

**MARION POWER PLANT – EMERY POND  
SOUTHERN ILLINOIS POWER COOPERATIVE  
LOCATION RESTRICTION DEMONSTRATION – FAULT 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 §257.62 Fault 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)*.

§257.62(a) Fault areas of the CCR Rule states:

*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 by the dates specified in paragraph (c) of this section that an alternative setback distance of less than 60 meters (200 feet) will prevent damage to the structural integrity of the CCR unit.*

Hanson Professional Services Inc. reviewed the Illinois State Geologic Survey Map of Structural Features and Emery Pond is not within 200 ft. of known faults.

§257.62(b) 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 fault area requirements set forth by 40 CFR §257.62(a).

James P. Knutelski, P.E.  
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Seal:



Lic. Expires 11/30/2019

Signature: James P. Knutelski

Date: 2/15/2019