



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

MEMORANDUM

16 October 2018
File No. 130116

SUBJECT: Location Restriction Demonstration - Fault Areas
J.M. Stuart Electric Generating Station
Pond 7/7A
Aberdeen, Ohio

AES Ohio Generation, LLC (AES) operates the coal-fired J.M. Stuart Electric Generating Station (Plant) located near Aberdeen, Ohio. The Pond 7/7A (Units) are existing coal combustion residuals (CCR) surface impoundments. 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. 36435 (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 faults are an unnamed fault located approximately 4 miles southeast and an unnamed fault located approximately 5 miles southwest of the Units and 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 Units.



§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 Units, that the demonstration that the CCR Units are 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:

