



Indianapolis Power & Light Company  
Harding Street Generating Station

Pond 2A/2B Location Restriction Compliance:  
Fault Areas

Prepared by



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# 1 DEMONSTRATION

## **Federal CCR Rule References: 40 CFR 257.53 and 257.62(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 2A/2B, 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 257.62(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...that an alternative setback distance of less than 60 meters (200 feet) will prevent damage to the structural integrity of the CCR unit.”

Pursuant to 40 CFR 257.53:

“*Holocene* means the most recent epoch of the Quaternary period...11,700 years before present, to present.”

Based on a review of the United States Geological Survey’s (USGS) “Quaternary Fault and Fold Database of the United States,” there are no mapped faults within 200 feet of Pond 2A/2B at HSS. Therefore, Pond 2A/2B meets the performance standard promulgated by 40 CFR 257.62(a).



## 2 CERTIFICATION

### Federal CCR Rule Reference: 40 CFR 257.62(b)

The demonstration presented herein meets the requirements of 40 CFR 257.62(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:

