



HALEY & ALDRICH, INC.
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MEMORANDUM

16 October 2018

File No. 130116

SUBJECT: Location Restriction Demonstration - Fault Areas
Killen Electric Generating Station
Ash Pond
Manchester, OH

AES Ohio Generation, LLC (AES) operates the coal-fired Killen Electric Generating Station (Plant) located near Manchester, Ohio. The Ash Pond (Unit) is an existing coal combustion residuals (CCR) surface impoundment. This demonstration addresses the requirements of 40 CFR §257.62 (*Fault Areas*) of the US Environmental Protection Agency's (EPA) rule entitled *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities*. 80 Fed. Reg. 21302 (Apr. 17, 2015) (promulgating 40 CFR §257.62); 83 Fed. Reg. 36,435 (July 30, 2018) (amending 40 CFR §257.62).


§257.62(a): New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located within 60 meters (200 feet) of the outermost damage zone of a fault that has had displacement in Holocene time unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that an alternative setback distance of less than 60 meters (200 feet) will prevent damage to the structural integrity of the CCR unit.

A review of available data from the U.S. Geologic Survey, the Ohio Department of Natural Resources (ODNR) Division of Geological Survey (DGS), the Kentucky Geological Survey, and other available information was completed for this demonstration. The nearest known mapped fault is an unnamed fault located approximately 11 miles southwest of the Unit and the timeframe of the most recent activity on this fault is not known. Based on the available published geologic data and information reviewed, there are no active faults or fault damage zones that have had displacement in Holocene time reported or indicated within 200 feet of the Unit.



§257.62(b): The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the demonstration meets the requirements of paragraph (a) of this section.

I, Steven F. Putrich, 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 demonstration that the CCR Unit is not located within 60 meters (200 feet) of the outermost damage zone of a fault that has had a displacement in Holocene time as included in the Location Restrictions Evaluation memorandum dated 12 October 2018 meets the requirements of 40 CFR §257.62(a).

Signed: 
Consulting Engineer

Print Name: Steven F. Putrich
Ohio License No.: 67329
Title: Vice President
Company: Haley & Aldrich, Inc.

Professional Engineer's Seal:

