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File No. 130116-013

**SUBJECT:** Killen Station - Groundwater Monitoring Systems Certification  
Ash Pond, Collection Basin No. 1 and Collection Basin No. 2  
AES Ohio Generation, LLC


AES Ohio Generation, LLC (AES) operates the existing coal combustion residuals (CCR) management units referred to as Ash Pond, Collection Basin No. 1 and Collection Basin No. 2 at the Killen Electric Generating Station (KEGS) located near Manchester, Adams County, Ohio. These CCR units are considered subject to the CCR Rule since they were active as of the effective date of the CCR Rule. This document addresses the requirements of §257.91 Groundwater Monitoring Systems, specifically section §257.91(f), of the US Environmental Protection Agency's (EPA's) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, 40 CFR Part 257 (CCR Rule) effective 19 October 2015. This document serves as certification that the units comply with the requirements defined in the CCR Rule. This certification has been prepared based upon information made accessible by AES pursuant to §257.91(e)(1).

AES has determined that a multi-unit groundwater monitoring system is preferred for the Collection Basin No. 1 and Collection Basin No. 2 impoundments as allowed pursuant to §257.91(d). This multi-unit monitoring system is as capable of detecting monitored constituents passing through the combined unit waste boundary as individual groundwater monitoring systems.

The single-unit groundwater monitoring system at the Ash Pond unit and the multi-unit groundwater monitoring system at the Collection Basin No. 1 and Collection Basin No. 2 impoundments have been designed to include as a minimum one upgradient and three downgradient monitoring wells pursuant to §257.91(c). The actual number of wells used in the groundwater monitoring system is sufficient and appropriate to characterize the quality of groundwater flowing beneath each single or multi-unit monitoring system based on site-specific conditions.

Pursuant to CFR Title 40 Chapter I Subchapter I Part 257 Subpart D §257.91(f), I certify that the groundwater monitoring systems for the Ash Pond, Collection Basin No. 1 and Collection Basin No. 2 have been designed and constructed to meet the requirements of §257.91. The certification submitted is, to the best of my knowledge, accurate and complete.



Signed:   
Certifying Engineer

Print Name: Steven F. Putrich, P.E.  
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Title: Senior Associate  
Company: Haley & Aldrich, Inc.