

# RETROFIT PLAN

**CFR 257.102(k)**

East Bottom Ash Pond

Rockport Plant  
Spencer County, Indiana

March 2021

Prepared for: Indiana Michigan Power Company – Rockport Plant

2791 North US 231

Rockport, Indiana 47635

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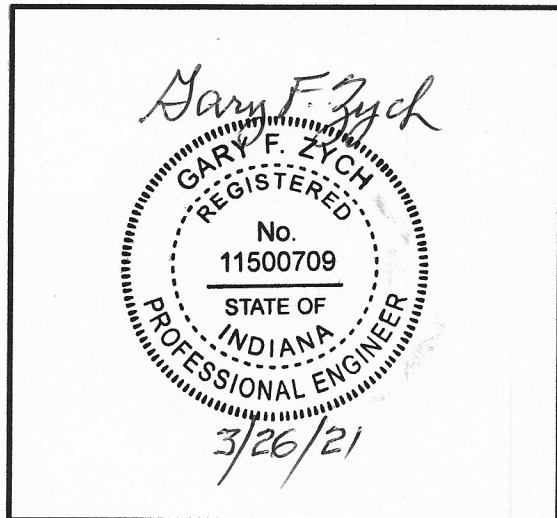
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RETROFIT PLAN  
CFR 257.102(K)  
ROCKPORT PLANT  
EAST BOTTOM ASH POND

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I certify to the best of my knowledge, information, and belief that the information contained in this closure plan meets the requirements of 40 CFR § 257.102(k)

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## **1.0 OBJECTIVE**

This report was prepared by AEP- Geotechnical Engineering Services (GES) section to fulfill requirements of CFR 257.102(k) for Retrofit Plans of the existing East Bottom Ash Pond.

## **2.0 DESCRIPTION OF THE CCR UNIT**

The Rockport plant is located near the City of Rockport, Spencer County, Indiana. Unit 1 owned by Indiana Michigan Power Co. (I&M), a unit of American Electric Power and operates the plant. The facility operates two surface impoundments for storing CCR within the Bottom Ash Complex.

The Bottom Ash Pond Complex is formed by excavation into the existing ground with a diked embankment along the West Bottom Ash Pond. The Bottom Ash Ponds and Wastewater Ponds were designed in tandem; one bottom ash pond and one wastewater pond are in service at any given time. The Least terns are an endangered species of birds that are known to nest along areas of the Bottom Ash Complex. There are six main ponds within the bottom ash pond complex as listed below.

### List of Ponds defined as the CCR Unit:

West Bottom Ash Pond (WBAP)  
East Bottom Ash Pond (EBAP)

### List of other ponds part of the Bottom Ash Pond Complex

West Waste Water Pond  
East Waste Water Pond  
Reclaim Pond  
Clear Water Pond

## **3.0 DESCRIPTION OF RETROFIT PLAN 257.102(k)(2)(i)(A)**

*[A narrative description of the specific measures that will be taken to retrofit the CCR unit in accordance with this section]*

All CCR and non-CCR wastestreams will cease discharging into the East Bottom Ash Pond no later than April 11, 2021. Operations will begin to drain the free water and then start to dewater the CCR material. The CCR material will be removed as described in the following section. After the CCR and soil material have been removed, additional soil material will be placed to meet the 5-foot separation distance as required by the Location Restriction section CFR 257.60.

A CCR compliant liner system will be designed and constructed as per the requirements CFR 257.72.

## **4.0 CCR REMOVAL 257.102 (k)(2)(i)(B)**

*[Description of the procedures to remove all CCR and contaminated soils and sediments from the CCR unit]*

All CCR material will be excavated from the East Bottom Ash Pond, and hauled to and placed in the Rockport Landfill. An additional 12-inches of soil along the bottom of the ponds will also be removed. A third party CQA contractor will be on-site during the removal process and visually inspect and document that all CCR material is removed, plus the additional 12-inches of soil.

The earthwork activities will be performed in such a manner as to provide the least disturbance to the Least Tern avian habitat. The interior pond embankment's riprap will be excavated and stockpiled for reuse.

### **5.0 ESTIMATE OF MAXIMUM CCR VOLUME 257.102 (k)(2)(i)(C)**

*[An estimate of the maximum amount of CCR to be removed as part of the retrofit operations]*

The estimated maximum CCR volume to be removed is 276,000 Cubic Yards, which includes the removal of 12-inches of soil.

### **6.0 ESTIMATE OF THE AREA OF CCR UNIT TO BE RETROFIT 257.102 (k)(2)(i)(D)**

*[An estimate of the largest area of CCR unit that will be affected by the retrofit operations]*

The existing East Bottom Ash Pond has a defined limit of approximately 32 acres. The area to be retrofitted is 30 acres.

### **7.0 RETROFIT SCHEDULE 257.102(k)(2)(E)**

*[A schedule for completing all activities necessary to satisfy the retrofit criteria in the section, including an estimate of the year in which retrofit activities for the CCR unit will be completed.]*

The table below provides the general activities and milestones of the retrofit schedule. The schedule takes into account Least Tern nesting season, annually from May – August.

Engineering and design of EBAP retrofit	November 2020 – June 2021
Cease all discharges into EBAP	April 11, 2021
Submit and obtain permit approvals	November 2020 – April 2022
Bid and award construction contract	April 2021 – August 2021
Remove material in EBAP	August 2021 – May 2022
Retrofit EBAP	August 2022 – May 2023