November 1, 2024

1 Riverside Plaza
Columbus, OH 43215

INDIANA MICHIGAN POWER
An AEP Company

Via E-mail

November 1, 2024

Ms. Lindsey Hummel, Senior Environmental Manager
Indiana Department of Environmental Management
OLQ Solid Waste Permits Section
IGCN 1154
100 North Senate Avenue
Indianapolis, Indiana 46204

RE: American Electric Power
Rockport Plant
Ash Landfill Permit FP 74-02
West Bottom Ash Pond Material Removal
Waste Sampling and Analysis Plan for Acceptance

Dear Ms. Hummel:

Included in this letter is the waste sampling and analysis plan for the Rockport West Bottom Ash Pond (WBAP) material during the closure by removal project for acceptance of this material in the Rockport RWS I Landfill FP 74-02. Additionally, the Safety Data Sheet (SDS) for Mississippi Lime Pebble and Granular Quicklime is included. The lime is being requested to be used during the WBAP closure project in order to assist with drying out the saturated material in the WBAP for proper transport prior to disposal in the on-site RWS I Landfill. The lime will remain mixed with the waste material during final disposition.

Introduction

The purpose of this sample and analysis plan (SAP) is to classify the bottom ash material that is in the WBAP. The WBAP is approximately 30 acres. Over the course of plant operations, the WBAP has accepted Unit 1 and Unit 2 (U1/2) fly ash silo sumps, U1/2 pyrites sluice, U1/2 bottom ash sluice, coal yard runoff, stormwater discharge, and landfill leachate during emergencies. Because the bottom ash waste stream was mixed with other, non-CCR waste streams, and the minor permit mod from August 23, 2022 required the BAP closure projects to classify this material; this SAP is being developed to share with IDEM prior to initiating waste sampling and classification for approval for acceptance to the on-site landfill.

Site Layout

The pond complex is shown below. The number "*" indicates where the various sluice lines previously entered the East and West BAP during routine operations. The sluice lines flowed to either the EBAP or the WBAP while both were in operation. From there, the ash settles into the ash pond. The wastewater then flows in-line to the East or West Wastewater Pond (WWP).

Figure 1

From the WWP, the water flows to the Reclaim Pond. From the Reclaim Pond, the plant either reclaims some of the water for re-use in plant operations or the wastewater then flows to the clearwater pond. From the Clear Water Pond the wastewater discharges to the Ohio River via Outfall 001 (Permit No. IN0051845).

The WBAP is now out of operation and entering closure by removal. The EBAP was closed by removal, retrofitted, and is now in operation for the plant wastewater flows, including sluiced bottom ash.

Ash Generation and Collection Process
Rockport Plant consists of two identical coal-fired steam electric generating units with each unit rated at 1300 megawatts. The plant burns about 2.6 million tons of coal per year for generating electricity, as averaged between 2020 - 2023. Currently, the Rockport Plant is burning a coal mix consisting of about 85% western coal and about 15% eastern coal.

The coal is delivered by barge and is off-loaded to the coal storage yard directly east of the pond complex. The coal is transported by conveyor into one of the two units. The coal is pulverized to a face powder consistency then injected and burned in the steam generator, the heat produced converts water in the steam generator tubes to steam used to drive the turbine generators which produces the electricity.

The burning of coal produces two types of ash – fly ash and bottom ash. About 75% of coal ash produced at Rockport is fly ash with the remaining 25% in the form of bottom ash. Rockport produces about 184,000 tons of ash per year based on 2019-2023 disposal averages.

Fly ash is the fine particulate matter entrained in the hot flue gases. To remove the fly ash prior to the gases exiting through the plant stack, the flue gas is routed through an electrostatic precipitator (ESP). At the precipitator, the gas passes through an electrostatic field where the ash particles are negatively charged. The ash is removed as the gas passes through a series of positively charged plates which attract the fly ash particles. The fly ash adheres to the plates until removed by mechanical rappers which knock the fly ash down into a series of collection hoppers. From the hoppers, the fly ash is pneumatically conveyed to a storage silo. From the silo, the ash is either loaded dry into closed trucks and shipped off site for various uses or conditioned with a small quantity of water then loaded and hauled to the landfill by truck for disposal at the on-site landfill. Because fly ash is exempted from requiring classification when disposed of in a Type I RWS as long as it is not mixed with other non-exempt wastes, fly ash is not being classified prior to disposal in the on-site landfill.

Bottom ash is the heavier coal ash particles that fall to the bottom of the steam generator and are collected in hoppers. The refractory lined hoppers extend across the full width of the bottom of the steam generator and are located directly under the throat formed by the sloping furnace walls. The hoppers are kept full of water to protect the lining and break the fall of large pieces of hot slag which shatter upon contact with the relatively cool water. From the hoppers, the bottom ash - water mixture is routed through a crusher station to crush the ash to a size suitable for pumping. The ash is then pumped to the bottom ash pond. As the bottom ash sluice is discharged into the pond, the ash separates from the sluice water creating an ash delta at the discharge pipe. The wastewater flows through the pond complex, without-bottom ash, as described in the **Site Layout** section.

The liquid in the WBAP has been pumped out. Internal drainage areas have been constructed within the WBAP in order to facilitate drying of the waste material to be removed. Some of the material has pushed via dozer into different areas in order to expose the native bottom of the WBAP for planning purposes. During the dozing, material was mixed and stockpiled in a manner that mixed many areas and different materials into various stockpiles. The material in the stockpiles was then/is “flipped” by dozers and/or excavators in order to facilitate the material to dry out enough to be loaded, hauled, and placed in the Phase 1 area of the on-site landfill. No material has been removed from the WBAP to-date. Many different areas within the pond are stockpiled together, creating a homogenous mixture that would be representative of the EBAP waste materials within each stockpile. The northern most area where the sluice lines discharge into the pond were not part of the dozing and mixing as those areas have enough build up of mixed ash material that liquid is not built up and therefore pumping and draining isn’t necessary for drying out that portion of the material.

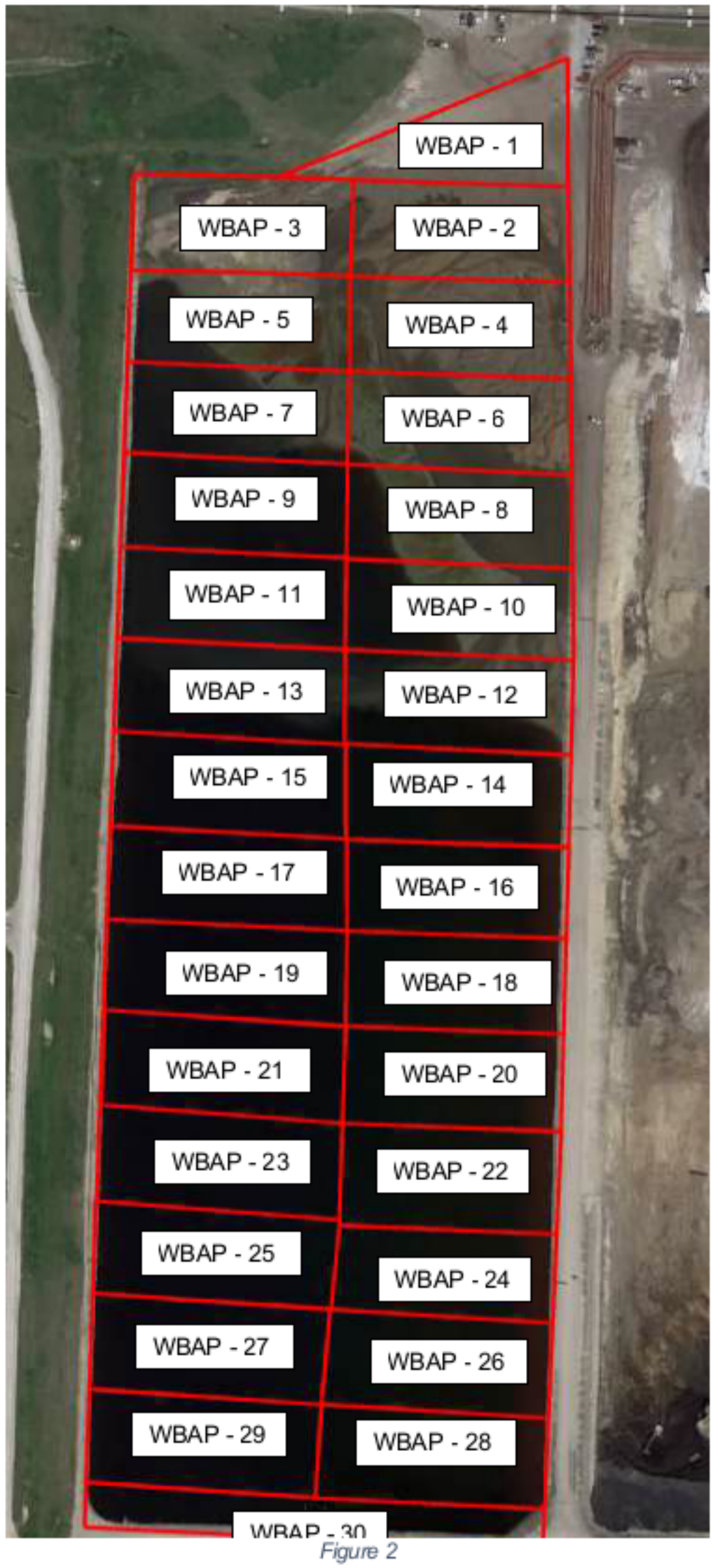
Sampling Plan

The majority of the bottom ash sluiced to the WBAP settles quickly and creates an ash delta, or a build up of ash, near the sluice pipe inlet to the WBAP. Any ash that does not settle in the first area of the inlet flows further into the pond and settles prior to discharge to the wastewater pond. The bottom ash and other sluice line inputs into the WBAP have been consistently the same throughout the course of the plant operations. Because of this, the ash and any other solids that settle out are consistent throughout the WBAP footprint and over the course of time, with the majority settling out near the sluice pipe inlet. This can be visualized in the areas northern most of the WBAP in Figures 1 and 2.

As seen in Figure 2, the WBAP can be divided into 30 separate areas. Areas 1-29 are all approximately one acre and area 30 is approximately 0.75 acres. Due to the early settling of the solids, Areas 1-8 will be representative of the entire pond solids. For this reason, Areas 1-8 will be sampled 3 times. Samples will be collected randomly within each area at approximately 18 inches below the surface. If all these results are below the Type I standard for disposal in the RWS I on-site landfill, the remaining areas will be sampled once each. All areas will be sampled randomly within the area and at a depth of 18 inches below the surface.

If any area or sample fails to meet the Type I limits, the area will be resampled to confirm the results. If results are confirmed, the material in that area will be taken to an appropriate off-site facility. After removing material that failed, an additional five samples of the area will be collected in order to confirm the failing material was all removed. The five samples will be collected within the one acre area that failed. One sample will be taken from the center of the area and the four remaining samples will be taken in four ninety-degree directions at the middle of the sidewalls of the area after excavation of the failing material is complete.

The location of each sample within each area will be determined randomly in the field. After the location for sample collection is chosen, approximately 18 inches of material will be excavated by shovel or by heavy equipment such as an excavator. Sample at the 18 inch depth will be collected by hand. Rubber gloves will be used to grab the sample(s). After each sample, a new pair of gloves will be donned in order to reduce any potential cross contamination. All samples will be placed in individual 1000 mL, HDPE, screw-top bottles and uniquely labeled.


WBAP - 1
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WBAP - 5
WBAP - 4
WBAP - 7
WBAP - 6
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WBAP - 28
WBAP - 30

Figure 2

Analysis Plan

As per Indiana Administrator Code (IAC) 10-9-4, Restricted Waste Sites Waste Criteria, samples collected will be analyzed for constituents in Table 1. The samples will be prepared for analysis and analyzed as listed below. Additionally, hold times and preservation requirements for each parameter can be found in Table 1. Results will be compared to the limits in IAC 10-9-4 Table I Type I criteria.

Constituent	Preparation Method	Analysis Method	Hold Time	Preservation
Arsenic	EPA Method 1311 (TCLP)	EPA Method 6010	180 days	Unpreserved
Barium	EPA Method 1311 (TCLP)	EPA Method 6010	180 days	Unpreserved
Cadmium	EPA Method 1311 (TCLP)	EPA Method 6010	180 days	Unpreserved
Chromium	EPA Method 1311 (TCLP)	EPA Method 6010	180 days	Unpreserved
Lead	EPA Method 1311 (TCLP)	EPA Method 6010	180 days	Unpreserved
Mercury	EPA Method 1311 (TCLP)	EPA Method 7470	28 days	Unpreserved
Selenium	EPA Method 1311 (TCLP)	EPA Method 6010	180 days	Unpreserved
Silver	EPA Method 1311 (TCLP)	EPA Method 6010	180 days	Unpreserved

Table 1

Conclusion

Upon result receipt, all laboratory analyses, level IV Analytical Data QA/QC, and chain of custodies will be provided to IDEM for approval of the waste classification.

If there are any questions, please contact me at (614) 397-9198 or by email at bekepchar@aep.com.
Sincerely,

Benjamin E. Kepchar

Benjamin E. Kepchar, P.E.
Environmental Services

SAFETY DATA SHEET

1. Identification

Product Identifier	**Mississippi Lime Pebble and Granular Quicklime - Ste. Genevieve Facility**
Other means of identification	
CAS number	1305-78-8
Recommended use	Industrial uses
Recommended restrictions	Not for use as direct food or pharma ingredients.
Manufacturer/Importer/Supplier/Distributor information	
Manufacturer:	Mississippi Lime Company
Address:	16147 US Highway 61 Ste Genevieve, MO 63670
24 Hour Emergency Contact Number:	(800) 437-5463

2. Hazard(s) identification

Physical hazards	Not classified.	
Health hazards	Skin corrosion/irritation	Category 1C
	Serious eye damage/eye irritation	Category 1
	Carcinogenicity	Category 1A
	Specific target organ toxicity, single exposure	Category 3 respiratory tract irritation
Environmental hazards	Hazardous to the aquatic environment, acute hazard	Category 3
OSHA defined hazards	Not classified.	

Label elements

Signal word	Danger
Hazard statement	Causes severe skin burns and eye damage. May cause respiratory irritation. May cause cancer. Harmful to aquatic life.
Precautionary statement	
Prevention	Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Do not breathe dust. Wear protective gloves/protective clothing/eye protection/face protection. Wash thoroughly after handling. Use only outdoors or in a well-ventilated area. Avoid release to the environment.
Response	If swallowed: Rinse mouth. Do NOT induce vomiting. If on skin (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower. If inhaled: Remove person to fresh air and keep comfortable for breathing. If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a poison center/doctor. Wash contaminated clothing before reuse.
Storage	Store in a well-ventilated place. Keep container tightly closed. Store locked up.
Disposal	Dispose of contents/container in accordance with local/regional/national/international regulations.
Hazard(s) not otherwise classified (HNOC)	None known.
Supplemental information	None.

3. Composition/information on ingredients

Substances

Chemical name	Common name and synonyms	CAS number	%
Calcium oxide (CaO)		1305-78-8	97 - 99

Impurities

Chemical name	CAS number	%
Magnesium Oxide	1309-48-4	≤ 1
Silicon Oxide	7631-86-9	≤ 1
Quartz	14808-60-7	≤ 0.5

Composition comments All concentrations are in percent by weight.

4. First-aid measures

Inhalation Remove victim to fresh air and keep at rest in a position comfortable for breathing. Call a poison center or doctor/physician if you feel unwell.

Skin contact Take off immediately all contaminated clothing. Rinse skin with water/shower. Call a physician or poison control center immediately. Chemical burns must be treated by a physician. Wash contaminated clothing before reuse.

Eye contact Do not rub eyes. Immediately flush eyes with plenty of water for at least 15 minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Call a physician or poison control center immediately.

Ingestion Call a physician or poison control center immediately. Rinse mouth. Do not induce vomiting. If vomiting occurs, keep head low so that stomach content doesn't get into the lungs.

Most important symptoms/effects, acute and delayed Burning pain and severe corrosive skin damage. Causes serious eye damage. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Permanent eye damage including blindness could result. May cause respiratory irritation.

Indication of immediate medical attention and special treatment needed Provide general supportive measures and treat symptomatically. Chemical burns: Flush with water immediately. While flushing, remove clothes which do not adhere to affected area. Call an ambulance. Continue flushing during transport to hospital. Keep victim under observation. Symptoms may be delayed.

General information IF exposed or concerned: Get medical advice/attention. If you feel unwell, seek medical advice (show the label where possible). Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves.

5. Fire-fighting measures

Suitable extinguishing media Use fire-extinguishing media appropriate for surrounding materials.

Unsuitable extinguishing media Do not use water as an extinguisher. The product reacts with water and will generate heat.

Specific hazards arising from the chemical During fire, gases hazardous to health may be formed.

Special protective equipment and precautions for firefighters Self-contained breathing apparatus and full protective clothing must be worn in case of fire.

Fire fighting equipment/instructions Use water spray to cool unopened containers. Move containers from fire area if you can do it without risk. In case of fire and/or explosion do not breathe fumes.

Specific methods Use standard firefighting procedures and consider the hazards of other involved materials.

General fire hazards The product is nonflammable and does not support combustion.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures Keep unnecessary personnel away. Keep people away from and upwind of spill/leak. Wear appropriate protective equipment and clothing during clean-up. Do not breathe dust. Use a NIOSH/MSHA approved respirator if there is a risk of exposure to dust/fume at levels exceeding the exposure limits. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Ensure adequate ventilation. Local authorities should be advised if significant spillages cannot be contained. For personal protection, see section 8 of the SDS.

Methods and materials for containment and cleaning up

Avoid dispersal of dust in the air (i.e., clearing dust surfaces with compressed air). Collect dust using a vacuum cleaner equipped with HEPA filter. Prevent product from entering drains. Stop the flow of material, if this is without risk. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Do not get water inside containers. Prevent entry into waterways, sewer, basements or confined areas.

Small Spills: Cover with DRY earth, DRY sand, or other non-combustible material followed with plastic sheet to minimize spreading or contact with rain. Collect spill using a vacuum cleaner with a HEPA filter. Put material in suitable, covered, labeled containers.

Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS.

Environmental precautions

Avoid release to the environment. Inform appropriate managerial or supervisory personnel of all environmental releases. Prevent further leakage or spillage if safe to do so. Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling

Minimize dust generation and accumulation. Provide appropriate exhaust ventilation at places where dust is formed. Do not breathe dust. Do not get in eyes, on skin, or on clothing. Avoid prolonged exposure. Wear appropriate personal protective equipment. Avoid release to the environment. Observe good industrial hygiene practices.

Conditions for safe storage, including any incompatibilities

Store locked up. Store in original tightly closed container. Store in a well-ventilated place. Avoid contact with acids, water, and moisture. Protect from humidity. The substance is hygroscopic and will absorb water by contact with the moisture in the air. Store away from incompatible materials (see Section 10 of the SDS).

8. Exposure controls/personal protection

Occupational exposure limits

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Material	Type	Value	
Calcium oxide (CaO) (CAS 1305-78-8)	PEL	5 mg/m3	
Impurities	**Type**	**Value**	**Form**
Magnesium Oxide (CAS 1309-48-4)	PEL	15 mg/m3	Total particulate.
Quartz (CAS 14808-60-7)	PEL	0.05 mg/m3	Respirable dust.

US. OSHA Table Z-3 (29 CFR 1910.1000)

Impurities	Type	Value	Form
Magnesium Oxide (CAS 1309-48-4)	TWA	5 mg/m3	Respirable fraction.
		15 mg/m3	Total dust.
		50 mppcf	Total dust.
		15 mppcf	Respirable fraction.
Silicon Oxide (CAS 7631-86-9)	TWA	0.8 mg/m3	
		20 mppcf	
Quartz (CAS 14808-60-7)	TWA	0.1 mg/m3	Respirable.
		2.4 mppcf	Respirable.

US. ACGIH Threshold Limit Values

Material	Type	Value	
Calcium oxide (CaO) (CAS 1305-78-8)	TWA	2 mg/m3	
Impurities	**Type**	**Value**	**Form**
Magnesium Oxide (CAS 1309-48-4)	TWA	10 mg/m3	Inhalable fraction.
Quartz (CAS 14808-60-7)	TWA	0.025 mg/m3	Respirable fraction.

US. NIOSH: Pocket Guide to Chemical Hazards

Material	Type	Value	
Calcium oxide (CaO) (CAS 1305-78-8)	TWA	2 mg/m3	
Impurities	**Type**	**Value**	**Form**
Silicon Oxide (CAS 7631-86-9)	TWA	6 mg/m3	
Quartz (CAS 14808-60-7)	TWA	0.05 mg/m3	Respirable dust.

Biological limit values No biological exposure limits noted for the ingredient(s).

Appropriate engineering controls Good general ventilation should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level. If engineering measures are not sufficient to maintain concentrations of dust particulates below the Occupational Exposure Limit (OEL), suitable respiratory protection must be worn. Eye wash facilities and emergency shower must be available when handling this product.

Individual protection measures, such as personal protective equipment

Eye/face protection When working with powders or dusts, wear dust-proof chemical goggles and face shield unless full facepiece respiratory protection is worn.

Skin protection

Hand protection Wear appropriate chemical resistant gloves. Suitable gloves can be recommended by the glove supplier.

Skin protection

Other Wear appropriate chemical resistant clothing. Apron with long sleeves or two piece chemical protective clothing, and rubber boots are recommended.

Respiratory protection If engineering controls do not maintain airborne concentrations below recommended exposure limits (where applicable) or to an acceptable level (in countries where exposure limits have not been established), an approved respirator must be worn. Wear NIOSH approved respirator appropriate for airborne exposure at the point of use.

Thermal hazards Wear appropriate thermal protective clothing, when necessary.

General hygiene considerations Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance

Physical state	Solid.
Form	Powder.
Color	Light grey to white.
Odor	Odorless.
Odor threshold	Not available.
pH	> 12,4 Saturated solution in water
Melting point/freezing point	4661.6 °F (2572 °C)
Initial boiling point and boiling range	5162 °F (2850 °C)
Flash point	Not available.
Evaporation rate	Not available.
Flammability (solid, gas)	Non flammable.

Upper/lower flammability or explosive limits

Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Vapor density	Not available.
Relative density	Not available.

Solubility(ies)

Solubility (water)	Reacts to form calcium hydroxide.
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity	Not available.

Other information

Explosive properties	Not explosive.
Molecular formula	Ca-O
Molecular weight	56.08 g/mol
Oxidizing properties	Not oxidizing.

10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Stable under the prescribed storage conditions.
Possibility of hazardous reactions	Strong exothermic reaction with acids. Calcium oxide reacts exothermically with water to form calcium hydroxide. The heat generated by this reaction may ignite combustible materials.
Conditions to avoid	Contact with incompatible materials. The substance is hygroscopic and will absorb water by contact with the moisture in the air.
Incompatible materials	Acids. Water, moisture. Humid air. Hydrogen fluoride. Phosphorus pentoxide. Boric oxide. Steam. Many organic materials.
Hazardous decomposition products	Contact with water: Calcium hydroxide.

11. Toxicological information

Information on likely routes of exposure

Inhalation	May cause irritation to the respiratory system. Prolonged inhalation may be harmful.
Skin contact	Causes severe skin burns.
Eye contact	Causes serious eye damage.
Ingestion	Causes digestive tract burns.
Symptoms related to the physical, chemical and toxicological characteristics	Burning pain and severe corrosive skin damage. Causes serious eye damage. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Permanent eye damage including blindness could result. May cause respiratory irritation.

Information on toxicological effects

Acute toxicity	Not expected to be acutely toxic.

Toxicological data

Impurities	**Species**	**Test Results**
Silicon Oxide (CAS 7631-86-9)		
Acute		
Dermal		
LD50	Rabbit	> 5000 mg/kg, 24 Hours
Inhalation		
Dust		
LC50	Rat	> 0.14 mg/l, 4 Hours
Oral		
LD50	Rat	> 3300 mg/kg

Skin corrosion/irritation	Causes severe skin burns.
Serious eye damage/eye irritation	Causes serious eye damage.

Respiratory or skin sensitization

Respiratory sensitization	Not a respiratory sensitizer.
Skin sensitization	This product is not expected to cause skin sensitization.

Germ cell mutagenicity	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.
Carcinogenicity	May cause cancer.

IARC Monographs. Overall Evaluation of Carcinogenicity

Quartz (CAS 14808-60-7)	1 Carcinogenic to humans.
Silicon Oxide (CAS 7631-86-9)	3 Not classifiable as to carcinogenicity to humans.

NTP Report on Carcinogens

Quartz (CAS 14808-60-7)	Known To Be Human Carcinogen.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)

Quartz (CAS 14808-60-7)	Cancer

Reproductive toxicity	This product is not expected to cause reproductive or developmental effects.
Specific target organ toxicity - single exposure	May cause respiratory irritation.
Specific target organ toxicity - repeated exposure	Not classified.
Aspiration hazard	Not an aspiration hazard.
Chronic effects	Prolonged inhalation may be harmful.

12. Ecological information

Ecotoxicity	Harmful to aquatic life.
Persistence and degradability	The product solely consists of inorganic compounds which are not biodegradable.
Bioaccumulative potential	No data available on bioaccumulation.
Mobility in soil	No data available for this product.
Other adverse effects	The product may affect the acidity (pH-factor) in water with risk of harmful effects to aquatic organisms.

13. Disposal considerations

Disposal instructions	Collect and reclaim or dispose in sealed containers at licensed waste disposal site. Incinerate the material under controlled conditions in an approved incinerator. Do not allow this material to drain into sewers/water supplies. Do not contaminate ponds, waterways or ditches with chemical or used container. Dispose of contents/container in accordance with local/regional/national/international regulations.
Local disposal regulations	Dispose in accordance with all applicable regulations.
Hazardous waste code	The waste code should be assigned in discussion between the user, the producer and the waste disposal company.
Waste from residues / unused products	Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).
Contaminated packaging	Since emptied containers may retain product residue, follow label warnings even after container is emptied. Empty containers should be taken to an approved waste handling site for recycling or disposal.

14. Transport information

DOT

UN number	UN1910
UN proper shipping name	Calcium oxide
Transport hazard class(es)	
Class	8
Subsidiary risk	-
Label(s)	8
Packing group	III
Special precautions for user	Symbol A – Airfreight Regulated. This material is not subject to HMR when transported by ground. Read safety instructions, SDS and emergency procedures before handling.
Special provisions	IB8, IP3, T1, TP33
Packaging exceptions	154
Packaging non bulk	213
Packaging bulk	240

IATA

UN number	UN1910

UN proper shipping name	Calcium oxide
Transport hazard class(es)	
Class	8
Subsidiary risk	-
Packing group	III
Environmental hazards	No.
ERG Code	8L
Special precautions for user	Read safety instructions, SDS and emergency procedures before handling.

IMDG

UN number	UN1910
UN proper shipping name	CALCIUM OXIDE
Transport hazard class(es)	
Class	8
Subsidiary risk	-
Packing group	Not available.
Environmental hazards	
Marine pollutant	No.
EmS	Not available.
Special precautions for user	Not subject to the provisions of this Code but may be subject to provisions governing the transport of dangerous goods by other modes. SP 960. Read safety instructions, SDS and emergency procedures before handling.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code Not applicable.

15. Regulatory information

US federal regulations This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

CERCLA Hazardous Substance List (40 CFR 302.4)

Not listed.

SARA 304 Emergency release notification

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)

Quartz (CAS 14808-60-7)	Cancer lung effects immune system effects kidney effects

Toxic Substances Control Act (TSCA) All components of the mixture on the TSCA 8(b) inventory are designated "active".

Superfund Amendments and Reauthorization Act of 1986 (SARA)

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical	Yes
Classified hazard categories	Skin corrosion or irritation Serious eye damage or eye irritation Carcinogenicity Specific target organ toxicity (single or repeated exposure)

SARA 313 (TRI reporting)

Not regulated.

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA) Contains component(s) regulated under the Safe Drinking Water Act.

US state regulations

US. Massachusetts RTK - Substance List

Calcium oxide (CaO) (CAS 1305-78-8)
Magnesium Oxide (CAS 1309-48-4)
Quartz (CAS 14808-60-7)
Silicon Oxide (CAS 7631-86-9)

US. New Jersey Worker and Community Right-to-Know Act

Calcium oxide (CaO) (CAS 1305-78-8)
Magnesium Oxide (CAS 1309-48-4)
Quartz (CAS 14808-60-7)
Silicon Oxide (CAS 7631-86-9)

US. Pennsylvania Worker and Community Right-to-Know Law

Calcium oxide (CaO) (CAS 1305-78-8)
Magnesium Oxide (CAS 1309-48-4)
Quartz (CAS 14808-60-7)
Silicon Oxide (CAS 7631-86-9)

US. Rhode Island RTK

Calcium oxide (CaO) (CAS 1305-78-8)
Magnesium Oxide (CAS 1309-48-4)
Quartz (CAS 14808-60-7)

California Proposition 65

WARNING: This product can expose you to SILICA, CRYSTALLINE QUARTZ, which is known to the State of California to cause cancer. For more information go to www.P65Warnings.ca.gov.

California Proposition 65 - CRT: Listed date/Carcinogenic substance

Quartz (CAS 14808-60-7) Listed: October 1, 1988

US. California. Candidate Chemicals List. Safer Consumer Products Regulations (Cal. Code Regs, tit. 22, 69502.3, subd. (a))

Magnesium Oxide (CAS 1309-48-4)
Quartz (CAS 14808-60-7)

International Inventories

Country(s) or region	Inventory name	On Inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	Yes
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	Yes
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	Yes
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	Yes
Taiwan	Taiwan Chemical Substance Inventory (TCSI)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).
A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date 26-June-2018
Revision date 06-September-2019
Version # 04

HNIS® ratings	Health: 3* Flammability: 0 Physical hazard: 1
Disclaimer	Mississippi Lime Company cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

From: SOUTH, TROY
To: Martin, Bradley A
Subject: FW: AEP-Rockport Plant, Waste Sampling and Analysis Plan for Acceptance
Date: Friday, November 1, 2024 2:12:23 PM
Attachments: image001.png
Rockport WBAP Material Disposal Classification for RWS I Nov 2024.pdf

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Please combine the received e-mail and PDF attachment and file in VFC. Thanks

Solid waste authorization-waste approval
SW Program ID 74-02
AI 12105

From: Benjamin E Kepchar <bekepchar@aep.com>
Sent: Friday, November 1, 2024 1:57 PM
To: SOUTH, TROY <TSOUTH@idem.IN.gov>; Hummel, Lindsey <LHummel@idem.IN.gov>
Cc: John F Trout III <jftrout@aep.com>
Subject: RE: AEP-Rockport Plant, Waste Sampling and Analysis Plan for Acceptance

Good afternoon Troy and Lindsey,

Attached is the Rockport Plant West Bottom Ash Pond Sampling and Analysis Plan for the CCR Unit closure by removal project in order to be able to classify the mixed waste in the WBAP and dispose of it at the Rockport RWS I Landfill (74-02). Your comment has been addressed in the Sampling Plan section. Specifically:

> "After removing material that failed, an additional five samples of the area will be collected in order to confirm the failing material was all removed. The five samples will be collected within the one acre area that failed. One sample will be taken from the center of the area and the four remaining samples will be taken in four ninety-degree directions at the middle of the sidewalls of the area after excavation of the failing material is complete."

Thank you
Ben

AMERICAN ELECTRIC POWER
BENJAMIN E KEPCHAR | **ENVIRONMENTAL ENGINEER SR**
BEKEPCHAR@AEP.COM | D:614.716.2252 | C:614.397.9198
1 RIVERSIDE PLAZA, COLUMBUS, OH 43215

From: SOUTH, TROY <TSOUTH@idem.IN.gov>

Sent: Friday, October 25, 2024 12:49 PM
To: Benjamin E Kepchar <bekepchar@aep.com>
Subject: [EXTERNAL] RE: AEP-Rockport Plant, Waste Sampling and Analysis Plan for Acceptance

Hi Ben. IDEM staff reviewed the SAP and have the following comment that needs addressed: If any sample result fails the Type I criteria, the area will be resampled to confirm the results and if it continues to fail the Type I criteria, the area will be removed, and another sample will be collected to confirm the failing material was removed. However, the confirmation sampling procedure should be based on collection of five samples with four samples collected in four ninety-degree directions at the middle of the sidewalls and one sample collected on the floor.
Thanks

From: Benjamin E Kepchar <bekepchar@aep.com>
Sent: Monday, September 30, 2024 10:05 AM
To: SOUTH, TROY <TSOUTH@idem.IN.gov>
Cc: Freeman, Lori <lfreeman@idem.IN.gov>; Hummel, Lindsey <LHummel@idem.IN.gov>
Subject: RE: AEP-Rockport Plant, Waste Sampling and Analysis Plan for Acceptance

Good morning Troy. Attached is the revised Rockport West Bottom Ash Pond (WBAP) sample and analysis plan (SAP) for review prior to initiating waste characterization prior to the closure by removal of the WBAP CCR Unit. Your comments regarding lab analysis method, hold times, preservation, sample collection method, sample container, level IV QAQC, and representative sample collection have all been addressed. Specifically, the analysis plan section includes a table for the laboratory methods, hold time, and preservation. The sample plan section includes discussion on collection method, sample container, and obtaining representative samples throughout the pond area.

Additionally, the SAP includes an SDS for Mississippi Lime Pebble and Granular Quicklime. I am requesting these materials be approved for use as a waste amendment in order to assist with drying the mixed waste material for proper transportation and disposal in the Rockport RWS I.

Please let me know if you have any questions or comments.

If you would like to discuss any aspect of the plan, feel free to reach out to me directly on my cell phone. Thank you
Ben

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