

BRAYTON POINT LLC

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July 31, 2018

Ms. Millie Garcia-Serrano
Regional Director
Massachusetts Department of Environmental Protection
Southeast Regional Office
Lakeville, MA 02347, MO 63131

Subject: **Notification of Ash Basins A, B and C Closure Progress Report**
Brayton Point, LLC, Brayton Point Station- Somerset, MA

Dear Ms. Garcia-Serrano:

In accordance with the USEPA Coal Combustion Residual (CCR) Rule 40CFR 257, this letter serves as notice that the attached 2018 Closure Progress Report has been prepared per 40CFR 257.100(c)(2)(i) and is available for review.

If you have any questions regarding this submittal, please contact Elizabeth Schlaeger, P.E. at 314.835.2802 or via e-mail at eschlaeger@enviroanalyticsgroup.com.

Sincerely,

BRAYTON POINT, LLC



Mike Roberts



Consulting
Engineers and
Scientists

August 2, 2018
Project 1800705

Mr. Mike Roberts
Brayton Point, LLC
1650 Des Peres Road, Suite 230
St. Louis, MO 63131

**Subject: Ash Basins A, B and C Closure Progress Report
Brayton Point, LLC, Brayton Point Station- Somerset, MA**

Dear Mr. Roberts:

In accordance with the USEPA Coal Combustion Residual (CCR) Rule 40CFR 257.100(c)(2)(i), this letter serves as the 2018 Closure Progress Report for Ash Basins A, B and C (collectively “the Basins”) at the Brayton Point Station in Somerset, Massachusetts.

The Basins served as polishing basins in the wet bottom ash management system. Bottom ash from the boilers fell into the wet collection system at the boilers and was conveyed as bottom ash sluice water to the hydro-bins. Decant from the hydro-bins was conveyed into either Basins B or C and then to Basin A for polishing or settling out of additional bottom ash material. The Basins were therefore classified as existing CCR surface impoundments under the provisions of the CCR Rule. Brayton Point ceased electricity generating operations on May 31, 2017. Following shutdown, Brayton Point began the process of closing the Basins. Basin B received its last CCR material on May 31, 2017. Basins A and C were in service until June 1, 2017.

A Notice of Intent (NOI) to close the Basins in accordance with 40CFR 257.100(c)(2)(i) was submitted to the Massachusetts Department of Environmental Protection (DEP) on June 30, 2017 (Basin B) and October 13, 2017 (Basins A and C). The NOIs detailed that the Basins were to be closed under the requirements of 40CFR 257.102(e)(1)(ii), and specifically, “closure by removal of CCR”. Basin closures were initiated within 30 days of the NOI notifications in accordance with 40 CFR 257.102(c). Basin closures were performed in accordance with the certified Basin Closure Plans (revised November 2017), which included dewatering of the Basins, removal of CCR material and removal of the existing liner system. The Basins were then partially backfilled and graded. Construction activities associated with Basin closure were completed in December 2017.

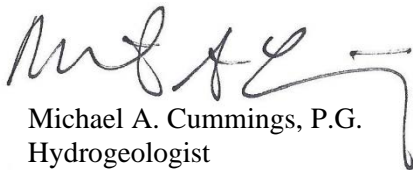
Detection Monitoring was performed at the CCR multi-unit groundwater network in November 2017, following installation of the groundwater monitoring well network and establishment of background groundwater quality data. The November 2017 groundwater sampling data were summarized in the 2017 Annual Groundwater Monitoring and Corrective Action Report (Annual Report), dated January 31, 2018. The 2017 Annual Report identified a Statistically Significant Increase (SSI) in the concentrations of six CCR Rule Appendix III-list analytes, and an Alternative Source Demonstration was prepared documenting that the SSI detections were a result of error in statistical evaluation. The ASD was placed into the facility’s operating record on April 11, 2018.

The first 2018 semiannual Detection Monitoring was completed in May 2018 and groundwater data will be documented in the 2018 Annual Report scheduled for completion by the end of January 2019. Detection Monitoring is scheduled to continue on a semiannual basis. According to 40 CFR 257.102(c) closure of the Basins will be complete when groundwater monitoring concentrations in downgradient wells do not exceed the groundwater protection standard established pursuant to 257.95(h) for Appendix IV constituents.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

GEI CONSULTANTS, INC.



Michael A. Cummings, P.G.
Hydrogeologist



Richard H. Frappa, P.G.
Senior Consultant

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