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Coal Combustion Residuals Unit Liner Documentation

Richmond Power & Light
Whitewater Valley Station
Surface Impoundment
Wayne County, Indiana

GAI Project Number: C151119.07

April 2018



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Certification/Statement of Professional Opinion

The Coal Combustion Residuals Liner Documentation Report (Report) for the Whitewater Valley Station (Station) Surface Impoundment was prepared by GAI Consultants, Inc. (GAI). The Report may contain findings and determinations that are based on certain information that GAI has relied on, but not independently verified. This Certification/Statement of Professional Opinion is therefore limited to the information available to GAI at the time the Report was written. On the basis of and subject to the foregoing, it is my professional opinion as a Professional Engineer licensed in the State of Indiana that the Report has been prepared in accordance with good and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances, at the same time, and in the same locale. It is my professional opinion that the Report is accurate and has been prepared consistent with the requirements of § 257.71(a)(1) of the United States Environmental Protection Agency's "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments," published in the Federal Register on April 17, 2015 with an effective date of October 19, 2015 (40 CFR 257 Subpart D), and meeting the provisions of the "Extension of Compliance Deadlines for Certain Inactive Surface Impoundments: Response to Partial Vacatur," effective October 4, 2016.

The use of the words "certification" and/or "certify" in this document shall be interpreted and construed as a Statement of Professional Opinion and is not and shall not be interpreted or construed as a guarantee, warranty, or legal opinion.

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Acronyms

CCR	Coal Combustion Residuals
CCR Rule	"Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments" 40 CFR 257 Subpart D (2015)
CFR	Code of Federal Regulations
EPA	United States Environmental Protection Agency
GAI	GAI Consultants, Inc.
Impoundment	Surface Impoundment
IN	Indiana
Report	Coal Combustion Residuals Liner Documentation Report
RP&L	Richmond Power & Light
Station	Whitewater Valley Station

1.0 Introduction

The Whitewater Valley Station (Station) is owned by Richmond Power & Light (RP&L) and is located in Richmond, Indiana (IN). The Station includes a Surface Impoundment (Impoundment), which is used for the long term storage of Coal Combustion Residuals (CCR).

The Impoundment is located on RP&L property at the Whitewater Valley Power Station in Wayne County, Indiana (coordinates 39° 48' 12.9" North and 84° 53' 54.8" West). The Impoundment is located in the northwestern corner of the property.

The Impoundment is currently inactive and is regulated as an existing CCR Surface Impoundment under the United States Environmental Protection Agency's (EPA's) "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments" [40 CFR 257 Subpart D] published in the Federal Register on April 17, 2015 with an effective date of October 19, 2015 (CCR Rule), and meeting the provisions of the "Extension of Compliance Deadlines for Certain Inactive Surface Impoundments: Response to Partial Vacatur," effective October 4, 2016.

2.0 Purpose

This Liner Documentation Report (Report) is prepared pursuant to the requirements in the CCR Rule. Specifically, § 257.71(a)(1) of the CCR Rule states that the owner or operator of an existing CCR unit must document whether or not the existing CCR unit was constructed with:

- (i) a minimum of 2 feet of compacted soil with a hydraulic conductivity of no more than 1×10^{-7} cm/sec;
- (ii) a composite liner meeting the requirements of § 257.70(b), or;
- (iii) an alternate composite liner that meets the requirements of § 257.70(c).

3.0 Liner Documentation

No historical information was available that indicates the impoundment was constructed with a liner system. Borings made within the Impoundment by GAI in September 2015, did not provide evidence of a liner system below the Impoundment.

4.0 Conclusion

Based on available information, it is GAI's determination that the Impoundment was not constructed with a liner meeting the requirements of CCR Rule § 257.71(a)(1).