



Indianapolis Power & Light Company
Harding Street Generating Station

Pond 2A/2B Location Restriction Compliance:
Placement Above the Uppermost Aquifer

Prepared by



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Issue Purpose: Use

1 DEMONSTRATION

Federal CCR Rule References: 40 CFR 257.53 and 257.60(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 257.60(a):

“New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must be constructed with a base that is located no less than 1.52 meters (five feet) above the upper limit of the uppermost aquifer.”

Pursuant to 40 CFR 257.53:

“*Uppermost aquifer* means the geologic formation nearest the natural ground surface that is an aquifer, as well as lower aquifers that are hydraulically interconnected with this aquifer within the facility’s property boundary. Upper limit is measured at a point nearest to the natural ground surface to which the aquifer rises during the wet season.”

Based on a review of historical boring logs and data collected throughout IPL’s groundwater monitoring program for the CCR units at HSS, it has been determined that Pond 2A/2B does not meet the performance standard promulgated by 40 CFR 257.60(a).



2 CERTIFICATION

Federal CCR Rule Reference: 40 CFR 257.60(b)

The demonstration presented herein meets the requirements of 40 CFR 257.60(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:

