CLOSURE PLAN

CFR 257.102(b)

West Bottom Ash Pond

Rockport Plant Spencer County, Indiana

January 2024

Prepared for: Indiana Michigan Power Company - Rockport Plant

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Rockport, Indiana 47635

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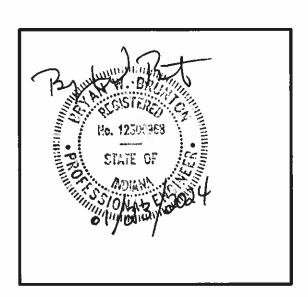


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CLOSURE PLAN CFR 257.102(b) ROCKPORT PLANT WEST BOTTOM ASH POND

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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(b)

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1.0 OBJECTIVE

This report was prepared by AEP- Geotechnical Engineering Services section to fulfill requirements of CFR 257.102(b) for Closure Plan of a new CCR Surface Impoundment.

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 East Bottom Ash Pond

<u>List of other ponds part of the Bottom Ash Pond</u>

Complex

West Waste Water Pond East Waste Water Pond

Reclaim Pond Clear Water Pond

3.0 DESCRIPTION OF CLOSURE PLAN 257.102(b)(1)(i)

[A narrative description of how the CCR unit will be closed in accordance with this section]

The WBAP will be closed by removal of the CCR material.

4.0 CLOSURE BY REMOVAL 257.102 (b)(1)(ii)

[If closure of the CCR unit will be accomplished through removal of CCR from the CCR unit, a description of the procedures to remove the CCR and decontaminate the CCR unit in accordance with paragraph (c) of this section.]

All CCR material will be excavated from the West 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. 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 excavate and stockpiled for reuse. The West BAP will be closed by removal and filled with water to maintain habitat for the Least tern.

4.1 CLOSURE PERFORMANCE STANDARDS 257.102 (c)

[An owner or operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the

groundwater protection standard established pursuant to §257.95(h) for constituents listed in appendix IV to this part.]

Closure of the bottom ash ponds will be completed when all CCR in the unit and the bottom soils have been removed and groundwater monitoring demonstrates that all concentrations of the assessment monitoring constituents listed in appendix IV to part 257 do not exceed either statistically equivalent background levels or MCLs for two consecutive sampling events using the statistical procedures in § 257.93(g).

5.0 ESTIMATE OF MAXIMUM CCR VOLUME 257.102 (b)(1)(iv)

[An estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit.]

The actual volume of CCR material will depend on future plant operations and CCR generation and is not viable to predict.

The estimated maximum CCR volume ever on-site is 511,000 Cubic Yards.

6.0 ESTIMATE OF LARGEST AREA OF CCR REQUIRING COVER 257.102 (b)(1)(v)

[An estimate of the largest area of CCR unit ever requiring a final cover]

The ponds will be closed by removal of CCR materials as such this section is not applicable.

7.0 CLOSURE SCHEDULE 257.102(b)(1)(vi)

[A schedule for completing all activities necessary to satisfy the closure criteria in the section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including identification of major milestones such as coordinating with and obtaining necessary approvals and permits from other agencies, the dewatering and stabilization phases of the CCR surface impoundment closure, or installation of the final cover system, and the estimated timeframes to complete each step or phase of the CCR unit closure.

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

Activity	Timeframe
Engineering and design of EBAP retrofit/WBAP Closure	November 2020 – June 2021
Cease all discharges into EBAP	Completed April 01, 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 – October 2023
Cease all discharges into WBAP	Completed October 26, 2023
Remove material in WBAP	October 2023 – November 2024

8.0 RECORD OF PLAN REVISIONS

The table below provides the record of plan revisions:

Record of Plan Revisions				
Revision	Date	Revision Description		
Number				
0	September 2016	Original Document for single CCR Unit that include		
		both EBAP/WBAP		
1	July 2020	Revised to Closure by Removal		
2	November 2020	Revised Schedule to reflect EBAP retrofit		
	March 2021	CCR unit split into two CCR units to track EBAP		
		Retrofit separate from WBAP closure		
3	January 2024	Revised to WBAP only – update schedule		