORP, Field	mV	-76.80	-57.50	93.90	-114.20
pH, Field	Std. Units	7.26	7.20	6.76	7.29
<b>Analytical Data</b>					
Alkalinity,Bicarbonate (CaCO <sub>3</sub> )	mg/L	282	300	287	254
Antimony, Total	ug/L	<1.0	<1.0	8.8	<1.0
Arsenic, Dissolved	ug/L	5.2	3.9	1.7	277
Arsenic, Total	ug/L	5.3	4.2	1.5	268
Barium, Total	ug/L	47.8	64.2	51.5	35.8
Beryllium, Total	ug/L	<0.20	<0.20	<0.20	<0.20
Boron, Total	ug/L	937	1240	7550	1850
Cadmium, Total	ug/L	<2.0	<2.0	<2.0	<2.0
Calcium, Total	ug/L	101000	109000	191000	209000
Chloride	mg/L	118	92.8	78.0	405
Chromium, Total	ug/L	<10.0	<10.0	<10.0	<10.0
Cobalt, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Dissolved Organic Carbon	mg/L	1.2	<1.0	2.8	4.1
Fluoride	mg/L	0.46	0.73	<0.1	2.5
Iron, Dissolved	ug/L	1480	1080	<100	1270
Iron, Ferrous	mg/L	<0.20	<0.20	<0.20	<0.20
Iron, Total	ug/L	1550	1140	165	1360
Lead, Total	ug/L	<10.0	<10.0	<10.0	<10.0
Lithium, Dissolved	ug/L	30.2	29.5	74.5	56.8
Lithium, Total	ug/L	32.1	30.6	86.0	62.5
Magnesium, Total	ug/L	35400	30000	42900	68400
Manganese, Dissolved	ug/L	199	253	<10.0	157
Manganese, Total	ug/L	206	263	18.1	161
Mercury	ug/L	<2.0	<2.0	<2.0	<2.0
Molybdenum, Dissolved	ug/L	51.2	87.8	95.2	69.9
Molybdenum, Total	ug/L	55.5	95.9	93.9	72.8
pH at 25 Degrees C	Std. Units	7.8	7.7	7.5	7.7
Potassium, Total	ug/L	6560	5380	10600	12500
Selenium, Total	ug/L	<1.0	<1.0	120	<1.0
Sodium, Total	ug/L	84400	58700	72300	295000
Sulfate	mg/L	123	71.7	391	624
Sulfide	mg/L	<0.10	<0.10	<0.10	<0.10
Thallium, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Total Dissolved Solids	mg/L	606	574	948	1810
Total Organic Carbon	mg/L	1.1	<1.0	<1.0	<4.0
Total Radium	pCi/L	0.933	1.27	2.53	0.926

Notes:

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**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		MW-10S	MW-11D	MW-11S	MW-12D
Pace Lab ID		50257654005; 50257661005	50258335003; 50258337003	50258335004; 50258337004	50257505004; 50257498004
Sample Date		5/19/2020	5/27/2020	5/27/2020	5/18/2020
Static Water Elevation (ft MSL)		663.03	656.04	654.14	651.93
<b>Field Parameters</b>	<b>Units</b>				
Temperature	°C	17.58	14.25	18.51	17.16
Dissolved Oxygen, Field	mg/L	1.35	0.07	1.49	0.13
Conductivity, Field	uS/cm	3643.20	1464.10	514.34	1636.60
ORP, Field	mV	-75.90	-86.50	28.50	-104.40
pH, Field	Std. Units	7.11	7.29	7.93	7.32
<b>Analytical Data</b>					
Alkalinity,Bicarbonate (CaCO <sub>3</sub> )	mg/L	254	235	657	195
Antimony, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Arsenic, Dissolved	ug/L	343	14.7	3.6	291
Arsenic, Total	ug/L	358	15.7	13.8	287
Barium, Total	ug/L	81.1	26.8	304	27.4
Beryllium, Total	ug/L	<0.20	<0.20	0.72	<0.20
Boron, Total	ug/L	3230	11200	574	10100
Cadmium, Total	ug/L	<2.0	<2.0	<2.0	<2.0
Calcium, Total	ug/L	450000	243000	157000	217000
Chloride	mg/L	464	93.9	23.0	178
Chromium, Total	ug/L	<10.0	<10.0	34.2	<10.0
Cobalt, Total	ug/L	1.2	<1.0	10.7	<1.0
Dissolved Organic Carbon	mg/L	<4	1.4	2.8	1.3
Fluoride	mg/L	2.0	0.37	1.6	1.1
Iron, Dissolved	ug/L	1980	5840	<100	1170
Iron, Ferrous	mg/L	0.21	0.79	<0.20	<0.20
Iron, Total	ug/L	2190	6100	29500	1200
Lead, Total	ug/L	<10.0	<10.0	15.4	<10.0
Lithium, Dissolved	ug/L	60.4	133	<20	109
Lithium, Total	ug/L	75.8	142	41.3	113
Magnesium, Total	ug/L	85000	58900	62900	53600
Manganese, Dissolved	ug/L	1060	43.9	18.2	368
Manganese, Total	ug/L	1140	46.8	522	395
Mercury	ug/L	<2.0	<2.0	<2.0	<2.0
Molybdenum, Dissolved	ug/L	74.6	<10.0	74.0	214
Molybdenum, Total	ug/L	82.7	<10.0	83.3	227
pH at 25 Degrees C	Std. Units	7.6	7.4	8.1	7.8
Potassium, Total	ug/L	13100	3140	9810	15900
Selenium, Total	ug/L	<1.0	<1.0	<2.0	<1.0
Sodium, Total	ug/L	299000	79300	21400	171000
Sulfate	mg/L	1220	645	104	646
Sulfide	mg/L	<0.10	<0.10	<0.10	<0.10
Thallium, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Total Dissolved Solids	mg/L	2510	1250	390	1360
Total Organic Carbon	mg/L	<4.0	1.2	1.5	1.3
Total Radium	pCi/L	0.988	<1.64	0.786	0.886

Notes:

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**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		MW-12S	MW-13D	MW-13S	MW-14D
Pace Lab ID		50258506002	50257654008; 50257661008	50257654007; 50257661007	50258199004; 50258205004
Sample Date		5/29/2020	5/19/2020	5/19/2020	5/26/2020
Static Water Elevation (ft MSL)		653.12	659.06	659.10	656.37
<b>Field Parameters</b>	<b>Units</b>				
Temperature	°C	18.74	17.23	17.27	15.50
Dissolved Oxygen, Field	mg/L	0.44	0.03	0.00	0.04
Conductivity, Field	uS/cm	2168.50	2219.60	2188.70	4007.40
ORP, Field	mV	-41.10	-162.60	-115.00	-141.70
pH, Field	Std. Units	7.15	7.65	7.45	7.69
<b>Analytical Data</b>					
Alkalinity,Bicarbonate (CaCO <sub>3</sub> )	mg/L	223	196	236	227
Antimony, Total	ug/L	2.1	<1.0	<1.0	<1.0
Arsenic, Dissolved	ug/L	71.1	247	319	127
Arsenic, Total	ug/L	64.7	241	311	131
Barium, Total	ug/L	34.9	33.2	35.5	59.8
Beryllium, Total	ug/L	<0.20	<0.20	<0.20	<0.20
Boron, Total	ug/L	11000	16700	13300	63900
Cadmium, Total	ug/L	<2.0	<2.0	<2.0	<2.0
Calcium, Total	ug/L	223000	230000	196000	532000
Chloride	mg/L	186	216	254	284
Chromium, Total	ug/L	<10.0	<10.0	<10.0	<10.0
Cobalt, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Dissolved Organic Carbon	mg/L	3.6	1.8	2.2	2.0
Fluoride	mg/L	1.8	0.59	0.93	<0.1
Iron, Dissolved	ug/L	127	1870	1220	2880
Iron, Ferrous	mg/L	<0.20	<0.20	<0.20	<0.20
Iron, Total	ug/L	402	2260	1260	3190
Lead, Total	ug/L	<10.0	<10.0	<10.0	<10.0
Lithium, Dissolved	ug/L	88.8	86.2	77.5	791
Lithium, Total	ug/L	97.5	96.8	83.6	820
Magnesium, Total	ug/L	65600	54800	56400	255000
Manganese, Dissolved	ug/L	359	208	457	374
Manganese, Total	ug/L	351	236	479	410
Mercury	ug/L	<2.0	<2.0	<2.0	<2.0
Molybdenum, Dissolved	ug/L	199	834	701	172
Molybdenum, Total	ug/L	198	881	746	187
pH at 25 Degrees C	Std. Units	7.6	7.8	7.8	7.6
Potassium, Total	ug/L	12600	15400	12900	58300
Selenium, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Sodium, Total	ug/L	157000	192000	199000	260000
Sulfate	mg/L	671	702	548	2310
Sulfide	mg/L	<0.10	<0.10	<0.10	<0.10
Thallium, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Total Dissolved Solids	mg/L	1470	1540	1410	3910
Total Organic Carbon	mg/L	1.4	1.9	2.6	1.9
Total Radium	pCi/L	1.11	0.966	<1.94	1.9

Notes:

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**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		MW-15S	MW-15I	MW-15D	M-4
Pace Lab ID		50258335005; 50258337005	50258335006; 50258337006	50258335007; 50258337007	50258511001
Sample Date		5/27/2020	5/27/2020	5/27/2020	5/28/2020
Static Water Elevation (ft MSL)		667.91	668.36	668.30	656.56
<b>Field Parameters</b>	<b>Units</b>				
Temperature	°C	13.57	14.27	14.35	19.82
Dissolved Oxygen, Field	mg/L	5.39	0.00	0.06	0.34
Conductivity, Field	uS/cm	838.13	729.05	746.44	2289.60
ORP, Field	mV	-5.90	-6.90	-68.30	-153.50
pH, Field	Std. Units	7.34	7.29	7.31	7.16
<b>Analytical Data</b>					
Alkalinity,Bicarbonate (CaCO3)	mg/L	302	315	317	354
Antimony, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Arsenic, Dissolved	ug/L	<1.0	<1.0	1.1	981
Arsenic, Total	ug/L	<1.0	<1.0	1.2	964
Barium, Total	ug/L	55.8	72.8	64.2	163
Beryllium, Total	ug/L	<0.20	<0.20	<0.20	NA
Boron, Total	ug/L	145	148	152	28300
Cadmium, Total	ug/L	<2.0	<2.0	<2.0	NA
Calcium, Total	ug/L	112000	110000	112000	341000
Chloride	mg/L	64.2	21.0	27.2	101
Chromium, Total	ug/L	<10.0	<10.0	<10.0	<10.0
Cobalt, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Dissolved Organic Carbon	mg/L	1.1	<1.0	<1.0	5.0
Fluoride	mg/L	0.11	0.12	0.11	0.11
Iron, Dissolved	ug/L	<100	<100	1140	3710
Iron, Ferrous	mg/L	<0.20	<0.20	<0.20	<0.20
Iron, Total	ug/L	228	<100	1200	5670
Lead, Total	ug/L	<10.0	<10.0	<10.0	NA
Lithium, Dissolved	ug/L	<20.0	<20.0	<20.0	276
Lithium, Total	ug/L	<20.0	<20.0	<20.0	301
Magnesium, Total	ug/L	30500	29900	33700	61100
Manganese, Dissolved	ug/L	<10.0	11.9	118	746
Manganese, Total	ug/L	21.1	12.7	124	827
Mercury	ug/L	<2.0	<2.0	<2.0	NA
Molybdenum, Dissolved	ug/L	<10.0	<10.0	<10.0	242
Molybdenum, Total	ug/L	<10.0	<10.0	<10.0	241
pH at 25 Degrees C	Std. Units	7.5	7.5	7.5	7.8
Potassium, Total	ug/L	2050	1500	2130	23800
Selenium, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Sodium, Total	ug/L	39600	18200	19400	129000
Sulfate	mg/L	48.4	38.6	79.4	797
Sulfide	mg/L	<0.10	<0.10	<0.10	<0.10
Thallium, Total	ug/L	<1.0	<1.0	<1.0	NA
Total Dissolved Solids	mg/L	515	432	473	1630
Total Organic Carbon	mg/L	<1.0	<1.0	<1.0	3.9
Total Radium	pCi/L	<1.32	1.05	1.21	1.95

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

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Static water elevation listed for a well may have been collected on a date different than date of well sampling.

**Table 6**  
**Summary of Monitoring Results - May 2020**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		PZ-100S	PZ-100D	PZ-101S	PZ-101D
Pace Lab ID		50257850001; 50257879001	50257850002; 50257879002	50257850003; 50257879003	50257850004; 50257879004
Sample Date		5/20/2020	5/20/2020	5/20/2020	5/20/2020
Static Water Elevation (ft MSL)		652.72	636.25	646.21	606.12
<b>Field Parameters</b>	<b>Units</b>				
Temperature	°C	16.45	17.00	15.08	15.13
Dissolved Oxygen, Field	mg/L	0.04	0.03	0.00	0.17
Conductivity, Field	uS/cm	2711.10	2461.90	1484.30	1572.70
ORP, Field	mV	-101.10	-192.00	-132.00	-100.50
pH, Field	Std. Units	7.33	29.00	7.90	7.30
<b>Analytical Data</b>					
Alkalinity,Bicarbonate (CaCO <sub>3</sub> )	mg/L	254	181	237	186
Antimony, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Arsenic, Dissolved	ug/L	1.5	25.4	18.5	4.0
Arsenic, Total	ug/L	1.8	25.8	19.6	4.3
Barium, Total	ug/L	33.9	64.3	143	75.8
Beryllium, Total	ug/L	NA	NA	NA	NA
Boron, Total	ug/L	1960	9080	4910	8240
Cadmium, Total	ug/L	NA	NA	NA	NA
Calcium, Total	ug/L	174000	220000	165000	162000
Chloride	mg/L	491	239	106	130
Chromium, Total	ug/L	<10.0	<10.0	<10.0	<10.0
Cobalt, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Dissolved Organic Carbon	mg/L	<4	1.7	1.7	1.2
Fluoride	mg/L	2.0	0.31	0.25	0.19
Iron, Dissolved	ug/L	1410	3430	5470	3280
Iron, Ferrous	mg/L	<0.20	<0.20	<0.20	<0.20
Iron, Total	ug/L	1660	3610	5640	3360
Lead, Total	ug/L	NA	NA	NA	NA
Lithium, Dissolved	ug/L	64.8	73.6	25.0	60.4
Lithium, Total	ug/L	55.4	67.8	22.7	55.4
Magnesium, Total	ug/L	63900	57100	52500	49700
Manganese, Dissolved	ug/L	472	254	619	449
Manganese, Total	ug/L	494	269	663	474
Mercury	ug/L	NA	NA	NA	NA
Molybdenum, Dissolved	ug/L	160	183	43.5	119
Molybdenum, Total	ug/L	139	184	45.1	123
pH at 25 Degrees C	Std. Units	7.8	7.8	7.5	7.6
Potassium, Total	ug/L	10700	11100	4700	6820
Selenium, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Sodium, Total	ug/L	308000	180000	78800	102000
Sulfate	mg/L	498	705	409	472
Sulfide	mg/L	<0.10	<0.10	<0.10	<0.10
Thallium, Total	ug/L	NA	NA	NA	NA
Total Dissolved Solids	mg/L	1710	1400	974	1030
Total Organic Carbon	mg/L	<4	1.6	1.4	<1.0
Total Radium	pCi/L	1.51	1.52	<1.99	0.946

Notes:

ft MSL: Elevation, feet mean sea level

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uS/cm: microsiemen per centimeter

umhos/cm: micromhos per centimeter

mV: millivolt

Std. Units: standard units

mg/L: milligram per liter

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Static water elevation listed for a well may have been collected on a date different than date of well sampling.

**Table 6**  
**Summary of Monitoring Results - May 2020**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		MW-102D	MW-103S	MW-103I	MW-103D
Pace Lab ID		50257879006; 50257883001	50257879007; 50257883002	50257879008; 50257883003	50257879009; 50257883004
Sample Date		5/20/2020	5/20/2020	5/20/2020	5/20/2020
Static Water Elevation (ft MSL)		617.02	666.27	613.87	610.94
<b>Field Parameters</b>	<b>Units</b>				
Temperature	°C	14.57	14.40	14.04	14.41
Dissolved Oxygen, Field	mg/L	0.22	0.82	0.18	1.18
Conductivity, Field	uS/cm	2774.40	1754.80	890.81	797.66
ORP, Field	mV	-178.50	-58.00	-98.40	6.60
pH, Field	Std. Units	7.14	6.94	7.51	7.82
<b>Analytical Data</b>					
Alkalinity,Bicarbonate (CaCO <sub>3</sub> )	mg/L	98.9	574	278	240
Antimony, Total	ug/L	<1.0	<1.0	<1.0	2.7
Arsenic, Dissolved	ug/L	70.4	14.0	<1.0	<1.0
Arsenic, Total	ug/L	74.6	13.8	<1.0	<1.0
Barium, Total	ug/L	64.8	79.3	196	182
Beryllium, Total	ug/L	NA	NA	NA	NA
Boron, Total	ug/L	16800	852	279	231
Cadmium, Total	ug/L	NA	NA	NA	NA
Calcium, Total	ug/L	357000	277000	85900	60100
Chloride	mg/L	208	75.8	115	110
Chromium, Total	ug/L	<10.0	<10.0	<10.0	<10.0
Cobalt, Total	ug/L	<1.0	2.8	<1.0	<1.0
Dissolved Organic Carbon	mg/L	2.8	6.2	3.7	2.3
Fluoride	mg/L	0.2	0.21	0.19	0.37
Iron, Dissolved	ug/L	4680	12900	1680	<100
Iron, Ferrous	mg/L	<0.20	1.5	<0.20	<0.20
Iron, Total	ug/L	5210	12800	1580	<100
Lead, Total	ug/L	NA	NA	NA	NA
Lithium, Dissolved	ug/L	168	<20.0	<20.0	<20.0
Lithium, Total	ug/L	153	<20.0	<20.0	<20.0
Magnesium, Total	ug/L	55300	79100	27500	26900
Manganese, Dissolved	ug/L	420	411	319	93.6
Manganese, Total	ug/L	444	419	306	101
Mercury	ug/L	NA	NA	NA	NA
Molybdenum, Dissolved	ug/L	333	18.1	<10.0	<10.0
Molybdenum, Total	ug/L	329	15.9	<10.0	<10.0
pH at 25 Degrees C	Std. Units	7.5	7.2	7.6	7.8
Potassium, Total	ug/L	20600	3050	6920	4450
Selenium, Total	ug/L	<1.0	<1.0	<1.0	<1.0
Sodium, Total	ug/L	184000	50200	50800	81000
Sulfate	mg/L	1150	438	46.3	42.4
Sulfide	mg/L	<0.10	<0.10	<0.10	<0.10
Thallium, Total	ug/L	NA	NA	NA	NA
Total Dissolved Solids	mg/L	2070	1350	527	506
Total Organic Carbon	mg/L	1.7	5.2	2.5	2.1
Total Radium	pCi/L	1.45	1.03	1.66	<2.43

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.

**Table 6**  
**Summary of Monitoring Results - May 2020**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		MW-104D
Pace Lab ID		50257879010; 50257883005
Sample Date		5/20/2020
Static Water Elevation (ft MSL)		590.16
<b>Field Parameters</b>	<b>Units</b>	
Temperature	°C	16.06
Dissolved Oxygen, Field	mg/L	0.74
Conductivity, Field	uS/cm	1444.20
ORP, Field	mV	-48.20
pH, Field	Std. Units	6.64
<b>Analytical Data</b>		
Alkalinity,Bicarbonate (CaCO <sub>3</sub> )	mg/L	302
Antimony, Total	ug/L	<1.0
Arsenic, Dissolved	ug/L	3.2
Arsenic, Total	ug/L	3.4
Barium, Total	ug/L	46.9
Beryllium, Total	ug/L	NA
Boron, Total	ug/L	1500
Cadmium, Total	ug/L	NA
Calcium, Total	ug/L	163000
Chloride	mg/L	117
Chromium, Total	ug/L	<10.0
Cobalt, Total	ug/L	<1.0
Dissolved Organic Carbon	mg/L	2
Fluoride	mg/L	0.16
Iron, Dissolved	ug/L	3250
Iron, Ferrous	mg/L	<0.20
Iron, Total	ug/L	3500
Lead, Total	ug/L	NA
Lithium, Dissolved	ug/L	<20.0
Lithium, Total	ug/L	<20.0
Magnesium, Total	ug/L	48400
Manganese, Dissolved	ug/L	264
Manganese, Total	ug/L	283
Mercury	ug/L	NA
Molybdenum, Dissolved	ug/L	12.5
Molybdenum, Total	ug/L	13.7
pH at 25 Degrees C	Std. Units	7.3
Potassium, Total	ug/L	6250
Selenium, Total	ug/L	<1.0
Sodium, Total	ug/L	70700
Sulfate	mg/L	276
Sulfide	mg/L	<0.10
Thallium, Total	ug/L	NA
Total Dissolved Solids	mg/L	906
Total Organic Carbon	mg/L	<1.0
Total Radium	pCi/L	<2.09

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.

**Table 7**  
**Summary of Monitoring Results - August 2020**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		PZ-100S	PZ-100D	PZ-101S	PZ-101D	MW-102D
Pace Lab ID		50265200001	50265200002	50265200003	50265200004	50265200005
Sample Date		8/18/2020	8/18/2020	8/18/2020	8/18/2020	8/18/2020
Static Water Elevation (ft MSL)		655.06	637.87	650.56	607.19	616.67
<b>Field Parameters</b>	<b>Units</b>					
Temperature	°C	17.28	17.26	15.78	16.66	17.86
Dissolved Oxygen, Field	mg/L	0.7	0.12	1.05	1.35	0.86
Conductivity, Field	uS/cm	1417.6	2209.4	1131.2	1233.1	2540.7
ORP, Field	mV	-25.1	39.2	59.1	-37.4	50.3
pH, Field	Std. Units	7.26	7.3	6.9	7.1	7.23
<b>Analytical Data</b>						
Alkalinity,Bicarbonate (CaCO3)	mg/L	275	179	247	255	95.0
Antimony, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0
Arsenic, Dissolved	ug/L	1.4	16.6	20.9	4.2	67.4
Arsenic, Total	ug/L	1.5	16.3	21.2	4.2	63.5
Barium, Total	ug/L	37.0	72.0	141	55.5	62.1
Beryllium, Total	ug/L	NA	NA	NA	NA	NA
Boron, Total	ug/L	1920	9080	4140	5640	19300
Cadmium, Total	ug/L	NA	NA	NA	NA	NA
Calcium, Total	ug/L	158000	228000	144000	118000	340000
Chloride	mg/L	404	243	103	81.2	179
Chromium, Total	ug/L	<10.0	<10.0	<10.0	<10.0	<10.0
Cobalt, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0
Dissolved Organic Carbon	mg/L	4.0	<4	1.7	1.1	1.8
Fluoride	mg/L	1.9	0.29	0.21	0.19	0.20
Iron, Dissolved	ug/L	1160	4180	5150	2520	4880
Iron, Ferrous	mg/L	<0.20	<0.20	0.3	<0.20	0.94
Iron, Total	ug/L	1220	4160	5180	2520	5070
Lead, Total	ug/L	NA	NA	NA	NA	NA
Lithium, Dissolved	ug/L	55.1	68.3	23.7	60.7	130
Lithium, Total	ug/L	56.8	65.2	25.2	61.3	133
Magnesium, Total	ug/L	59300	60300	46500	37500	61900
Manganese, Dissolved	ug/L	478	305	599	350	476
Manganese, Total	ug/L	421	259	538	311	435
Mercury	ug/L	NA	NA	NA	NA	NA
Molybdenum, Dissolved	ug/L	164	182	50.4	147	368
Molybdenum, Total	ug/L	167	185	52.3	152	392
pH at 25 Degrees C	Std. Units	7.7	7.7	7.6	7.7	7.5
Potassium, Total	ug/L	11000	11200	4720	6240	21000
Selenium, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0
Sodium, Total	ug/L	287000	171000	76800	82400	178000
Sulfate	mg/L	392	741	346	226	1040
Sulfide	mg/L	<0.10	<0.10	<0.10	<0.10	<0.10
Thallium, Total	ug/L	NA	NA	NA	NA	NA
Total Dissolved Solids	mg/L	1540	1580	900	778	2100
Total Organic Carbon	mg/L	2.6	1.6	1.5	<1	1.7
Total Radium	pCi/L	1.11	1.79	1.34	1.01	1.24

Notes:

ft MSL: Elevation, feet mean sea level

°C: Degrees celcius

uS/cm: microsiemen per centimeter

umhos/cm: micromhos per centimeter

NA = Not analyzed

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.

**Table 7**  
**Summary of Monitoring Results - August 2020**  
**Multiunit Ash Pond System**  
**Indianapolis Power and Light Company**  
**Harding Street Generating Station**  
**Indianapolis, Indiana**  
**ATC Project No. 170LF00872**

Well ID		MW-103S	MW-103I	MW-103D	MW-104S	MW-104D
Pace Lab ID		50265200006	50265200007	50265343001	50265343002	50265343005
Sample Date		8/18/2020	8/18/2020	8/19/2020	8/19/2020	8/19/2020
Static Water Elevation (ft MSL)		666.05	613.51	610.61	624.54	589.76
<b>Field Parameters</b>	<b>Units</b>					
Temperature	°C	15.32	20.66	20.7	17.76	17.18
Dissolved Oxygen, Field	mg/L	0.72	0.64	12.56	2.38	3.03
Conductivity, Field	uS/cm	1870.8	911.63	849.11	1620.8	1518.8
ORP, Field	mV	-52.9	-98.6	89.7	48.5	37.7
pH, Field	Std. Units	6.76	7.25	7.42	6.93	6.92
<b>Analytical Data</b>						
Alkalinity,Bicarbonate (CaCO3)	mg/L	551	268	253	315	344
Antimony, Total	ug/L	<1.0	<1.0	<1.0	<1.0	<1.0
Arsenic, Dissolved	ug/L	17.1	<1	<1	<1	3.6
Arsenic, Total	ug/L	17.4	<1	<1	<1	1.2
Barium, Total	ug/L	79.6	190	255	54.2	75.2
Beryllium, Total	ug/L	NA	NA	NA	NA	NA
Boron, Total	ug/L	892	251	259	1530	2030
Cadmium, Total	ug/L	NA	NA	NA	NA	NA
Calcium, Total	ug/L	297000	83100	74200	262000	235000
Chloride	mg/L	72.3	124	112	85.6	105
Chromium, Total	ug/L	<10.0	<10.0	<10.0	<10.0	<10.0
Cobalt, Total	ug/L	2.6	<1.0	<1.0	1.8	1.5
Dissolved Organic Carbon	mg/L	5.4	4.0	3.1	1.0	1.4
Fluoride	mg/L	0.21	0.18	0.21	0.20	0.12
Iron, Dissolved	ug/L	15500	1580	256	167	1360
Iron, Ferrous	mg/L	3.1	<0.20	<0.20	<0.20	0.21
Iron, Total	ug/L	16600	1640	1500	244	3760
Lead, Total	ug/L	NA	NA	NA	NA	NA
Lithium, Dissolved	ug/L	<20	<20	<20	26.0	25.5
Lithium, Total	ug/L	<20	<20	<20	25.5	25.1
Magnesium, Total	ug/L	89100	27100	26200	77800	59500
Manganese, Dissolved	ug/L	356	298	116	36.1	259
Manganese, Total	ug/L	340	278	125	42.4	288
Mercury	ug/L	NA	NA	NA	NA	NA
Molybdenum, Dissolved	ug/L	18.6	<10	<10	<10	<10
Molybdenum, Total	ug/L	19.3	<10	<10	<10	<10
pH at 25 Degrees C	Std. Units	7.3	7.7	7.6	7.1	7.1
Potassium, Total	ug/L	2740	6400	5010	7060	10000
Selenium, Total	ug/L	<1.0	<1.0	<1.0	4.3	1.1
Sodium, Total	ug/L	50400	58500	73100	71800	76000
Sulfate	mg/L	482	21.2	21.8	638	457
Sulfide	mg/L	<0.10	<0.10	<0.10	<0.10	<0.10
Thallium, Total	ug/L	NA	NA	NA	NA	NA
Total Dissolved Solids	mg/L	1450	474	475	1360	1120
Total Organic Carbon	mg/L	5.3	2.6	2.7	1.1	1.1
Total Radium	pCi/L	1.03	1.54	0.849	1.33	1.38

Notes:

ft MSL: Elevation, feet mean sea level

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NA = Not analyzed

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

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sampling.

**Table 8**  
 Groundwater Protection Standards -  
 November 2019 and May 2020  
 Multiunit Ash Pond System  
 Indianapolis Power and Light Company  
 Harding Street Generating Station  
 Indianapolis, Indiana  
 ATC Project No. 170LF00872

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: Site Location Map

Figure 2: Groundwater Monitoring System – CCR Network Wells and N&E Wells/Piezometers



