CLOSURE PLAN

CFR 257.102(b)

East 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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ROCKPORT PLANT
EAST BOTTOM ASH POND

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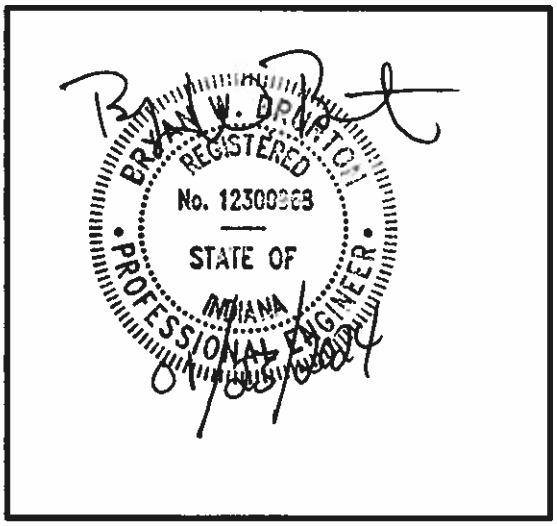

I certify to the best of my knowledge, information, and belief that the information contained in this closure plan meets the requirements of 40 CFR § 257.102(b)

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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.

Indiana Michigan Power Co. (I&M), a unit of American Electric Power, owns and operates the plant. The facility retrofitted the existing East Bottom Ash Pond (EBAP) into a new surface impoundment as per the requirements CFR 257.102 and in accordance with the Retrofit Plan.

The retrofitted EBAP will be part of the Bottom Ash Pond Complex. There are six main ponds within the bottom ash pond complex as listed below:

List of Ponds defined as a CCR Unit:	List of other ponds part of the Bottom Ash Pond Complex:
West Bottom Ash Pond (*commenced closure October 2023*)	West Waste Water Pond
East Bottom Ash Pond (retrofitted)	East Waste Water Pond
	Reclaim Pond
	Clear Water Pond

The original EBAP was formed by excavation into the existing ground to construct small embankments prior to filling the surrounding floodplain area to elevation 399. The retrofitted East Pond will be the same footprint as the closed EBAP, approximately 30 acres. Discharge from the new surface impoundment will flow into the existing wastewater ponds at the Bottom Ash Complex.

The retrofitted EBAP will receive influents from CCR waste streams and from non-CCR waste streams. The influents will be primarily sluiced bottom ash, stormwater pond discharge and coal pile runoff 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 East Bottom Ash Pond 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 retrofitted EPAP and hauled to and placed in the Rockport on-site Landfill. All other non-soil materials (e.g., geomembrane, GCL, concrete) will be removed and disposed at an approved landfill. The earthwork activities will be performed in such a manner as to provide the least disturbance to the Least Tern avian habitat.

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 retrofitted EBAP will be completed when all CCR in the unit and the non-soil materials 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 impossible to predict. For the purposes of this closure plan, it is assumed the average maximum thickness of CCR material would be 9.5 feet thick. This would result in a maximum volume of CCR at the retrofitted EBAP that would not be greater than 460,000 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 retrofitted EBAP 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.]

Prior to commencing closure construction, design documents will be prepared to support applications for any required local, state and federal permits. Closure construction design documents will include construction drawings, technical specifications and quality assurance testing work plans.

Current preliminary time frames of anticipated closure activities are listed below:

Activity	Timeframe
Engineering and design of closure plans	August 2028 – December 2028
Bid and award construction contract	August 2029 – December 2029
Terminate CCR waste streams	January 2029
Terminate or reroute non-CCR waste streams	January 2030
Estimated surface impoundment closure	January 2030 – December 2030

8.0 RECORD OF PLAN REVISIONS

The table below provides the record of plan revisions:

Record of Plan Revisions		
Revision Number	Date	Revision Description
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 to track EBAP Retrofit separate from WBAP closure - Refer to EBAP Retrofit Plan
3	October 2023	Revised to EBAP post retrofit with final closure by removal when plant ceases operation
4	January 2024	Clarify Record of Revision