

SUBJECT: Location Restriction Demonstration – Unstable Areas

Miami Fort Power Station

CCR Landfill

North Bend, Ohio

Dynegy Miami Fort, LLC operates the coal-fired Miami Fort Power Station (Plant) located near North Bend, Ohio. The Subject Landfill is an existing coal combustion residuals (CCR) Unit at the Plant. This demonstration addresses the requirements of 40 CFR §257.64 Unstable Area 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. 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) – The Unit is not located in a seismic zone, and conditions associated with the potential for significant differential settlement were not identified in the area where the Unit is located. A separate report entitled “Unstable Areas Location Restriction Compliance Summary” was completed by Hanson Professional Services Inc. and confirms the integrity of the CCR Landfill and liner system.

Determination of compliance with §257.64(b)(2) - Based on available United States Geological Survey (USGS) and Ohio Department of Natural Resources Division of Geological Survey (ODGS) 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. Also, available subsurface information and topography of the site based on the Unit design documents indicates that it is situated on competent

