



HALEY & ALDRICH, INC.
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MEMORANDUM

16 October 2018
File No. 130116

SUBJECT: Location Restriction Demonstration - Wetland Areas
Killen Electric Generating Station
Ash Pond
Manchester, Ohio

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 at the Plant. This demonstration addresses the requirements of 40 CFR §257.61 (*Wetlands*) 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 §257.61); 83 Fed. Reg. 36,435 (July 30, 2018) (amending 40 CFR §257.61).

§257.61(a): New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located in wetlands, as defined in §232.2 of this chapter, unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that the CCR unit meets the requirements of paragraphs (a)(1) through (5) of this section.

Based on a review of the U.S. Fish and Wildlife Service's National Wetland Inventory mapping, 0.5-meter resolution aerial imagery (2017), National Resource Conservation Service soil data and the results of field assessments in the vicinity of the Unit, the Unit is not located in wetlands as defined by 40 CFR §232.2.

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§257.61(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 CCR Unit is not located in wetlands as included in the Location Restrictions Evaluation memorandum dated 12 October 2018 and, therefore, meets the requirements of 40 CFR §257.61(a).

Signed: 
Consulting Engineer

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

Professional Engineer's Seal:

