

CCR Certification Report:
Liner Design Criteria Evaluation

For

Ash Pond

At Edwards Power Station

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1 INTRODUCTION

The purpose of this liner design criteria evaluation is to document that the requirements specified in 40 CFR §257.71(a)(1) have been evaluated to support the liner certification for the Ash Pond at the Edwards Power Station, an existing CCR surface impoundment as defined under 40 CFR §257.53.

Owners or operators of existing CCR surface impoundments must document, by October 17, 2016, whether or not such units were constructed with a liner meeting any one of the following criteria as defined in 40 CFR §257.71(a)(1):

- (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).

In accordance with §257.71(a)(3), if the CCR unit was not constructed with a liner that meets the requirements of §257.71(a)(1)(i), (ii) or (iii) as listed above, it will be considered an existing unlined CCR surface impoundment.

2 LINER EVALUATION

Based on the evaluation of design drawings and available construction records, it has been determined that the Edwards Power Station Ash Pond is not constructed with a liner that meets the design criteria in 40 CFR §257.71(a)(1)(i), (ii) or (iii), respectively, for a compacted soil liner, a composite liner, or an alternative composite liner.

3 CONCLUSION

The Ash Pond at the Edwards Power Station was evaluated relative to the USEPA CCR Rule requirements for liner certification for an existing CCR surface impoundment (§257.71(a)(1)). Based on the evaluation presented herein, the Ash Pond was not constructed with a liner that meets the design criteria specified in §257.71(a)(1).

4 CERTIFICATION

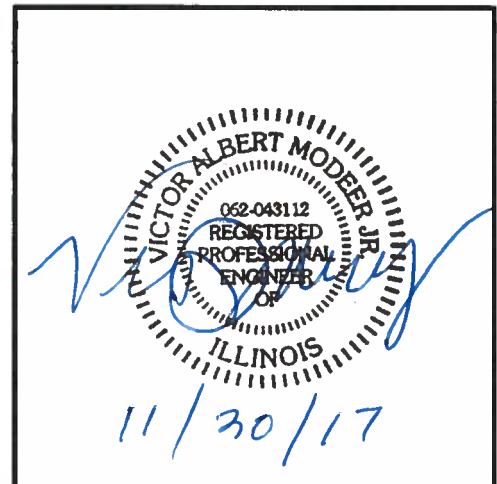
Certification Statement 40 CFR § 257.71(b) – Liner Design Criteria for an Existing CCR Surface Impoundment

CCR Unit: Edwards Ash Pond

I, Victor Modeer, 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 documentation as to whether the CCR Unit meets the requirements of 40 CFR § 257.71(a) is accurate.

VICTOR A MODEER JR.
Printed Name

10/13/14
Date



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