

**CLOSURE PLAN FOR EXISTING CCR SURFACE IMPOUNDMENT**  
**40 CFR 257.102(b)**  
**REV 1 – 11/10/2017**

**SITE INFORMATION**

Site Name / Address	Brayton Point Power Station / 1 Brayton Point Road, Somerset, MA 02725		
Owner Name / Address	Brayton Point Energy, LLC / 1500 Eastport Plaza Drive, Collinsville, IL 62234		
CCR Unit	Ash Basin A	Closure Method	Closure by Removal of CCR

**CLOSURE PLAN DESCRIPTION**

(b)(1)(i) – Narrative description of how the CCR unit will be closed in accordance with this section.	<p>Ash Basin A has an existing liner system, which, from bottom to top, consists of a 20-mil PVC liner, one foot of soil fill, a geotextile fabric, and one foot of riprap stone blanket. Ash Basin A will be unwatered (surface water removed), and existing CCR and underlying riprap and soil fill will be dewatered, as necessary, to facilitate closure by removal of the CCR material through excavation. The ash sluice pump house will be decommissioned and de-energized. The inlet piping to the basin will be capped. The outlet piping to the Equalization Basin will be cleaned by flushing. The existing CCR will be removed using an excavator or clam-shell machine. Riprap will be removed from the side slopes and bottom and rinsed. All layers of the existing lining system will be removed, including riprap, geotextile fabric, soil fill, and PVC liner. The basin will be partially backfilled and graded to reduce the potential for ponding of stormwater. Backfill may include some rinsed riprap.</p> <p>In accordance with 257.102(b)(3), this written closure plan was amended to provide additional details after the final design was completed. This amended closure plan reflects the information available to date.</p>
(b)(1)(ii) – If closure of the CCR unit will be accomplished through removal of CCR from the CCR unit, a description of the procedures to remove the CCR and decontaminate the CCR in accordance with 257.102(c).	<p>Ash Basin A will be unwatered, and existing CCR and underlying riprap and soil fill will be dewatered, as necessary, to facilitate closure. The existing CCR will be consolidated and removed from Ash Basin A. The existing liner system under the CCR will be removed. CCR constituent concentrations throughout the CCR unit and any areas affected by releases will be removed. Groundwater monitoring will be performed in accordance with 40 CFR 257, Subpart D to demonstrate that groundwater monitoring concentrations will not exceed the groundwater protection standard for constituents listed in appendix IV to 40 CFR 257 in accordance with 257.102(c).</p>

**INVENTORY AND AREA ESTIMATES**

(b)(1)(iv) – Estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit	Approximately 8,300 cubic yards
(b)(1)(v) – Estimate of the largest area of the CCR unit ever requiring a final cover	NA

<b>CLOSURE SCHEDULE</b>	
(b)(1)(vi) – Schedule for completing all activities necessary to satisfy the closure criteria in this section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including major milestones and the estimated timeframes to complete each step or phase of CCR unit closure.	
The milestone and the associated timeframes are initial estimates. Some of the activities associated with the milestones will overlap. Amendments to the milestones and timeframes will be made as more information becomes available.	
Written Closure Plan	October 17, 2016 (Rev 1 November 10, 2017)
Notification of Intent to Close Placed in Operating Record	No later than the date closure of the CCR unit is initiated. Closure to commence in accordance with the applicable timeframes in 40 CFR 257.102(e).
Agency coordination and permit acquisition <ul style="list-style-type: none"> <li>Coordinating with federal and/or state agencies for compliance</li> <li>Acquiring federal and/or state permits</li> </ul>	June 2017 July 2017
Mobilization	July 2017
Dewater and remove CCR <ul style="list-style-type: none"> <li>Complete dewatering, as necessary</li> </ul>	January 2018
Remove CCR <ul style="list-style-type: none"> <li>Removal of CCR material in pond and existing liner system</li> </ul>	January 2018
Groundwater Monitoring	2018 - 2021 (estimated)
Estimate of Year in which all closure activities will be completed	2021
<b>AMENDMENT AND CERTIFICATION</b>	
(b)(3)(i) – The owner or operator may amend the initial or any subsequent written closure plan developed pursuant to 257.102(b)(1) at any time.	This amended closure plan, as allowed by 257.102(b)(3), may be amended at any time, including as more information becomes available.
(b)(3)(ii) – The owner or operator must amend the written closure plan whenever: (A) There is a change in the operation of the CCR unit that would substantially affect the written closure plan in effect; or (B) Before or after closure activities have commenced, unanticipated events necessitate a revision of the written closure plan.	
(b)(3)(iii) – The owner or operator must amend the closure plan at least 60 days prior to a planned change in the operation of the facility or CCR unit, or no later than 60 days after an unanticipated event requires the need to revise an existing written closure plan. If a written closure plan is revised after closure activities have commenced for a CCR unit, the owner or operator must amend the current closure plan no later than 30 days following the triggering event.	
(b)(4) – The owner or operator of the CCR unit must obtain a written certification from a qualified professional engineer that the initial and any amendment of the written closure plan meets the requirements of this 40 CFR 257.102.	Certification by a qualified professional engineer will be appended to this plan.

**Certification Statement 40 CFR § 257.102 (b)(4) – Amended Written Closure Plan for a CCR Surface Impoundment**

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

I, R. Lee Wooten, 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 certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above referenced CCR Unit, that the information contained in the amended written closure plan, dated November 10, 2017, meets the requirements of 40 CFR § 257.102.

R. Lee Wooten

Printed Name

R. Lee Wooten

Date

11/10/17

