CLOSURE PLAN FOR EXISTING CCR SURFACE IMPOUNDMENT
40 CFR 257.102(b)
REV 0 – 10/17/2016

SITE INFORMATION			
Site Name / Address	Zimmer Power Station / 1781 US Rt. 52, Moscow, OH 45153		
Operator Name / Address	Dynegy Zimmer, LLC / 1500 Eastport Plaza Drive, Collinsville, IL 62234		
CCR Unit	Zimmer D Basin	Closure Method	Closure by Removal of CCR

CLOSURE PLAN DESCRIPTION	
(b)(1)(i) – Narrative description of how the CCR unit will be closed in accordance with this section.	A granular underdrain system, leading to the dewatering sump, is present above a one-foot clay layer over the entire footprint of D Basin. Dewatering is not expected to be required to facilitate closure by removing the CCR due to the underdrain system. The existing CCR will be removed and the underdrain system, the inlet and outlet structures and piping, and the pump system will be removed and disposed. In addition, up to one foot of the existing clay layer below the CCR material may be removed and disposed. The south embankment, or portions of the embankment, may be removed to promote runoff to other non-CCR ponds. The area will be backfilled and/or graded as necessary to minimize the potential for ponding and vegetated with native grasses. In accordance with 257.102(b)(3), this initial written closure plan will be amended to provide additional details after the final design is completed, if the final design would substantially affect this written closure plan. This initial closure plan reflects the information available to date.
(b)(1)(ii) – If closure of the CCR unit will be accomplished through removal of CCR from the CCR unit, a description of the procedures to remove the CCR and decontaminate the CCR in accordance with 257.102(c).	The existing CCR will be consolidated and removed from the D Basin. Up to one foot of the clay under the CCR may be removed. CCR constituent concentrations throughout the CCR unit and any areas affected by releases will be removed. Groundwater monitoring will be performed in accordance with 40 CFR 257, Subpart D to demonstrate that groundwater monitoring concentrations will not exceed the groundwater protection standard for constituents listed in appendix IV to 40 CFR 257 in accordance with 257.102(c).

INVENTORY AND AREA ESTIMATES	
(b)(1)(iv) – Estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit	190,000 cubic yards
(b)(1)(v) – Estimate of the largest area of the CCR unit ever requiring a final cover	NA

CLOSURE SCHEDULE	
(b)(1)(vi) – Schedule for completing all activities necessary to satisfy the closure criteria in this section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including major milestones and the estimated timeframes to complete each step or phase of CCR unit closure.	
The milestone and the associated timeframes are initial estimates. Some of the activities associated with the milestones will overlap. Amendments to the milestones and timeframes will be made as more information becomes available.	
Written Closure Plan	October 17, 2016
Notification of Intent to Close Placed in Operating Record	No later than the date closure of the CCR unit is initiated. Closure to commence in accordance with the applicable timeframes in 40 CFR 257.102(e).
Agency coordination and permit acquisition • Coordinating with state agencies for compliance • Acquiring state permits	 Year 1 – 5 (estimated) Year 1 – 5 (estimated)
Mobilization	Year 2 – 5 (estimated)
Remove CCR • Complete dewatering, if necessary	 Year 2 – 5 (estimated)
Remove CCR • Removal of CCR material and underdrain system in pond • Groundwater monitoring	 Year 2 – 5 (estimated)
Estimate of Year in which all closure activities will be completed	Year 5

AMENDMENT AND CERTIFICATION	
(b)(3)(i) – The owner or operator may amend the initial or any subsequent written closure plan developed pursuant to 257.102(b)(1) at any time. (b)(3)(ii) – The owner or operator must amend the written closure plan whenever: (A) There is a change in the operation of the CCR unit that would substantially affect the written closure plan in effect; or (B) Before or after closure activities have commenced, unanticipated events necessitate a revision of the written closure plan. (b)(3)(iii) – The owner or operator must amend the closure plan at least 60 days prior to a planned change in the operation of the facility or CCR unit, or no later than 60 days after an unanticipated event requires the need to revise an existing written closure plan. If a written closure plan is revised after closure activities have commenced for a CCR unit, the owner or operator must amend the current closure plan no later than 30 days following the triggering event.	This initial closure plan will be amended as required by 257.102(b)(3) and, as allowed by 257.102(b)(3), may be amended at any time, including as more information becomes available.
(b)(4) – The owner or operator of the CCR unit must obtain a written certification from a qualified professional engineer that the initial and any amendment of the written closure plan meets the requirements of this 40 CFR 257.102.	Certification by a qualified professional engineer will be appended to this plan.

Certification Statement 40 CFR § 257.102 (b)(4) – Initial Written Closure Plan for a CCR Surface Impoundment

CCR Unit: Dynegy Zimmer, LLC; Zimmer Power Station; D Basin

I, Victor Modeer, being a Registered Professional Engineer in good standing in the State of Ohio, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above referenced CCR Unit, that the information contained in the initial written closure plan, dated October 17, 2016, meets the requirements of 40 CFR § 257.102.

Victor Modeer, PE, D.GE

Printed Name

10/13/16

Date