



Indianapolis Power & Light Company
Eagle Valley Generating Station

CCR Surface Impoundment Closure Plan

Prepared by



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1 INTRODUCTION & PURPOSE

Federal CCR Rule Reference: 40 CFR 257.102(b)

Pursuant to 40 CFR 257.102(b), this document provides the written closure plan for the following existing coal combustion residuals (CCR) surface impoundments at Indianapolis Power & Light Company's (IPL) Eagle Valley Generating Station:

- Pond A,
- Pond B, and
- Pond C.

IPL intends to close these existing CCR surface impoundments in accordance with the requirements of 40 CFR 257.102(d) by leaving the CCR in place and installing a final cover system.

2 CLOSURE PLAN NARRATIVE DESCRIPTION

Federal CCR Rule Reference: 40 CFR 257.102(b)(1)(i) & 257.102(d)(1)

IPL has ceased sending low volume waste streams to the existing CCR surface impoundments and has initiated closure through the planning and permitting process. Prior to commencing physical closure activities, IPL will remove process piping feeding into the existing CCR surface impoundments. At the time of closure, each existing CCR surface impoundment and the *in situ* CCR therein will be sufficiently dewatered (if necessary) and stabilized. Then, the stored CCR in each existing CCR surface impoundment and, if required, any general fill will be graded to designed contours. A protective final cover system will subsequently be installed over the collective footprints of the aforementioned CCR surface impoundments to minimize infiltration and prevent storm water contact with the CCR. Materials for the final cover system will be placed and compacted to limit erosion, settling, and future maintenance, and to maintain positive drainage. As the final cover system is installed, soil properties, compaction, permeability, and thickness testing will be performed to confirm compliance with the closure plan and federal and state regulations in effect at the time of closure.

3 FINAL COVER SYSTEM DESCRIPTION

Federal CCR Rule Reference: 40 CFR 257.102(b)(1)(iii) & 257.102(d)(1)

Pursuant to the closure performance standards prescribed in 40 CFR 257.102(d)(1), the final cover system encapsulating the CCR surface impoundments will:

1. Minimize the post-closure infiltration of liquid into the CCR,
2. Minimize the risk of release of CCR or contaminated run-off to the ground or surface waters, or to the atmosphere,
3. Preclude the probability of future impoundment of water, sediment, or slurry,
4. Provide major slope stability to prevent sloughing of the final cover system during the post-closure care period,
5. Minimize future maintenance, and

6. Allow closure activities to be completed as quickly as practical consistent with recognized and generally accepted good engineering practices.

3.1 ESTABLISH GRADE & SUPPORT FOR FINAL COVER SYSTEM

Federal CCR Rule Reference: 40 CFR 257.102(d)(1)(ii), 257.102(d)(1)(iii), & 257.102(d)(3)(i)(D)

To accomplish the closure goals promulgated by 40 CFR 257, the upper surface of the stored CCR, or possibly general fill if sufficient quantities of CCR are not available, will be graded to form an in-sloped drainage system. This will be accomplished by diverting non-contact storm water run-off into conveyance channels that traverse across a majority of the collective footprint of the CCR surface impoundments. The final cover system will generally be graded with slopes between 2% and 12.5%, inclusive. However, for erosion control, slopes inducing channelized flow will be graded at approximately 1%. The aforementioned channels will convey storm water to drainage ditches located around the perimeter of the final cover system's footprint. The slopes of the final cover system will be designed to be globally stable from a geotechnical basis. In addition, these slopes will be designed to accommodate settling and subsidence while maintaining this positive drainage strategy.

3.2 INFILTRATION LAYER

Federal CCR Rule Reference: 40 CFR 257.102(d)(1)(i) & 257.102(d)(3)(ii)(A)

Using the nomenclature in 40 CFR 257, an alternate infiltration layer will be placed on top of the graded CCR to minimize the infiltration of liquids through the closed CCR surface impoundments. Specifically, the alternate infiltration layer will consist of, in order of increasing proximity from the graded CCR, a geomembrane, a nonwoven geotextile, a sand drainage layer, and a compacted cohesive soil layer.

The geomembrane will consist of 40-mil-thick, linear low-density polyethylene (LLDPE), which has a minimal hydraulic conductivity that is less than the permeability of any of the natural subsoils underlying the unlined existing CCR surface impoundments. The installation of the geomembrane will be subjected to a quality assurance and control program. A nonwoven geotextile will be placed directly over the geomembrane to prevent damage to the latter during the placement of the remainder of the infiltration layer.

The sand and the compacted cohesive soil layers will protect the geosynthetics from mechanical and environmental disturbances and will provide additional control against the infiltration of liquids into the residual CCR. Furthermore, the sand layer will (1) promote drainage of any liquids that have percolated to the soil-geomembrane interface and (2) preclude damage to the geomembrane.

3.3 EROSION LAYER

Federal CCR Rule Reference: 40 CFR 257.102(d)(3)(ii)(B)

Continuing with the nomenclature in 40 CFR 257, an erosion layer consisting of topsoil capable of sustaining native plant growth will be provided above the infiltration layer to minimize erosion of the final cover system. Specifically, the erosion layer will consist of at least six inches of topsoil. The entire surface of the final cover system will be seeded with a suitable seed mixture compliant with the Indiana

Department of Transportation’s Standard Specifications, and regular maintenance of the seeding will take place until a vegetative cover is established and self-sustaining. The storm water run-off management strategy described in Section 3.1 further minimizes erosion of the final cover system.

4 ESTIMATED MAXIMUM INVENTORIES OF CCR

Federal CCR Rule Reference: 40 CFR 257.102(b)(1)(iv)

The estimated maximum inventory of CCR that will be contained within Ponds A, B, and C at any point over their active lives is approximately 810 acre-ft in total.

5 ESTIMATED COVER SURFACE AREA

Federal CCR Rule Reference: 40 CFR 257.102(b)(1)(v)

As previously discussed, the final cover system will encapsulate the collective footprint of the Station’s existing CCR surface impoundments, which is approximately 33 acres. It is estimated that this area represents the largest surface area that will ever require a final cover at any point over the ponds’ active lives.

6 CLOSURE SCHEDULE

Federal CCR Rule Reference: 40 CFR 257.102(b)(1)(vi)

Table 1 lists the major milestones necessary to close the Station’s existing CCR surface impoundments with an estimated duration and year of completion for each milestone. IPL estimates that all closure activities for the existing CCR surface impoundments at the Eagle Valley Generating Station will be completed by the year 2024.

Table 1: Planning Level Schedule for Closure of Existing CCR Surface Impoundments

Task Description	Estimated Duration	Estimated Completion Year ¹
Obtain Necessary Approvals & Permits to Proceed with Closure ²	–	2021
Dewatering (If Necessary), Clearing & Grubbing, & Consolidation of Ponds A, B, & C	9 Months	2021–2022
Install Final Cover System	6 Months	2023–2024
Certify Closure of Ponds A, B, & C in Accordance with Closure Plan	–	2024

¹ These dates are based on a preliminary schedule for demonstrative purposes and are subject to change.

² Subject to the Indiana Department of Environmental Management’s approval of the closure plan.

7 AMENDMENTS TO CLOSURE PLAN

Federal CCR Rule Reference: 40 CFR 257.102(b)(3)

IPL will amend this plan prior to a change in the operation of any of the existing CCR surface impoundments that would substantially affect this plan or after an unanticipated event necessitates a revision to this plan. If this plan is revised, IPL will retain an independent, qualified professional engineer licensed in the State of Indiana to provide written certification that any and all amendments to this plan meet the requirements of 40 CFR 257.102(b).

8 COMPLETION OF CLOSURE ACTIVITIES

Federal CCR Rule Reference: 40 CFR 257.102(f)(3)

Upon completion of closure of the existing CCR surface impoundments, IPL will obtain a certification from an independent, qualified professional engineer licensed in the State of Indiana verifying that the surface impoundments have been closed in accordance with the closure plan in effect at the time of closure.

9 CERTIFICATION

Federal CCR Rule Reference: 40 CFR 257.102(b)(4)

I certify that this amendment to the closure plan for Ponds A, B, and C meets the requirements for a written closure plan pursuant to 40 CFR 257.102(b).

I certify that this document was prepared by me or under my supervision and that I am a registered professional engineer under the laws of the State of Indiana.

Certified By: David E. Nielson

Date: November 11, 2020

Seal:

