

APPENDIX F – CLOSURE AND POST-CLOSURE CARE

Closure Plan

Closure Plan Addendum No. 1

Closure Plan Addendum No. 2

Alternative Closure Demonstration Completeness Determination Letter

Post-Closure Plan

Post-Closure Plan Addendum No. 1

SITE INFORMATION

Site Name / Address	Coletto Creek Power Station, 45 FM 2987 Fannin, Goliad County, TX		
Owner Name / Address	Coletto Creek Power, LP 1500 Eastport Plaza Drive Collinsville, IL 62234		
CCR Unit	Primary Ash Pond	Final Cover Type	Soil/Synthetic Liner System
Reason for Initiating Closure	Known final receipt of waste/Final removal of beneficial reuse materials	Closure Method	Close In-Place

CLOSURE PLAN DESCRIPTION

(b)(1)(i) – Narrative description of how the CCR unit will be closed in accordance with this section.	The Primary Ash Pond will be closed such that contained CCR solids will remain in-place. In accordance with §257.102(b)(3), this written closure plan will be amended to provide additional details after the final engineering design for the grading and cover system is completed. This closure plan reflects the best information available to date, and the plan may be amended in the future.
(b)(1)(iii) – If closure of the CCR unit will be accomplished by leaving CCR in place, a description of the final cover system and methods and procedures used to install the final cover.	First, the Primary Ash Pond will be dewatered with the resulting water to be discharged through existing TPDES Outfall No. 003. CCR solids will be graded and leveled, then covered with a final cover system as described below. Existing perimeter dikes will remain intact and the final cover system will tie into these dikes. The cover system will consist of the following elements, listed in order from contact with the CCR to the top: 1) subgrade leveling fill (as needed); 2) 1 foot thick soil liner with a permeability not to exceed the permeability of 1×10^{-5} cm/sec; 3) Synthetic Liner System consisting of: Geosynthetic Clay Liner (GCL), Textured (both sides) 40 Mil Linear-Low Density Polyethylene Flexible Membrane Liner (LLDPE-FML), Double Sided (geotextile fabric on both sides) Geonet Drainage Layer; and 4) 24-inch Protective/Vegetative Soil Layer. The top of the final cover system will be vegetated to minimize erosion. The final cover will be sloped to promote drainage and storm water runoff.
(b)(1)(iii) – How the final cover system will achieve the performance standards in §257.102(d).	
(d)(1)(i) Control, minimize or eliminate, to the maximum extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate, or contaminated run-off to the ground or surface waters or to the atmosphere.	The permeability of the final cover will be equal to or less than the permeability of the bottom liner or a permeability no greater than 1×10^{-5} cm/sec, whichever is less, and will be graded to prevent ponding and promote drainage.
(d)(1)(ii) – Preclude the probability of future impoundment of water, sediment, or slurry.	The final cover will be sloped across the unit as needed to preclude the probability of future impoundment of water, sediment, or slurry.
(d)(1)(iii) – Include measures that provide for major slope stability to prevent the sloughing or movement of the final cover system during the closure and post-closure care period.	The top of the vegetated final cover system will be sloped and the outsides of the perimeter dikes will be vegetated as necessary to minimize the potential for erosion. The cap system will be designed by a Qualified Professional Engineer in a manner to prevent sloughing or movement of the final cover system and geotechnical testing and evaluation will be performed as needed during and after construction to confirm that engineering slope stability standards have been achieved.
(d)(1)(iv) – Minimize the need for further maintenance of the CCR unit.	The vegetative cover will be regularly mowed and maintained to minimize the potential for erosion or other structural issues that would cause more extensive and long-term maintenance issues. The storm water control system will be regularly inspected for proper operation.
(d)(1)(v) – Be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices.	Construction would occur in a phased approach as sections of the impoundment are prepared, enabling expedited capping of portions of the CCR impoundment.
(d)(2)(i) – Free liquids must be eliminated by removing liquid wastes or solidifying the remaining wastes and waste residue.	The unit will be dewatered sufficiently to remove the free liquids to provide a stable base for the construction of the final cover system.
(d)(2)(ii) – Remaining wastes must be stabilized sufficiently to support the final cover system.	Dewatering and regrading of existing in-place CCR will sufficiently stabilize the waste such that the final cover will be supported.
(d)(3) – A final cover system must be installed to minimize infiltration and erosion, and at minimum, meets the requirements of (d)(3)(i).	The final cover system will be constructed as described above in accordance with (d)(3)(i) and will minimize infiltration and erosion.
(d)(3)(i) – The design of the final cover system must be included in the written closure plan.	When the final design of the final cover system is completed, the written closure plan will be amended to include the detailed final design.
(d)(3)(i)(A) – The permeability of the final cover system must be less than or equal to the permeability of any bottom liner system or natural subsoils present, or a permeability no greater than 1×10^{-5} cm/sec, whichever is less.	The permeability of the final cover will be equal to or less than the permeability of the existing bottom liner or no greater than 1×10^{-5} cm/sec, whichever is less. This will be verified during construction per the construction quality assurance plan to be developed in conjunction with the detailed amended closure plan.
(d)(3)(i)(B) – The infiltration of liquids through the closed CCR unit must be minimized by the use of an infiltration layer that contains a minimum of 18 inches of earthen material.	Infiltration of liquids through the closed CCR unit will be minimized by the placement of a 24-inch thick protective/vegetated soil layer over the Geonet drainage layer.
(d)(3)(i)(C) – The erosion of the final cover system must be minimized by the use of an erosion layer that contains a minimum of six inches of earthen material that is capable of sustaining native plant growth.	The final cover will include a minimum 24-inch protective/vegetated soil layer that is capable of sustaining native plant growth. The vegetative cover will be regularly maintained to prevent erosion.
(d)(3)(i)(D) – The disruption of the integrity of the final cover system must be minimized through a design that accommodates settling and subsidence.	The final cover system will be designed to account for expected settlement and subsidence.

INVENTORY AND AREA ESTIMATES

(b)(1)(iv) – Estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit	Approx. 10 million cubic yards
(b)(1)(v) – Estimate of the largest area of the CCR unit ever requiring a final cover	Approx. 190 acres

CLOSURE SCHEDULE

(b)(1)(vi) – Schedule for completing all activities necessary to satisfy the closure criteria in this section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including major milestones ...and the estimated timeframes to complete each step or phase of CCR unit closure.	
<p>Note: At the time of this Written Closure Plan, there are no immediate plans to close the Primary Ash Pond. The Primary Ash Pond is currently actively managing CCR wastes generated during operation of the coal-fired power plant. CCR waste is also actively removed from the Primary Ash Pond for off-site beneficial use. This practice is expected to continue after the pond no longer accepts CCR solids. The milestones presented in this plan, therefore, provide an overview of major tasks associated with final closure of the Primary Ash Pond and a schedule relative to the timeframes specified in the rule. This Closure Plan will be amended with more specific information once closure activities have been initiated.</p>	
(b)(2) - Initial Written Closure Plan Placed in Permanent Record	By October 17, 2016

(e)(1)(ii) – The owner or operator must commence closure of the CCR unit no later than 30 days after the date on which the CCR unit...: Removed the known final volume of CCR from the CCR unit for the purpose of beneficial use of CCR.

Closure activities will commence 30 days after known final receipt of CCR waste and removal of the last known quantity of CCR from the Primary Ash Pond for the purpose of beneficial reuse, which for the purposes of this plan is assumed to be the year 2045. Closure activities will consist of the following components which will be implemented between 2045 and 2050:

- 1) §257.102(g) Preparation of Notice of Intent to close a CCR Unit
- 2) Agency coordination
- 3) Mobilization
- 4) Reroute plant process water pipes and dewater and stabilize CCR
- 5) Grading of CCR material to final design grades
- 6) Installation of cap system
- 7) §257.102(h) Preparation of Notification of Closure of a CCR Unit
- 8) §257.102(h)(i) Deed Notation

f(2)(ii) – ...the owner or operator must complete closure of the CCR unit: For existing and new CCR surface impoundments and any lateral expansion of a CCR surface impoundment, within five years of commencing closure activities pursuant to...paragraph (e)(2) of this section.

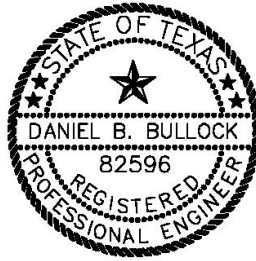
Final closure of the Primary Ash Pond will occur within 5 years of commencing closure activities.

Certification by qualified professional engineer appended to this plan.

Certification Statement 40 CFR § 257.102 (b)(4) – Written Closure Plan for a CCR Surface Impoundment or Landfill

CCR Unit: Coletto Creek Power, LP; Coletto Creek Power Station; Coletto Creek Primary Ash Pond

I, Daniel Bullock, being a Registered Professional Engineer in good standing in the State of Texas, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above referenced CCR Unit, that the information contained in the written closure plan, dated January 24, 2018, meets the requirements of 40 CFR § 257.102.



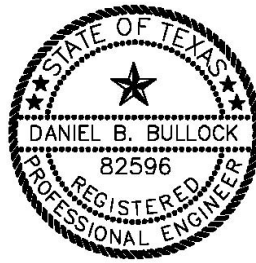
1/24/2018

Daniel Bullock, P.E. (TX 82596)
Bullock, Bennett & Associates, LLC
Firm Registrations: Engineering F-8542, Geoscience 50127

Certification Statement 40 CFR § 257.102 (d)(3)(iii) – Design of the Final Cover System for a CCR Surface Impoundment or Landfill

CCR Unit: Coletto Creek Power, LP; Coletto Creek Power Station; Coletto Creek Primary Ash Pond

I, Daniel Bullock, being a Registered Professional Engineer in good standing in the State of Texas, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above referenced CCR Unit, that the conceptual-level design of the final cover system as included in the written closure plan, dated January 24, 2018, meets the requirements of 40 CFR § 257.102.



1/24/2018

Daniel Bullock, P.E. (TX 82596)
Bullock, Bennett & Associates, LLC
Firm Registrations: Engineering F-8542, Geoscience 50127

40 C.F.R. § 257.102(B)(3): Closure Plan Addendum
Coletto Creek Existing CCR Surface Impoundment
November 30, 2020

ADDENDUM NO. 1 COLETO CREEK EXISTING CCR SURFACE IMPOUNDMENT CLOSURE PLAN

This Addendum No. 1 to the Closure Plan for Existing Coal Combustion Residuals (CCR) Impoundment for the Coletto Creek Primary Ash Pond at the Coletto Creek Power Station, Revision 1 - January 24, 2018 has been prepared to meet the requirements of Title 40 of the Code of Federal Regulations (40 C.F.R. Section 257.103(f)(2)(v)(D)) as a component of the demonstration that the Coletto Creek Primary Ash Pond qualifies for a site-specific alternative deadline to initiate closure due to permanent cessation of a coal-fired boiler by a certain date.

The Coletto Creek Primary Ash Pond will begin construction of closure by April 17, 2025 and cease receipt and placement of CCR and non-CCR wastestreams by no later than September 17, 2027 as indicated in the Coletto Creek Power Plant Alternative Closure Demonstration dated November 30, 2020. Closure will be completed by October 17, 2028 within the 5-year timeframe included in the Closure Schedule identified in the Coletto Creek Existing CCR Surface Impoundment Closure Plan in accordance with 40 C.F.R. § 257.102(f)(1)(ii).

All other aspects of the Closure Plan remain unchanged.

CERTIFICATION

I, Maureen T. Warren, a Qualified Professional Engineer in good standing in the State of Texas, certify that the information in this addendum is accurate as of the date of my signature below. The content of this report is not to be used for other than its intended purpose and meaning, or for extrapolations beyond the interpretations contained herein.



Maureen T. Warren
Qualified Professional Engineer
117550
Texas

Ramboll Americas Engineering Solutions, Inc., f/k/a O'Brien & Gere Engineers, Inc.
Date: November 30, 2020



TECHNICAL MEMORANDUM

TO: Eric Chavers – Luminant
FROM: Dan Bullock, P.E. – BBA (TX PE No. 82596)
RE: Closure Plan for Coletto Creek Primary Ash Pond – Addendum No. 2
DATE: October 6, 2023

This Addendum No. 2 to the Closure Plan for the Coletto Creek Primary Ash Pond (PAP) at the Coletto Creek Power Station has been prepared to update the following closure plan sections (updated information provided in italics) and to provide conceptual-level closure design drawings and specifications (Attachment A – Conceptual Closure Design – Primary Ash Pond). Final closure design has been initiated to meet the outlined schedules. A closure plan revision will be submitted to TCEQ once the final design is complete.

CLOSURE PLAN FOR EXISTING CCR SURFACE IMPOUNDMENT 40 CFR §257.102 (B)

SITE INFORMATION

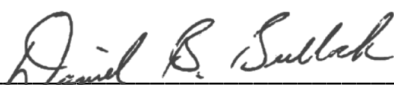
Owner Name / Address: *Coletto Creek Power, LLC / 6555 Sierra Drive, Irving, TX 75039*

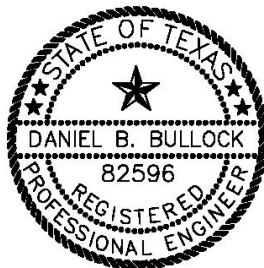
ATTACHMENT

Attachment A – Conceptual Closure Design – Primary Ash Pond, October 2023

PROFESSIONAL CERTIFICATION

This document and all attachments were prepared by Bullock, Bennett & Associates, LLC under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I hereby certify that this Addendum No. 2 to the Closure Plan for the Coletto Creek Primary Ash Pond has been prepared in accordance with the requirements of 40 C.F.R. §257.102.


Daniel B. Bullock, P.E. (TX 82596)



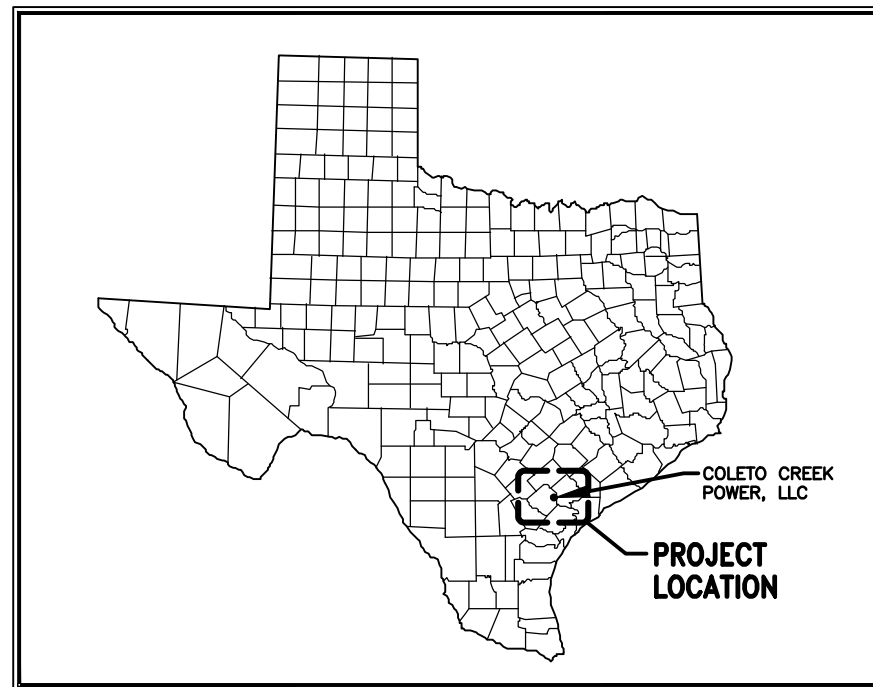
10/06/2023

Attachment A - Conceptual Closure Design, Primary Ash Pond

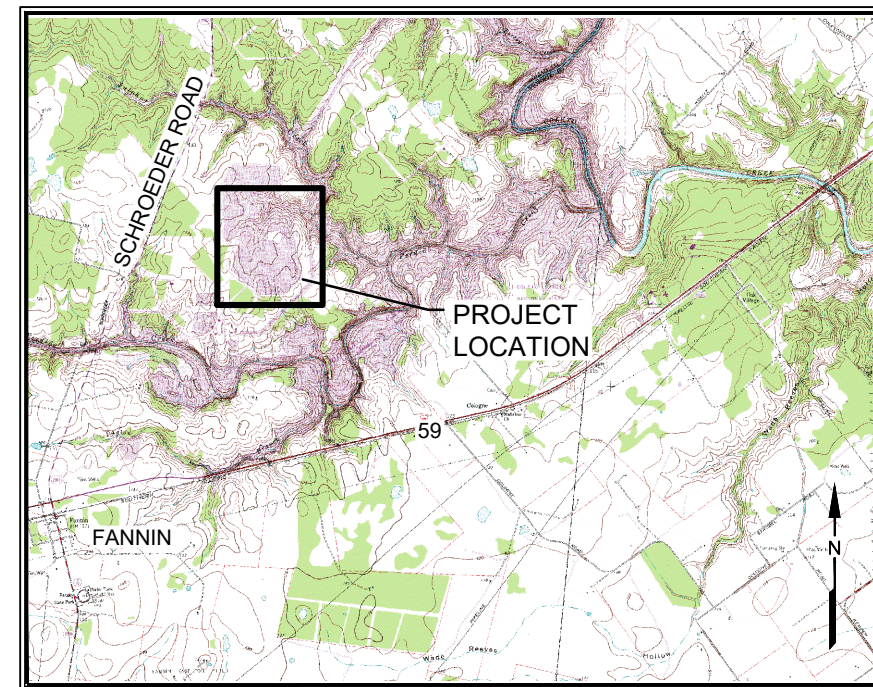
**COLETO CREEK POWER, LLC
FANNIN, TEXAS**

**CONCEPTUAL CLOSURE DESIGN - PRIMARY ASH POND
(NOT FOR CONSTRUCTION)**

OCTOBER 2023



VICINITY MAP



LOCATION MAP

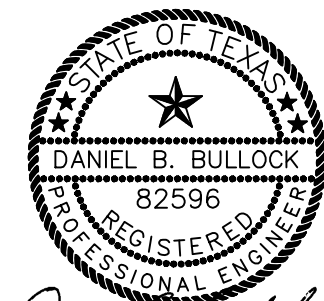
DRAWING INDEX:

- 1 COVER SHEET AND SHEET INDEX
- 2 GENERAL NOTES
- 3 EXISTING SITE CONDITIONS
- 4 CONCEPTUAL FINAL CLOSURE GRADING PLAN
- 5 CROSS SECTIONS A-A' AND B-B'
- 6 SECTIONS AND DETAILS
- 7 SWPPP DETAILS

Bullock, Bennett & Associates, LLC

ENGINEERING AND GEOSCIENCE
Texas Registration Number 8542

165 N. LAMPASAS STREET, BERTRAM, TEXAS 78605
TELEPHONE (512) 355-9198
FAX (512) 355-9197



Daniel B. Bullock
October 6, 2023

GENERAL NOTES:

1. THE COLETO CREEK PRIMARY ASH POND (PAP) WILL BEGIN CONSTRUCTION OF CLOSURE BY APRIL 17, 2025 AS INDICATED IN THE COLETO CREEK POWER PLANT ALTERNATIVE CLOSURE DEMONSTRATION DATED NOVEMBER 30, 2020. CLOSURE WILL BE COMPLETED BY OCTOBER 17, 2028, IN ACCORDANCE WITH 40 C.F.R. § 257.103(f)(2)(iv)(B).

2. THE PAP CLOSURE AND FINAL COVER SYSTEM ARE CURRENTLY BEING DESIGNED FOR FUTURE INSTALLATION. VARIOUS CONCEPTUAL LEVEL FINAL COVER SYSTEM ALTERNATIVES, COMPLIANT WITH CCR RULES FOR AN UNLINED IMPOUNDMENT, ARE BEING EVALUATED FOR USE ON THE PAP. THIS CONCEPTUAL LEVEL DESIGN SET IS PROVIDED FOR INTERIM STATUS REVIEW ONLY, AND IS NOT PREPARED FOR CONSTRUCTION PURPOSES. THE CONCEPTUAL GRADING PLAN, FINAL COVER SYSTEM DESIGN AND STORM WATER CONTROLS PRESENTED HEREIN ARE SUBJECT TO CHANGE, AND UPON COMPLETION OF THE FINAL, ENGINEERED DESIGN PACKAGE WILL BE SUBMITTED TO TCEQ FOR REVIEW AND APPROVAL PRIOR TO COMMENCING CONSTRUCTION ACTIVITIES AND IN ACCORDANCE WITH CCR RULES.

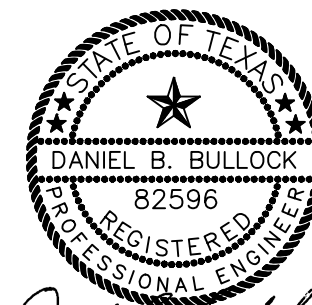
3. UPON COMPLETION OF THE FINAL ENGINEERING DESIGN FOR THE PAP CLOSURE AND FINAL COVER SYSTEM, DETAILED, ENGINEER-SEALED CONSTRUCTION PLANS AND SPECIFICATIONS WILL BE PROVIDED TO TCEQ FOR REVIEW. ALL FINAL COVER SYSTEM COMPONENTS WILL BE DESIGNED AND CONSTRUCTED IN ACCORDANCE WITH GOOD ENGINEERING PRACTICE AND INDUSTRY STANDARDS. ALL FIELD AND LABORATORY CONSTRUCTION QUALITY ASSURANCE TESTING WILL BE PERFORMED IN GENERAL ACCORDANCE WITH STANDARD PROCEDURES ESTABLISHED BY ASTM, AASHTO, TEXAS DEPARTMENT OF TRANSPORTATION, OR OTHER STANDARDS APPROVED BY ENGINEER.

4. IN GENERAL, THE NORTH PORTION OF THE PAP CONTAINS A THIN LAYER OF CCR MATERIALS. THE NORTH AREA CCR MATERIALS WILL BE EXCAVATED AND CONSOLIDATED TO THE SOUTH PORTION OF THE PAP, AND THE NORTH PORTION WILL BE CLOSED BY REMOVING THE CCR MATERIALS IN ACCORDANCE WITH STATE AND FEDERAL RULES. THE CONSOLIDATED SOUTH PORTION OF THE PAP WILL RECEIVE FINAL COVER IN ACCORDANCE WITH CCR RULES. THE LIMITS OF THE CONSOLIDATED FINAL COVER CCR AREAS INDICATED IN THIS CONCEPTUAL-LEVEL DESIGN ARE INITIAL APPROXIMATIONS AND WILL BE REVISED UPON COMPLETION OF FINAL ENGINEERING DESIGN.

5. PROPOSED PAP FINAL COVER ELEVATIONS INDICATED ON THESE DRAWINGS ARE PRELIMINARY AND MAY BE REVISED PRIOR TO FINAL DESIGN; HOWEVER, FINAL COVER SLOPES WILL GENERALLY REMAIN BETWEEN APPROXIMATELY 3 TO 5%. IF STEEPER AREAS ARE INCLUDED, ADEQUATE EROSION PROTECTION WILL BE INCORPORATED.

6. A COMBINATION OF EROSION CONTROL BLANKETS, SILT FENCE, HAY-BALE DIKES AND ROCK FILTER DAMS AS APPROPRIATE, WILL BE INSTALLED IN DISTURBED AREAS WHERE THERE IS POTENTIAL FOR STORMWATER RUNOFF.

7. STORMWATER CONTROL BERMS AND LET-DOWN STRUCTURES WILL BE USED AS APPROPRIATE TO ROUTE STORMWATER RUNOFF IN A MANNER PROTECTIVE OF THE PAP FINAL COVER SYSTEM.



Daniel B. Bullock
October 6, 2023

Coletto Creek Power, LLC
Conceptual Closure Design

SHEET 2

GENERAL NOTES

PROJECT: 23643-07 BY: RCAD-RR DATE: OCT 2023 CHECKED: DBB

Bullock, Bennett & Associates, LLC
Engineering and Geoscience

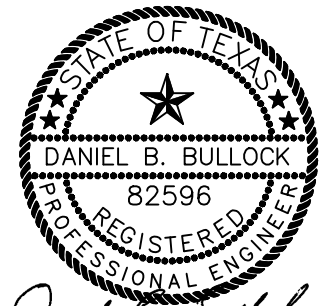
Texas Registrations: Engineering F-8542, Geoscience 50127



NOTE:

AERIAL IMAGE PROVIDED BY PLEX-EARTH USING GOOGLE EARTH. IMAGE TAKEN JANUARY 2023.

EXISTING DISCHARGE STRUCTURE TO BE REMOVED AND PROPERLY DISPOSED.



Daniel B. Bullock
October 6, 2023

Coletto Creek Power, LLC
Conceptual Closure Design

SHEET 3

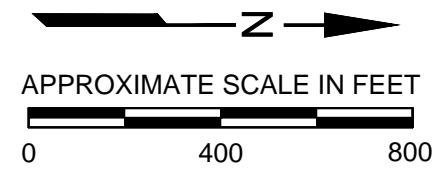
**EXISTING SITE
CONDITIONS**

PROJECT: 23643-07 BY: RCAD-RR DATE: OCT 2023 CHECKED: DBB

Bullock, Bennett & Associates, LLC

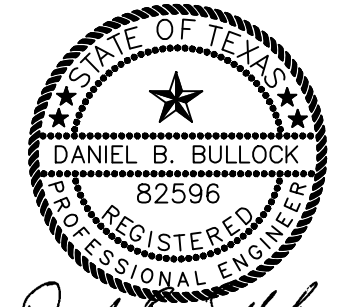
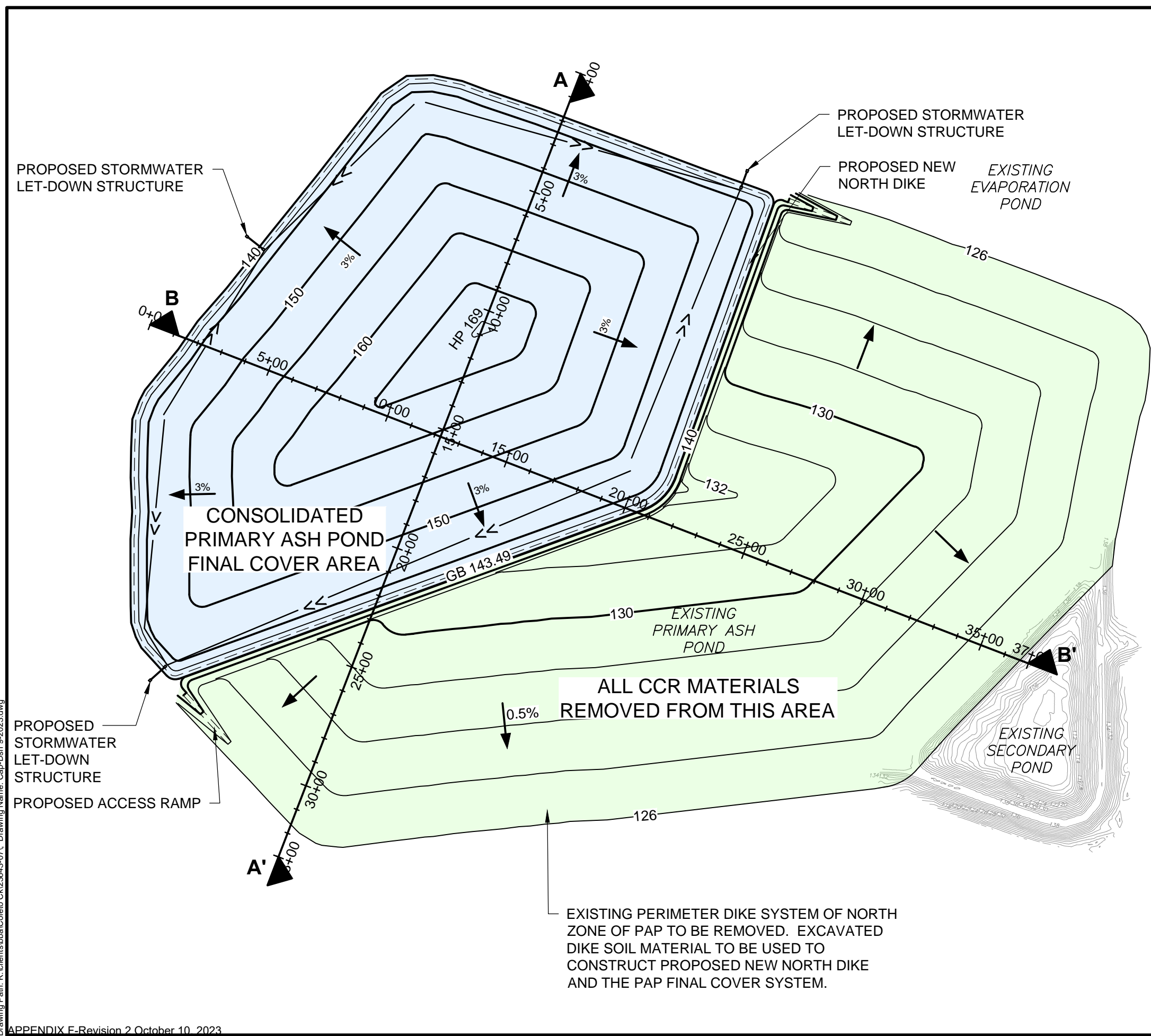
Engineering and Geoscience

Texas Registrations: Engineering F-8542, Geoscience 50127



SOURCE:
 ON-GROUND TOPOGRAPHIC AND BATHYMETRIC SURVEY PROVIDED BY T. BAKER SMITH (3854 FM 1069, ARANSAS PASS, TX. 78336, 361-334-5719) ON AUGUST 2021. HORIZONTAL DATUM: NAD83, TEXAS CENTRAL SOUTH ZONE, US FEET. VERTICAL DATUM: NAVD88, GRID UNITS, US SURVEY FEET.

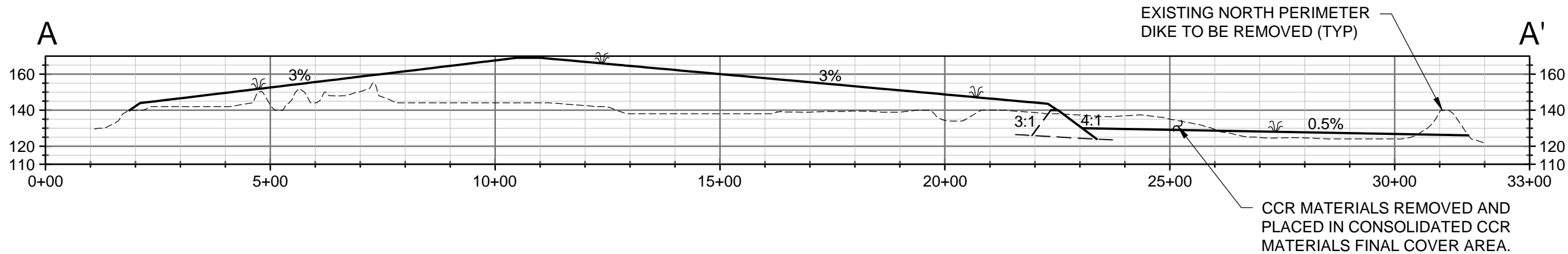
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 - EXISTING CONTOURS (FT. MSL) C.I. = 5 Feet
 - PROPOSED CONTOURS (FT. MSL) C.I. = 1 Foot
 - PROPOSED CONTOURS (FT. MSL) C.I. = 5 Feet
 - PROPOSED STORMWATER COLLECTOR BERM
 - DIRECTION OF FLOW



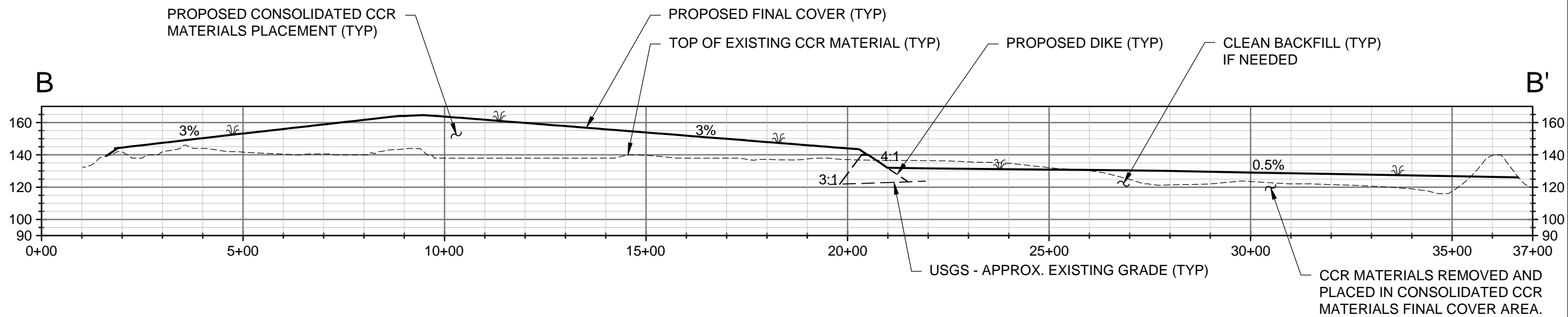
Daniel B. Bullock
 October 6, 2023

Coletto Creek Power, LLC			
Conceptual Closure Design			
SHEET 4			
CONCEPTUAL FINAL CLOSURE GRADING PLAN			
PROJECT: 23643-07	BY: RCAD-RR	DATE: OCT 2023	CHECKED: DBB
Bullock, Bennett & Associates, LLC			
Engineering and Geoscience Texas Registrations: Engineering F-8542, Geoscience 50127			

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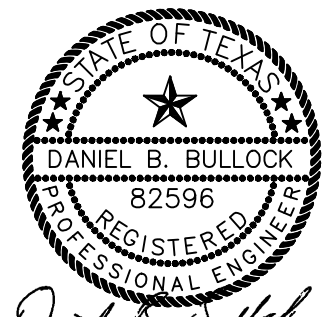
CROSS SECTION A-A'



CROSS SECTION B-B'

NOTE:

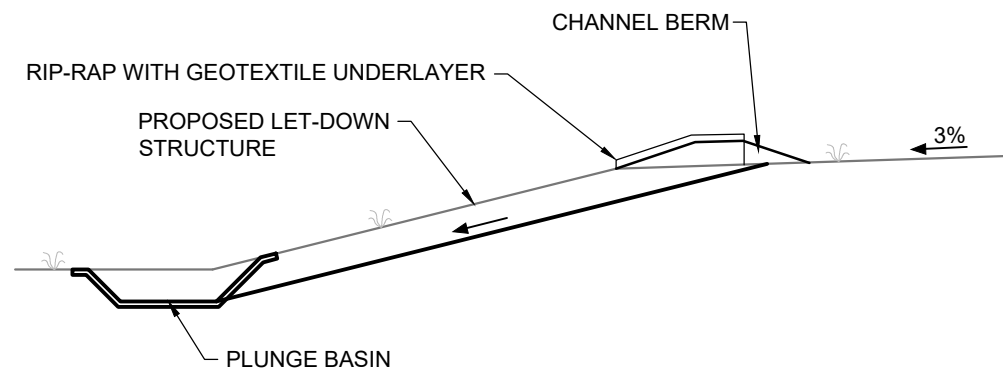
ALL LIMITS OF CCR MATERIALS INDICATED AND ALL GRADES INDICATED ARE CONCEPTUAL AND WILL BE ADJUSTED AS APPROPRIATE UPON EVALUATION OF SITE CONDITIONS AND PREPARATION OF FINAL ENGINEERING DESIGN DRAWINGS.



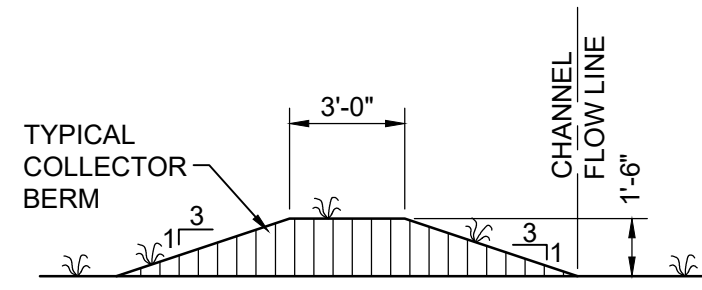
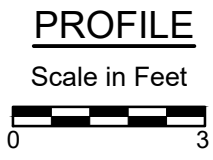
Daniel B. Bullock
October 6, 2023

Coletto Creek Power, LLC Conceptual Closure Design			
SHEET 5			
CROSS SECTIONS A-A' & B-B'			
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Bullock, Bennett & Associates, LLC Engineering and Geoscience Texas Registrations: Engineering F-8542, Geoscience 50127			

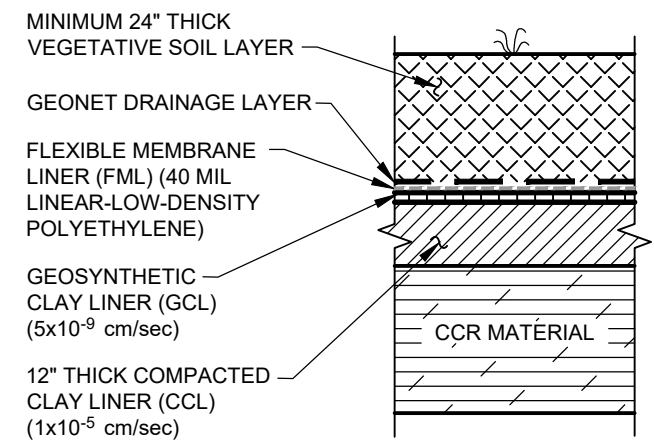
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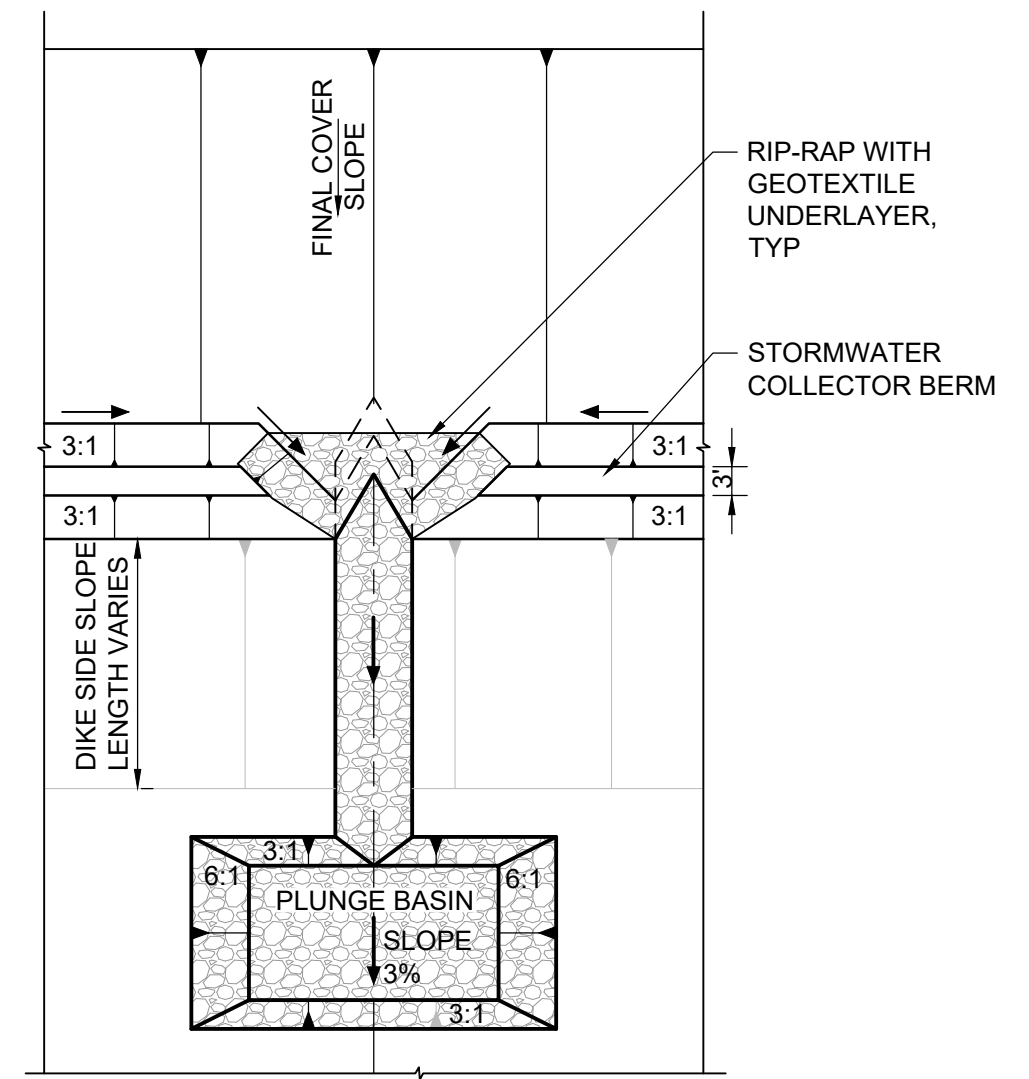
LET-DOWN STRUCTURE



COLLECTOR CHANNEL BERM

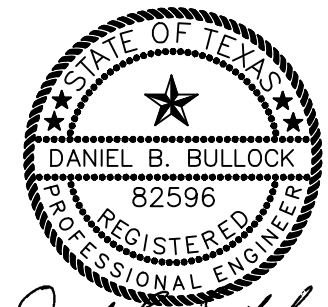
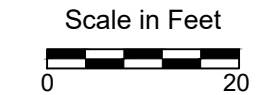


TYPICAL FINAL COVER SECTION
(VARIOUS COVER ALTERNATIVES ARE BEING EVALUATED)



* COLLECTOR BERMS TO BE ORIENTED AS-NEEDED TO DIVERT STORMWATER TO LET-DOWN STRUCTURE.

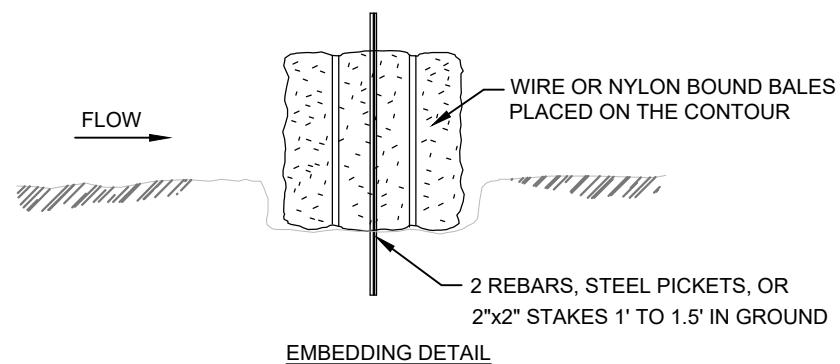
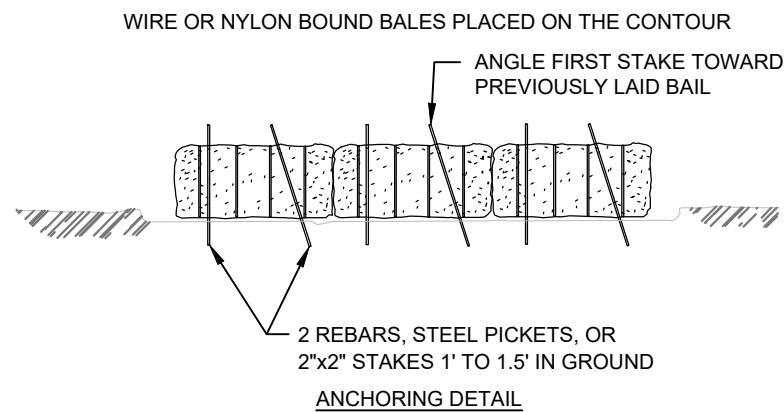
BI-DIRECTIONAL LET-DOWN STRUCTURE PLAN



Daniel B. Bullock
October 6, 2023

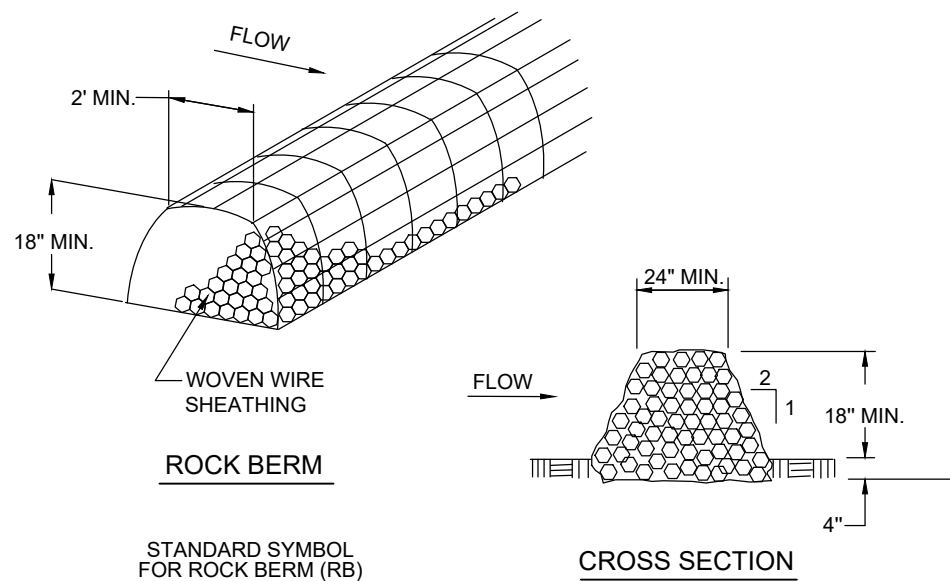
Coletto Creek Power, LLC Conceptual Closure Design			
SHEET 6			
SECTIONS AND DETAILS			
PROJECT: 23643-07	BY: RCAD-RR	DATE: OCT. 2023	CHECKED: DBB
Bullock, Bennett & Associates, LLC Engineering and Geoscience Texas Registrations: Engineering F-8542, Geoscience 50127			

Plot Date: 10/06/23 - 8:44am, Plotted by: Admin
Drawing Path: K:\clients\bba\Coletto CK\23643-07\ Drawing Name: C-LG-DT104.dwg
APPENDIX E-Revision 2 October 10, 2023

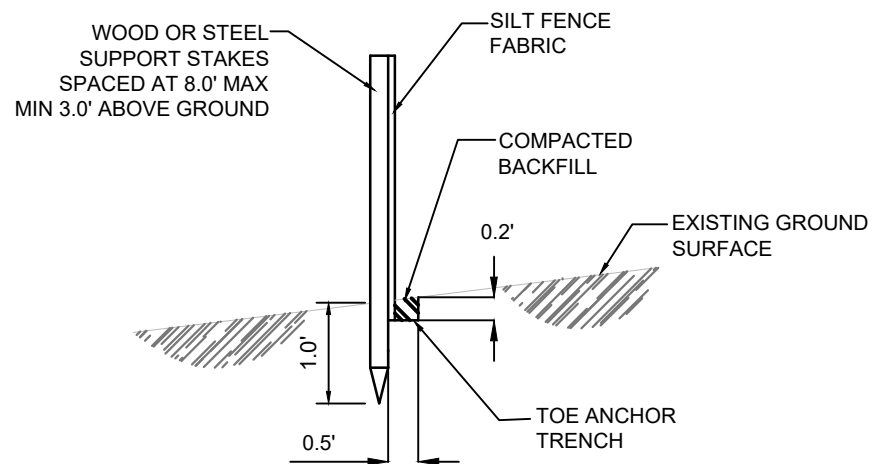


NOTE:
EACH BALE SHALL BE EMBEDDED IN THE SOIL A MINIMUM OF 0.2 FEET. BALES SHALL BE SECURELY ANCHORED IN PLACE BY 3/8 INCH REBAR STAKES DRIVEN THROUGH THE BALES. THE FIRST STAKE IN EACH BALE SHALL BE ANGLED TOWARD PREVIOUSLY LAID BALE TO FORCE BALES TOGETHER.

HAY BALE DIKE
NOT TO SCALE



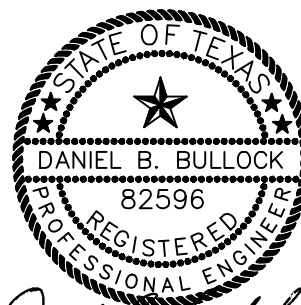
ROCK BERM
NOT TO SCALE



NOTE:
SILT FENCE SHALL BE INSTALLED AT A LEVEL GRADE TO THE EXTENT POSSIBLE. BOTH ENDS AT EACH FENCE SECTION MUST EXTEND AT LEAST 10.0' UPSLOPE AT AN ANGLE OF 45° TO THE MAIN FENCE ALIGNMENT. SILT FENCE SHALL BE INSTALLED IN ACCORDANCE WITH SECTION 02135 - SEDIMENTATION AND EROSION CONTROL.

SILT FENCE
NOT TO SCALE

Plot Date: 10/06/23 - 8:45am, Plotted by: Admin
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Daniel B. Bullock
October 6, 2023

Coletto Creek Power, LLC
Conceptual Closure Design

SHEET 7

SWPPP DETAILS

PROJECT: 23643-07 BY: RCAD-RR DATE: OCT 2023 CHECKED: DBB

Bullock, Bennett & Associates, LLC
Engineering and Geoscience

Texas Registrations: Engineering F-8542, Geoscience 50127



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

January 11, 2022

OFFICE OF
LAND AND EMERGENCY
MANAGEMENT

Ms. Cynthia Vodopivec
Coletto Creek Power, LLC
Coletto Creek Power Plant
Environmental Services
6555 Sierra Dr.
Irving, TX 75039

Dear Ms. Vodopivec:

On November 30, 2020, the Environmental Protection Agency (EPA) received a demonstration for the Coletto Creek Power Plant requesting authorization to continue using the Primary Ash Pond until July 17, 2027, and completing closure no later than October 17, 2028, pursuant to the alternative closure provision 40 C.F.R. § 257.103(f)(2). EPA reviewed your demonstration to determine whether it included the required information, analyses and documentation specified under 40 C.F.R. § 257.103(f)(2), and we have determined that your demonstration is complete.

This letter merely communicates EPA's determination that your submitted demonstration contains sufficient information for EPA to evaluate the merits of your demonstration. EPA has not made any decision on whether to approve your request. The demonstration will undergo further review to make such a determination. After this review, EPA will publish its proposed decision for public comment in a docket on www.regulations.gov. After consideration of the comments, EPA will issue its final decision on the demonstration.

As a consequence of your submission of a complete demonstration, the deadline for the Coal Combustion Residuals unit covered by the demonstration to cease receipt of waste is tolled until EPA issues a final decision on the demonstration. 40 C.F.R. § 257.103(f)(3)(ii).

EPA will notify you when a proposed decision on the demonstration is issued. If you have any questions, please contact Kirsten Hillyer at Hillyer.Kirsten@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry N. Breen".

Barry N. Breen
Acting Assistant Administrator

SITE INFORMATION

Site Name / Address	Coletto Creek Power Station, 45 FM 2987 Fannin, Goliad County, TX		
Owner Name / Address	Coletto Creek Power, LP 1500 Eastport Plaza Drive Collinsville, IL 62234		
CCR Unit	Primary Ash Pond	Final Cover Type	Soil/Synthetic Liner System
Reason for Initiating Closure	Known final receipt of waste/Final removal of beneficial reuse materials	Closure Method	Close In-Place

CONTACT INFORMATION (d)(1)(ii)

Contact Name	CCR Office, Coletto Creek Power, LP		
Address	601 Travis Street, Suite 1400, Houston, TX 77002		
Phone Number	800-633-4704	Email	ccr@dynegy.com

POST-CLOSURE PLAN DESCRIPTION

(d)(1)(i) Description of the monitoring and maintenance activities required in paragraph (b) of this section for the CCR unit, and the frequency at which these activities will be performed;	(b)(1) Maintaining the integrity and effectiveness of the final cover system, including making repairs to the final cover as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover; (3) Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of §§ 257.90 through 257.98. Descriptions of maintenance activities and frequencies are provided below.
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(d)(1)(iii) A description of the planned uses of the property during the post-closure period.	The property will continue to be operated as a coal-fired power plant. If operation of the power plant is discontinued, post-closure use of the property shall not disturb the integrity of the final cover, liner(s), or any other component of the containment system, or the function of the monitoring systems unless necessary to comply with the requirements in this subpart. Any other disturbance will only be allowed if the owner or operator of the CCR unit demonstrates that disturbance of the final cover, liner, or other component of the containment system, including any removal of CCR, will not increase the potential threat to human health or the environment. The demonstration will be certified by a qualified professional engineer, and notification shall be provided to the Texas Commission on Environmental Quality (TCEQ) that the demonstration has been placed in the operating record and on the owners or operator's publicly accessible Internet site. Following closure of the Primary Ash Pond, a notation on the deed to the property, or some other instrument that is normally examined during title search, will be recorded in accordance with 40 CFR 257.102(i). The notation will notify potential purchasers of the property that the land has been used as a CCR unit and its use is restricted under the post-closure care requirements per 40 CFR 257.104(d)(1)(iii). Within 30 days of recording the deed notation, a notification stating that the notation has been recorded will be placed in the facility's operating record. The notification will be placed on the owner or operator's publicly accessible CCR Web site in accordance with 40 CFR 257.107.
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Post Closure Care Requirements §257.104(b)

(b)(1) Maintaining the integrity and effectiveness of the final cover system, including making repairs to the final cover as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover;	In accordance with TCEQ guidelines, cover and drainage system inspections will be conducted semi-annually and after severe storms to check the condition of the facilities. The following items will be checked: Erosion of closure cover, deterioration of vegetative cover, damage to erosion control facilities, settlement, and drainage from operation of the seepage collection system. A description of the condition of the facility will be recorded in a logbook during each inspection. Any deterioration will be documented by photographs. In addition, settlement will be evaluated by topographic survey the first 5 years after closure. All records will be maintained in the facility's Permanent Record.
(b)(3) Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of §§ 257.90 through 257.98.	Groundwater monitoring is conducted in accordance with the requirements of §257.90 through §257.98 as detailed in the certified Coletto Creek Power Station Groundwater Sampling and Analysis Plan (October 17, 2017) and Groundwater Hydrogeologic Monitoring Plan (October 17, 2017).

NOTIFICATION AND RECORDKEEPING REQUIREMENTS

257.105(i) <i>Closure and post-closure care.</i> The owner or operator of a CCR unit subject to this subpart must place the information, as it becomes available, in the facility's operating record:	The following post-closure care information will be placed in the facility's operating record as it becomes available: <ul style="list-style-type: none"> The written post-closure plan, and any amendment of the plan, as required by § 257.104(d), except that only the most recent closure plan must be maintained in the facility's operating record irrespective of the time requirement specified in paragraph (b) of this section. The notification of completion of post-closure care period as required by § 257.104(e).
§257.106(i) <i>Closure and post-closure care.</i> The owner or operator of a CCR unit subject to this subpart must notify the State Director and/or appropriate Tribal authority when information has been placed in the operating record and on the owner or operator's publicly accessible Internet site.	TCEQ will be notified when information has been placed in the facility's operating record. Notification will be submitted as follows: <ul style="list-style-type: none"> Notification of the availability of the written post-closure plan, and any amendment of the plan, specified under § 257.105(i)(12). Notification of completion of post-closure care specified under §257.105(i)(13).
257.107(i) <i>Closure and post-closure care.</i> The owner or operator of a CCR unit subject to this subpart must place the information on the owner or operator's CCR Web site:	The following information will be placed in the facility's Web site: <ul style="list-style-type: none"> The written post-closure plan, and any amendment of the plan, specified under § 257.105(i)(12). The notification of completion of post-closure care specified under § 257.105(i)(13).

POST-CLOSURE SCHEDULE

(c) <i>Post-closure care period.</i> (1) Except as provided by paragraph (c)(2) of this section, the owner or operator of the CCR unit must conduct post-closure care for 30 years. (2) If at the end of the post-closure care period the owner or operator of the CCR unit is operating under assessment monitoring in accordance with § 257.95, the owner or operator must continue to conduct post-closure care until the owner or operator returns to detection monitoring in accordance with § 257.95.	
Note: At the time of this Written Post-Closure Plan, there are no immediate plans to close the Primary Ash Pond. The Primary Ash Pond is currently actively managing CCR wastes generated during operation of the coal-fired power plant. CCR waste is also actively removed from the Primary Ash Pond for off-site beneficial use. This practice is expected to continue after the pond no longer accepts CCR solids. The information presented in this plan, therefore, provides an overview of major tasks associated with final post-closure monitoring of the Primary Ash Pond and a schedule relative to the timeframes specified in the rule. This Post-Closure Plan will be amended with more specific information once closure activities have been initiated.	
(d)(2)(i) - Initial Written Post-Closure Plan Placed in Permanent Record	October 17, 2016

((e) Notification of completion of post-closure care period. No later than 60 days following the completion of the post-closure care period, the owner or operator of the CCR unit must prepare a notification verifying that post-closure care has been completed. The notification must include the certification by a qualified professional engineer verifying that post-closure care has been completed in accordance with the closure plan specified in paragraph (d) of this section and the requirements of this section. The owner or operator has completed the notification when it has been placed in the facility's operating record as required by § 257.105(i)(13).

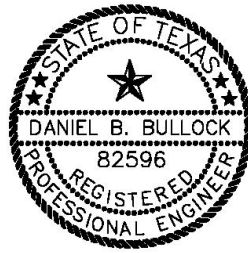
Notification of the completion of post-closure care activities will be placed in the facility's Permanent Record no later than 60 days following the completion of the post-closure care period.

Certification by qualified professional engineer appended to this plan.

Certification Statement 40 CFR § 257.104(d) – Written Post-Closure Plan for a CCR Surface Impoundment or Landfill

CCR Unit: Coletto Creek Power, LP; Coletto Creek Power Station; Coletto Creek Primary Ash Pond

I, Daniel Bullock, being a Registered Professional Engineer in good standing in the State of Texas, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above referenced CCR Unit, that the information contained in the written post-closure plan, dated January 24, 2018, meets the requirements of 40 CFR § 257.104.



1/24/2018

Daniel Bullock, P.E. (TX 82596)
Bullock, Bennett & Associates, LLC
Firm Registrations: Engineering F-8542, Geoscience 50127

TECHNICAL MEMORANDUM

TO: Eric Chavers – Luminant
FROM: Dan Bullock, P.E. – BBA (TX PE No. 82596)
RE: Post-Closure Plan for Coletto Creek Primary Ash Pond – Addendum No. 1
DATE: October 6, 2023

This Addendum No. 1 to the Post-Closure Plan for the Coletto Creek Primary Ash Pond (PAP) at the Coletto Creek Power Station has been prepared to update the following post-closure plan sections (updated information provided in italics):

POST-CLOSURE PLAN FOR EXISTING CCR SURFACE IMPOUNDMENT §257.104(D)

SITE INFORMATION

Owner Name / Address: *Coletto Creek Power, LLC / 6555 Sierra Drive, Irving, TX 75039*

CONTACT INFORMATION

Contact Name: *Renee Collins*
Address: *6555 Sierra Drive, Irving, TX 75039*
Phone Number: *(214) 875-8382; 6555*
Email: renee.collins@luminant.com

POST-CLOSURE SCHEDULE

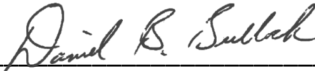
- (c) Post-closure care period. (1) Except as provided by paragraph (c)(2) of this section, the owner or operator of the CCR unit must conduct post-closure care for 30 years.
(2) If at the end of the post-closure care period the owner or operator of the CCR unit is operating under assessment monitoring in accordance with § 257.95, the owner or operator must continue to conduct post-closure care until the owner or operator returns to detection monitoring in accordance with § 257.95.

Note: The Primary Ash Pond is currently actively managing CCR wastes generated during operation of the coal-fired power plant. CCR waste is also actively removed from the Primary Ash Pond for off-site beneficial use. This practice is expected to continue after the pond no longer accepts CCR solids. The PAP will begin construction of closure by April 17, 2025, as indicated in the Coletto Creek Power Plant Alternative Closure Demonstration dated November 30, 2020.

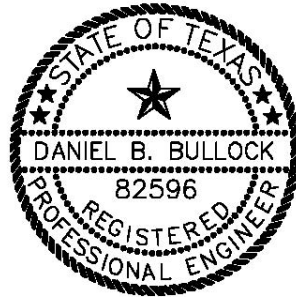
Closure will be completed by October 17, 2028, in accordance with 40 C.F.R. § 257.103(f)(2)(iv)(B). Upon completion of closure, post-closure will begin and will continue for 30 years. If at the end of the post-closure care period the owner or operator of the CCR unit is operating under assessment monitoring in accordance with § 257.95, the owner or operator must continue to conduct post-closure care until the owner or operator returns to detection monitoring in accordance with § 257.95.

PROFESSIONAL CERTIFICATION

This document was prepared by Bullock, Bennett & Associates, LLC under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I hereby certify that this Addendum No. 1 to the Post-Closure Plan for the Coletto Creek Primary Ash Pond has been prepared in accordance with the requirements of 40 C.F.R. §257.104.



Daniel B. Bullock, P.E. (TX 82596)



10/06/2023