



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

**MEMORANDUM**

July 2019  
Project No. 130116-042

**SUBJECT: Demonstration for 60-Day Extension – Corrective Measures Assessment (CMA)**  
AES Ohio Generation, LLC (AES)  
Pond 5, Pond7/7A, Pond 10 and Landfill 11  
J.M. Stuart Station - Manchester, Ohio

Pursuant to CFR Title 40 Chapter 257 Subpart D §257.96(a) (CCR Rule), I certify that AES has demonstrated the need for an additional 60 days beyond the regulatory time period of 90 days to complete the assessment of corrective measures for the active Coal Combustion Residuals (CCR) surface impoundments referred to as Pond 5, Pond7/7A and Pond 10 and the CCR landfill referred to as Landfill 11 at the JM Stuart Station, due to site-specific conditions and the evaluation of remedial treatment alternatives in support of an informed CMA process.

In the case of the assessment for each of these four CCR units, the site has complex hydrogeology and nature and extent (N&E) investigations are ongoing in support of the CMA process. Nature and extent information is an important component of the CMA. AES is also in the process of reviewing possible groundwater remedies and is evaluating potential closure strategies as well as implementation of critical steps in the groundwater treatment and remedy assessment process. Based on these site-specific conditions and related groundwater treatment alternatives evaluations in support of the CMA by AES, a 60-day extension is needed to complete the CMA process.

This certification as submitted, is to the best of my knowledge, accurate and complete.

Signed: 

Certifying Engineer  
Print Name: Steven F. Putrich, P.E.  
Ohio License No.: 67329  
Title: CCR Practice Lead, Senior Consulting Engineer  
Company: Haley & Aldrich, Inc.

Professional Engineer's Seal

