

October 13, 2016
BBA Project No. 15-214

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

RE: Coletto Creek Power – Certification of Ash Ponds 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 and Secondary Ash Ponds (hereafter collectively referred to as the “Ash Ponds”), the Evaporation Pond and Coal Pile Runoff Ponds. Our report review and certification only addresses the Ash Ponds, as the other ponds reportedly do not contain coal combustion residuals (CCR) and therefore are not subject to 40 *CFR* Part 257 rules.

40 *CFR* Part 257.71 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:

(a)(1)(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; or, (a)(1)(ii) and (a)(1)(iii), a composite or alternate composite liner system, respectively, meeting applicable design criteria.

The Ash Ponds were not constructed with a composite or alternate composite liner system. They were constructed with an in-situ, low permeability bottom liner and a constructed low permeability perimeter dike system. The S&L report demonstrated that the Ash Ponds’ liner system was constructed in accordance with technical guidelines and requirements of the Texas Department of Water Resources and the Coletto Creek Power Station Permit No. 02159. Using a combination of average liner thickness and median hydraulic conductivity data, S&L certified the Ash Ponds’ in-situ liner as having a thickness of 9 feet and hydraulic conductivity of 4×10^{-8} cm/sec.

The Summary Report indicated the Ash Ponds’ 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 Ash Ponds’ 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.

BBA appreciates the opportunity to assist Coletto Creek Power with this project. If you have any

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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.



10/13/2016

Texas PE No. 82596

Texas Firm Registrations:

Engineering: F-8542, Geoscience: 50127