# 2023 Annual Landfill Inspection Report

Landfill

Rockport Plant Indiana Michigan Power Company Rockport, Indiana

September 2023

Prepared for: Indiana Michigan Power Company - Rockport Plant

Prepared by: American Electric Power Service Corporation 1 Riverside Plaza Columbus, OH 43215



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PREPARED BY Bi & Palmer	DATE	09/06/2023
Brian G. Palmer, P.E.	-	
REVIEWED BY Shahiryar Baig, P.E.	DATE _	09-07-2023
APPROVED BY Brown W Brunton, P.E.	DATE _	09/07/2023

Manager – AEP Geotechnical Engineering

09-07-2023 "Contraction in the state NO. 1030204

I certify to the best of my knowledge, information and belief the information contained in this report meets the requirements of 40 CFR § 257.84(b).

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## **1.0 INTRODUCTION**

This report was prepared by AEP- Geotechnical Engineering Services (GES) section, in part, to fulfill requirements of 40 CFR 257.84 and to provide the Rockport Plant an evaluation of the facility.

Mr. Brian Palmer performed the 2023 inspection of the Landfill at the Rockport Plant. This report is a summary of the inspection and an assessment of the general condition of the facility. Mr. Larry Hofius, the landfill supervisor for the Plant, was the facility contact. The inspection was performed on August 1, 2023. Weather conditions during the inspection had temperatures in the upper 70°F to mid-80°F, sunny skies and dry ground conditions. There was 0.94 inches of rainfall recorded over the seven days prior to the inspection.

## 2.0 DESCRIPTION OF LANDFILL

The overall features of the landfill were categorized into the following components as a means of organizing the inspection and reporting:

- Closed Landfill Area
- 2015 Landfill Construction Area (Cells 1A, 1B, 2, and 3)
- 2016 Landfill Construction Area (Cell 5 and 4A)
- Inactive Landfill Areas (Cells 4B, 6, and 7)
- Leachate Ponds
- Storm Water Drainage Ditches

These features, including the approximate limits of each area, are shown on the Figure 1.

The Closed Landfill Area is located on the north and east sides of the landfill as shown on Figure 1. This area of the landfill was constructed between 1985 and 1987 and was used for disposal of Type II ash. The area was closed and final cover was placed between 2000 and 2007. The final cover consists of twenty-four (24) inch thick compacted clay cover and a six (6) inch thick topsoil cover to support vegetation.

The 2015 Landfill Construction Area (Cells 1A, 1B, 2 and 3). The constructions of these lined cells were completed in 2015 in order to dispose of the Type I Dry Sorbent Injection Ash. Waste placement in the western portion (Cells 1B, 2, & 3) is operationally complete and temporary cover has been installed over the area. Active waste placement is currently in Cell 1A and moving north.

The 2016 Landfill Construction Area (Cell 5 and 4A) was completed in 2016. A portion of this cell was built over the slope of the previously filled Type II landfill area and a perimeter berm construction along the eastern edge of Cell 5 is tied into the existing landfill cap. A soil and vegetative cover was placed over the entire area in 2017. The Southern portion of Cell 5 (referenced as Cell 5S) has had the soil and vegetative cover removed and a separator berm constructed to make area ready for active waste placement.

Inactive Landfill Areas (Cell 4B, 6, and 7) consist of a Perimeter berm and Type II soil liner construction that was completed for these cells during the period from 2012 to 2014 and the area is reserved for future composite liner construction. A layer of intermediate cover soils is in place over part of the Type II soil liner area and is generally vegetated.

## 3.0 REVIEW OF AVAILABLE INFORMATION (257.84(b)(1)(i))

A review of available information regarding the status and condition of the Landfill which include files available in the operating record, such as design and construction information, previous 7 day inspection reports, and previous annual inspections has been conducted.

## 4.0 INSPECTION (257.84(b)(1)(ii))

#### 4.1 CHANGES IN GEOMETRY SINCE LAST INSPECTION (257.84(b)(2)(i))

No modifications have been made to the geometry of the Landfill since the 2022 annual inspection. The geometry of the landfill has remained essential unchanged, except for the changes in topography of the active landfill area due to placement of ash.

### 4.2 VOLUME (257.84(b)(2)(ii))

The total volume of ash disposed at the landfill up to the 2023 inspection date of August 1, 2023 was estimated to be 2,914,030 tons of Type I ash and 5,647,488 tons of Type II ash.

#### 4.3 DEFINITIONS OF VISUAL OBSERVATIONS AND DEFICIENCIES

This summary of the visual observations uses terms to describe the general appearance or condition of an observed item, activity or structure. The meaning of these terms is as follows:

Good:	A condition or activity that is generally better or slightly better than what is minimally expected or anticipated from a design or maintenance point of view.
Fair/Satisfactory:	A condition or activity that generally meets what is minimally expected or anticipated from a design or maintenance point of view.
Poor:	A condition or activity that is generally below what is minimally expected or anticipated from a design or maintenance point of view.
Minor:	A reference to an observed item (e.g., erosion, seepage, vegetation, etc.) where the current maintenance condition is below what is normal or desired, but which is not currently causing concern from a structure safety or stability point of view.
Significant:	A reference to an observed item (e.g. erosion, seepage, vegetation, etc.) where the current maintenance program has neglected to improve the condition. Usually conditions that have been identified in the previous inspections, but have not been corrected.
Excessive:	A reference to an observed item (e.g., erosion, seepage, vegetation, etc.) where the current maintenance condition is above or worse than what it is normal or desired, or which may have affected the ability of the observer to properly evaluate the structure or particular area of interest or which may be a concern from a structure safety or stability point of view.

This document also uses the definition of a "deficiency" as referenced in the CCR rule section §257.84(b)(5) Inspection Requirements for CCR Landfills. This definition has been assembled using the CCR rule preamble as well as guidance from MSHA, "Qualifications for Impoundment Inspection" CI-31, 2004. These guidance documents further elaborate on the definition of deficiency. Items not identified as a deficiency are considered routine maintenance items or items to be monitored.

A "deficiency" is some evidence that a landfill has developed a problem that could impact the structural integrity of the landfill. There are four general categories of deficiencies. These four categories are described below:

- 1. Uncontrolled Seepage (Leachate Outbreak)
  - Leachate outbreak is the uncontrolled release of leachate from the landfill.
- 2. Displacement of the Embankment

Displacement of the embankment is large scale movement of part of the landfill or perimeter berm. Common signs of displacement are cracks, scarps, bulges, depressions, sinkholes and slides.

3. Blockage of Control Features

Blockage of Control Features is the restriction of flow at spillways, decant or pipe spillways, or drains.

4. Erosion

Erosion is the gradual movement of surface material by water, wind or ice. Erosion is considered a deficiency when it is more than a minor routine maintenance item.

### 4.4 VISUAL INSPECTION (257.84(b)(1)(ii))

A visual inspection of the Landfill was conducted to identify any signs of distress or malfunction of the landfill and appurtenant structures. Specific items inspected included all structural elements of the landfill perimeter berms, temporary and final covers, drainage features, leachate ponds, open cells, and appurtenances such as chimney drains etc.

Overall the facility is in good condition. The landfill is functioning as intended with no signs of potential structural weakness or conditions which are disrupting to the safe operation of the landfill. Inspection photos are included in Attachment A. Additional pictures taken during the inspection can be made available upon request. A map presenting locations of the inspection observations is included in Attachment A.

#### LEACHATE PONDS

- 1. The small crack in the concrete liner of the West Pond previously reported was located just above the leachate outlet pipes entering the pond from the south. There appears to be no change in width of the crack from the 2022 inspection.
- 2. The West pond concrete lined portion was operating with about 6 feet of freeboard. The concrete lined section in general is in good condition with no signs of damage (except for small crack noted above).
- 3. The LLDPE lined portion of the West Pond appeared to be in good condition with no signs of issues with the liner. The pond was operating with about 6-ft of freeboard.
- 4. The 002 Pond is out of service and had been pumped mostly empty for maintenance. The LLDPE liner in leachate pond 002 appeared to be in good condition. As the 002 pond liner leaks noted in the 2022 inspection report were repaired in October of 2022.
- 5. The riprap armor on the exterior slopes of 002 Pond appeared in good condition.
- 6. Cracks in the above grade concrete thrust blocks for the eastern influent lines into Pond 002 were reviewed and did appear generally similar as noted in 2022.
- 7. The North Pond was generally in good condition. At the time of the inspection both cells were filled and operating with about 6 feet of freeboard.

- 8. The concrete lined cell of the North Pond did not appear to have any signs of damage, cracks or spalling. There were no signs of blockage of the inlet and outlet piping. The fence surrounding the leachate pond was in good condition.
- 9. The liner patch in the North Pond noted in the 2022 inspection was repaired by the plant, and no issues were noted during the inspection.

#### 2015 CONSTRUCTION AREA (CELL 1A, 1B, 2, & 3)

- 1. The 10-foot tall soil containment berm constructed along the northern edge of Cell 1A in 2021 has been removed and a new containment berm constructed in the southern portion of Cell 5 (see 2016 Construction Area).
- 2. During the inspection, ash was being placed in the active disposal areas.
- 3. The chimney drains appear to be functioning as designed and there was some pooling of water around the drains and appeared to be related to topography/grade.
- 4. The temporary soil cover has been placed on the surface of Cells 1B, 2 & 3 with the area seeded and vegetation generally established.
- 5. The temporary cover addressed issues with overtopping in Cell 2 and all ash issue identified during the 2022 inspection have been corrected and contained within the working area or with temporary cover.
- 6. While vegetation is generally established in the temporary cover in Cells 1B, 2, & 3 some areas still need work to finish stabilization with additional seeding and fixing erosion of temporary cover.

#### 2016 CONSTRUCTION AREA (CELL 4A & 5)

- 1. A new containment berm constructed in the southern portion of Cell 5 (referenced as Cell 5S) and the soil and vegetative cover removed to prepare the area for active waste placement. Standing water was noted along the berm towards the area of waste placement.
- 2. The chimney drains in the Cell 5S appear functional and ready for waste placement.
- 3. Cell 4A & 5 had temporary grass cover that was in good condition. There were no signs of settlement, movement or distress in this area.

#### CLOSED LANDFILL AREAS

- 1. The area of erosion rill and rodent borrows identified during last year's inspection along the riprap channel adjacent to the landfill access road has been repaired.
- 2. The closed landfill area was observed to have a thick grass cover over the entire capped area that had recently been mowed. There were no signs of settlement, signs of movement or distress of the landfill area. The closed landfill area was in good condition and well maintained.

#### INACTIVE LANDFILL AREAS (CELL 4B, 6 & 7)

1. The inactive landfill cells 4B, 6 and 7 were in good condition. The vegetative cover was well established and in good condition. With no apparent signs of erosion or seepage.

#### STORM WATER DRAINAGE DITCHES

1. The perimeter ditches to the West and South were in good condition with no signs of erosion or blockage and appeared to be functioning as designed.

#### 4.5 CHANGES THAT EFFECT STABILITY OR OPERATION (257.84(b)(2)(iv))

Based on interviews with plant personnel and field observations there were no changes to the landfill since the last annual inspection that would affect the stability of the landfill.

## 5.0 SUMMARY OF FINDINGS

#### **5.1 GENERAL OBSERVATIONS**

The following general observations were identified during the visual inspection:

1. In general, the landfill is functioning as designed and the active cells, inactive cells, closed areas, leachate ponds and ditches are in good condition. Improvements to the facility have been completed over the past several years, including efforts to improve the temporary grass cover, new pond liner installation in leachate pond 002, and the leachate seepage repair to address a previous deficiency.

Continue to performing regular maintenance and inspections as required. Specific maintenance items have been noted and are described in Section 5.2.

#### 5.2 MAINTENANCE ITEMS

The following maintenance items were identified during the visual inspection, see inspection map for locations. Contact GES for specific recommendations regarding repairs:

- 1. Several areas of erosion or poor vegetation were noted in the temporary cover over Cells 1B, 2, & 3. Continue monitoring and repairing these areas.
- 2. Install a suitable sealant in the crack in the concrete lined section of the west pond, located above the leachate discharge pipe.

#### 5.3 ITEMS TO MONITOR

The following items are specifically called out continued monitoring.

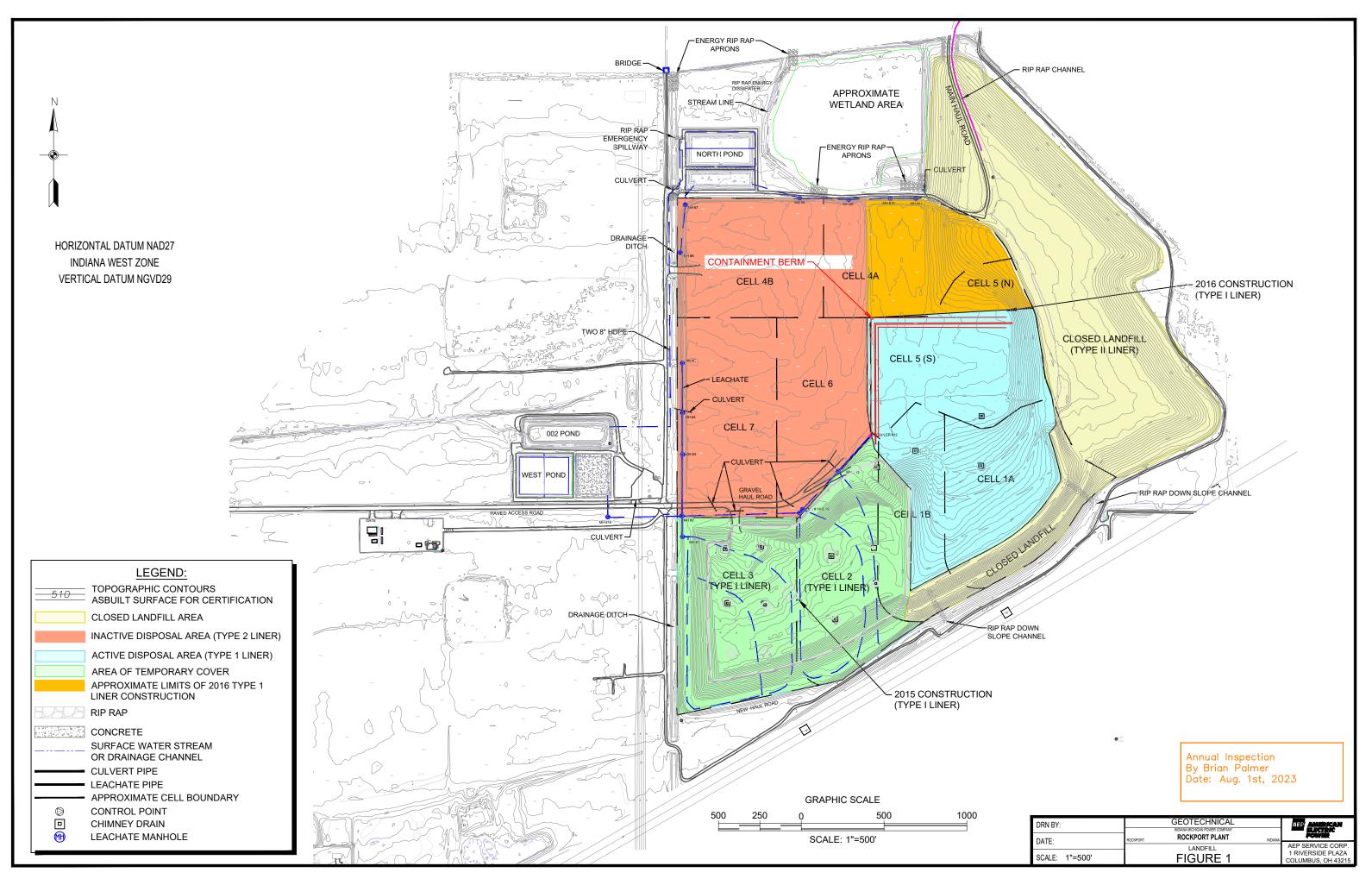
- 1. Monitor the cracked thrust block on the leachate influent lines on the east side of pond 002 for any additional movement or distress.
- 2. Continue monitoring and repairing the grass cover in the in the inactive landfill areas.
- 3. Continue monitoring the liner system in the various leachate ponds and make repairs as appropriate

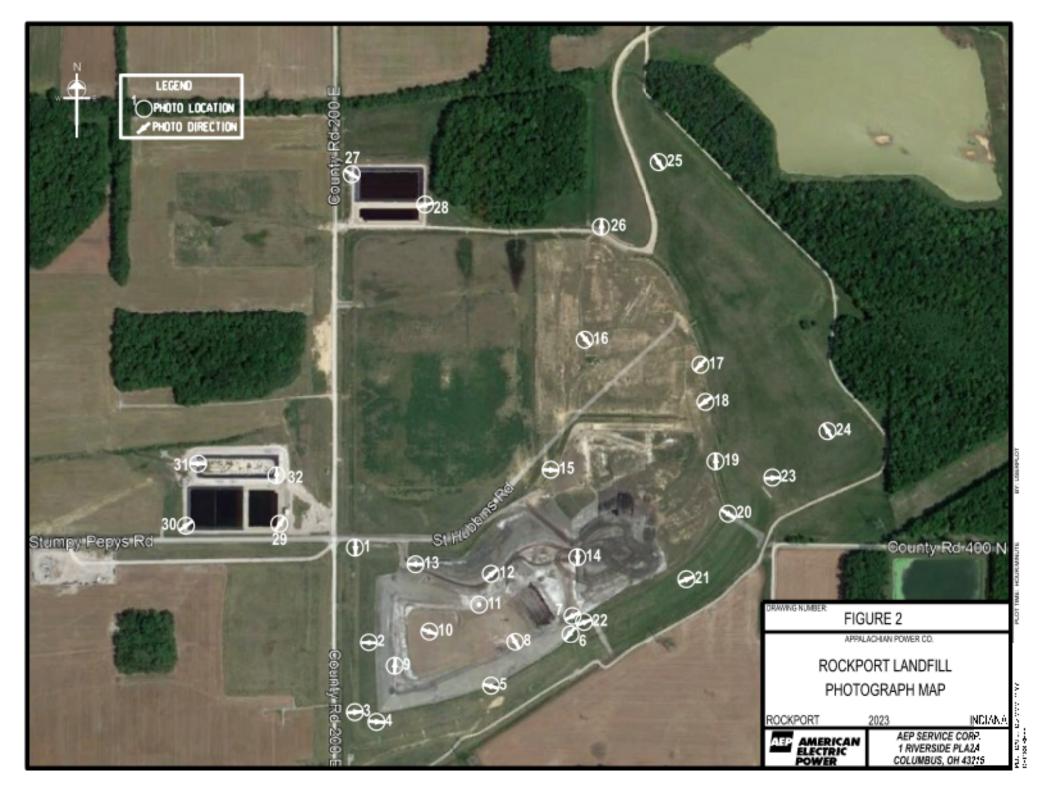
#### 5.4 DEFICIENCIES (257.84(b)(2)(iii))

There were no signs of structural weakness or disruptive conditions that were observed at the time of the inspection that would require additional investigation or remedial action.

Based on the review of the data there were no signs of actual or potential structural weakness or adverse conditions. A deficiency is defined as either 1) uncontrolled seepage (leachate outbreak), 2) displacement of the embankment, 3) blockage of control features, or 4) erosion, more than minor maintenance. If any of these conditions occur before the next annual inspection contact AEP Geotechnical Engineering immediately.

**Figures** 





#### ATTACHMENT A

Photos

		AEP GE	S Landfill Ins	pectio	)n
Plant N	lame:	Rockport	Inspector:	B Palı	mer
	Unit:	Landfill	Date:	Aug	ust 1, 2023
Photo #:	1		N	lotes:	General condition of temporary cover on west slope of Cell 3
					N37 56.702 W87 1.058
Photo #:	2			lotes:	General condition of rock down chute on Cell 3 west slope
4	-	T. M. ANNO SI	and the second	S.	N37 56.609 W87 1.035

01

		AEP GE	CS Landfill Ins	pectio	n
Plant N	lame:	Rockport	Inspector:	B Palr	ner
	Unit:	Landfill	Date:	Augu	ust 1, 2023
Photo #:	3			otes:	General condition of rock down chute SW corner of Cell 3
Photo #:	4		N	otes:	General condition of
					temporary cover 0n south slope of Cell 3
					N37 56.529 W87 1.029

		AE	P GE	S Land	lfill Ins	pectio	on
Plant N	lame:	Rockport		In	spector:	B Palı	mer
	Unit:	Landfill			Date:	Aug	ust 1, 2023
Photo #:	5				N	lotes:	Erosion repair areas on upper part of south slope of Cell 2 temporary cover
Photo #:	6						N37 56.566 W87 0.883
						lotes:	General condition of temporary cover on cell 1B south slope
							N37 56.617 W87 0.782

		AEP GI	ES La	andfill ]	Insp	oectio	n
Plant N	ame:	Rockport		Inspecto	or:	B Palr	ner
	Unit:	Landfill		Da	ate:	Augu	ust 1, 2023
Photo #:	7				No	otes:	General condition of cell 1B temporary cover on upper area. Area recently seeded and Grass still high to allow vegetation to establish
							N37 56.632 W87 0.779
Photo #:	8			C		otes:	General condition of cell 2 south slope. Note spots with limited vegetation on the surface of the lower berm.
		P	age:	04	R.B.		

		AE	<b>PGE</b>	S Land	fill Ins	pectio	on
Plant N	lame:	Rockport		Ins	spector:	B Palı	mer
	Unit:	Landfill			Date:	Aug	ust 1, 2023
Photo #:	9				N	lotes:	General condition of temporary cover on top of cell 3 west slope.
							N37 56.586 W87 1.006
Photo #:	10				Ν	lotes:	General condition of
						A	cells 2&3 temporary cover on top with chimney drain riser in foreground
<b>小</b>		TE SO	and the second	A CARLES			N37 56.620 W87 0.962

		AE	P GE	S Land	Ifill Ins	pectio	on
Plant Na	ame:	Rockport		In	spector:	B Palı	mer
l	Unit:	Landfill			Date:	Aug	ust 1, 2023
Photo #:	11				N	otes:	Erosion around mulch
							log on temporary cover in cell 2 N37 56.646 W87 0.899
Photo #:	12				Ν	otes:	General condition of
							temporary cover on north slope of cells 1B & 2.
化、原料	Tachs!	W. P. T. C. M	ALC: NO.	See As	Shall Sta		N37 56.677 W87 0.885

		AEP GI	ES La	andfill In	isp	oectio	n
Plant N	ame:	Rockport		Inspector	:	B Palr	ner
	Unit:	Landfill		Date	e:	Augu	ıst 1, 2023
Photo #:	13				No	otes:	General condition of
							temporary cover on cell 3 north slope N37 56.686 W87 0.980
Photo #:	14				No	otes:	General condition of waste surface in open area of cell 1A & 1B. Area drains to chimney drain.
14	22.4	P	age:	07		Strain 1	N37 56.692 W87 0.774
		1.	~90.				

		AEP GI	ES Landfill Ins	pectio	n
Plant N	ame:	Rockport	Inspector:	B Paln	ner
	Unit:	Landfill	Date:	Augu	ıst 1, 2023
Photo #:	15		Ν	lotes:	General condition of cell 1A working area
-					
	-				
	- Aller	Le la fil	TTO AND		
		with an			
					N37 56.782 W87 0.807
Photo #:	16		Ν	lotes:	General condition of cell 5S area looking towards
		* =			active working face (cell 1A background)
-					
			Real Property in the second	-	
Real			and the second s		
	之后			5	N37 56.912 W87 0.766

		AEP GE	CS Landfill Ins	pectio	n
Plant N	lame:	Rockport	Inspector:	B Palr	ner
	Unit:	Landfill	] Date:	Augu	ust 1, 2023
Photo #:	17		Ν	otes:	Overview of cell 1A/5S working area.
			* . 	6	
1					
		N Lal	and all a second design of the		
	and the	The state of the second			
	*				
	123	and the second second	Sector Sector		N37 56.888 W87 0.618
Photo #:	18		Ν	otes:	Active working face with dozer pushing material
					out, water truck wetting for dust control and
		VIL		-	roller for compaction
		And and the other states			
					N37 56.849 W87 0.610

		AI	E <b>P GE</b>	S Lan	dfill In	sp	ectio	)n
Plant N	lame:	Rockport			nspector:		B Palr	mer
	Unit:	Landfill			Date	):	Augu	ust 1, 2023
Photo #:	19					No	otes:	General condition of top of berm separating cell
								1A/5A (left) from closed
								landfill (right)
					-			
					State Tr	The		
					TROP .			
						-	3	
		Y Solling		NS P				
Circles .	-17			政保				N37 56.789 W87 0.598
Photo #:	20					NIa		
			SHORE O			INC	otes:	General condition of rock chute on closed
	A STATE				A MARINE	100		landfill at Southeastern corner cell 1A.
And and the	and the second		untra Er	bud added		1.64	-	
			· erit					
	- art		-				100	
L.		the second						
	7		NE		1		A.	<b></b>
63		(at)		at w				N37 56.738 W87 0.581

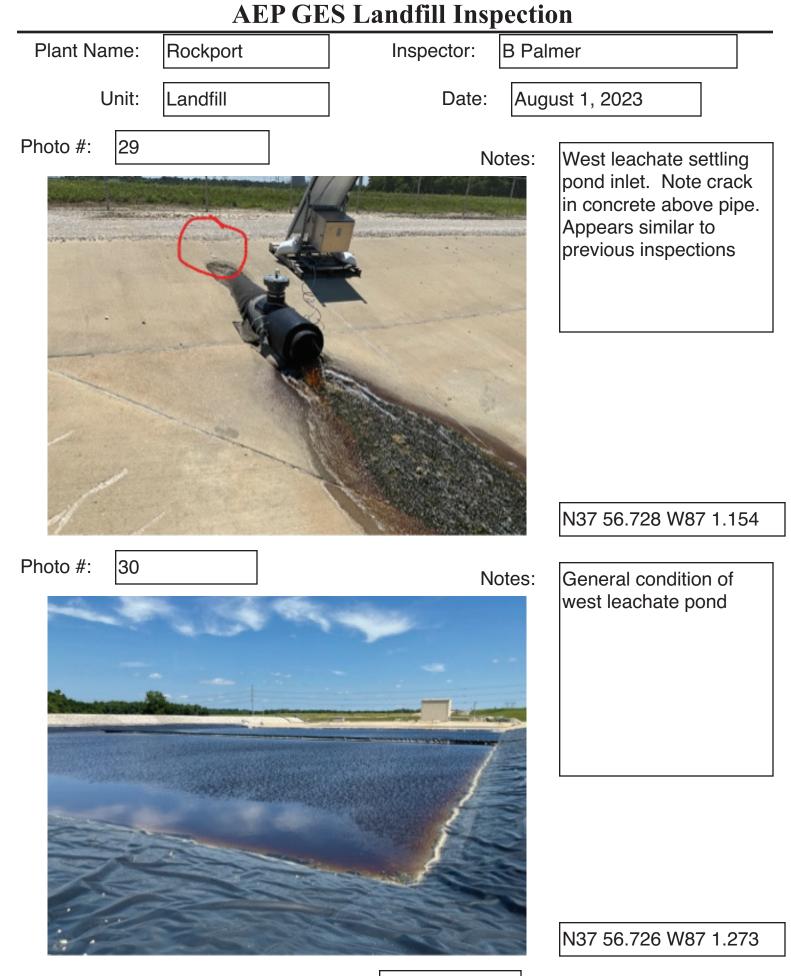
		AEP	GES Landfill Insp	pectio	n
Plant Name:		Rockport	Inspector:	B Palr	ner
	Unit:	Landfill	Date:	Augu	ust 1, 2023
Photo #:	21		N	otes:	General condition of closed landfill on south
					side of Cell 1A
Photo #:	22		N	otes:	General condition of
			V		closed landfill on south side of Cell 1A
				1 2	N37 56.630 W87 0.767

		AEP G	ES Landfill Ins	pectio	n
Plant N	ame:	Rockport	Inspector:	B Palr	mer
	Unit:	Landfill	Date:	Augi	ust 1, 2023
Photo #:	23		N	otes:	General condition of south slope of closed landfill area
					N37 56.774 W87 0.525
Photo #:	24		N	otes:	General condition of top of closed landfill area
					N37 56.820 W87 0.456

		AEP GE	ES Landfill Ins	pectio	on
Plant Na	ame:	Rockport	Inspector:	B Pal	mer
	Unit:	Landfill	Date:	Aug	ust 1, 2023
Photo #:	25		N	lotes:	General condition of final cover on east slope of closed landfill area
		COMPANY AND			
Sile			14. 16. 16 16	N.	N37 57.091 W87 0.672
Photo #:	26		Ν	lotes:	General condition of
					final cover on west slope at north end of closed landfill. Rodent/ erosion identified in 2022 repair along riprap
1	54	H K K		R.	N37 57.020 W87 0.729

13

		AEP G	ES La	undfill In	sp	ectio	n
Plant Na	ame:	Rockport		Inspector:		B Palr	ner
l	Unit:	Landfill		Date	):	Augu	ıst 1, 2023
Photo #:	27				No	otes:	General condition of
							North leachate pond
Photo #:	28				No	otes:	General condition of North leachate settling pond
		Ρ	age:	14			



		AEP GE	S Landfill Insp	pectio	on	
Plant Na	ame:	Rockport	Inspector:	B Pal	mer	
	Unit:	Landfill	Date:	Aug	ust 1, 2023	
Photo #:	31		No	otes:	General condition of 0	
	-				pond. Water level low for turtle rescue prior t bring pond in service.	to
			Water of the second sec			
	the second				N37 56.787 W87 1.25	6
Photo #:	32			otes:	General condition of 0 inlet pipe with cracked thrust block.	
Cold Services				14	N37 56.776 W87 1.15	
	and the second second			50.14		

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