aes Indiana

Eagle Valley Site

CCR Fugitive Dust Control Plan

Revision 2

November 25, 2025

Issue Purpose: Use

Project No.: 10572-165

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This plan (“Plan”) was prepared by Sargent & Lundy, L.L.C. (“S&L”), in accordance with the agreement between S&L and AES Indiana (“Client”). This Plan was prepared using the degree of skill and care ordinarily exercised by engineers practicing under similar circumstances. Client acknowledges: (1) S&L prepared this Plan subject to the particular scope limitations, budgetary and time constraints, and business objectives of the Client; (2) information and data provided by others may not have been independently verified by S&L; and (3) the information and data contained in this Plan are time sensitive and changes in the data, applicable codes, standards, and acceptable engineering practices may invalidate the findings of this Plan. Any use or reliance upon this Plan by third parties shall be at their sole risk.

ISSUE SUMMARY & CERTIFICATION

Revision	Purpose of Issue	Date	Pages Affected
0	Use	10/12/2015	All
1	Use	05/13/2025	All
2	Use	11/25/2025	All

This is to certify that this amendment to the Eagle Valley Site's CCR Fugitive Dust Control Plan has been prepared, reviewed, and approved in accordance with Sargent & Lundy's Standard Operating Procedure, SOP-0405, which is based on ANSI/ISO/ASSQC Q9001 Quality Management Systems.

Contributor Summary & Current Revision Signatures			
Revision	**Prepared By**	**Reviewed By**	**Approved By**
0	E. Prater	D. Helm	L. Illingworth
1	T. Dehlin	T. Constantine	T. Constantine
2	T. Constantine	T. Dehlin	T. Constantine
	Travis Constantine 2025.11.25 08:28:07 -06'00'	Digitally signed by Thomas Dehlin Date: 2025.11.25 15:16:33-06'00'	Travis Constantine 2025.11.25 15:20:28 -06'00'

I certify:

- This amended CCR Fugitive Dust Control Plan meets the requirements 40 CFR 257.80.
- This amended CCR Fugitive Dust Control Plan was prepared by me or under my direct supervision.
- I am a registered professional engineer under the laws of the State of Indiana.

Certified By: Travis Constantine Date: November 25, 2025

Seal:

Travis Constantine 2025.11.25 15:20:43 -06'00'

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EXECUTIVE SUMMARY

AES Indiana is committed to protecting the quality of the environment through feasible and effective measures. As one of these measures, AES Indiana has prepared this Coal Combustion Residuals (CCR) Fugitive Dust Control Plan to minimize fugitive dust generated through its operations. This Fugitive Dust Control Plan was developed to meet the requirements of 40 CFR 257.80.

This CCR Fugitive Dust Control Plan is intended to apply to all AES Indiana employees and contractors and to all CCR operations activities which create fugitive dust at the Eagle Valley Site (EVS). Employees shall minimize fugitive dust generated on site and shall implement and follow this plan. Operations activities shall also be conducted in accordance with this plan.

1.0 INTRODUCTION

1.1 PURPOSE OF THIS PLAN

The purpose of this plan is to minimize coal combustion residuals (CCR) from becoming airborne at the Eagle Valley Site (EVS). The primary sources of fugitive dust are listed in this plan. This CCR Fugitive Dust Control Plan was developed to meet the requirements of 40 CFR 257.80.

1.2 SITE DESCRIPTION

EVS is located approximately four miles north of Martinsville in Morgan County, Indiana. AES Indiana currently operates a combined cycle gas turbine (CCGT) power plant at EVS. Between 1949 and 2016, AES Indiana operated two fuel oil-fired electric generating units and four coal-fired electric generating units. These units and the corresponding boilers and ancillary coal combustion and conveyance systems have since been demolished. Therefore, EVS does not currently generate CCR. However, CCR remains in three CCR surface impoundments at EVS: Ponds A, B, and C.

Prior to ceasing coal-fired power generating operations, bottom ash and fly ash generated at the four coal-fired electric generating units at EVS were sluiced to Ponds A, B, and C. These three ponds operated in series, with Pond A serving as the initial settling pond, Pond B serving as the secondary settling pond, and Pond C serving as the final settling pond. Following the cessation of coal combustion at EVS in 2016, AES Indiana only used Ponds A, B, and C intermittently for treating non-CCR wastewater during decommissioning and demolition of the former coal-fired power plant. On April 17, 2019, AES Indiana ceased placing any wastewater into Ponds A, B, and C and initiated closure in accordance with 40 CFR 257.102(g). Since then, AES Indiana began coordinating with the Indiana Department of Environmental Management (IDEM), the Indiana Department of Natural Resource (IDNR), and Morgan County on the closure and post-closure care plan for Ponds A, B, and C.

On January 10, 2025, IDEM approved AES Indiana's closure and post-closure plan for Ponds A, B, and C. A contractor is currently closing Ponds A, B, and C in accordance with the approved closure and post-closure plan and additional state and county permits. This CCR Fugitive Dust Control Plan describes the measures that are being implemented during closure of Ponds A, B, and C to minimize CCR from becoming airborne at EVS.

1.3 POTENTIAL SOURCES OF CCR FUGITIVE DUST

Primary potential sources of CCR fugitive dust at EVS during closure of Ponds A, B, and C are:

1. Exposed, dry CCR within Ponds A, B, and C
2. Incidental CCR material on plant roads adjacent to Ponds A, B, and C
3. Earthmoving equipment grading or driving over CCR within Ponds A, B, and C

2.0 MONITORING

2.1 FREQUENCY OF MONITORING

CCR fugitive dust is monitored as part of normal plant operations and will be continuously monitored throughout closure activities at Ponds A, B, and C.

2.2 MONITORING METHODS

CCR fugitive dust will be monitored visually. Action levels will be implemented as weather conditions and source conditions warrant.

2.3 CONTROL MEASURES

Water sprays will be the primary means of preventing CCR fugitive dust from becoming airborne during closure of Ponds A, B, and C. Water will be applied to exposed CCR as necessary to control incidental fugitive dust emissions at the site. Water sprays are suitable for a range of climate conditions, including warm humid conditions like those of central Indiana where EVS is located. Water will be applied uniformly and lightly to prevent muddy, slippery, or other hazardous conditions and will be applied frequently enough to adequately control the dust nuisance. Water will be applied as needed by water truck and temporary sprinkler systems.

Another control measure that will be utilized is the use of dust suppressants. Dust suppressants are suitable for dust control by reducing the generation and re-entrainment of dust at the source and are particularly useful in dry conditions, keeping particles from becoming airborne. Dust suppressants will be applied uniformly and local to active earthmoving areas and applied frequently to adequately control the dust nuisance.

To limit the source of potential CCR fugitive dust, the contractor closing Ponds A, B, and C plans to limit the area of exposed CCR to the area(s) in which there is active excavation and grading work. Existing vegetation within Ponds A, B, and C will be left undisturbed until the given area needs to be excavated or regraded in accordance with the closure plan. This vegetation will limit the potential of CCR fugitive dust from becoming airborne from these areas where the contractor is not actively working.

Table 1 lists corrective measures and frequencies applicable to the potential CCR fugitive dust sources during closure of Ponds A, B, and C. Application of these corrective measures is considered AES Indiana’s best effort to minimize CCR fugitive dust at EVS.

TABLE 1: CORRECTIVE MEASURES

Sources	Corrective Measure	Description
Exposed, dry CCR within Ponds A, B, and C	1	Apply water as needed
	2	Apply dust suppressant(s) as needed; dust suppressants would be used in addition to or as an alternative to water application.
Incidental CCR material on plant roads adjacent to Ponds A, B, and C	1	Apply water as needed
Earthmoving equipment grading or driving over CCR within Ponds A, B, and C	1	Apply water as needed
	2	Reduce vehicle speeds
	3	Apply dust suppressant(s) as needed; dust suppressants would be used in addition to or as an alternative to water application.

3.0 RECORDKEEPING

3.1 CONTENT OF RECORDS

The CCR Fugitive Dust Monitoring Report Form (Appendix A) shall be completed when corrective measures are taken to reduce CCR fugitive dust over and above routine control measures. The completed reports shall serve as a record of visual monitoring and any control measures taken to effectively minimize CCR from becoming airborne at EVS. 40 CFR 257.80(a). The reports shall also serve as a means to assess the effectiveness of this CCR Fugitive Dust Control Plan. 40 CFR 257.80(b)(4). Each report shall include:

1. The date and local time of monitoring.
2. Description of the CCR fugitive dust source.
3. The observer.
4. Corrective actions taken and results of those actions. Depending upon the dust source, it may be necessary to apply multiple control measures.

The plant's existing environmental management system will be used to log citizen complaints and the corrective actions taken. 40 CFR 257.80(b)(3). Logged complaints will be placed in the annual CCR fugitive dust control report (Section 4.3). 40 CFR 257.80(c).

3.2 RECORD STORING AND RETENTION

This plan will be maintained in the facility's operating record for at least five years after AES Indiana completes post-closure care of the facility's last CCR unit. 40 CFR 257.105(g)(1). Completed CCR Fugitive Dust Monitoring Report forms will be kept for use in the annual CCR fugitive dust control report but are not required to be individually placed in the station's operating record. Logged citizen complaints will be placed in the annual CCR fugitive dust control report. However, the logged complaints are not required to be individually placed in the station's operating record.

3.3 AMENDMENTS TO THIS PLAN

AES Indiana will amend this written plan whenever there is a change in conditions that would substantially affect the written plan in effect. 40 CFR 257.80(b)(6). The amended plan, when placed in the station's operating record, is considered the most recent control plan.

4.0 REPORTING

4.1 NOTIFICATION REQUIREMENTS

Within 30 days of placing this CCR Fugitive Dust Control Plan or future amendments and updates (Sections 4.3 and 1.1) in the station's operating record, AES Indiana will notify IDEM that the document is available and will post the document to AES Indiana's CCR website for EVS. 40 CFR 257.106(d), 257.106(g)(1), 257.107(d), and 257.107(g)(1).

4.2 CITIZEN COMPLAINTS

Citizen complaints involving CCR fugitive dust will be logged into an existing external communications log maintained by the plant that is part of the plant's environmental management system. 40 CFR 257.80(b)(3). The log will use the existing environmental management system communications process. The log of citizen complaints will be kept for use in the annual CCR fugitive dust control report but is not required to be placed in the station's operating record.

4.3 ANNUAL CCR FUGITIVE DUST CONTROL REPORT

AES Indiana will prepare an annual CCR fugitive dust control report that includes the following:

1. A description of the actions taken to control CCR fugitive dust.
2. A record of all citizen complaints.
3. A summary of corrective actions taken.

AES Indiana will complete each annual CCR fugitive dust control report no later than a year after the date of completing the previous report. Each annual CCR fugitive dust control report will be deemed complete when AES Indiana has entered the report into the EVS operating record. 40 CFR 257.80(c)). The annual fugitive dust control reports will be placed on AES Indiana's CCR website for EVS 40 CFR 257.107(g)(2).

5.0 QUALITY CONTROL

5.1 EVALUATING FUGITIVE DUST CONTROL PLAN EFFECTIVENESS

AES Indiana will review and evaluate the effectiveness of this CCR Fugitive Dust Control Plan. 40 CFR 257.80(b)(4). AES will evaluate this plan by reviewing the CCR Fugitive Dust Monitoring Report forms periodically. Revisions to this plan will only be made with approval of AES Indiana environmental staff.

5.2 CCR FUGITIVE DUST CONTROL PLAN AMENDMENTS

AES Indiana will revise this CCR Fugitive Dust Control Plan when there is a significant change in operating conditions that would substantially affect this Plan. 40 CFR 257.80(b)(6).

5.3 PROFESSIONAL ENGINEER (PE) CERTIFICATION

AES Indiana will obtain a certification from a qualified professional engineer that the CCR Fugitive Dust Control Plan and subsequent amendments meet the air criteria requirements of 40 CFR Part 257 Subpart D. 40 CFR 257.80(b)(7).

APPENDIX A:
CCR FUGITIVE DUST MONITORING REPORT FORM

CCR FUGITIVE DUST MONITORING REPORT FORM

Date	Time	Description of Fugitive Dust Source	Observer	Corrective Action Taken and Results of the Action