

ATC Group Services LLC

7988 Centerpoint Dr.
Suite 100
Indianapolis, IN 46256

Phone +1 317 849 4990
Fax +1 317 849 4278

www.atcgroupservices.com

January 31, 2018

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

Re: **CCR Annual Groundwater Monitoring and Corrective Action Report**
Indianapolis Power & Light Company
Harding Street Generating Station
Indianapolis, Indiana
ATC Project No. 170LF00428

Dear Mr. Heger:

ATC Group Services LLC (ATC) has prepared this 2017 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:

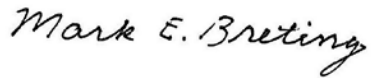
For existing CCR landfills and existing CCR surface impoundments, no later than January 31, 2018, and annually thereafter, the owner or operator must prepare an annual groundwater monitoring and corrective action report. For new CCR landfills, new CCR surface impoundments, and all lateral expansions 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

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

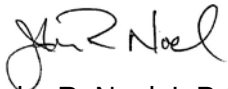
Other information required to be included in this report will be provided, as appropriate, in subsequent annual reports.

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,



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



John R. Noel, L.P.G.
Principal Geologist

Copies: Mr. Thom O'Leary
Mr. Juan Hummel

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Table 1
Well Sampling Summary
Harding Street Generating Station
Indianapolis, Indiana
ATC Project No. 170LF00428

Identification	Date Installed	Upgradient/Background or Downgradient	Number of Samples	Sample Date	Detection or Assessment Monitoring
MW-1S	9/25/2015	Upgradient/Background	9	4/7/2016	Detection
				5/26/2016	
				8/9/2016	
				9/27/2016	
				11/29/2016	
				1/26/2017	
				5/23/2017	
				8/9/2017	
				9/20/2017	
MW-1D	9/25/2015	Upgradient/Background	9	4/7/2016	Detection
				5/26/2016	
				8/9/2016	
				9/27/2016	
				11/29/2016	
				1/26/2017	
				5/23/2017	

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Well Sampling Summary
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Identification	Date Installed	Upgradient/Background or Downgradient	Number of Samples	Sample Date	Detection or Assessment Monitoring
MW-3S	9/28/2015	Upgradient/Background	9	4/5/2016	Detection
				5/25/2016	
				8/8/2016	
				9/26/2016	
				11/28/2016	
				1/24/2017	
				5/22/2017	
				8/7/2017	
				9/20/2017	
MW-3D	2/10/2016	Upgradient/Background	9	4/5/2016	Detection
				5/25/2016	
				8/8/2016	
				9/26/2016	
				11/28/2016	
				1/24/2017	
				5/22/2017	

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Identification	Date Installed	Upgradient/Background or Downgradient	Number of Samples	Sample Date	Detection or Assessment Monitoring
MW-6S	9/28/2015	Downgradient	9	4/6/2016	Detection
				5/25/2016	
				8/9/2016	
				9/27/2016	
				11/29/2016	
				1/25/2017	
				5/23/2017	
				8/8/2017	
				9/20/2017	
MW-7S	9/30/2015	Downgradient	9	4/6/2016	Detection
				5/25/2016	
				8/9/2016	
				9/27/2016	
				11/29/2016	
				1/25/2017	
				5/23/2017	

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Identification	Date Installed	Upgradient/Background or Downgradient	Number of Samples	Sample Date	Detection or Assessment Monitoring
MW-9S	2/11/2016	Downgradient	9	4/6/2016	Detection
				5/25/2016	
				8/8/2016	
				9/27/2016	
				11/28/2016	
				1/25/2017	
				5/23/2017	
				8/8/2017	
				9/20/2017	
MW-9I	2/24/2016	Downgradient	9	4/6/2016	Detection
				5/25/2016	
				8/8/2016	
				9/27/2016	
				11/28/2016	
				1/25/2017	
				5/23/2017	

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Identification	Date Installed	Upgradient/Background or Downgradient	Number of Samples	Sample Date	Detection or Assessment Monitoring
MW-10D	2/16/2016	Downgradient	9	4/6/2016	Detection
				5/25/2016	
				8/9/2016	
				9/27/2016	
				11/29/2016	
				1/25/2017	
				5/23/2017	
				8/8/2017	
				9/20/2017	
MW-11S	2/17/2016	Downgradient	9	4/7/2016	Detection
				5/26/2016	
				8/10/2016	
				9/28/2016	
				11/30/2016	
				1/26/2017	
				5/24/2017	

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Identification	Date Installed	Upgradient/Background or Downgradient	Number of Samples	Sample Date	Detection or Assessment Monitoring
MW-12D	2/18/2016	Downgradient	9	4/6/2016	Detection
				5/25/2016	
				8/9/2016	
				9/27/2016	
				11/29/2016	
				1/25/2017	
				5/23/2017	
				8/8/2017	
				9/20/2017	
MW-13S	2/15/2016	Downgradient	9	4/6/2016	Detection
				5/25/2016	
				8/9/2016	
				9/27/2016	
				11/29/2016	
				1/25/2017	
				5/23/2017	

