

BRAYTON POINT LLC

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July 23, 2019

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

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 40 CFR 257, this letter serves as notice that the attached 2019 Closure Progress Report has been prepared per 40 CFR 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 July 23, 2019
Engineers and Project 1800705
Scientists

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 40 CFR 257.100(c)(2)(i), this letter serves as the 2019 Closure Progress Report for Ash Basins A, B and C (collectively “the Basins”) at the Brayton Point Station in Somerset, Massachusetts. This 2019 Closure Progress Report summarizes closure activities performed in the first half of 2019 as well as activities performed since closure activities began in 2017.

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 40 CFR 257.100(c)(2)(i) was submitted to the Massachusetts Department of Environmental Protection (MassDEP) 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 40 CFR 257.102(e)(1)(ii), and specifically, “closure by removal of CCR”. 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. Construction activities associated with Basin closure were completed in December 2017.

Detection Monitoring was performed in November 2017, and February, May, and July 2018, following installation of the groundwater monitoring well network and establishment of background groundwater quality data. The groundwater sampling data were summarized in the 2018 Annual Groundwater Monitoring and Corrective Action Report (2018 Annual Report), dated January 31, 2019. The 2018 Annual Report identified a Statistically Significant Increase (SSI) in the concentrations of four CCR Rule Appendix III-list analytes. As a result of the identification of SSIs, an Assessment Monitoring program was established on August 7, 2018 requiring sampling and analysis for all Appendix IV constituents in compliance with 40 CFR §257.95(b).

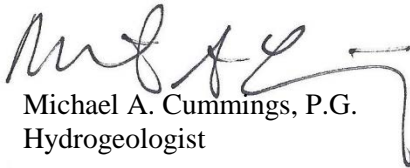
Assessment Monitoring was performed in October 2018 and concentrations of Appendix IV constituents were detected above laboratory reporting limits. In accordance with 40 CFR §257.95(d)(1), wells with detectable concentrations of Appendix IV constituents were re-sampled for Appendix III constituents and detected Appendix IV constituents within 90 days of receipt of laboratory data. As part of Assessment Monitoring, GEI resampled the wells on February 25, 2019 and obtained the results on April 9, 2019.

We reviewed the February 2019 results and identified several constituents that were detected above laboratory reporting limits. In accordance with Part 257.95(d)(2), groundwater protection standards must be developed for those Appendix IV constituents that were detected. GEI developed groundwater protection standards and is currently evaluating the identified constituents against these standards. 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. The 2019 Annual Groundwater Monitoring and Corrective Action Report is due by January 31, 2020, unless requirements for closure under the CCR Rule are met before that date.

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



Ryan S. Hoffman, P.G., LSP
Senior Project Manager

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