



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 Inflow Design Flood Control
System Plan

For

Ash Basin C

At Brayton Point Power Station

1 Introduction

This Coal Combustion Residual (CCR) Rule Report documents that the initial inflow design flood control system plan for Ash Basin C at the Brayton Point Energy, LLC Brayton Point Power Station meets the requirements specified in 40 Code of Federal Regulations (CFR) §257.82. Ash Basin C is located near Somerset, Massachusetts in Bristol County, approximately 0.2 miles northeast of the Brayton Point Power Station, in an area known as Ash Basin Complex. Ash Basin C is used to manage bottom ash discharge water at the Brayton Point Power Station.

Ash Basin C is an existing CCR surface impoundment as defined by 40 CFR §257.53. The CCR Rule requires that the initial inflow design flood control system plan for an existing CCR surface impoundment be prepared by October 17, 2016. The plan must document how the inflow design flood control system has been designed and constructed to meet the requirements of 40 CFR §257.82 and be supported by appropriate engineering calculations.

The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer stating that the inflow design flood control system meets the requirements of 40 CFR §257.82. The owner or operator must prepare an inflow design flood control system plan every five years.

2 Initial Inflow Design Flood Control System Plan

40 CFR §257.82

(a) The owner or operator of an existing ... CCR surface impoundment ... must design, construct, operate, and maintain an inflow design flood control system as specified in paragraphs (a)(1) and (2) of this section.

(1) The inflow design flood control system must adequately manage flow into the CCR unit during and following the peak discharge of the inflow design flood specified in paragraph (a)(3) of this section.

(2) The inflow design flood control system must adequately manage flow from the CCR unit to collect and control the peak discharge resulting from the inflow design flood specified in paragraph (a)(3) of this section.

(3) The inflow design flood is:

(i) For a high hazard potential CCR surface impoundment, ..., the probable maximum flood;

(ii) For a significant hazard potential CCR surface impoundment, ..., the 1,000-year flood;

(iii) For a low hazard potential CCR surface impoundment, ..., the 100-year flood; or

(iv) For an incised CCR surface impoundment, the 25-year flood.

(b) Discharge from the CCR unit must be handled in accordance with the surface water requirements under §257.3-3.

Analyses completed for the initial inflow design flood control system plan of Ash Basin C are described in the following subsections. Data and analysis results in the following subsections are based on spillway design information shown on design drawings, construction information, topographic surveys, information about operational and maintenance procedures provided by Brayton Point Energy, LLC, and field measurements collected by AECOM. The analysis approach and results of the hydrologic and hydraulic analyses are presented in the following subsections.

Ash Basin C is an incised CCR surface impoundment, as defined by 40 CFR §257.53. Therefore, in accordance with 40 CFR §257.82(a)(3)(iv), the Inflow Design Flood (IDF) is the 25-year flood.

2.1 Initial Inflow Design Flood Control Systems (§257.82(a))

An initial inflow design flood control system plan, supported by a hydraulic and hydrologic analysis, was developed for Ash Basin C by evaluating the effects of a 24-hour duration design storm for the 25-year IDF using a hydraulic HydroCAD (Version 10) computer model and a starting water surface elevation of 21.9 feet. The computer model evaluated Ash Basin C's ability to collect and control the 25-year IDF under existing operational and maintenance procedures. Rainfall data for the 25-year IDF was obtained from the Northeast Regional Climate Center (NRCC). The NRCC rainfall depth is 6.04 inches.

The HydroCAD model results for Ash Basin C indicate that the CCR unit has sufficient storage capacity and spillway structures to adequately manage (1) flow into the CCR unit during and following the peak discharge of the 25-year IDF and (2) flow from the CCR unit to collect and control the peak discharge resulting from the 25-year IDF. The peak water surface elevation is 22.1 feet during the IDF, and the minimum crest elevation of Ash Basin C is 24.2 feet. Therefore, overtopping is not expected.

Based on this evaluation, Ash Basin C meets the requirements in §257.82(a).

2.2 Discharge from the CCR Unit (§257.82(b))

40 CFR §257.82(b) provides that the discharge from the CCR unit must be handled in accordance with the surface water requirements under 40 CFR §257.3-3, which states the following:

(a) For purposes of section 4004(a) of the Act, a facility shall not cause a discharge of pollutants into waters of the United States that is in violation of the requirements of the National Pollutant Discharge Elimination System (NPDES) under section 402 of the Clean Water Act, as amended.

(b) For purposes of section 4004(a) of the Act, a facility shall not cause a discharge of dredged material or fill material to waters of the United States that is in violation of the requirements under section 404 of the Clean Water Act, as amended.

(c) A facility or practice shall not cause non-point source pollution of waters of the United States that violates applicable legal requirements implementing an areawide or Statewide water quality management plan that has been approved by the Administrator under section 208 of the Clean Water Act, as amended.

(d) Definitions of the terms Discharge of dredged material, Point source, Pollutant, Waters of the United States, and Wetlands can be found in the Clean Water Act, as amended, 33 U.S.C. 1251 et seq., and implementing regulations, specifically 33 CFR part 323 (42 FR 37122, July 19, 1977).

The handling of discharge was evaluated by reviewing design drawings, operational and maintenance procedures, conditions observed in the field by AECOM, and the inflow design flood control system plan developed per §257.82(a).

Based on this evaluation, Ash Basin C does not discharge into waters of the United States. Discharge from Ash Basin C is channeled to Ash Basin A, which is then pumped to the Brayton Point Station for use as sluice water, or is diverted to the onsite wastewater treatment plant. Hydraulic and hydrologic analyses performed as part of the initial inflow design flood control system plan found Ash Basin C adequately manages outflow during the 25-year IDF, as overtopping of the Ash Basin C crest is not expected.

Therefore, discharge into waters of the United States is not expected during normal or 25-year IDF conditions, and Ash Basin C meets the requirements in §257.82(b).

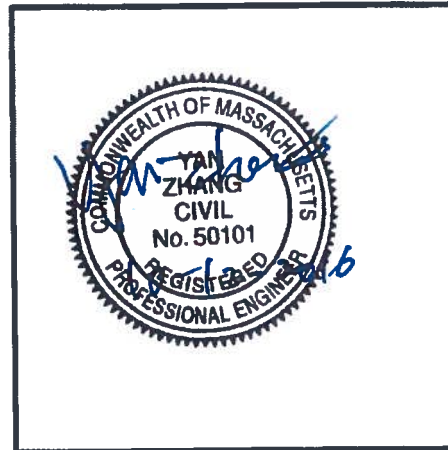
3 Certification Statement

CCR Unit: Brayton Point Energy, LLC; Brayton Point Power Station; Ash Basin C

I, Yan Zhang, being a Registered Professional Engineer in good standing in the Commonwealth of Massachusetts, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this CCR Rule Report, and the underlying data in the operating record, has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the initial inflow design flood control system plan dated October 12th, 2016 meets the requirements of 40 CFR §257.82.

Yan Zhang
Printed Name

10-12-2016
Date



About AECOM

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 www.aecom.com.

1001 Highlands Plaza Drive West
Suite 300
St. Louis, MO 63110
1-314-429-0100