

Notice of Intent to Extend Coal Combustion Residuals Impoundment Closure Timeframe

Richmond Power and Light
Whitewater Valley Station
Richmond, Indiana

IDEM SW Program ID 89-UP-04
GAI Project Number: C151119.25
April 2026



Prepared by: GAI Consultants, Inc.
Pittsburgh Office
385 East Waterfront Drive
Homestead, Pennsylvania 15120-5005

Prepared for: Richmond Power and Light
2000 US 27 South
Richmond, Indiana 47374-7269

Table of Contents

Owner's Certification	ii
1.0 Introduction	1
2.0 Purpose	1
3.0 Closure of CCR Impoundment	1
4.0 Extension of Closure	1
5.0 Record Keeping	2

Owner's Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Owner Representative (Signature)

Anthony L. FOSTER # General Manager/CEO
Owner Representative (Printed Name and Title) *Richmond Power & Light*

4/2/2026

Date

1.0 Introduction

The Whitewater Valley Station (Station) is a coal-fired electric generating station in the city of Richmond, Wayne County, Indiana (IN) and owned by Richmond Power & Light (RP-L). The Station consists of two generating units, which can produce a combined 100 megawatts of electricity and is operated by the IN Municipal Power Agency (IMPA).

Coal combustion residuals (CCR) generated at the Station were historically sluiced to the Surface Impoundment (Impoundment), which was built in the 1950s. The size of the Impoundment is approximately 14 acres, and the state identification number for the Impoundment is 89-UP-04.

The Impoundment 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 subsequent revisions. The Impoundment meets the provisions of the CCR Rule's Extension of Compliance Deadlines for Certain Inactive Surface Impoundments: Response to Partial Vacatur, effective October 4, 2016.

In April 2020 a Location Restrictions Assessment was prepared for the Impoundment as required by the CCR Rule. In that assessment, it was determined that the Impoundment does not meet the location restriction for placement above the uppermost aquifer. As a result, according to CCR Rule requirements the Impoundment must be closed.

2.0 Purpose

This document has been prepared in accordance with the United States Environmental Protection Agency's 40 CFR Part 257, Disposal of Coal Combustion Residuals from Electric Utilities (CCR Rule). The Notice of Intent to Extend Closure Timeframe has been prepared pursuant to §257.102(f) of the CCR Rule.

3.0 Closure of CCR Impoundment

According to §257.101(a)(1) of the CCR Rule, "not later than April 11, 2021, an owner or operator of an existing unlined CCR surface impoundment must cease placing CCR and non-CCR wastestreams into such CCR surface impoundment and either retrofit or close the CCR unit in accordance with the requirements of §257.102." Section 257.102(f)(1) of the CCR Rule states that closure must be completed "for existing and new CCR surface impoundments...within five years of commencing closure activities." Based on the April 11, 2021 date closure of the Impoundment must be completed by April 11, 2026.

A Closure Plan for the Impoundment was submitted to the Indiana Department of Environmental Management (IDEM) in August 2023. As delineated in the Closure Plan, material within the Impoundment will be graded to provide drainage and covered with a final cover system. Closure of the site occurs when the final cover system has been placed over the Impoundment and other features of the Closure Plan are constructed.

4.0 Extension of Closure

According to §257.102(f)(2)(i)(A) of the CCR Rule, the deadline for closure of the Impoundment can be extended "if the owner or operator can demonstrate that it was not feasible to complete closure of the CCR unit within the required timeframes due to factors beyond the facility's control." Section 257.102(f)(2)(i)(D) of the CCR Rule allows for an extension due to "time required or delays caused by the need to coordinate with and obtain necessary approvals and permits from a state or other agency." Since the Closure Plan was submitted in 2023 and review comments/approval have not yet been provided, the deadline for completion of Impoundment closure under the CCR Rule can be extended.

Section 257.102(f)(2)(ii)(A) states that "CCR surface impoundments of 40 acres or smaller may extend the time to complete closure by no longer than two years." As such, the deadline for completion of closure for the Impoundment will be extended to April 11, 2028.

5.0 Record Keeping

This notification shall be placed in the Station's operating record and will be available on the Station's internet site. The relevant State Director will be notified when this notice has been placed in the operating record and the Station's internet site.