

September 3, 2020  
Project C151119.22

**Demonstration for 60-Day Extension for Assessment of Corrective Measures  
Professional Engineer Certification  
Whitewater Valley Station Surface Impoundment**

Professional Engineer Certification Statement (§257.96 Subpart A)

Richmond Power and Light has determined that the analysis of the effectiveness of potential corrective measures in meeting all of the requirements and objectives of a selected remedy described in §257.97 could not be achieved within the 90-day timeline to complete the Assessment of Corrective Measures for the Whitewater Valley Station Surface Impoundment. This was due to the necessary installation of offsite downgradient monitoring wells as part of site characterization activities. Landowner access approvals, offsite well installation, two rounds of sampling and preliminary result evaluation necessary for the Assessment of Corrective Actions report preparation could not be completed within the 90-day timeframe. As a result, the 60-day timeline extension was elected. The final published rule allows for a single 60 day extension based on site-specific conditions or circumstances.

I hereby attest that, having reviewed the detection and assessment monitoring documentation and being familiar with the provisions of Title 40 of the Code of Federal Regulations §257.96, that the demonstration justifying a 60-day time extension to the 90-day completion period of the Assessment of Corrective Measures is accurate for the Whitewater Valley Station Surface Impoundment in accordance with the requirements of §257.96(a). This will now set the deadline for completing the Assessment of Corrective Measures for September 7, 2020.

Sincerely,  
**GAI Consultants, Inc.**

  
John R. Klamut, PE  
Senior Project Manager  
Professional Engineer Certification Number PE11800468

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