

**MARION POWER PLANT – EMERY POND
SOUTHERN ILLINOIS POWER COOPERATIVE
LOCATION RESTRICTION DEMONSTRATION – UNSTABLE AREAS**

Southern Illinois Power Cooperative operates the Marion Power Plant (site) located on the northwestern shore of Lake of Egypt near Marion, Illinois. Emery Pond has been identified as an existing coal combustion residuals (CCR) surface impoundment. The Emery Pond is a less-than-1-acre pond south of the main stack at the site.

This demonstration addresses the requirements of 40 CFR §257.64 Unstable Areas of the US Environmental Protection Agency (EPA)'s rule entitled *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities*, published in the Federal Register on April 17, 2015 (CCR Rule). The CCR Rule is an extension of the Code of Federal Regulations (CFR) Title 40, Part 257 and was amended on July 2, 2015, by 40 CFR §257 *Technical Amendments to the Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities—Correction of the Effective Date* and again on July 30, 2018, by 40 CFR §257 *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Amendments to the National Minimum Criteria (Phase One, Part One)*.

§257.64(a) Unstable areas of the CCR Rule states:

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.

Hanson Professional Services Inc. conducted a review of the Emery Pond evaluating poor foundation conditions, areas susceptible to mass movement, and karst terrain. The evaluation found the Emery Pond is not in an unstable area.

§257.64(c) of the CCR Rule states:

The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer stating that the demonstration meets the requirements of paragraph (a) of this section.

As a Qualified professional engineer as defined by 40 CFR 257 Subpart D, I certify that I have personally examined and am familiar with the design information referenced below, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete.

I certify that Emery Pond meets the unstable areas requirements set forth by 40 CFR §257.64(a).

James P. Knutelski, P.E.
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Seal:



Signature: 

Lic. Expires 11/30/2019

Date: 2/15/2019