



NOTIFICATION FOR THE ESTABLISHMENT OF AN ASSESSMENT MONITORING PROGRAM
Big Brown Steam Electric Station
Bottom Ash Ponds and Ash Disposal Area II

August 16, 2018

In accordance with 40 CFR 257.94(e), the owner or operator of a coal combustion residuals (CCR) unit must establish an assessment monitoring program meeting the requirements of 40 CFR 257.95 if a statistically significant increase (SSI) over background groundwater quality is identified by the detection monitoring program, and prepare a notification stating that an assessment monitoring program has been established. The notification must be placed in the facility's operating record within 30 days of establishing an assessment monitoring program. See 40 CFR 257.105(h)(5). The notification must also be posted to the CCR web site within 30 days of the date the information was placed in the operating record. See 40 CFR 257.107(d); 40 CFR 257.107(h)(4).

Comparison of background groundwater quality with concentrations of parameters in downgradient monitoring wells observed during the initial detection monitoring event at the Bottom Ash Ponds and at Ash Disposal Area II was completed in January 2018 and identified an SSI for one or more of the 40 CFR Part 257 Appendix III parameters.

As allowed by 40 CFR 257.94(e)(2), the following were evaluated as potential cause of each SSI:

- A source other than the CCR unit;
- An error in sampling;
- An error in analysis;
- An error in statistical evaluation;
- A natural variation in groundwater quality.

The evaluations were not conclusive in demonstrating an alternate source/cause for the SSI by April 16, 2018. Consequently, an assessment monitoring program was triggered/initiated on April 16, 2018 and was established by July 16, 2018 for the Bottom Ash Ponds and Ash Disposal Area II at the referenced site.