

**GROUNDWATER MONITORING SYSTEM CERTIFICATION
ASH BASIN 6
U.S. EPA COAL COMBUSTION RESIDUALS (CCR) RULE**

**BRUNNER ISLAND STEAM ELECTRIC STATION
EAST MANCHESTER TOWNSHIP
YORK COUNTY, PENNSYLVANIA**

Prepared for:

**BRUNNER ISLAND, LLC
East Manchester Township
York County, Pennsylvania**



Prepared by:



Engineering for the Environment. Planning for People.™

West Chester, PA

And the

**V.F. BRITTON GROUP, LLC
Wayne, PA**

**AGC Project No: 2015-3397
October 2017**



GROUNDWATER MONITORING SYSTEM CERTIFICATION
Ash Basin 6 - U.S. EPA Coal Combustion Residuals Rule
Brunner Island Steam Electric Station, East Manchester Township, York County,
Pennsylvania

Advanced GeoServices Corp. (Advanced GeoServices) has been retained by Brunner Island, LLC to prepare the following assessment of whether the coal combustion residuals (“CCR”) surface impoundment groundwater monitoring system for Ash Basin 6, at the Brunner Island Steam Electric Station in East Manchester Township, York County, Pennsylvania, meets the groundwater monitoring system design and construction requirements set out in 40 C.F.R. § 257.91. Presented below are the project background, assessment, limitations, and certification.

1.0 BACKGROUND

Pursuant to 40 C.F.R. § 257.90(b)(2), owners and operators of existing CCR surface impoundments must install a groundwater monitoring system as required by 40 C.F.R. § 257.91. 40 C.F.R. § 257.91 requires owners and operators of a CCR unit to install a groundwater monitoring system that, relying on site-specific technical information, consists of a sufficient number of wells, installed at appropriate locations and depths, to yield groundwater samples from the uppermost aquifer that accurately represent the quality of background groundwater that has not been affected by leakage from the CCR unit and accurately represent the quality of groundwater passing the waste boundary of the CCR unit.

Pursuant to 40 C.F.R. § 257.91(f), the owner or operator must obtain a certification from a qualified professional engineer stating that the groundwater monitoring system has been designed and constructed to meet the requirements of 40 C.F.R. § 257.91, including the performance standards specified in 40 C.F.R. § 257.91(a), based on the site-specific information specified in 40 C.F.R. § 257.91(b). If the groundwater monitoring system includes only the minimum number of monitoring wells specified in 40 C.F.R. § 257.91(c)(1), the certification must document the basis supporting this determination.

In support of our assessment, Advanced GeoServices completed an evaluation of the groundwater monitoring system for the above-referenced CCR unit and determined that sufficient information is available to make the certification required under 40 C.F.R. § 257.91(f).

3.0 LIMITATIONS

The signature of Advanced GeoServices’ authorized representative on this document represents that to the best of our knowledge, information, and belief, it is our professional opinion that the aforementioned information is accurate as of the date of such signature. Our opinion is made on the basis of our experience, qualifications, and professional judgment and is not to be construed



as a warranty or guaranty. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data, and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

4.0 CERTIFICATION

I, **Christopher T. Reitman** being a Registered Professional Engineer, in accordance with the **Pennsylvania** Professional Engineer's Registration, do hereby certify to the best of my knowledge, information, and belief, that the groundwater monitoring system for the CCR unit that is the subject of this certification dated **October 17, 2017** has been designed and constructed to meet the requirements of 40 C.F.R. § 257.91, and that this certification is true and correct and has been prepared in accordance with generally accepted good engineering practices.

SIGNATURE

DATE October 17, 2017

Christopher T. Reitman

