

Submitted to Brayton Point Energy, LLC 1 Brayton Point Rd., Somerset, MA 02725 Submitted by AECOM 1001 Highlands Plaza Drive West Suite 300 St. Louis, MO 63110

October 2016

## CCR Rule Report: Initial Structural Stability Assessment

For

Ash Basin A

At Brayton Point Power Station

1

This Coal Combustion Residual (CCR) Rule Report documents that Ash Basin A at the Brayton Point Energy, LLC Brayton Point Power Station is exempt from the structural stability assessment requirements specified in 40 Code of Federal Regulations (CFR) §257.73(d). Ash Basin A is located near Somerset, Massachusetts in Bristol County, approximately 0.1 miles northeast of the Brayton Point Power Station, in an area known as the Ash Basin Complex.

Ash Basin A is an incised CCR surface impoundment, as defined by 40 CFR §257.53, that is used to manage bottom ash discharge water from Ash Basins B and C. Under 40 CFR §257.73(b) a structural stability assessment (§257.73(d)) must be performed for an existing CCR surface impoundment that either:

- 1. Has a height of five feet or more and a storage volume of 20 acre-feet or more; or
- 2. Has a height of 20 feet or more.

Ash Basin A does not satisfy either of these criteria because the incised basin does not have dikes. Therefore, the Ash Basin A is not subject to the §257.73(d) structural stability assessment requirements.

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