

Memo

To: Mike Roberts – Brayton Point, LLC

From: Michael Cummings and Ryan Hoffman - GEI Consultants, Inc.

Date: September 5, 2018

Re: Assessment Monitoring Program Establishment Notification - Ash Basins A, B and C
Brayton Point Station
Somerset, Massachusetts
GEI Project No. 1800705

In accordance with 40 CFR §257.94(e), the owner or operator of a coal combustion residuals (CCR) unit must 1) establish an assessment monitoring program meeting the requirements of 40 CFR §257.95 if a statistically significant increase (SSI) over background groundwater quality is identified by the detection monitoring program; and 2) prepare a notification stating that an assessment monitoring program has been established. Per 40 CFR §257.105(h)(5), this notification must be placed in the facility's operating record within 30 days of the establishment of an assessment monitoring program.

On August 7, 2018 we identified an SSI above certain CCR Rule Appendix III background values in groundwater samples collected at the Brayton Point Station Ash Basins A, B and C. The SSI was identified within 90 days of receipt of groundwater data on May 9, 2018. As a result of the above-background SSI, the assessment monitoring program was established on August 7, 2018 and will require sampling and analysis for all Appendix IV constituents in compliance with 40 CFR §257.95(b). The first sampling and analysis will be completed within 90 days of the establishment of the assessment monitoring program.

MC/RH:ht

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