40 C.F.R. § 257.91(f) Groundwater Monitoring System Certification
CCR Unit: Dynegy Miami Fort, LLC; Miami Fort Power Station; Miami Fort Pond System

In accordance with 40 C.F.R. § 257.91(f), the owner or operator of a coal combustion residual (CCR) unit must obtain a certification from a qualified professional engineer stating that the groundwater monitoring system at the CCR unit has been designed and constructed to meet the requirements of 40 C.F.R. § 257.91. If the groundwater monitoring system includes the minimum number of monitoring wells specified in 40 C.F.R. § 257.91(c)(1), the certification must document the basis supporting use of the minimum number of monitoring wells. Further, in accordance with 40 C.F.R. § 257.91(e)(1), when completing the groundwater monitoring system certification, the qualified professional engineer must be given access to documentation regarding the design, installation, development, and decommissioning of any monitoring wells, piezometers and other measurement, sampling, and analytical devices.

The individual groundwater monitoring systems designed and constructed for Basins A and B include more than the minimum number of downgradient monitoring wells specified in 40 C.F.R. § 257.91(c)(1). The combined groundwater monitoring system for the Miami Fort Pond System is equally as capable of detecting monitored constituents downgradient at the waste boundary of the CCR multiunit as the individual monitoring systems for Basins A and B, as required by 40 C.F.R. § 257.91(d)1.

Further evaluation of the groundwater conceptual site model and flow conditions, including a groundwater model, is currently in progress to support remedy selection as part of the corrective measures assessment process, in addition to identifying location(s) for additional background monitoring well(s). Site constraints may limit the options for locating additional background monitoring wells.

The undersigned has been given access to the documentation regarding the design, installation, development, piezometers and other measurement, sampling, and analytical devices concerning the monitoring system for the Miami Fort Pond System.

I, Nicole Pagano, a qualified professional engineer in good standing in the State of Ohio, certify that the groundwater monitoring system at the Miami Fort Pond System has been designed and constructed to meet the requirements of 40 C.F.R. § 257.91.

Nicole M. Pagano
Qualified Professional Engineer
E-85428
Ohio
O'Brien & Gere Engineers, Inc., a Ramboll Company
Date: May 22, 2020

I, Brian Hennings, certify that the groundwater monitoring system at the Miami Fort Pond System has been designed and constructed to meet the requirements of 40 C.F.R. § 257.91.

Brian G. Hennings
Managing Hydrogeologist
O'Brien & Gere Engineers, Inc., a Ramboll Company
Date: May 22, 2020