



Indianapolis Power & Light Company
Petersburg Generating Station

Liner Documentation for
Existing CCR Surface Impoundments

Prepared by



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S&L Project No. 10572-085

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Issue Purpose: Use

1 LINER DOCUMENTATION

Federal CCR Rule Reference: 40 CFR 257.71(a)(1)

Indianapolis Power & Light Company (IPL) operates the Petersburg Generating Station (PS). The site's existing coal combustion residual (CCR) surface impoundments – Pond A, Pond A', and Pond C – presently accept CCR and are planned to be closed in the future. This document addresses the liner design to satisfy 40 CFR 257.71(a)(1):

“No later than October 17, 2016, the owner or operator of an existing CCR surface impoundment must document whether or not such unit was constructed with any one of the following:

- (i) A liner consisting of a minimum of two feet of compacted soil with a hydraulic conductivity of no more than 1×10^{-7} cm/sec;
- (ii) A composite liner that meets the requirements of § 257.70(b); or
- (iii) An alternative composite liner that meets the requirements of § 257.70(c).”

While the PS existing CCR surface impoundments were constructed with compacted soil, ash, and/or clay, they do not meet the requirements above. Therefore, for the purposes of 40 CFR 257.71(a)(1), Ponds A, A', and C are considered to be existing unlined CCR surface impoundments and are subject to 40 CFR 257.101(a).

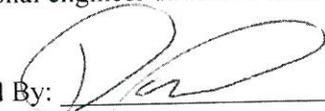


2 CERTIFICATION

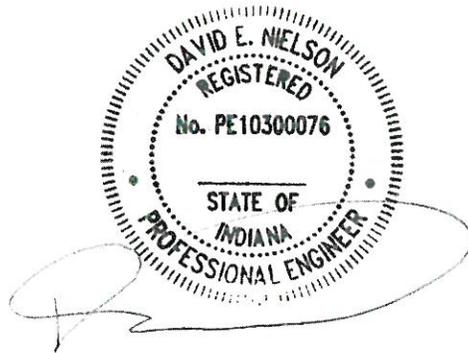
Federal CCR Rule Reference: 40 CFR 257.71(b)

The documentation presented herein to meet the requirements of 40 CFR 257.71(a) is accurate.

I certify that this document was prepared by me or under my direct supervision and that I am a registered professional engineer under the laws of the State of Indiana.

Certified By:  Date: 10-14-2016

Seal:



10-14-2016

EXP- 7-31-2018