

STRUCTURAL STABILITY ASSESSMENT REPORT

Big Brown Steam Electric Station

REPORT

Submitted To: Luminant 1601 Bryan Street Dallas, TX 75201

Submitted By: Golder Associates Inc. 500 Century Plaza Drive, Suite 190 Houston, TX 77073 USA



Professional Engineering Firm Registration Number F-2578

Project No. 164816401



October 2016



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1.0 INTRODUCTION

1.1 Purpose

The "Disposal of Coal Combustion Residuals (CCR) from Electric Utilities rule" (40 Code of Federal Regulations (40 CFR) Part 257), effective October 19, 2015, requires that existing CCR surface impoundments meeting the requirements of §257.73(b) conduct initial and periodic structural stability assessments in accordance with §257.73(d). This report provides the structural stability assessment for the Big Brown Steam Electric Station's (BBSES's) CCR Impoundment, identified as the North Bottom Ash Pond (NBAP) and South Bottom Ash Pond (SBAP) also referred to collectively as the Bottom Ash Ponds (BAP).

1.2 Site Background

The BBSES generates fly ash, bottom ash and boiler slag during electricity generation. The NBAP and SBAP are active, clay lined, excavated impoundments surrounded and separated by engineered earthen berms. Each pond receives a slurry of bottom ash/boiler slag and water and is used to separate the solids from the water using gravity sedimentation. Water decanted from the ponds is returned to the power plant. Separated solids accumulate in the ponds and are periodically removed and placed in an adjacent surface lignite mine operated by an affiliated Luminant company (Luminant Mining Company). This is the only CCR surface impoundment at the BBSES.

1.3 Previous Evaluations

Golder performed previous evaluations on the BAP as part of the below report submitted to Luminant:

Ash Pond Slope Stability Investigation Report, Big Brown Power Plant, Freestone County, Texas, dated November 2012

This study found the pond slopes to be adequately stable.



2.0 SUBSURFACE CONDITIONS

2.1 Regional Geology

The BBSES site is located in the western part of the East Texas Basin along the edge of the East Texas Salt Structure Province. Surface geology comprises of the Wilcox formation – irregularly bedded fine to coarse sand, more or less lignitic clay or lignite. Other formations in the region include the Carrizo Sand, the Queen City Sand and Sparta Sand (Guyton & Associates, 1972; Galloway et al, 1983).

2.2 Site Geology

Surficial soils at BBSES consist of loamy, moderately permeable, gently to moderately sloping, well-drained soils. Underlying soils consist of randomly sorted strata containing shale, clayey, and sandy materials (USDA 2002). Despite the abrupt changes in dip, there is no evidence of faulting in the region of the BBSES site (ERM-Southwest Inc., 1986).

2.2.1 Subsurface Investigations and Laboratory Testing

Information from a previous subsurface investigation was used to characterize the subsurface site conditions. Golder conducted a subsurface investigation for the BAP in October 2012, as part of a slope stability evaluation. Golder completed six borings through the crest of the pond embankment at an elevation of approximately 350 feet – mean sea level, ft-msl. The boring depths ranged from 30 to 50 feet below ground surface (bgs) (Golder, 2012). Appendix A includes the boring location map and the boring logs.

Laboratory testing was performed on selected samples in accordance with commonly accepted methods and practices. Undisturbed and disturbed soil samples were tested to determine water content, Atterberg limits, grain size distribution, and shear strength. Water content determination was performed in accordance with ASTM D2216; Atterberg limits were determined in accordance with ASTM D4318; and grain size distribution was performed in accordance with ASTM D422. Shear strength testing consisted of unconsolidated-undrained (UU) and consolidated-undrained (CU) triaxial compression tests in general accordance with ASTM D2850 and D4767, respectively. Laboratory test summary sheets results are presented in Appendix B. The test results can be found in Appendix C.

The soils encountered in the borings generally consisted of very stiff to hard sandy clay and compact to very dense clayey sands. The subsurface stratigraphy generally consisted of clayey or silty sand with interspersed layers of sandy clay and lean clay. A thin layer of loose compact clayey sand was encountered in some boreholes at a depth of around 44 feet bgs.

Saturated soils were encountered in the embankment fill in only one of the six borings at a depth of 20 feet (i.e. at EL 330 ft-msl). Monitoring wells around the BAP indicate that the groundwater elevation is located between EL 309 to 313 ft-msl.



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The findings from the above subsurface investigation were reviewed for their applicability to this study, and are summarized in the following sections.



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3.0 STRUCTURAL STABILITY ASSESSMENT - §257.73(d)(1)(i)-(vii)

The CCR rules require conducting periodic structural stability assessments by a qualified professional engineer to document whether the design, construction, operation and maintenance is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater that can be impounded therein.

3.1 Foundations and Abutments - §257.73(d)(1)(i)

As noted above, the foundation soils consist of native soils and fill. The foundation soils and abutments are stable.

3.2 Slope Protection - §257.73(d)(1)(ii)

The downstream slope of the embankments in the BAP are protected from erosion and deterioration by the establishment of a vegetative cover. The vegetative cover is inspected weekly for erosion, signs of seepage, animal burrows, sloughing, and plants that could negatively impact the embankment.

3.3 Dikes (Embankment) - §257.73(d)(1)(iii)

The BAP embankment was constructed in 1989, of compacted site soils excavated from within the pond footprint. The BAP is divided into north and south ponds by an interior divided dike. No construction testing of the original embankment fill is available. Nevertheless, Golder's subsurface investigation in 2012 comprised boreholes drilled into the embankment. The embankment soils were generally found to be well-compacted and of sufficient density.

As part of several modifications to the BAP in 1999, a 3-foot thick compacted clay liner was constructed on the interior slopes. The construction drawings indicate that the compacted clay liner was specified to have a hydraulic conductivity of less than 1×10^{-7} cm/s. No significant repairs have been performed to the BAP embankment since its construction, except the addition of the clay liner in 1999.

Based on a review of past inspection reports and on recent observations, the embankment is sufficient to withstand the range of loading conditions they are subjected to.

3.4 Vegetated Slopes - §257.73(d)(1)(iv)

As of June 14, 2016, the US Court of Appeals for the District of Columbia Circuit issued an Order that remanded and vacated the CCR rule requirement that vegetation on the exterior portions of dikes on CCR surface impoundments be maintained not to exceed six inches in height. EPA will issue a new rulemaking in the future to address this issue.

Each of the surface impoundments at the BBSES are inspected weekly. Luminant maintains the vegetation in a manner that ensures adequate inspections can be conducted.





3.5 Spillways - §257.73(d)(1)(v)

There are no spillways on the BAP.

3.6 Hydraulic Structures - §257.73(d)(1)(vi)

Two pipes pass below the west embankment: a 30-in. diameter concrete pipe at the North BAP; and a 42in. diameter concrete pipe at the South BAP. These pipes provide suction from the BAP to a pump station that returns the process water back to the generating units. These are the only pipes passing through the embankment and are the only outlets from the BAP. The pump station controls the recycling of the discharge back to the plant.

The BAP receives dewatering bin overflow through two sets of pipes entering above the crest of the pond on the east side. High density polyethylene (HDPE) pipes are located along the crest of the west side of the pond, and are used for moving liquid between the north and south BAPs with a mobile pump, during an emergency.

No significant deterioration, deformation, distortion, bedding deficiencies, sedimentation, or debris were observed that may negatively affect the operation of the surface impoundment.

3.7 Downstream Slopes Adjacent to Water Body - §257.73(d)(1)(vii)

The BAP embankment is bordered to the south by a narrow water channel connected to Fairfield Lake (a man-made reservoir) (Figure 1). Based on visual observations, the water channel bank is located approximately 25 feet from the embankment toe and is sloped at approximately 3H:1V (horizontal to vertical). The bank height is estimated to be 20 to 30 feet from the bottom of the channel, based on TWDB, 1999.

The Fairfield Dam has a crest elevation of 322 ft-msl. The south toe of the BAP embankment is approximately 13 feet above the Fairfield Dam crest; therefore, the embankment will likely never be inundated and never subjected to rapid drawdown. Rapid drawdown within the adjacent channel could potentially affect the stability of the channel slopes. However, any slope failures would be shallow and unlikely to affect the BAP embankment.

3.8 Structural Stability Deficiencies - §257.73(d)(2)

No structural stability deficiencies were identified during this assessment.





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4.0 CONCLUSION

Based on our review of the information provided by Luminant, on information prepared by Golder Associates Inc., and on our on-site observations, no structural stability deficiencies were identified in the surface impoundment during this assessment.

Golder appreciates the opportunity to assist Luminant with this project. If you have any questions, or require further assistance from Golder, please contact the undersigned at (281) 821-6868.

GOLDER ASSOCIATES INC.

Varenya Kumar Staff Engineer

B. Front

Jeffrey B. Fassett, PE Associate Geotechnical Engineer





5.0 CERTIFICATION

I hereby certify that this report has been prepared in general accordance with normally accepted civil engineering practices and in accordance with the requirements of 40 CFR 257.73(d).



Jeffrey B. Fassett, PE Golder Associates Inc. Firm Registration Number F-2578



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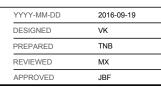
6.0 **REFERENCES**

- 40 CFR Parts 257 and 261, 2015, Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule, April 17, 2015.
- Galloway, W. E., Ewing, T. E., Garrett, C. M., Jr., Tyler, Noel, and Bebout, D. G., 1983, Atlas of major Texas oil reservoirs: The University of Texas at Austin, Bureau of Economic Geology Special Publication, 139 p.
- Golder Associates Inc., 2012, Ash Pond Slope Stability Investigation Report, Big Brown Power Plant, Freestone County, Texas, November 2012.
- Guyton, W.F., and Associates, 1972, Ground-water conditions in Anderson, Cherokee, Freestone, and Henderson counties, Texas: TWDB Rept. 150, 80 p.
- Texas Water Development Board., 1999, Volumetric Survey of Fairfield Lake prepared for USACE, Fort Worth District; in conjunction with Sabine River Authority and TXU Electric Company.



CLIENT LUMINANT POWER BIG BROWN

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REFERENCE(S) AERIAL PHOTO SOURCED FROM GOOGLE EARTH PRO DATED 2014



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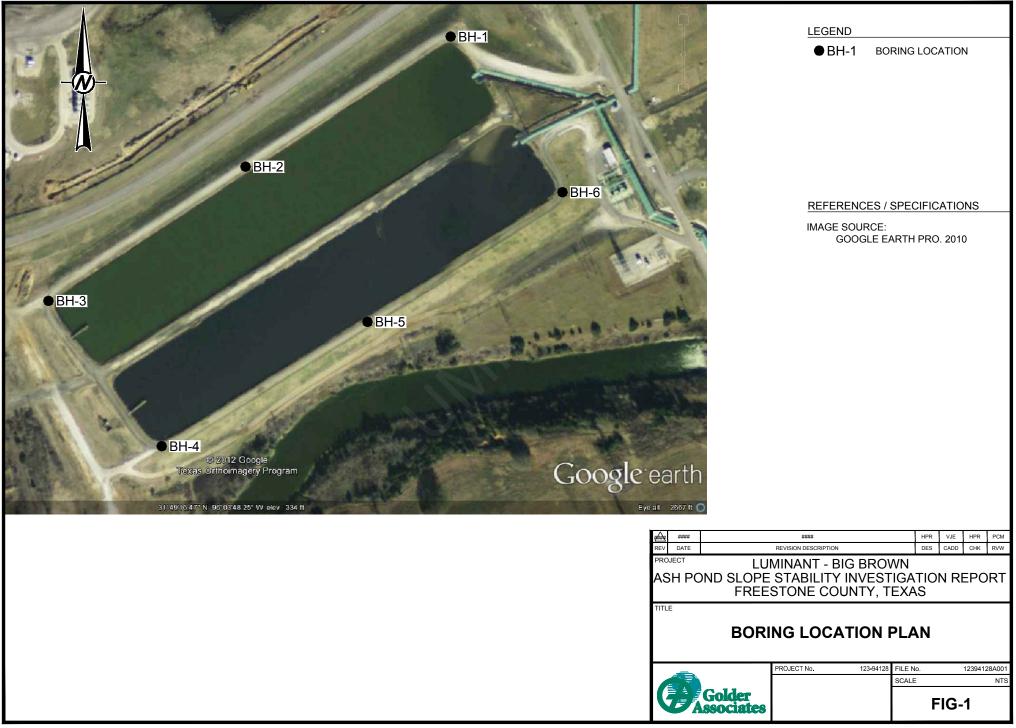
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FIGURE

APPENDIX A BORING LOCATION MAP & BORING LOGS

NOTE: Figure Reference - Golder Associates Inc., 2012, Ash Pond Slope Stability Investigation Report, Big Brown Power Plant, Freestone County, Texas, November 2012



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941Z	0				S	R	_	۲ ۲	Ľ۵	□ FINE	3 COr 40		• •	
Ś	0		(CL) SANDY LEAN CLAY, low plasticity, medium to fine, w	ell						20	+U			
EA B			graded, brown and orange, cohesive, moist		SH							····:	· · · :	
2					1	78		4.5				:		
Ž												· · · · . · · · ·	· · · :	
Į			trace gravel, red and gray at 3.5'		SH	78		4.5						
Ž	5				2	10		4.5						
Я С														
ני. חפי					SH	100		2.25		<u>⊦</u>	<u> </u>	-	÷	
Ē			(SC) CLAYEY SAND, medium to fine, well graded, some lo	w	3									
ABI			plasticity clay, orange, cohesive, moist									:		
л П			(CL) SANDY LEAN CLAY, low plasticity, medium to fine, w graded, brown and orange, cohesive, moist	ell	SH 4	89		0.75		••••••				
j.	10		(SC) CLAYEY SAND, medium to fine, well graded, some lo	w								· · · · . · · · ·	····:··· :	
Ĩ			plasticity clay, gray to brown, non-cohesive, moist									····		
2												· · · ·	· · · :	
NAN		110	(OL) CANDY I FAN OLAY I an alerticity and first a	- 11										
			(CL) SANDY LEAN CLAY, low plasticity, medium to fine, w graded, gray and brown, cohesive, moist	en	SH	75		3.25						
871.	15				5									
53-94														
1/2/												-	÷	
												:		
2			(SW) WELL GRADED SAND, medium to fine, with low place	sticity	SH					-				
UEC.		S.S.S	clay lenses, orange, non-cohesive, moist		6	52		3.0		•••••				
Y Y	20	13.34											••••	
2012		33										· · · · · · · · · · · · · · · · · · ·	· · · : :	
z												:		
- 60:c			(CH) SANDY FAT CLAY, high plasticity, medium to fine, w	اام								· · · · · · · · · · · · · · · · · · ·	· · · :	
12			graded, gray, cohesive, moist	CII	SH 7	83		2.75		⊦ ●				
/07/1	25													
-														
19.7	_		(CL) SANDY LEAN CLAY, low plasticity, medium to fine, w	rell										
]ک	_		graded, gray, cohesive, moist											
ž			orange and gray at 28.0'		SH									
	 30				8	73		4.5		•				
5	_ 00 _												••••	
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Ì										:		· · · · · · · · · · · · · · · · · · ·		
Я Н			(SC) CLAYEY SAND, medium to fine, well graded, some lo	\ \/										
Ш Б		1))	plasticity clay, gray and orange, cohesive, moist		SH 9	67		4.25		•••••	· · · · · ·	· · · · ·	· · · :	
ij	35	11/2			9			1		:				

Ð	Gold	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870				В	OR	ING	B NUMBER BH-5 PAGE 2 OF 2
CLIE	NT Lur	minant	PROJECT	NAME	Pond	I Slope Sta	bility		
						Big Brown			
(ft) (ft) 25	GRAPHIC LOG	MATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 40 60 80 □ FINES CONTENT (%) □ 20 40 60 80
		(SC) CLAYEY SAND, medium to fine, well graded, some lo plasticity clay, gray and orange, cohesive, moist <i>(continued</i>	ow 1) Z	SS 10	100	13-15-16 (31)	-		
		wet at 43.5'		SS 11	100	4-5-5 (10) 10-10-12 (22)	-		
		Bottom of borehole at 50.0 feet.							

	Ð	Gold	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870				B	OR	ING	PAGE 1 OF 2
	CLIE	NT Lu	minant I	PROJEC [.]	T NAME	Pond	Slope Sta	bility		
	PROJ	ECT N	UMBER 123-94128	PROJEC ⁻	T LOCAT		Big Brown	Plant		
	DATE	STAR	TED 10/16/12 COMPLETED 10/16/12	GROUND					HOLE	SIZE inches
			ONTRACTOR Van & Sons Drilling Service							
			ETHOD _Mud Rotary							
			/ HR CHECKED BY PCM							
	NOTE	:>		AF						
1941 28BIGBKOWN.GPJ	o DEPTH (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 40 60 80 □ FINES CONTENT (%) □ 20 40 60 80
Í			(SC) CLAYEY SAND, medium to fine, well graded, some lo	w						
	· -		plasticity clay, brown, cohesive, moist		SH 1	28				•
	5		and low plasticity clay at 3.5'		SH 2	67		4.5		•
	 		(CL) SANDY LEAN CLAY, low plasticity, some medium to f sand, orange, wet (SW) WELL GRADED SAND, medium to fine, gray, dry	fine	SH 3	72		0.0		•
	10		(SC) CLAYEY SAND, medium to fine, well graded, and low plasticity clay, orange, dry, cohesive		SH 4	61		4.5		•
	15		(CL) LEAN CLAY, low plasticity, some medium to fine sand orange, moist, cohesive	1,	SH 5	54		4.5		•••••••••••••••••••••••••••••••••••••••
			(SC) CLAYEY SAND, medium to fine, well graded, and low					-		
	20		plasticity clay, gray, moist, cohesive		SS 6	54	5-7-10 (17)			.
			(CL) SANDY LEAN CLAY, low plasticity, increasing sand w depth, gray, cohesive, moist	ith	SH 7	100		2.0		
			(SC) CLAYEY SAND, medium to fine, well graded, and low plasticity clay, gray and orange, possible some lignite (black moist, cohesive		SH 8	88		3.5		•
	35		no lignite at 33.0'		SH 9	69		3.5		

Ø	Gold	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870				В	OR	ING	PAGE 2 OF 2
CLIE	NT Lur	ninant F	PROJEC1		Pond	I Slope Stal	bility		
						Big Brown			
UEPTH (ff) 32	GRAPHIC LOG	MATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 20 40 60 80 □ FINES CONTENT (%) □ 20 40 60 80
		(SC) CLAYEY SAND, medium to fine, well graded, and low plasticity clay, gray and orange, possible some lignite (black moist, cohesive <i>(continued)</i> (SW) WELL GRADED SAND, medium to fine, trace low plas clay lenses, gray, non-cohesive, moist	ς),	SH 10	60		0.0		••••••
		orange, clay nodules at 43.0'	7	SH 11	50		0.0		•
0PE STABILIT		with stiff, gray, clay nodules and lenses at 48.0'		SH 12	46		0.0		••••••
GEOTECH BH PLOTS - GINT STD US LAB.GDT - 11/20/12 15:10 - PN_2012 PROJECT FOLDERSV123-94128 LUMINANT POND SLOPE STABILITYRIG BROWN FIELD INVESTIGATION/04128BIGBROWN GFU									

APPENDIX B LABORATORY TEST SUMMARY SHEETS



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SUMMARY OF LABORATORY RESULTS

PAGE 1 OF 2

OJECT NUMBE	R <u>123-941</u>	28			PRO.	JECT LOCA	TION Big E	Brown Plant		·	
			A	tterberg Lim	iits			Unit V	Veight		
Sample ID	Depth	Natural Moisture (%)	Liquid Limit	Plastic Limit	Plasticity Index	%<#200 Sieve	Class- ification	Moisture Content (%)	Dry Density (psf)	Permeability (cm/sec)	Additiona Lab Testing
BH-1	1	19.3									
BH-1	4	11.9									
BH-1	6	8.8									
BH-1	9	13.6									
BH-1	13	19.1									
BH-1	18	15.5									
BH-1	23	15.4									
BH-1	28	19.9	33	13	20						
BH-1	33	16.0									
BH-1	39	22.9									
BH-1	44	25.6									
BH-1	49	27.6									
BH-2	1	20.1									
BH-2	4	13.3									
BH-2	6	16.2									
BH-2	9	9.9									
BH-2	13	18.3									
BH-2	18	17.9									
BH-2	23	15.0									
BH-2	28	17.2	34	17	17						
BH-2	33	22.5									
BH-2	39	24.2									
BH-2	44	26.1									
BH-2	49	25.6									
BH-3	1	12.2									
BH-3	4	17.3									
BH-3	6	16.7									
BH-3	9	18.6									
BH-3	13	18.7									
BH-3	18	14.1									
BH-3	24	8.5									
BH-3	29	7.0				17					
BH-4	1	9.9				.,					
BH-4	4	11.4									
BH-4	6	10.7									
BH-4	9	22.0									
BH-4	9 13	22.0	39	16	23						
BH-4	13	15.7		10	20						
BH-4	23	14.3									
BH-4	23	20.3									
BH-5	1	17.8									



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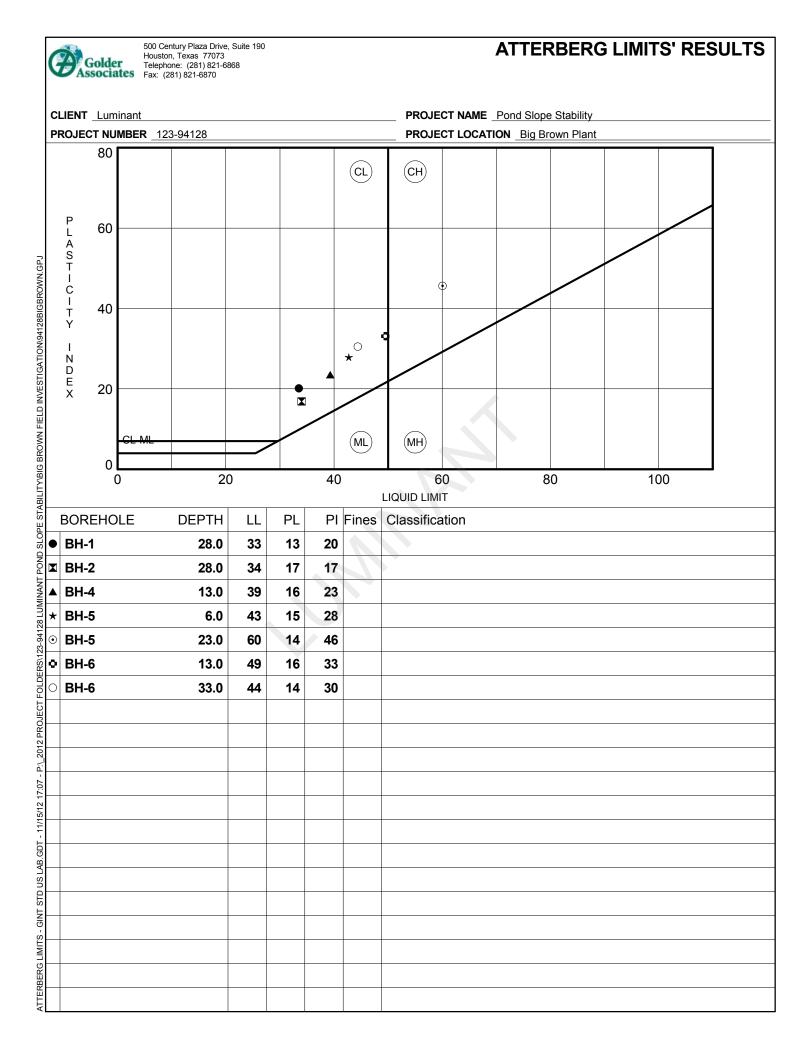
SUMMARY OF LABORATORY RESULTS

PAGE 2 OF 2

С	LIENT Luminant					PRO	JECT NAME	Pond Slop	be Stability			
PF	ROJECT NUMBER	123-941	28			PRO	JECT LOCA	TION Big E	Brown Plant			
				A	tterberg Lim	iits			Unit V	Veight		
	Sample ID	Depth	Natural Moisture (%)	Liquid Limit	Plastic Limit	Plasticity Index	%<#200 Sieve	Class- ification	Moisture Content (%)	Dry Density (psf)	Permeability (cm/sec)	Additional Lab Testing
	BH-5	4	20.3									
	BH-5	6	20.0	43	15	28						
	BH-5	9	20.8									
	BH-5	13	18.3									
	BH-5	18	14.2									
	BH-5	23	19.6	60	14	46						
	BH-5	28	15.7									
	BH-5	33	14.8									
	BH-5	39	19.6									
	BH-5	44	22.5									
	BH-5	49	20.9									
	BH-6	1	16.5									
	BH-6	4	11.9									
	BH-6	6	28.2									
	BH-6	9	12.3									
	BH-6	13	17.7	49	16	33						
	BH-6	19	20.6									
	BH-6	23	19.3									
	BH-6	28	13.3									
	BH-6	33	21.9	44	14	30						
	BH-6	38	21.5				69					
	BH-6	43	26.0									
	BH-6	48	31.1									

APPENDIX C LABORATORY TEST RESULTS

ATTERBERG LIMIT RESULTS



GRAIN SIZE ANALYSIS



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GRAIN SIZE DISTRIBUTION

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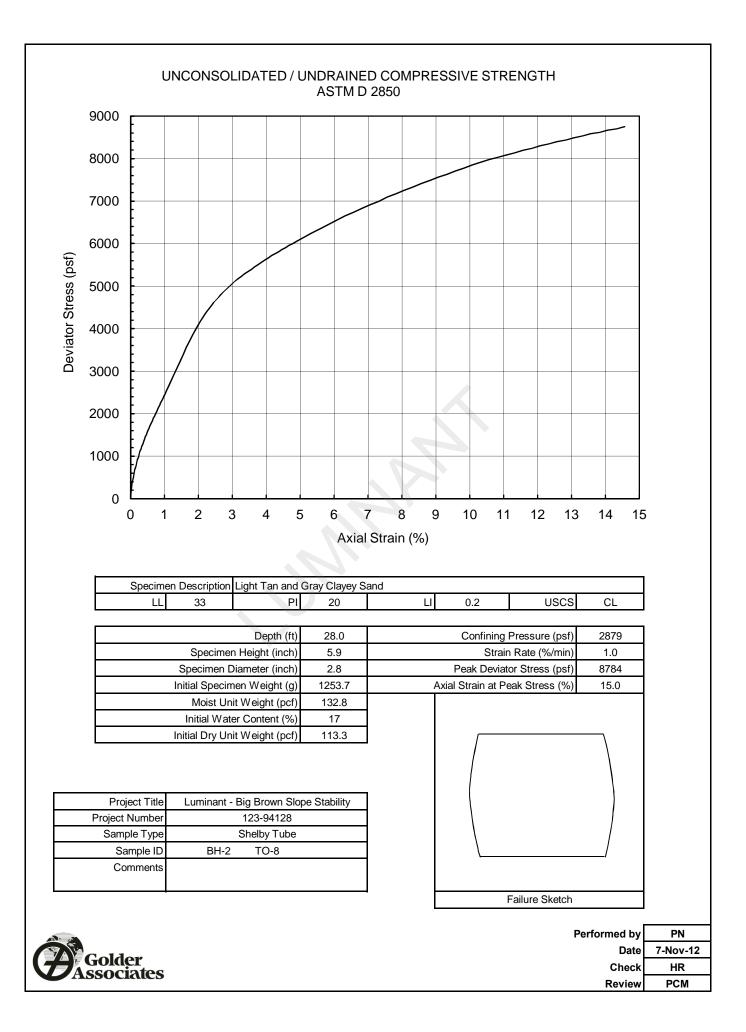


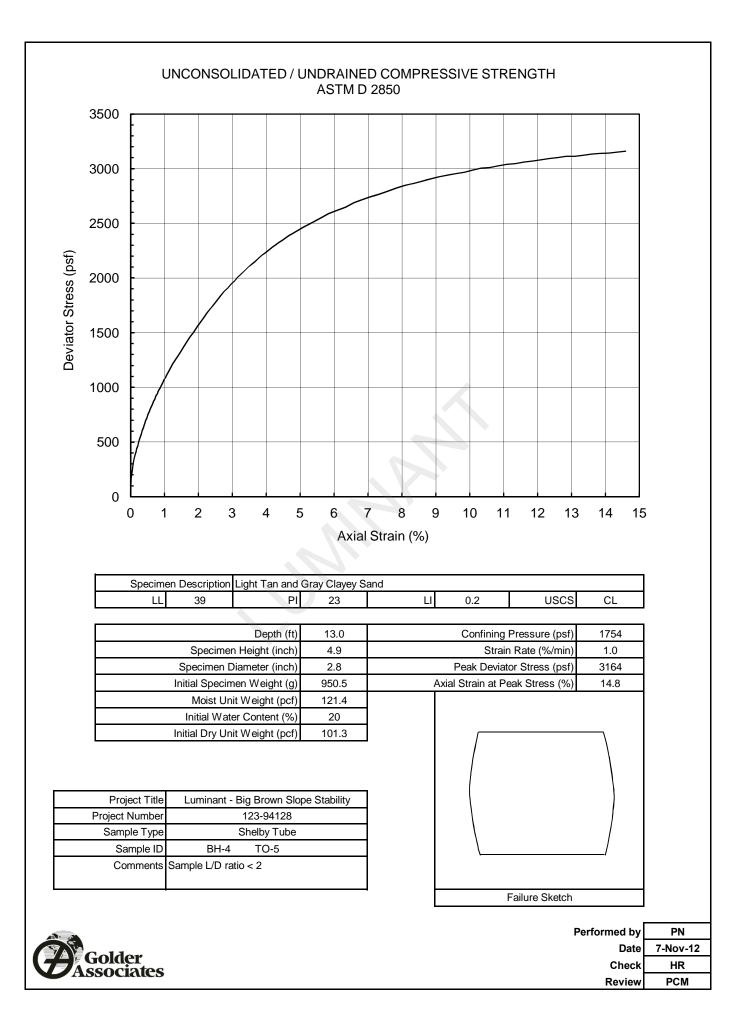
500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870

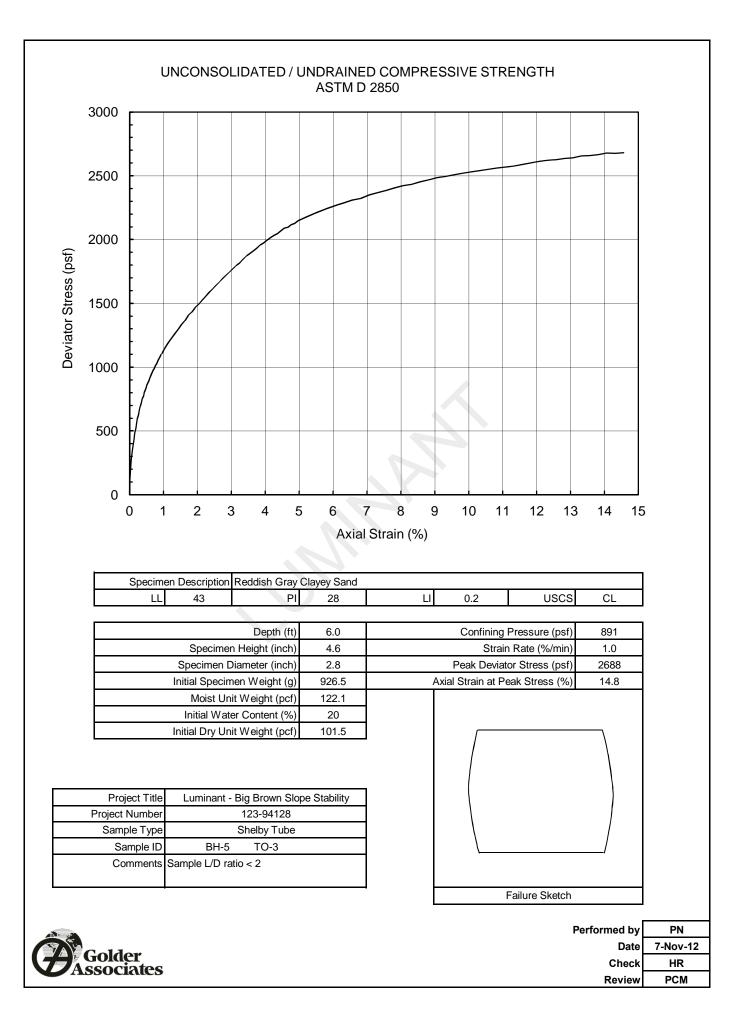
GRAIN SIZE DISTRIBUTION

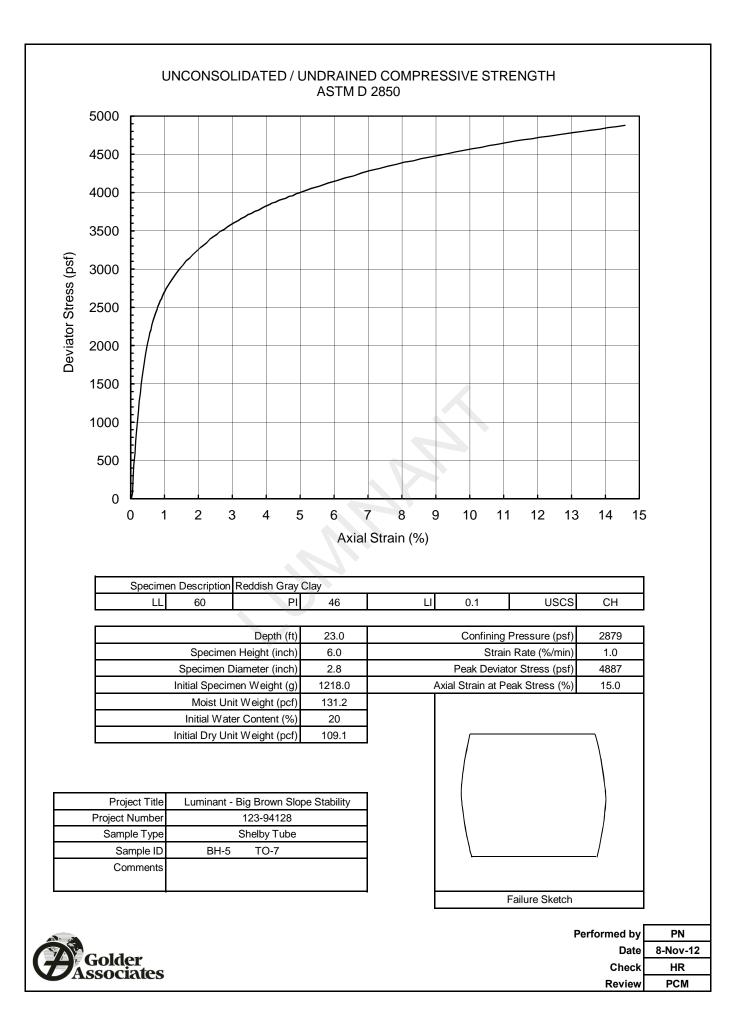
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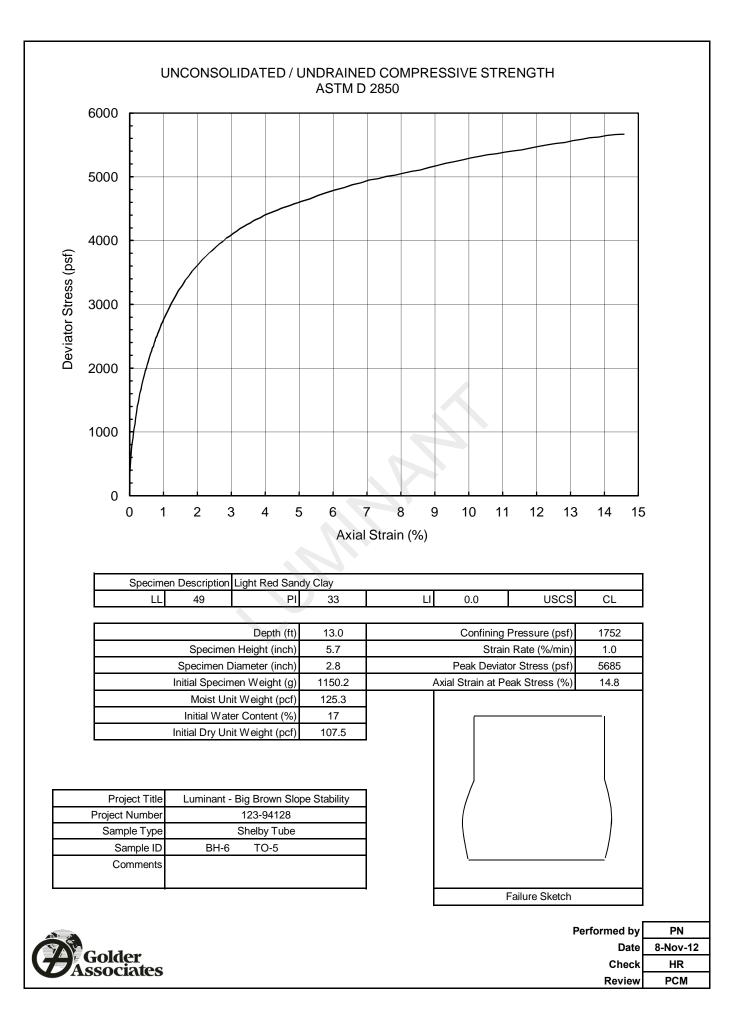
UNCONSOLIDATED / UNDRAINED COMPRESSIVE STRENGTH (UU)

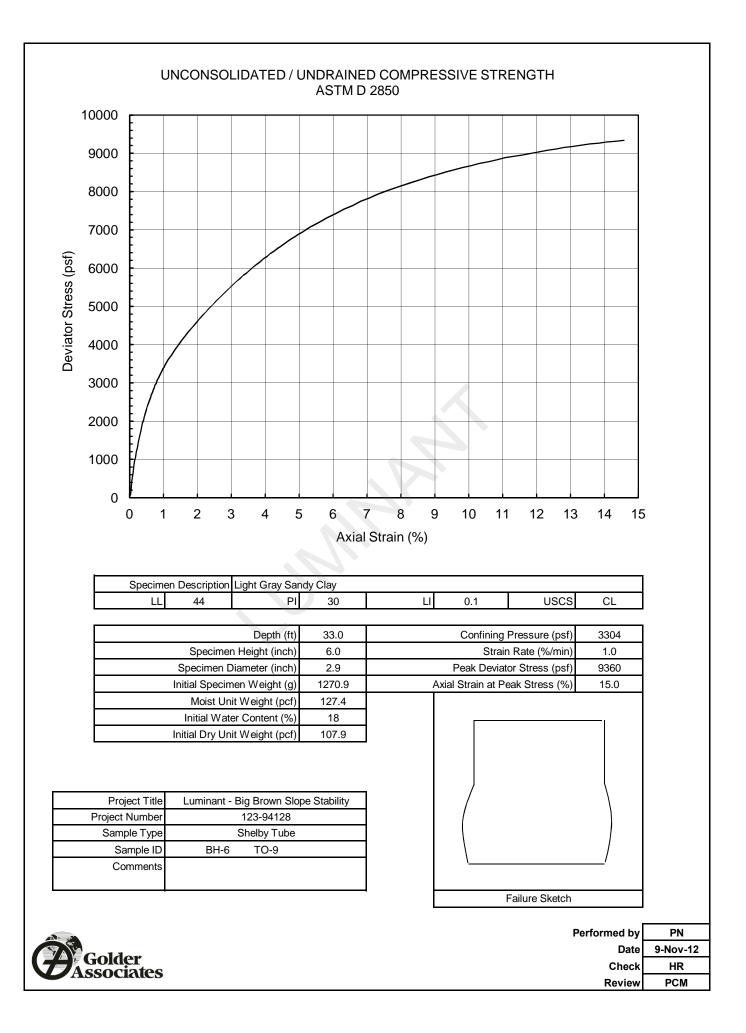




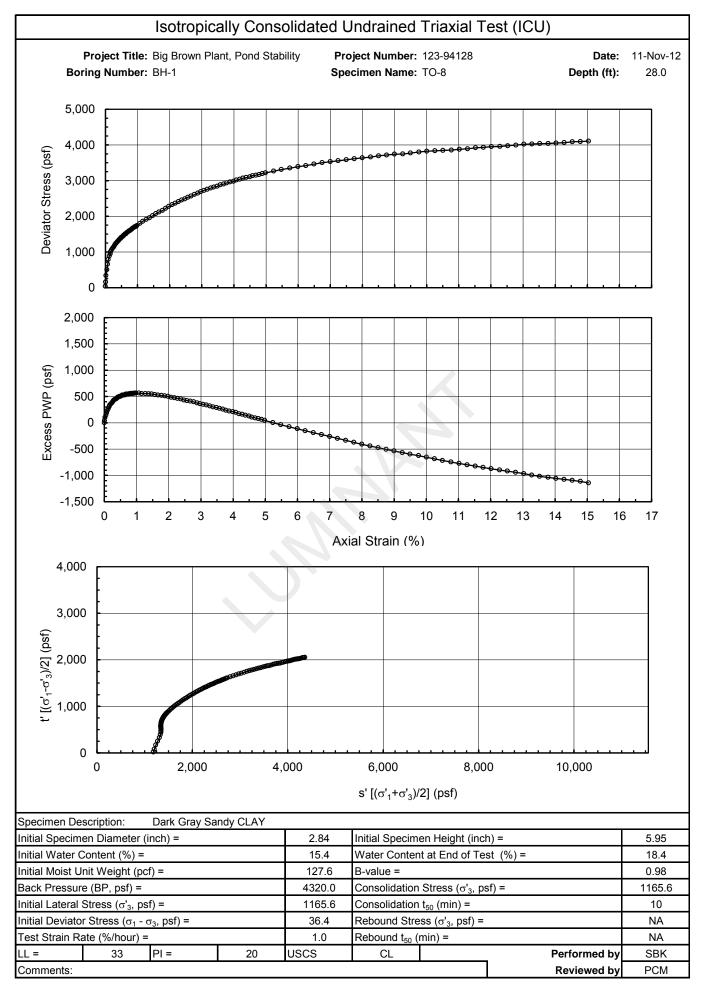




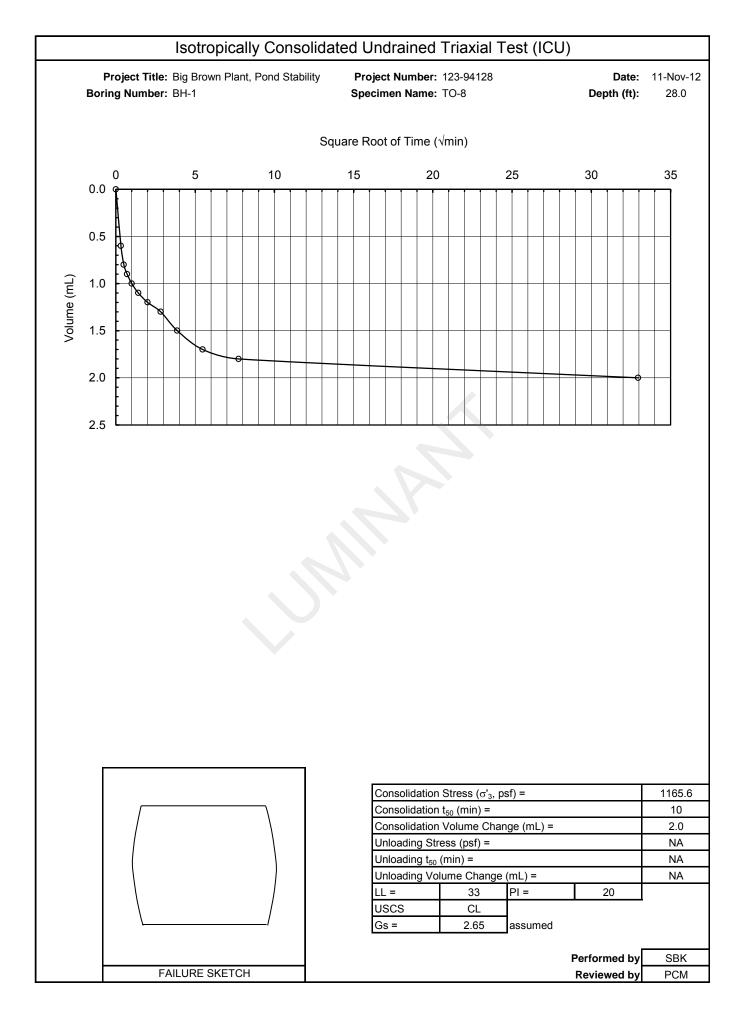


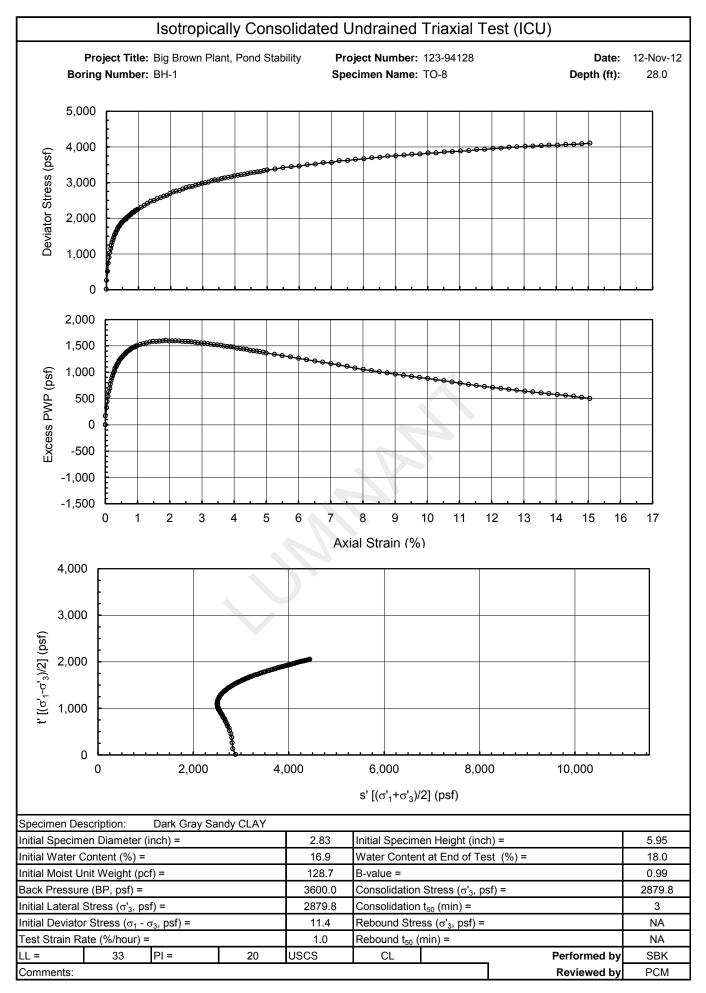


ISOTROPICALLY CONSOLIDATED UNDRAINED TRIAXIAL TEST (ICU)

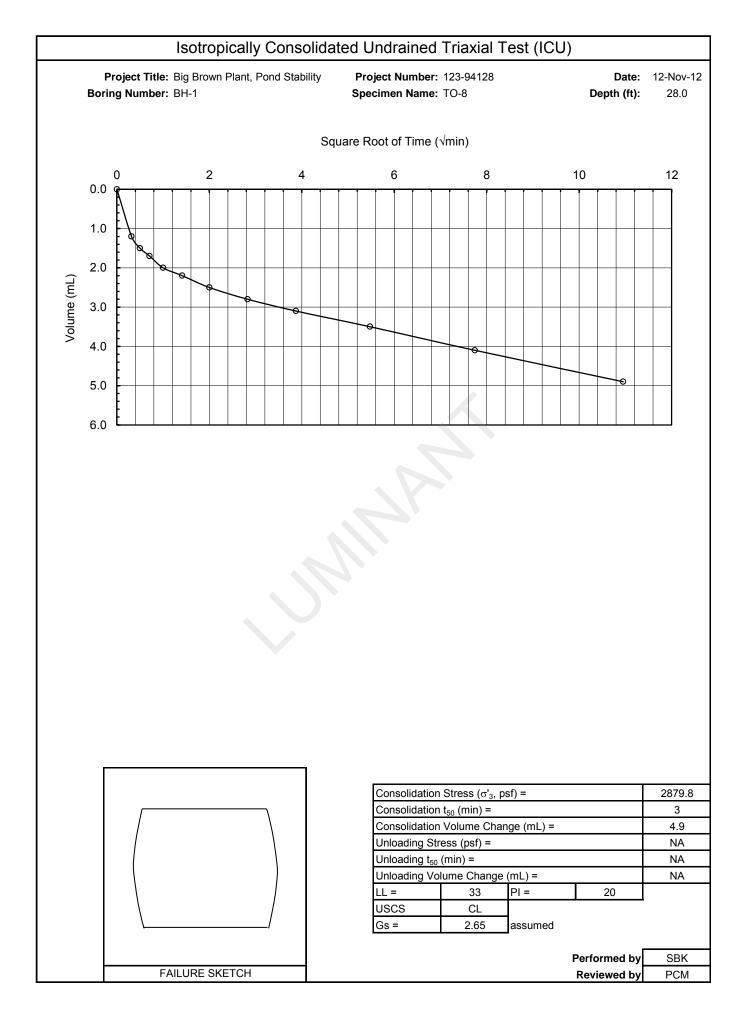


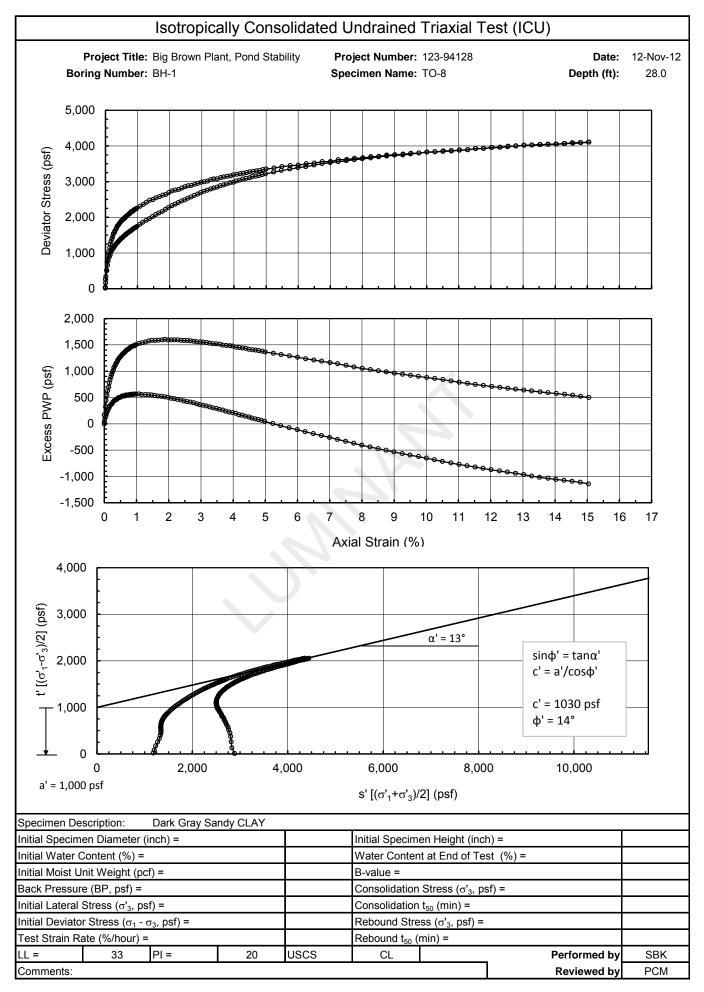
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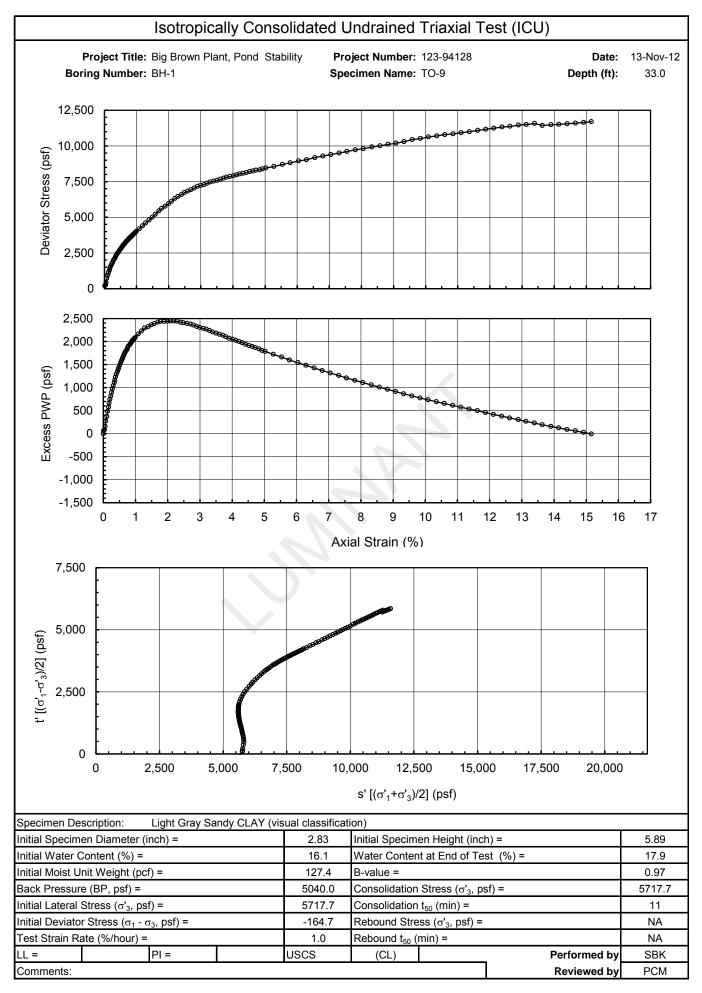


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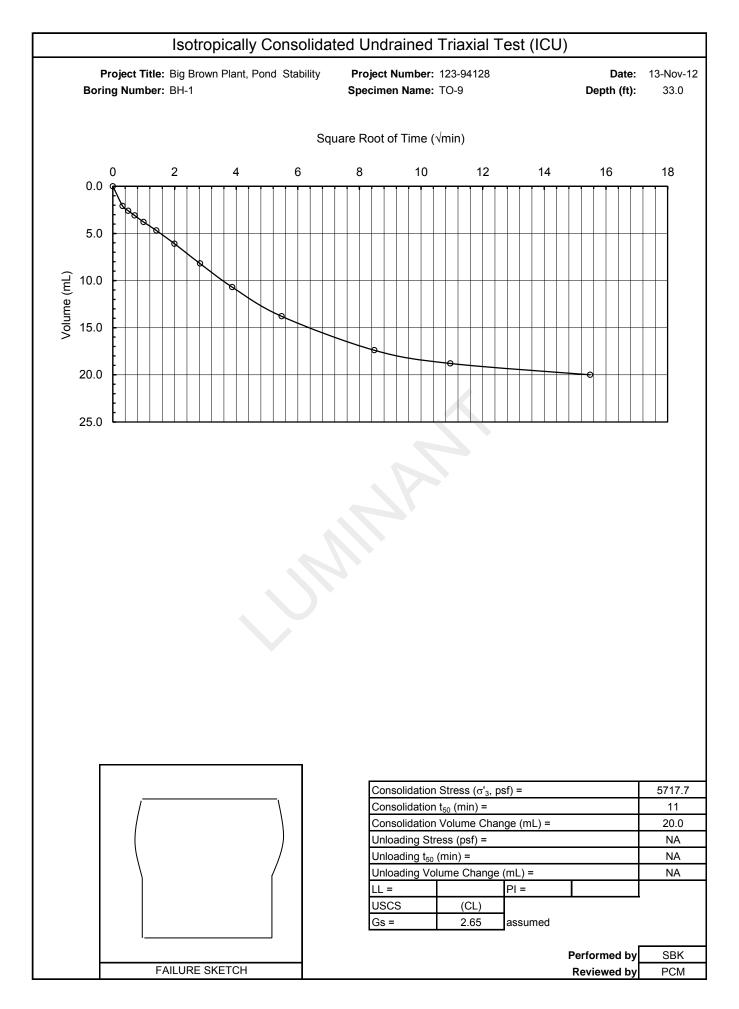




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Established in 1960, Golder Associates is a global, employee-owned organization that helps clients find sustainable solutions to the challenges of finite resources, energy and water supply and management, waste management, urbanization, and climate change. We provide a wide range of independent consulting, design, and construction services in our specialist areas of earth, environment, and energy. By building strong relationships and meeting the needs of clients, our people have created one of the most trusted professional services organizations in the world.

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