

Rev. January 24, 2018
(Original Date October 13, 2016)
BBA Project No. 17266

Mr. Robert Stevens, P.E.
Plant Manager
Coletto Creek Power, LP
P.O. Box 8
Fannin, TX 77960

**RE: Coletto Creek Power – Certification of Coletto Creek Primary Ash Pond Liner System
in Accordance with 40 CFR Part 257.71 (4)(b)**

Dear Mr. Stevens:

Bullock, Bennett, & Associates, LLC (BBA) has reviewed the report *Design and Construction Summary for Coal Pile and Wastewater Pond Facilities, Coletto Creek Power Station - Unit 1, Report SL-3689* (hereafter referred to as the “Summary Report”) dated December 1, 1978. The report was prepared by Sargent & Lundy Engineers (S&L) of Chicago, Illinois, and summarizes the design and construction of the Primary Ash Pond, Secondary Pond, the Evaporation Pond, and Coal Pile Runoff Pond. Our report review and certification only addresses the Coletto Creek Primary Ash Pond since it is the only coal combustion residuals (CCR) surface impoundment subject to 40 CFR Part 257 rules.

40 CFR Part 257.71(a)(1) addresses liner design criteria for existing CCR surface impoundments and indicates the liner system of an existing CCR impoundment must meet one of the following criteria:

- (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 system that meets the requirements of §257.70(c).

The Coletto Creek Primary Ash Pond was not constructed with a composite or alternative composite liner system. The pond includes an in-situ, low permeability bottom liner and a constructed low permeability perimeter dike system. The S&L report demonstrated that the Primary Ash Pond’s in-situ liner met the technical guidelines and requirements of the Texas Department of Water Resources and the Coletto Creek Power Station Permit No. 02159. S&L reported the in-situ liner in the area beneath both the Primary Ash Pond and Secondary Pond as having an average thickness of 9 feet and median hydraulic conductivity of 3.8×10^{-8} cm/sec (the liner characteristics were not distinguished between the two ponds).

The Summary Report indicated the Primary Ash Pond’s liner provided groundwater protection equivalent to the CCR rule which requires a two-foot-thick compacted soil liner with a hydraulic conductivity of 1×10^{-7} cm/sec. Acceptance of a demonstrated equivalence standard that meets the intent of the CCR rule is cause for further exploration with the EPA. The Primary Ash Pond’s liner system does not meet the stated criteria of 40 CFR 257.71(a)(1) as currently in effect and therefore, would be classified as an unlined CCR surface impoundment.

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BBA appreciates the opportunity to assist Coletto Creek Power, LP with this project. If you have any questions regarding this certification, or if we can be of further assistance, please call us at (512) 355-9198.

Sincerely,

Bullock, Bennett & Associates, LLC



Dan Bullock, P.E.



1/24/2018

Texas PE No. 82596
Texas Firm Registrations:
Engineering: F-8542, Geoscience: 50127