



Indianapolis Power & Light Company
Harding Street Generating Station

Pond 3 Location Restriction Compliance:
Wetlands

Prepared by



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Issue Purpose: Use

1 DEMONSTRATION

Federal CCR Rule References: 40 CFR 232.2 and 257.61(a)

Indianapolis Power & Light Company (IPL) owns and operates the Harding Street Generating Station (HSS), which is now a natural gas-fueled power plant. Pond 3, an existing coal combustion residual (CCR) surface impoundment at the site, presently does not accept CCR and is planned to be closed in the future. This document addresses the demonstration required for the CCR unit to satisfy 40 CFR 257.61(a):

“New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located in wetlands, as defined in §232.2 of this chapter, unless the owner or operator demonstrates...”

Pursuant to 40 CFR 232.2:

“The term *wetlands* means those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.”

Based on reviews of the “National Wetlands Inventory” and the “Web Soil Survey” databases maintained by the United States Fish and Wildlife Service (USFWS) and the National Resource Conservation Service (NRCS), respectively, in conjunction with field observations, Pond 3 is not located in a wetland. Therefore, Pond 3 meets the performance standard promulgated by 40 CFR 257.61(a).



2 CERTIFICATION

Federal CCR Rule Reference: 40 CFR 257.61(b)

The demonstration presented herein meets the requirements of 40 CFR 257.61(a).

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: David E. Nielson

Date: October 17, 2018

Seal:

