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To: Jared Morrison, Director  
Waste and Water Programs

**Project:**  
Liner Design Criteria  
Montrose North Ash Impoundment

**From:**  
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# Memorandum

**Subject: Montrose North Ash Impoundment Liner Design Criteria**

## CCR Unit Status and Regulatory Explanation:

The Montrose Generating Station North 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  $1 \times 10^{-7}$  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 North 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.

