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Coal Combustion Residuals Post-Closure Care Plan

Richmond Power & Light
Whitewater Valley Station
Surface Impoundment
Wayne County, Indiana

GAI Project Number: C151119.07

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Table of Contents

Certification/Statement of Professional Opinion	1
Acronyms.....	2
1.0 Introduction	3
2.0 Purpose	3
3.0 Post-Closure Responsibilities and Activities.....	3
3.1 Post-Closure Period.....	3
3.2 Post-Closure Contact.....	3
4.0 Inspections, Monitoring and Maintenance	3
4.1 Inspections.....	3
4.2 Monitoring.....	4
4.3 Maintenance.....	4
4.4 Training	4
5.0 Post-Closure Uses.....	4
6.0 Post-Closure Termination.....	4
7.0 References.....	5

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Certification/Statement of Professional Opinion

The Coal Combustion Residuals Post-Closure Care Plan (Post-Closure Plan) for the Whitewater Valley Station (Station) Surface Impoundment was prepared by GAI Consultants, Inc. (GAI). The Post-Closure Plan may contain findings and determinations that are based on certain information that, other than for information GAI originally prepared, GAI has relied on but not independently verified. This Certification/Statement of Professional Opinion is therefore limited to the information available to GAI at the time the Post-Closure Plan was written. On the basis of and subject to the foregoing, it is my professional opinion as a Professional Engineer licensed in the State of Indiana that the Post-Closure Plan has been prepared in accordance with good and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances, at the same time, and in the same locale. It is my professional opinion that the Report is accurate and has been prepared consistent with the requirements of § 257.104(d) of the United States Environmental Protection Agency's "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments," published in the Federal Register on April 17, 2015 with an effective date of October 19, 2015 (40 CFR 257 Subpart D), and meeting the provisions of the "Extension of Compliance Deadlines for Certain Inactive Surface Impoundments: Response to Partial Vacatur," effective October 4, 2016.

The use of the words "certification" and/or "certify" in this document shall be interpreted and construed as a Statement of Professional Opinion and is not and shall not be interpreted or construed as a guarantee, warranty, or legal opinion.

GAI Consultants, Inc.
REGISTERED
PE10708581
Charles F. Straley
Senior Engineering Manager
INDIANA
PROFESSIONAL ENGINEER
Date Apr 17, 2018

Acronyms

CCR	Coal Combustion Residuals
CCR Rule	"Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments" 40 CFR 257 Subpart D (2015)
CFR	Code of Federal Regulations
EPA	United States Environmental Protection Agency
GDN	Geocomposite Drainage Net
GAI	GAI Consultants, Inc.
HDPE	High-Density Polyethylene
Impoundment	Surface Impoundment
IN	Indiana
RP&L	Richmond Power & Light
Station	Whitewater Valley Power Station

1.0 Introduction

The Whitewater Valley Power Station (Station) is owned by Richmond Power & Light (RP&L) and is located in Richmond, Indiana (IN). The station includes a Surface Impoundment (Impoundment), which is used for the long term storage of coal combustion residuals (CCR).

The Impoundment is located on RP&L property at the Whitewater Valley Power Station in Wayne County, Indiana (coordinates 39° 48' 12.9" North and 84° 53' 54.8" West). The Impoundment is located in the northwestern corner of the property. This Post-Closure Care Plan (Post-Closure Plan) has been developed to describe monitoring, maintenance, and repair activities required for the Impoundment during the post-closure care period.

The Impoundment is currently inactive and is regulated as an existing CCR surface impoundment under the United States Environmental Protection Agency's (EPA's) "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments" [40 CFR 257 Subpart D] published in the Federal Register on April 17, 2015 with an effective date of October 19, 2015 (CCR Rule), and meeting the provisions of the "Extension of Compliance Deadlines for Certain Inactive Surface Impoundments: Response to Partial Vacatur," effective October 4, 2016.

2.0 Purpose

This Post-Closure Plan is prepared pursuant to § 257.104(d) of the CCR Rule [40 CFR § 257.104(d)].

3.0 Post-Closure Responsibilities and Activities

3.1 Post-Closure Period

As required by Section 257.104(c) of the CCR Rule, the post-closure care period for the Impoundment will be 30 years. Post-closure care will commence after notification is made that the Impoundment has been closed in accordance with § 257.102(h) of the CCR Rule.

3.2 Post-Closure Contact

Mr. Randall Baker with RP&L is designated as the contact person during the post-closure period. The contact information is as follows:

Mr. Randall Baker
General Manager
Richmond Power & Light
2000 U.S. 27 South
P.O. Box 908
Richmond, Indiana 47374
(765) 973-7271
RandyB@RP-L.com

4.0 Inspections, Monitoring and Maintenance

4.1 Inspections

Inspections will be performed by a RP&L employee or independent registered engineer or other qualified person. The closed Impoundment will be inspected at a frequency appropriate to maintain environmental and structural integrity of the cover system, but no less than monthly for the first year after closure, and quarterly thereafter.

4.2 Monitoring

Groundwater monitoring throughout the post-closure period will comply with requirements outlined in 40 CFR 257.90-98.

4.3 Maintenance

Based upon the facility inspection schedule, maintenance will be performed as required by Section 257.104(b) of the CCR Rule and in accordance with this Post-Closure Care Plan, including:

- a. The vegetated final cover will be mowed a minimum of once per year or as necessary to deter the growth of woody vegetation, deter rodent habitat, and to allow access for inspection;
- b. Areas determined to be deficient in vegetative cover will be seeded, fertilized and mulched in order to deter erosion;
- c. Maintenance of the Groundwater Monitoring System will be performed in accordance with the Groundwater Monitoring Plan and include repairing and/or replacing damaged materials or components as needed;
- d. Areas exhibiting rill erosion of four inches or deeper will be repaired to maintain design grade/specifications and reseeded. Application of fertilizer, selective herbicides, rodent control measures, etc., will be implemented as necessary;
- e. Areas exhibiting evidence of sliding or displacement due to settling will be examined to determine the cause of the movement. These areas will be backfilled with an appropriate material to maintain positive drainage, vegetation growth, and the integrity of the site; and
- f. Maintenance will consist of removing sediment and/or undesirable vegetation from the channels once accumulated sediments reach a depth of 25 percent of the hydraulic capacity. Damage to linings and hydraulic structures will be repaired or replaced if necessary.

RP&L will be responsible for post closure care, monitoring, inspection, and maintenance of this facility.

4.4 Training

Personnel responsible for conducting maintenance, inspection, and monitoring tasks will be competent individuals trained to perform their assigned tasks.

5.0 Post-Closure Uses

The closed Impoundment will be covered with vegetation, with the exception of durable surfaces such as the gravel drains, road surfaces, and lined drainage facilities. No other uses are planned for the Impoundment.

The Impoundment will be situated on Station property and access will be limited to authorized personnel.

6.0 Post-Closure Termination

The post-closure care period will occur for a minimum of 30 years following completion of closure. As required by Section 257.104(e) of the CCR Rule, no less than 60 days after the completion of post-closure care a notification will be prepared verifying that post-closure care has been completed; this notification will be posted on RP&L's publicly accessible internet site.

7.0 References

GAI Consultants, Inc. April 2018. *Closure Plan*.