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ENGINEERING CERTIFICATION LETTER

DATE: December 16, 2015

TO: BL England Generating Station Facility Operating Record

FROM: Barry Sutherland, PE, PP

RE: Notification of Intent to Initiate Closure of the CCR Surface Impoundments

This document is a notice of the intent to initiate closure of the inactive Coal Combustion Residuals (CCR) surface impoundments (Slag Ponds) at the BL England Generating Station located in Beesley's Point, New Jersey. It is also a declaration that these CCR surface impoundments are both inactive (not receiving CCR) and closing pursuant to the CCR Rule (40 CFR 257), with closure completion on or before April 17, 2018.

In accordance with the requirements of Paragraph (b) of 40 CFR 257.100, the inactive CCR surface impoundments will be closed as described in the following narrative description:

- Temporary steel sheeting may be installed around the Slag Ponds to maintain the integrity of nearby piping and structures. The sheeting can provide stability during the dewatering and removal of CCR from the ponds, and also allow for proper backfilling and compaction.
- The CCR will be removed from the surface impoundments via hydraulic dredging. The dredge will remove the CCR from the ponds, and pump the material through a temporary pipeline to a series of geotextile tubes (e.g., Geo Tubes) for dewatering.
- These geotextile tubes will be used to hold and dewater the slag material for approximately one (1) month after which, the CCR will be trucked off site to a permitted landfill for proper disposal.

A schedule for completing the construction closure activities is presented below:

- Install Sheeting: 4/4/17 – 5/1/17
- Hydraulic Dredging: 5/2/17 to 5/15/17
- Dewatering: 5/16/17 to 6/14/17
- Disposal: 6/15/17 to 6/30/17

This correspondence shall serve as certification that closure of the CCR surface impoundment is technically feasible within the timeframe described in Attachment 1.

TRC ENVIRONMENTAL CORPORATION



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