

Citizens Energy Group Environmental Investigation and Remediation Summary

Citizens Energy Group (CEG) is moving forward with final remediation in collaboration with the Indiana Department of Environmental Management (IDEM) and experts at Purdue University. CEG and IDEM have expressed confidence that the remediation can be completed to accommodate the CJC project. In addition, CEG has already completed several remediation measures, including enhancements to Pleasant Run Creek.

CEG will complete and is solely responsible to perform the work required by the Remediation Work Plans (RWP) necessary to obtain a Certificate of Completion from IDEM and a Covenant Not to Sue from the State of Indiana, which will benefit all future property owners including the City.

IDEM RWP Approval Process: CEG enrolled the Pleasant Run Crossing, Pleasant Run Crossing North, and Pleasant Run Crossing South (aka the “Core 3 Properties” into the IDEM Voluntary Remediation Program (VRP) in 2005. CEG submitted its initial RWP to IDEM on July 31, 2017. After receiving comments from IDEM, CEG submitted a revised RWP on November 3, 2017, which spans 3500+ pages. IDEM issued technical approval on November 9 and put the plan out for 30-day public notice. IDEM issued final approval on December 18, 2017.¹

Prior Environmental Investigations: CEG’s investigation activities at the Core 3 Properties the last ten-plus years have included:

- 355 soil boring locations and 127 underground water monitoring wells (as deep as 90 feet underground), in locations shown in Figure 1;
- 478 surface soil samples, 596 subsurface soil samples, 842 underground water monitoring well samples, and 28 grab underground water samples; and
- 305 sediment/soil samples, 40 sediment pore water samples, and 67 surface water samples from Pleasant Run Creek.

Soil Remediation: Under the RWP and working closely with IDEM, CEG is committed to removing or covering impacted soils in specific, designated areas of the property that exceed IDEM land use criteria for site redevelopment. CEG then must either excavate or, at a minimum, put a cover (clean soil, asphalt, concrete, etc.) on any remaining impacted soil allowed by IDEM to be left in place. IDEM has also approved specific requirements for the site to protect any construction workers that may encounter impacted soil either during CEG’s remediation or during construction of the CJC project.

Underground Water Remediation: CEG also must continue to monitor and, as necessary, capture and treat impacted underground water to ensure that it does not impact Pleasant Run Creek or deep, non-contaminated aquifers. CEG and all future land owners will have to comply with various Environmental Restrictive Covenants approved by IDEM, such as prohibition on use of underground water for drinking and not interfering

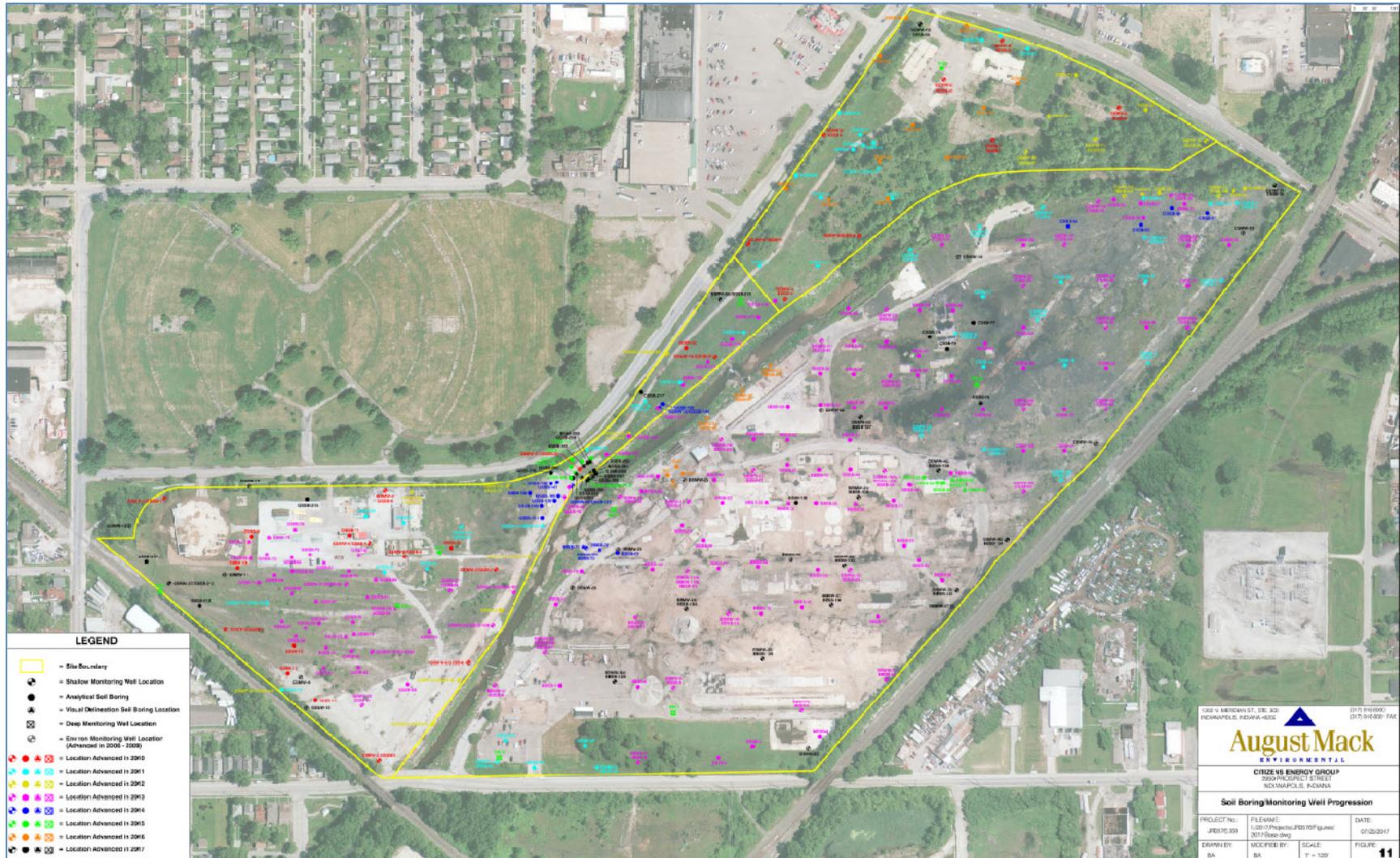
¹ CEG has also completed remediation at Prospect Place East.

with a low permeability cover installed by CEG in Pleasant Run Creek. As is typical with new construction in downtown Indianapolis, the City will install a vapor mitigation system, which will be approved by IDEM, in the CJC project buildings to ensure protection against any potential exposure from underlying impacts.

Habitat Restoration and Bank Stabilization: Per Indiana DNR and CEG agreement, CEG must mitigate 4.7 acres of forest area impacted by its recent remediation work along Pleasant Run Crossing. To do so, CEG has proposed planting more than 1,000 trees and 700 bushes across the site in 2018 in conjunction with its citywide 10,000 Trees Program, which is designed to help reduce sewer overflows to area waterways. CEG is also planning other bank stabilization projects along the northern part of Pleasant Run Creek to ensure no further impacts from the site.

The location of Citizens Energy Group's RWP activities approved by IDEM are shown in Figure 2.

Figure 1 – Subsurface and Underground Water Sampling Locations



Source: Figure 11 of Citizens Energy Group Revised Remediation Work Plan (November 3, 2017)(note: does not include surface sampling or Pleasant Run Creek investigations)

Figure 2 – Citizens Energy Group Integrated Remedial Strategy



Source: Figure EX-6 of Citizens Energy Group Revised Remediation Work Plan (November 3, 2017)