Indiana Michigan Power Company
Rockport Plant

CCR FUGITIVE DUST CONTROL PLAN

Prepared By:

Indiana Michigan Power Company
Rockport Plant
2791 North US Hwy 231
Rockport, IN 47635

and

American Electric Power Service Corporation
Environmental Services
1 Riverside Plaza
Columbus, Ohio 43215

Initial Issue – September 2015
Revision 1 – September 19, 2018
Revision 2 – July 23, 2021
Revision 3 – October 16, 2023
Revision 4 – October 31, 2024

Table of Contents

Appendices

Professional Engineer's Certification

By means of this certification, I certify that I have reviewed this CCR Fugitive Dust Control Plan and it meets the requirements of section 40 CFR 257.80(b).

David Anthony Miller

Printed Name of Registered Professional Engineer

David Anthony Miller

Signature

11700730	Indiana	10.31.2024
Registration No.	Registration State	Date

1.0 INTRODUCTION

This CCR Fugitive Dust Control Plan (Plan) has been prepared pursuant to the air criteria of 40 CFR part 257.80 (see Appendix A). The Plan has been prepared in accordance with the air criteria and following good engineering practices to include measures that will effectively minimize CCR from becoming airborne at the facility. The Plan and subsequent amendments will be placed in the operating record. The Plan and subsequent amendments will also be placed on Rockport Plant's publicly accessible internet website titled "CCR Rule Compliance Data and Information." The Plan will be amended whenever there is a change in conditions that would substantially affect the written plan in effect, such as the construction and operation of a new CCR unit. Where appropriate, the Plan incorporates fugitive dust control requirements as contained in the IDEM Title V Permit issued for the plant.

There is one bottom ash complex and one restricted waste landfill located at the Rockport Plant. The Bottom Ash Complex contains two Bottom Ash Ponds (BAPs) which receive bottom ash from the plant's generating units. The East BAP has been converted into a lined compliant impoundment effective October 2023. Upon the completion of the certification of completion process, the West Pond will be removed from active service and closed in accordance with the written closure plan. Both ponds remain subject to the Plan during the closure of the West Pond. The Restricted Waste Landfill (Landfill) receives waste from the plant's DSI/ACI/Fly Ash collection process and is subject to the Plan. The Landfill also receives bottom ash from the BAPs that is used in the Landfill construction or is in excess of what can be beneficially reused. The Plan addresses these CCR units and the associated paved and unpaved roadways.

2.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

2.1 Facility Information

General Information:

Name of Facility: Indiana Michigan Power Company Rockport Plant

Street: 2791 North US Hwy 231

City: Rockport State: IN ZIP Code: 47635

County: Spencer

Latitude: 37.927034 Longitude: 87.036369

2.2 Contact Information

Facility Operator:
Name: Indiana Michigan Power Company - Rockport Plant
Attention: Robert Beller - Plant Manager
Address: 2791 North US Hwy 231
City, State, Zip Code: Rockport, IN 47635

Facility Owner:
Name: Unit 1 – Indiana Michigan Power Company
Unit 2 – Indiana Michigan Power Company
Attention: Jill Lukehart – Manager – Air Quality Services
Address: 1 Riverside Plaza
City, State, Zip Code: Columbus, Ohio 43215

Plant Contact:
Name: John Trout – Rockport Plant Environmental & Lab Supervisor
Address: 2791 North US Hwy 231
City, State, Zip Code: Rockport, IN 47635
Telephone number: 812-649-6523
Email address: jftrout@aep.com

2.3 Activities at the Facility

The Rockport Power Plant is located on the shore of the Ohio River near Rockport, Indiana, and consists of two 1300 megawatt electric generating units. Approximately 10 million tons of coal per year are converted to electricity at the Rockport Plant, powering thousands of homes, businesses, schools, and industrial facilities.

Both units are equipped with Electrostatic Precipitators, Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI) systems to remove particulate matter, HCl, SO_2 and Mercury. The spent dry sorbent and activated carbon are combined with the fly ash and removed in the precipitator to produce the restricted waste that is placed in the Landfill. The fly ash handling system is an enclosed system. The fly ash mixture (restricted waste) is removed from the flue gas, collected in hoppers, and stored in silos before being placed on trucks for transport to the Landfill.

Bottom ash is produced by both Rockport Units and is wet sluiced to the East BAP during normal unit operations. The bottom ash is routinely reclaimed from the pond and beneficially reused for road base and structural fill projects. It is also trucked to the Landfill for use in Landfill construction. Should more bottom

ash be reclaimed than can be beneficially reused in a reasonable period of time, the excess bottom ash is disposed of in the Landfill.

2.4 Site Map

A Plot Plan for the Rockport Plant is included in Appendix B, along with a Rockport Landfill Diagram.

3.0 FUGITIVE DUST CONTROL SELECTION

3.1 Paved and Unpaved Roadways

3.1.1 Overview

Trucks are used to transport CCR to the Landfill from the plant site. Bottom ash is transported from the BAPs and the fly ash mixture (restricted waste) is transported from the storage silos located at each of the Rockport units. Bottom ash trucks travel approximately 0.15 miles over unpaved plant roadways and 1.3 miles over paved plant roadways to a public highway. Trucks carrying restricted waste travel approximately 1.1 miles from Unit 1 or 1.2 miles from Unit 2 on plant paved roads to reach the public highway. All trucks then travel approximately 0.2 miles over a public highway to the landfill entrance. Within the landfill, the trucks travel approximately 1.2 miles over landfill paved roadways to the disposal area, followed by travel of approximately 0.25 miles on unpaved surfaces within the active fill area to either a disposal area or to a stockpile location in the landfill where material is stored for construction purposes. The applicable and adequate fugitive dust control measures were primarily selected in accordance with the requirements contained in the Title V Air Permit issued by the Indiana Department of Environmental Management. The roadways are also subject to emission limits as contained in the air permit. Periodically, public roads traveled by trucks may be addressed to minimize fugitive dust due to plant activity.

3.1.2 Landfill and Plant Roadways

The primary appropriate and applicable fugitive dust control measures for roadways are watering and speed controls. Water trucks are used as needed based upon the daily inspections and other observations to minimize or eliminate fugitive dust. Chemical suppressants or stabilizers may also be used on unpaved roadways depending on specific site conditions. Posted speed limits vary between 15-30 mph for paved and unpaved roads. Earth or other materials that may be

deposited onto paved roadways from trucks will be promptly removed to minimize fugitive emissions. Implementation of control measures will not be necessary for roadways that are covered with snow and/or ice or if sufficient precipitation occurs to minimize or eliminate fugitive dust. Implementation of any control measures may be suspended if unsafe or hazardous driving conditions would be created by its use.

3.2 Landfill

3.2.1 Overview

The landfill receives the fly ash mixture (restricted waste) from the Rockport Plant. This waste is conditioned with a small amount of water for dust control before it is transported to the landfill. Bottom ash is stockpiled for construction purposes at the Landfill. The Landfill activities are subject to Title V Permit limitations. This permit specifies the applicable and appropriate fugitive dust control measures for the site to minimize or eliminate fugitive emissions. The permit also includes visible particulate emissions limits as well as monitoring, recordkeeping and reporting requirements. [Note: "conditioned" CCR means the material has sufficient moisture content to prevent wind dispersal but will not result in free liquids].

3.2.2 Restricted Waste Handling and Placement

The fly ash mixture (restricted waste) is unloaded from trucks in the active fill area of an open landfill cell, where a bulldozer of similar equipment will compact the materials. A roller may also be used for compaction. These materials contain sufficient moisture that little or no fugitive dust is generated. The landfill activities are subject to Title V Permit limitations. The fugitive dust control measures selected for truck unloading include maintaining moisture in the material, taking precautionary measures (minimize drop height) and watering if necessary. The measures selected for spreading and compaction include maintaining vehicle speed, maintaining moisture in the material and watering if necessary.

3.2.3 Bottom Ash Storage and Handling

While the bottom ash is typically moist, depending on the amount of moisture remaining in the ash and seasonal conditions, there may be fugitive emissions from the stockpile or truck unloading and loading activities. A review of potential control measures concluded that the applicable and appropriate options consist of applying water to the pile to minimize fugitive emissions as needed and maintaining moisture in

the material and taking precautionary measures (minimize drop height) for truck unloading and loading. Enclosures, compaction and daily cover are not applicable given the size of the area and characteristics of the material.

3.2.4 Wind Erosion

Generally, landfill disposal areas can be classified as closed or open. Closed areas have received final cover and vegetation has been established. Open areas contain both the active fill area and areas that have been compacted but not yet received final cover. The open area fugitive dust control measures include: precautionary measures such as minimizing the amount of open area and pile height; compacting material as it is unloaded and watering.

3.3 Bottom Ash Ponds

Rockport Plant bottom ash is produced by both Rockport units and is wet sluiced to the BAP during unit operations. Bottom ash is removed from the Bottom Ash Complex by heavy equipment from the BAP being emptied and placed in piles at the north end of the pond. The bottom ash is routinely reclaimed from the pond, loaded into trucks and transported for use as road base, structural fill or for landfill construction activities. While the bottom ash typically remains wet, depending on the amount of moisture remaining in the ash and seasonal conditions, there may be fugitive emissions from the pile or truck loading activities. A review of potential control measures concluded that the applicable and appropriate options consist of watering and minimizing drop height. Water is applied to the pile to minimize fugitive emissions as needed. Water spray is applied as needed to the material handling activities and the drop from the loader into the trucks is minimized to further minimize fugitive emissions. Enclosures, compaction and daily cover are not applicable given the size of the area and characteristics of the material.

4.0 PLAN ASSESSMENT

The Plan will be periodically assessed to verify its effectiveness, and if necessary, amended in accordance with Section 7.0 below. Daily dust inspections are conducted on the fly ash mixture truck loading areas. Weekly dust inspections are conducted at the Bottom Ash Pond areas and on the fly ash mixture silo bin vent filters. Records of these inspections are maintained in the plant's Environmental office. The Environmental & Lab Supervisor will review the inspection records when preparing the Annual Report (see Section 6.0 below) to assess the effectiveness of the Plan and to determine if additional or modified measures are warranted. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

5.0 CITIZEN COMPLAINT LOG

5.1 Plant Contacts

Generally, complaints made to the plant are by telephone and received by the Rockport Plant Environmental & Lab Supervisor (Plant Contact). In the case of holiday, weekends, or other times when the Plant Contact may not be onsite, the plant guard house or plant general phone number may receive complaint information by telephone that is provided to the Plant Contact at the earliest convenience.

5.2 Follow-up

All complaints will be entered into a log by the Plant Contact with details noted such as the nature of the complaint, date, time, and other relevant details. All complaints will be followed up which may include: checking plant operations at the time of the event, reviewing inspection records, discussing with other plant personnel, reviewing weather data, collecting samples and contacting the person making the complaint to obtain additional information.

5.3 Corrective Action and Documentation

Corrective actions will be taken as needed and documented. If it is determined that the Plan needs to be amended as a result of the corrective actions, it will be amended in accordance with Section 7. If possible, the Plant Contact will follow-up with the complainant to explain the findings of the complaint investigation, corrective actions or sampling results. Citizen complaints will be recorded in the annual Report.

6.0 ANNUAL REPORT

The Annual CCR fugitive dust control report (Annual Report) will be prepared which includes the following components: description of actions taken to control CCR fugitive dust; a record of all citizen complaints and a summary of any corrective measures taken. The initial Annual Report will be completed no later than 14 months after placing the initial CCR fugitive dust control plan in the facility's operating record. The deadline for completing subsequent reports is one year after the date of completing the previous report. The Annual Report will be deemed complete when the plan has been placed in the facility's operating record as described in Section 8.0.

7.0 PLAN AMENDMENTS

This Plan is a "living" document and will be amended, as necessary, whenever there is a change in conditions that would substantially affect the written plan in effect. The Plan will be amended in the case of construction and operation of a new CCR unit. Amendments and revisions made to the Plan will be documented in

Appendix C. The amended Plan will be placed into the facility's operating record as described in Section 8.0.

8.0 RECORDKEEPING, NOTIFICATION and INTERNET REQUIREMENTS

8.1 Recordkeeping

The Plan and files of all related information will be maintained in a written operating record at the facility for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, record or study. Files may be maintained on a computer or storage system accessible by a computer. One recordkeeping system may be used for the bottom ash ponds and the landfill if the system identifies each file by the name of each unit. The Plan (and any subsequent amendment of the plan) and the Annual Report will be kept in the facility's operating record as they become available. Only the most recent Plan must be maintained in the record.
[§ 257.105]

8.2 Notification

The Indiana Department of Environmental Management will be notified within 30 days of when the Plan (or any subsequent amended Plan) or the Annual Report is placed in the operating record and on the publicly available internet site. This notification will be made before the close of business on the day the notification is required to be completed. "Before the close of business day" means the notification must be postmarked or sent by e-mail. If the notification deadline falls on a weekend or federal holiday, the notification is automatically extended to the next business day. [§ 257.106]

8.3 Internet Site Requirements

The most recent Plan and annual Report will be placed on the facility's CCR website titled "CCR Rule Compliance Data and Information" within 30 days of placing them in the operating record. [§ 257.107]

Appendix A

Operating Criteria (re: Fed. Reg. Vol. 80, No. 74, April 17, 2015)
§ 257.80 Air criteria.

(a) The owner or operator of a CCR landfill, CCR surface impoundment, or any lateral expansion of a CCR unit must adopt measures that will effectively minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities.

(b) *CCR fugitive dust control plan.*

The owner or operator of the CCR unit must prepare and operate in accordance with a CCR fugitive dust control plan as specified in paragraphs (b)(1) through (7) of this section. This requirement applies in addition to, not in place of, any applicable standards under the Occupational Safety and Health Act.

(1) The CCR fugitive dust control plan must identify and describe the CCR fugitive dust control measures the owner or operator will use to minimize CCR from becoming airborne at the facility. The owner or operator must select, and include in the CCR fugitive dust control plan, the CCR fugitive dust control measures that are most appropriate for site conditions, along with an explanation of how the measures selected are applicable and appropriate for site conditions. Examples of control measures that may be appropriate include: Locating CCR inside an enclosure or partial enclosure; operating a water spray or fogging system; reducing fall distances at material drop points; using wind barriers, compaction, or vegetative covers; establishing and enforcing reduced vehicle speed limits; paving and sweeping roads; covering trucks transporting CCR; reducing or halting operations during high wind events; or applying a daily cover.

(2) If the owner or operator operates a CCR landfill or any lateral expansion of a CCR landfill, the CCR fugitive dust control plan must include procedures to emplace CCR as conditioned CCR. Conditioned CCR means wetting CCR with water to a moisture content that will prevent wind dispersal, but will not
result in free liquids. In lieu of water, CCR conditioning may be accomplished with an appropriate chemical dust suppression agent.

(3) The CCR fugitive dust control plan must include procedures to log citizen complaints received by the owner or operator involving CCR fugitive dust events at the facility.

(4) The CCR fugitive dust control plan must include a description of the procedures the owner or operator will follow to periodically assess the effectiveness of the control plan.

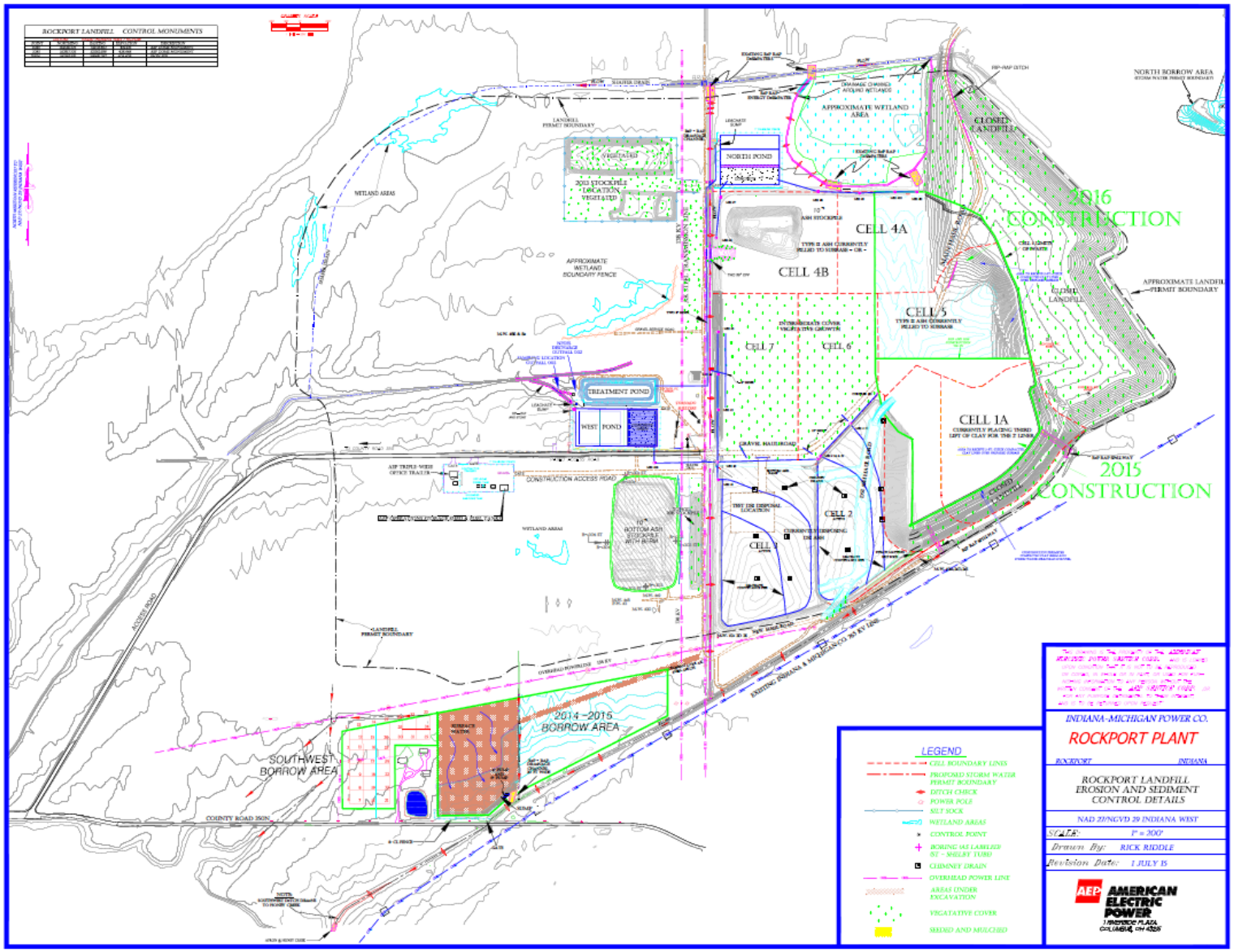
(5) The owner or operator of a CCR unit must prepare an initial CCR fugitive dust control plan for the facility no later than October 19, 2015, or by initial receipt of CCR in any CCR unit at the facility if the owner or operator becomes subject to this subpart after October 19, 2015. The owner or operator has completed the initial CCR fugitive dust control plan when the plan has been placed in the facility's operating record as required by § 257.105(g)(1).

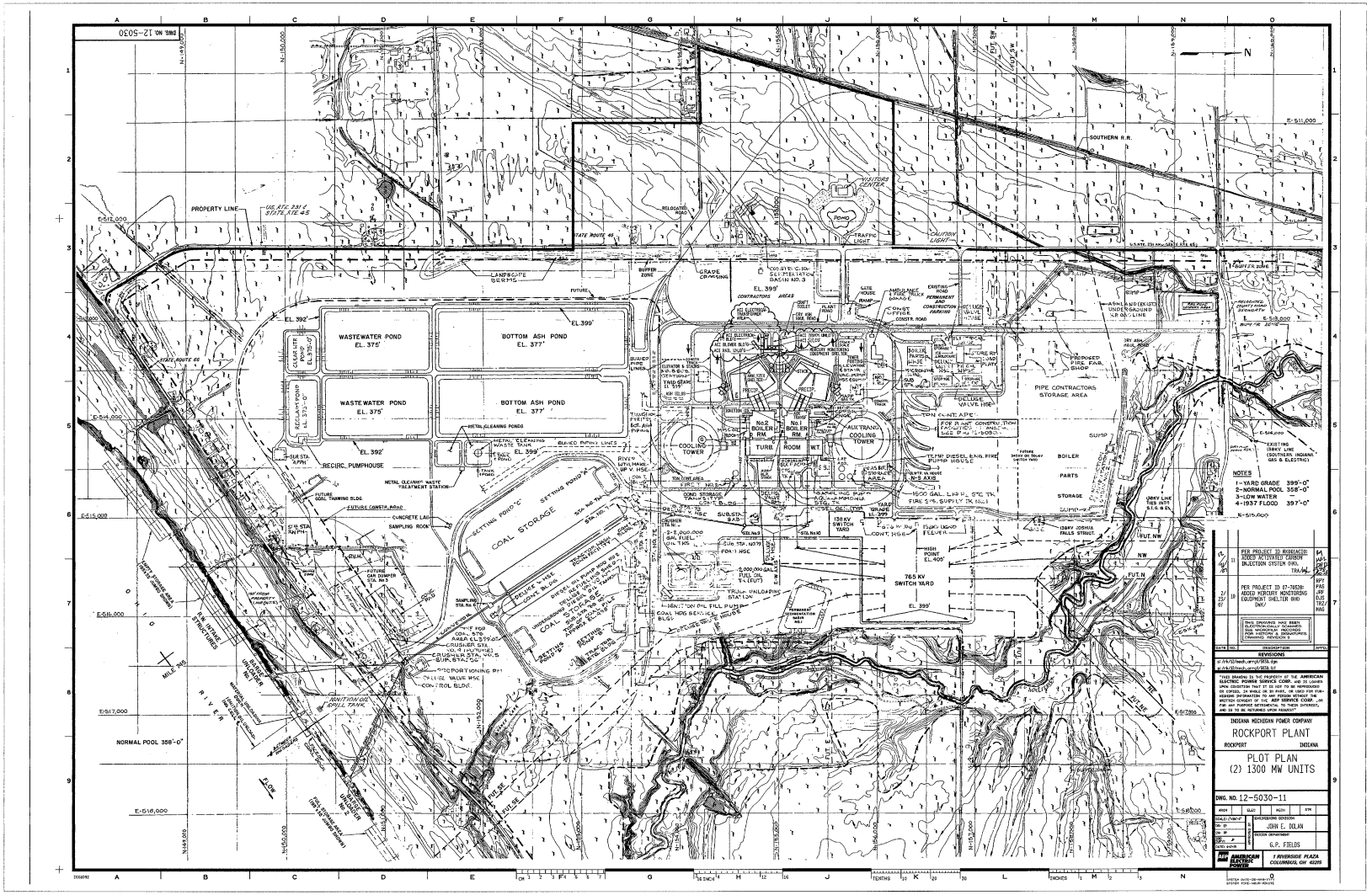
(6) *Amendment of the plan.* The owner or operator of a CCR unit subject to the requirements of this section may amend the written CCR fugitive dust control plan at any time provided the revised plan is placed in the facility's operating record as required by § 257.105(g)(1). The owner or operator must amend the written plan whenever there is a change in conditions that would substantially affect the written plan in effect, such as the construction and operation of a new CCR unit.

(7) The owner or operator must obtain a certification from a qualified professional engineer that the initial CCR fugitive dust control plan, or any subsequent amendment of it, meets the requirements of this section.

(c) *Annual CCR fugitive dust control report.* The owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken. The initial annual report must be completed no later than 14 months after placing the
initial CCR fugitive dust control plan in the facility's operating record. The deadline for completing a subsequent report is one year after the date of completing the previous report. For purposes of this paragraph (c), the owner or operator has completed the annual CCR fugitive dust control report when the plan has been placed in the facility's operating record as required by § 257.105(g)(2).
(d) The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in
§ 257.105(g), the notification requirements specified in § 257.106(g), and the internet requirements specified in § 257.107(g).

Appendix B


ROCKPORT LANDFILL CONTROL MONUMENTS
NORTH BORROW AREA
CLOSED LANDFILL
APPROXIMATE WETLAND AREA
NORTH POND
2016 CONSTRUCTION
CELL 4A
CELL 4B
CELL 5
CELL 7
CELL 6
CELL 1A
2015 CONSTRUCTION
CELL 2
CELL 3
TREATMENT POND
WEST POND
GRAVEL HAULROAD
CONSTRUCTION ACCESS ROAD
2014 -2015 BORROW AREA
SOUTHWEST BORROW AREA
APPROXIMATE LANDFILL PERMIT BOUNDARY
WETLAND AREAS
COUNTY ROAD 250N
AUSTER ROAD
LEGEND
CELL BOUNDARY LINES
PROPOSED STORM WATER PERMIT BOUNDARY
DITCH CHECK
POWER POLE
SILT SOCK
WETLAND AREAS
CONTROL POINT
BORING (AS LABELED) ST = SHELBY TUBE
CHIMNEY DRAIN
OVERHEAD POWER LINE
AREAS UNDER EXCAVATION
VEGATATIVE COVER
SEEDED AND MULCHED
INDIANA-MICHIGAN POWER CO.
ROCKPORT PLANT
ROCKPORT INDIANA
ROCKPORT LANDFILL
EROSION AND SEDIMENT
CONTROL DETAILS
NAD 27/NGVD 29 INDIANA WEST
SCALE: 1" = 300'
Drawn By: RICK RIDDLE
Revision Date: 1 JULY 15
AEP AMERICAN ELECTRIC POWER


PROPERTY LINE
WASTEWATER POND
EL. 375'
BOTTOM ASH POND
EL. 377'
WASTEWATER POND
EL. 375'
BOTTOM ASH POND
EL. 377'
RECLAIM POND
EL. 375'-0"
RECIRC. PUMPHOUSE
COAL STORAGE
SETTING POND 'C'
COOLING TOWER
AUX. TRANS. COOLING TOWER
765 KV SWITCH YARD
138KV SWITCH YARD
HIGH POINT EL. 405'
PIPE CONTRACTORS STORAGE AREA
BOILER PARTS STORAGE
SOUTHERN R.R.
NORMAL POOL 358'-0"
RIVER
ROCKPORT PLANT
PLOT PLAN
(2) 1300 MW UNITS
DWG. NO. 12-5030-11
INDIANA MICHIGAN POWER COMPANY
ROCKPORT INDIANA
AMERICAN ELECTRIC POWER
1 RIVERSIDE PLAZA
COLUMBUS, OH 43215

Appendix C

Record of Plan Revisions		
Revision Number	Date	Revision Description
0	9/26/2015	Initial Plan
1	9/17/2018	First Revision – Revised names of several responsible parties to reflect new individuals in these roles, removed references to DSI and ACI Storage Systems which are not CCR Units, and other minor wording changes.
2	7/23/2021	Second Revision – Changed names of Plant Manager and Environmental and Lab Supervisor to reflect reassignments and retirements of personnel. Revised bottom ash language to reflect CCR mandated changes to the bottom ash pond system and to reflect disposal as an option for excess bottom ash being removed from the pond.
3	10/16/2023	Third Revision – Changes Facility and Owner Contact Names to reflect recent changes in personnel and orgaizational structure. Eliminates the notatation of the Leaseholder Trustee following the termination of the Sale/Leaseback arrangement for Unit 2 with I&M regaining ownership of Unit 2. Revises description of Bottom Ash Ponds to reflect changes due to CCR Rules and the reconstruction of the East Pond and removal of the West Pond from active use for closure. Other minor wording chages.
4	10/31/2024	Changed Plant Manager from Curtis Cook to Robert Beller and the Owner to Jill Lukehart, Manager – Air Quality Services.