



HALEY & ALDRICH, INC.
6500 Rockside Road
Suite 200
Cleveland, OH 44131
216.739.0555

MEMORANDUM

16 October 2018
File No. 129788

SUBJECT: Location Restriction Demonstration – Placement Above Uppermost Aquifer
Coffeen Power Station
GMF Gypsum Stack Pond
Coffeen, Illinois

Illinois Power Generating Company operates the coal-fired Coffeen Power Station (Plant) located near Coffeen, Illinois. The GMF Gypsum Stack Pond (Unit) is an existing coal combustion residuals (CCR) surface impoundment. This demonstration addresses the requirements of 40 CFR §257.60 (*Placement above the uppermost aquifer*) of the U.S. Environmental Protection Agency's (EPA) rule entitled *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities*. 80 Fed. Reg. 21,302 (Apr. 17, 2015) (promulgating 40 CFR §257.60); 83 Fed. Reg. 36,435 (July 30, 2018) (amending 40 CFR §257.60).


§257.60(a): New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must be constructed with a base that is located no less than 1.52 meters (five feet) above the upper limit of the uppermost aquifer, or must demonstrate that there will not be an intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table). The owner or operator must demonstrate by the dates specified in paragraph (c) of this section that the CCR unit meets the minimum requirements for placement above the uppermost aquifer.

Haley & Aldrich reviewed available information provided by Vistra including historic record drawings, design drawings, and boring logs, and based on review and evaluation of the information provided, the results do not demonstrate compliance with the requirements of 40 CFR §257.60(a).

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Location Restriction – Placement Above Uppermost Aquifer
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§257.60(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 Illinois, 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 that the above-referenced CCR Unit does not meet the requirements of 40 CFR §257.60(a).

Signed: 
Consulting Engineer

Print Name: Steven F. Putrich
Illinois License No.: 62048779
Title: Vice President
Company: Haley & Aldrich, Inc.

Professional Engineer's Seal:





HALEY & ALDRICH, INC.
6500 Rockside Road
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MEMORANDUM

16 October 2018
File No. 129788

SUBJECT: Location Restriction Demonstration - Wetland Areas
Coffeen Power Station
GMF Gypsum Stack Pond
Coffeen, Illinois

Illinois Power Generating Company operates the coal-fired Coffeen Power Station (Plant) located near Coffeen, Illinois. The GMF Gypsum Stack Pond (Unit) is an existing coal combustion residuals (CCR) surface impoundment. This demonstration addresses the requirements of 40 CFR §257.61 (*Wetlands*) of the U.S. Environmental Protection Agency's (EPA) rule entitled *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities*. 80 Fed. Reg. 21,302 (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 (2015) and the results of on-site field assessments, 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 Illinois, 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 CCR Rule 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
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Title: Vice President
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MEMORANDUM

16 October 2018
File No. 129788

SUBJECT: Location Restriction Demonstration - Fault Areas
Coffeen Power Station
GMF Gypsum Stack Pond
Coffeen, Illinois

Illinois Power Generating Company operates the coal-fired Coffeen Power Station (Plant) located near Coffeen, Illinois. The GMF Gypsum Stack 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 U.S. Environmental Protection Agency's (EPA) rule entitled *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities*. 80 Fed. Reg. 21,302 (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 Illinois State Geological Survey, and other available information was completed for this demonstration. The nearest known mapped faults are the Crown Fault, which is located approximately 31 miles northwest, and the Centralia Fault zone, located approximately 35 miles southeast of the Unit. The timeframe of the most recent activity on these faults 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 Illinois, 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 CCR Rule 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
Illinois License No.: 62048779
Title: Vice President
Company: Haley & Aldrich, Inc.

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MEMORANDUM

16 October 2018
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SUBJECT: Location Restriction Demonstration – Seismic Impact Zone
Coffeen Power Station
GMF Gypsum Stack Pond
Coffeen, Illinois

Illinois Power Generating Company operates the coal-fired Coffeen Power Station (Plant) located near Coffeen, Illinois. The GMF Gypsum Stack Pond (Unit) is an existing coal combustion residuals (CCR) surface impoundment. This demonstration addresses the requirements of 40 CFR §257.63 (*Seismic Impact Zones*) of the U.S. Environmental Protection Agency's (EPA) rule entitled *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities*. 80 Fed. Reg. 21,302 (Apr. 17, 2015) (promulgating 40 CFR §257.63); 83 Fed. Reg. 36,435 (July 30, 2018) (amending 40 CFR §257.63).

§257.63(a): New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located in seismic impact zones unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that all structural components including liners, leachate collection and removal systems, and surface water control systems, are designed to resist the maximum horizontal acceleration in lithified earth material for the site.


A Seismic Impact Zone is defined in the CCR Rule (40 CFR §257.63) as "an area having a 2% or greater probability that the maximum expected horizontal acceleration, expressed as a percentage of the earth's gravitational pull (g), will exceed 0.10 g in 50 years". The 2014 US Geological Survey Hazard Map raw data for the Coffeen Power Station GMF Gypsum Stack Pond indicates that the maximum expected horizontal acceleration for 2 percent probability of exceedance in 50 years is 0.21g.

The results of our evaluation indicate that the Unit is in compliance with 40 CFR §257.63(a). Although the Unit is located in a seismic impact zone, it satisfies the demonstration requirements of 40 CFR §257.63(a). The AECOM report entitled "CCR Certification Report: Initial Structural Stability Assessment, Initial Safety Factor Assessment, and Initial Inflow Design Flood Control System Plan for the GMF Pond at Coffeen Power Station" dated October 2016 (AECOM Report), includes engineering analysis, calculations, and findings that support the requirements of 40 CFR §257.63(a), and provides documentation that those requirements have been evaluated by AECOM for the subject CCR unit.

§257.63(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 Illinois, 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, that the CCR Unit is located in a seismic impact zone as included in the CCR Rule Location Restrictions Evaluation memorandum dated 12 October 2018 and satisfies all requirements of 40 CFR §257.63(a).

By providing this certification demonstration statement, we are not stating or inferring that we have verified or certified the details, assumptions, calculations and/or site condition models developed by AECOM in the subject report; those elements of the report are considered the professional opinions and determinations of AECOM.

Signed: 

Consulting Engineer

Print Name: Steven F. Putrich
Illinois License No.: 62048779
Title: Vice President
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MEMORANDUM

16 October 2018
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SUBJECT: Location Restriction Demonstration – Unstable Areas
Coffeen Power Station
GMF Gypsum Stack Pond
Coffeen, Illinois

Illinois Power Generating Company operates the coal-fired Coffeen Power Station (Plant) located near Coffeen, Illinois. The GMF Gypsum Stack Pond (Unit) is an existing coal combustion residuals (CCR) surface impoundment. This demonstration addresses the requirements of 40 CFR §257.64 (*Unstable Areas*) of the U.S. Environmental Protection Agency's (EPA) rule entitled *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities*. 80 Fed. Reg. 21,302 (Apr. 17, 2015) (promulgating 40 CFR §257.64); 83 Fed. Reg. 36,435 (July 30, 2018) (amending 40 CFR §257.64).

§257.64(a): An existing or new CCR landfill, existing or new CCR surface impoundment, or any lateral expansion of a CCR unit must not be located in an unstable area unless the owner or operator demonstrates by the dates specified in paragraph (d) of this section that recognized and generally accepted good engineering practices have been incorporated into the design of the CCR unit to ensure that the integrity of the structural components of the CCR unit will not be disrupted.

§257.64(b): The owner or operator must consider all of the following factors, at a minimum, when determining whether an area is unstable:

- (1) On-site or local soil conditions that may result in significant differential settling;*
- (2) On-site or local geologic or geomorphologic features; and*
- (3) On-site or local human-made features or events (both surface and subsurface).*

Determination of compliance with §257.64(b)(1) - Conditions associated with the potential for significant differential settlement due to liquefaction were not identified in the area where the Plant is located. A separate report completed by AECOM entitled "CCR Certification Report: Initial Structural Stability Assessment, Initial Safety Factor Assessment, and Initial Inflow Design Flood Control System Plan for the GMF Pond at Coffeen Power Station" dated October 2016 concluded that a 1-ft thick layer of liquefiable material existed below the impoundment and post-liquefaction stability analyses performed by AECOM concluded that the impoundment slopes would remain stable if that layer liquefied during the design seismic event.

Determination of compliance with §257.64(b)(2) - Based on available United States Geological Survey (USGS) and Illinois State Geological Survey (ISGS) information, karst topography or physiographic features such as sinkholes, vertical shafts, sinking streams, caves, large springs, or blind valleys do not

exist at the Plant. To evaluate the susceptibility of landslides, we reviewed readily available USGS and IGS data. The USGS data indicates that the Plant is in an area of low landslide incidence and the closest document landslide is more than 10 miles from the site. Accordingly, it is our opinion that the Unit is not located in an area that has high susceptibility to landslides.

Determination of compliance with §257.64(b)(3) - An inactive underground mine is located below the Unit, however an evaluation by AECOM (2016) concluded that the presence of this underground mine does not negatively affect the stability of the Unit.

§257.64(c): 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 Illinois, 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 indicating the CCR Unit is not located in an unstable area as included in the CCR Rule Location Restrictions Evaluation memorandum dated 12 October 2018 meets the requirements of 40 CFR §257.64(a).

Signed: 
Consulting Engineer

Print Name: Steven F. Putrich
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Title: Vice President
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