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To: Jared Morrison, Director
Waste and Water Programs

Project:
Liner Design Criteria
Montrose South Ash Impoundment

From:
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Memorandum

Subject: Montrose South Ash Impoundment Liner Design Criteria

CCR Unit Status and Regulatory Explanation:

The Montrose Generating Station South Ash Impoundment is subject to the requirements of §257.71 which addresses the requirements for liner documentation for CCR surface impoundments. A surface impoundment is considered a “lined” surface impoundment if constructed with:

- i. A liner consisting of a minimum of two feet of compacted soil with a hydraulic conductivity of no more than 1×10^{-7} cm/sec;
- ii. A composite liner that meets the requirements of §257.70(b); or
- iii. An alternative composite liner that meets the requirements of §257.70(c).

The Montrose South Ash Impoundment is considered unlined primarily due to the lack of documentation supporting the “as built” clay liner materials, therefore is considered an unlined CCR surface impoundment.

