

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 B

At Brayton Point Power Station

This Coal Combustion Residual (CCR) Rule Report documents that Ash Basin B 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 B 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 B is an incised CCR surface impoundment, as defined by 40 CFR §257.53, that is used to manage bottom ash discharge water. 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 B does not satisfy either of these criteria because the incised basin does not have dikes. Therefore, the Ash Basin B is not subject to the §257.73(d) structural stability assessment requirements.

## About AFCOM

AECOM (NYSE: ACM) is a global provider of professional technical and management support services to a broad range of markets, including transportation, facilities, environmental, energy, water and government. With nearly 100,000 employees around the world, AECOM is a leader in all of the key markets that it serves. AECOM provides a blend of global reach, local knowledge, innovation, and collaborative technical excellence in delivering solutions that enhance and sustain the world's built, natural, and social environments. A Fortune 500 company, AECOM serves clients in more than 100 countries and has annual revenue in excess of \$19 billion.

More information on AECOM and its services can be found at <a href="https://www.aecom.com">www.aecom.com</a>.