2019 Annual Groundwater Monitoring and Corrective Action Report

Martin Lake Steam Electric Station Ash Pond Area - Rusk County, Texas

Prepared for:

Luminant Generation Company LLC

Submitted by:

Golder Associates Inc.

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January 31, 2020

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ACRONYMS AND ABBREVIATIONS

CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
GWPS	Groundwater Protection Standard
MCL	Maximum Concentration Level
mg/L	Milligrams per Liter
MLSES	Martin Lake Steam Electric Station
NA	Not Applicable
SSI	Statistically Significant Increase
SSL	Statistically Significant Levels
USEPA	United States Environmental Protection Agency

1.0 INTRODUCTION

Golder Associates, Inc. (Golder) has prepared this report on behalf of Luminant Generation Company LLC (Luminant) to satisfy annual groundwater monitoring and corrective action reporting requirements of the Coal Combustion Residuals (CCR) Rule for the Ash Pond Area at the Martin Lake Steam Electric Station (MLSES) in Rusk County, Texas. The CCR units and CCR monitoring well network are shown on Figure 1.

The CCR Rule (40 CFR 257 Subpart D - *Standards for the Receipt of Coal Combustion Residuals in Landfills and Surface Impoundments*) has been promulgated by the United States Environmental Protection Agency (USEPA) to regulate the management and disposal of CCRs as solid waste under Resource Conservation and Recovery Act (RCRA) Subtitle D. For existing CCR landfills and surface impoundments, the CCR Rule requires that the owner or operator prepare an annual groundwater monitoring and corrective action report to document the status of the groundwater monitoring and corrective action program for the CCR unit for the previous calendar year. Per 40 CFR 257.90(e) of the CCR Rule, the report should contain the following information, to the extent available:

(1) A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit;

(2) Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;

(3) In addition to all the monitoring data obtained under §§ 257.90 through 257.98, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs;

(4) A narrative discussion of any transition between monitoring programs (*e.g.,* the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels); and

(5) Other information required to be included in the annual report as specified in §§ 257.90 through 257.98.

2.0 MONITORING AND CORRECTIVE ACTION PROGRAM STATUS

Golder collected the initial Detection Monitoring Program groundwater samples from the Ash Pond Area CCR monitoring well network in September 2017. The evaluation of those data was completed in 2018 using procedures described in the Statistical Analysis Plan (PBW, 2017) to identify statistically significant increases (SSIs) of Appendix III parameters over background concentrations. The Detection Monitoring Program sampling dates and parameters are summarized in the following table:

Detection Monitoring Program Summary

Sampling Dates	Parameters	SSIs	Assessment Monitoring Program Established
September 21, 2017	Appendix III	Yes	July 16, 2018

Alternate source evaluations were inconclusive for one or more of the SSIs. Consequently, an Assessment Monitoring Program was initiated and established for the Ash Pond Area CCR units in 2018 in accordance with 40 CFR § 257.94(e)(2).

Assessment Monitoring groundwater samples were collected from the CCR groundwater monitoring network in 2018 and 2019, as required by the CCR Rule. Golder collected the initial Assessment Monitoring Program groundwater samples in June 2018. Subsequent Assessment Monitoring Program sampling events have been conducted on a semi-annual basis, as required by the CCR Rule. All CCR groundwater monitoring wells were sampled for Appendix III and Appendix IV constituents during the first semi-annual sampling events of each year. During the second semi-annual sampling events, the CCR wells were sampled for all Appendix III parameters and for the Appendix IV parameters that were detected during the first semi-annual sampling events in accordance with 40 CFR § 257.95(d)(1).

The statistical background values and Groundwater Protection Standards (GWPSs) are summarized in Tables 1 and 2, respectively. Appendix III and Appendix IV analytical data are summarized in Tables 3 and 4, respectively. Using the Appendix IV data collected during the assessment period through September 2018, SSLs above GWPSs were identified in January 2019 for beryllium, cobalt, and lithium. Notification of these SSLs was placed in the operating record on February 6, 2019 and was subsequently placed on the public website in accordance with 40 CFR § 257.107(d). An Assessment of Corrective Measures (ACM) was initiated on April 8, 2019 pursuant to §257.95(g). A justification letter for a 60-day extension due to site-specific circumstances that delayed work on the ACM was certified on July 3, 2019 in accordance with 40 CFR §257.96(a). A copy of the extension justification letter is provided in Attachment 1. The ACM was completed in September 2019 (Golder 2019) for the parameters detected at SSLs above GWPSs, pursuant to 40 CFR § 257.96.

Additional semi-annual Assessment Monitoring events were conducted in May 2019 and September 2019. Statistical analysis of the 2019 data was performed in accordance with the Statistical Analysis Plan for CCR Groundwater Monitoring (PBW 2017) and the USEPA Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities-Unified Guidance (USEPA 2009). The statistical analysis included an evaluation of confidence intervals for each of the Appendix IV parameter data sets to evaluate whether constituent concentrations were present at concentrations above GWPSs. SSLs above GWPSs were identified for beryllium and cobalt based on Appendix IV data collected through May 2019 and September 2019. Notification of the beryllium and cobalt SSLs based on Appendix IV data collected through May 2019 was placed in the operating record on October 7, 2019 and was subsequently placed on the public website in accordance with 40 CFR § 257.107(d). Notification of the beryllium and cobalt SSLs based on Appendix IV data collected through September 2019 is due in the operating record in February 2020.

The Assessment Monitoring Program sampling dates and parameters are summarized in the following table:

Assessment Monitoring Program Summary

Sampling Dates	Analytical Data Receipt Date	Parameters Collected	SSL(s)	SSL(s) Determination Date	Corrective Measures Assessment Initiated
June 12-13, 2018	July 27, 2018	Appendix III Appendix IV	NA	NA	NA
September 7, 2018	October 8, 2018	Appendix III Appendix IV[1]	Be, Co, Li	January 7, 2019	April 8, 2019
May 14, 2019	June 14, 2019	Appendix III Appendix IV	Be and Co	September 5, 2019	NA
September 10, 2019	October 11, 2019	Appendix III Appendix IV[1]	Be and Co	January 8, 2020	NA

Notes:

NA: Not Applicable

1. Groundwater sample analysis was limited to Appendix IV parameters detected in previous events in accordance with 40 CFR § 257.95(d)(1).

3.0 KEY ACTIONS COMPLETED IN 2019

Assessment Monitoring Program groundwater monitoring events were completed in May and September 2019. The number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and the analytical results for the groundwater samples are summarized in Table 3 (Appendix III parameters) and Table 4 (Appendix IV parameters). A map showing the CCR units and monitoring wells is provided as Figure 1.

As noted in Section 2.0, an ACM for the Appendix IV parameters identified at SSLs above GWPSs in 2018 (beryllium, cobalt, and lithium) was completed in September 2019. A public meeting was held on November 13, 2019 at the Henderson Chamber of Commerce to discuss the results of the of the ACM in accordance with 40 C.F.R. § 257.96(e).

No CCR wells were installed or decommissioned in 2019.

4.0 PROBLEMS ENCOUNTERED AND ACTIONS TO RESOLVE THE PROBLEMS

No problems were encountered with the CCR groundwater monitoring program in 2019.

5.0 KEY ACTIVITIES PLANNED FOR 2020

The following key activities are planned for 2020:

- Continue the Assessment Monitoring Program in accordance with 40 CFR § 257.95.

- Complete statistical evaluation of Appendix IV analytical data from the downgradient wells and compare results to GWPSs to determine whether an SSL has occurred.

- If an SSL is identified, notification will be prepared as required under 40 CFR § 257.95(g) and will placed in the operating record per 40 CFR § 257.105(h)(8), and will be subsequently placed on the public website per 40 CFR § 257.107(d). Potential alternate sources (i.e., a source other than the CCR unit caused the SSL or that the SSL resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality) will be evaluated. If an alternate source is identified to be the cause of the SSL, a written demonstration will be completed within 90 days of SSL detection and included in the Annual Groundwater Monitoring and Corrective Action Report.

- If an alternate source is not identified to be the cause of the SSL, the applicable requirements of 40 CFR §§ 257.94 through 257.98 (e.g., assessment of corrective measures) as may apply in will be met, including associated recordkeeping/notifications required by 40 CFR §§ 257.105 through 257.108.

- Luminant intends to select the remedy for parameters detected at SSLs above GWPSs from the potential corrective measure alternatives proposed in the ACM (Golder 2019). The remedy will be selected in accordance with 40 CFR §257.97 as soon as feasible after the public meeting required under 40 CFR §257.96(e).

6.0 REFERENCES

Golder, 2019. CCR Assessment of Corrective Measures, Martin Lake Steam Electric Station – Ash Pond Area, Rusk County, Texas. September.

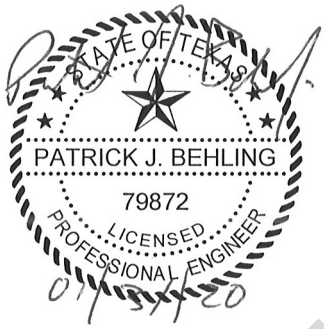
Pastor, Behling & Wheeler, LLC (PBW), 2017. Coal Combustion Residual Rule Statistical Analysis Plan, Martin Lake Steam Electric Station, Ash Ponds, Rusk County, Texas.

USEPA, 2009. Unified Guidance Document: Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, EPA 530-R-09-007, March 2009.

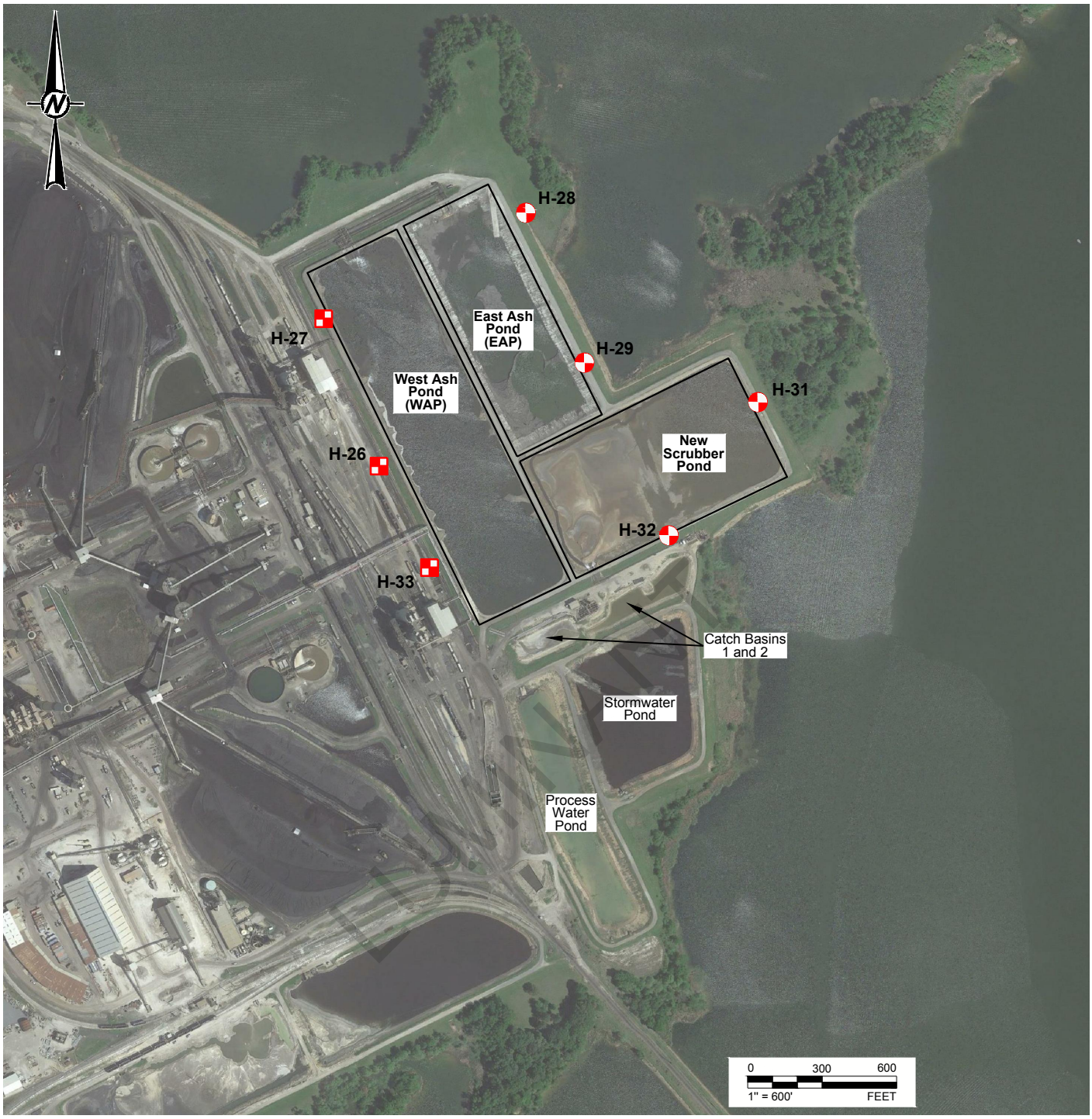
Signature Page

Golder Associates Inc.

Pat Behling
Principal Engineer



FIGURES



LEGEND

- DOWNGRADIENT CCR MONITORING WELL
- UPGRADIENT CCR MONITORING WELL

REFERENCE(S)

BASE MAP TAKEN FROM GOOGLE EARTH, IMAGERY DATED 4/6/17.

CLIENT
LUMINANT

PROJECT
MARTIN LAKE STEAM ELECTRIC STATION
TATUM, TEXAS

TITLE
DETAILED SITE PLAN - ASH POND AREA

CONSULTANT
GOLDER

YYYY-MM-DD	2020-01-23
DESIGNED	AJD
PREPARED	AJD
REVIEWED	WFV
APPROVED	WFV

PROJECT NO.	REV.	FIGURE
19122262	0	1

TABLES

Table 1
Background Statistical Values
MLSES Ash Pond Area

Parameter	Statistical Background Value
Boron (mg/L)	0.602
Calcium (mg/L)	57.2
Chloride (mg/L)	153
Fluoride (mg/L)	0.4
field pH (s.u.)	4.63 7.6
Sulfate (mg/L)	365
Total Dissolved Solids (mg/L)	1,110

Table 2
Appendix IV Analytical Results
MLSES Ash Pond Area

Parameter	Groundwater Protection Standard
Antimony (mg/L)	0.006
Arsenic (mg/L)	0.01
Barium (mg/L)	2
Beryllium (mg/L)	0.004
Cadmium (mg/L)	0.005
Chromium (mg/L)	0.1
Cobalt (mg/L)	0.0564
Fluoride (mg/L)	4
Lead (mg/L)	0.015
Lithium (mg/L)	0.177
Mercury (mg/L)	0.002
Molybdenum (mg/L)	0.1
Selenium (mg/L)	0.05
Thallium (mg/L)	0.002
Radium 226+228 (pCi/L)	5

TABLE 3
APPENDIX III ANALYTICAL RESULTS
MLSES ASH POND AREA

Sample Location	Date Sampled	B (mg/L)	Ca (mg/L)	Cl (mg/L)	Fl (mg/L)	pH (s.u.)	SO_4 (mg/L)	TDS (mg/L)
Upgradient Wells								
H-26	10/21/15	0.602	24.2	69.2	<0.1	5.82	154	466
	12/14/15	0.0679	9.88	40.3	<0.1	5.91	75.8	280
	02/23/16	0.206	11.7	17.1	0.151 J	6.84	54	219
	04/05/16	0.289	11.8	27.8	0.199 J	5.89	56.8	213
	06/07/16	0.441	11.7	48.6	<0.1	5.98	72.2	278
	08/09/16	0.569	14	70	<0.1	4.63	90.9	354
	10/18/16	0.439	13.6	49.1	0.127 J	6.63	69.7	263
	12/11/16	0.537	11.9	57.6	0.161 J	6.73	68.8	236
	09/21/17	0.579	13.1	67.8	<0.100	6.88	69.6	288
	06/13/18	0.512	17	66.1	<0.100	6.74	67	313
	09/07/18	0.606	11.3	65.1	<0.100	6.85	60.7	265
	05/14/19	0.0507	85.2	61.7	0.140 J	6.83	88.2	453
	09/10/19	0.505	12	72.1	<0.1	6.75	69.4	265
H-27	10/21/15	0.58	55.3	117	<0.1	6.24	328	800
	12/14/15	0.474	57.2	112	0.156 J	6.32	317	857
	02/23/16	0.523	53.8	113	0.101 J	5.82	344	811
	04/05/16	0.48	52.7	115	0.124 J	6.04	360	819
	06/07/16	0.319	10.6	40.5	<0.1	6.32	55	207
	08/09/16	0.462	54.3	124	<0.1	4.35	365	854
	10/18/16	0.477	56.5	114	0.144 J	6.87	336	868
	12/11/16	0.427	52.8	119	0.161 J	6.78	355	805
	09/21/17	0.48	61.1	122	<0.100	6.87	378	852
	06/13/18	0.404	57	110	0.208 J	6.52	372	850
	09/07/18	0.347	6.96	58.3	0.14 J	6.72	188	716
	05/14/19	0.35	61.8	132	0.159 J	6.78	406	897
	09/10/19	0.368	57.7	117	<0.1	6.77	365	841
H-33	10/20/15	0.0462	17.9	60.5	<0.1	5.78	120	415
	12/14/15	0.0596	10.7	59.6	0.136 J	5.73	110	403
	02/23/16	0.0656	11.2	56.1	0.125 J	6.92	111	625
	04/05/16	0.0659	14.9	58.3	0.14 J	6.31	113	589
	06/07/16	0.0571	20.1	67.5	<0.1	6.04	121	515
	08/09/16	0.0431	11.2	64.9	<0.1	5.13	120	442
	10/18/16	0.0539	11.1	59.2	<0.1	6.86	114	398
	12/11/16	0.0594	12.1	63.2	0.132 J	6.85	112	395
	09/21/17	0.0452	13.7	67.9	<0.100	7.02	107	412
	06/13/18	0.114	24	65.5	0.105 J	6.72	93.8	447
	09/07/18	0.112	22.4	66.2	0.135 J	6.73	96.8	489
	05/14/19	0.0592	68.6	80.4	0.166 J	6.81	104	559
	09/10/19	0.0631	44.1	86.1	<0.1	6.75	119	495
Downgradient Wells								
H-28	10/21/15	9.25	113	109	<0.1	5.92	1,010	1,830
	12/14/15	1.02	17.3	15.5	<0.1	6.02	113	299
	02/23/16	10.2	123	97.4	<0.1	4.45	1,070	1,910
	04/05/16	10.3	120	94.4	<0.1	5.97	1,080	1,890
	06/07/16	3.66	45.4	62.2	<0.1	6.16	465	817
	08/09/16	9.29	116	98.4	<0.1	3.83	1,080	2,100
	10/18/16	4.96	67.3	91.4	0.165 J	6.82	643	1,460
	12/11/16	3.94	45.7	56.7	0.114 J	6.64	445	766
	09/21/17	6.06	74.1	88.5	<0.100	6.77	702	1,220
	06/13/18	6.97	92.1	96.5	0.126 J	6.59	826	1,490
	09/07/18	4.54	60.5	93.4	<0.100	6.84	679	1,330
	05/14/19	8.51	99.7	98.9	<0.100	6.32	935	1,680
	09/10/19	5.69	68.9	95.9	<0.100	6.89	716	1,390

TABLE 3
APPENDIX III ANALYTICAL RESULTS
MLSES ASH POND AREA

Sample Location	Date Sampled	B (mg/L)	Ca (mg/L)	Cl (mg/L)	Fl (mg/L)	pH (s.u.)	SO_4 (mg/L)	TDS (mg/L)
H-29	10/21/15	0.0788	16	65.2	<0.1	5.78	171	441
	12/14/15	0.29	165	8.68	0.56	5.92	178	990
	02/23/16	0.268	59.4	14.6	0.239 J	11.20	156	334
	04/05/16	0.361	80.8	14.2	0.363 J	6.04	181	489
	06/07/16	0.311	29.8	19.3	0.27 J	6.13	166	308
	08/09/16	0.172	64.6	53.1	<0.1	5.97	124	575
	10/18/16	0.953	150	4.33	1.15	6.63	346	607
	12/11/16	1.02	130	4.65	1.4	6.59	365	651
	09/21/17	1.4	147	42	0.304	6.78	170	782
	06/13/18	5.89	81.1	84.1	0.123 J	6.75	713	1,240
	09/07/18	3.21	46.7	78.6	<0.100	6.77	544	1,030
	05/14/19	8.12	95.9	81.8	0.104 J	6.52	780	1,400
	09/10/19	8.05	97.1	90.5	<0.1	6.62	930	1,600
H-31	10/20/15	17.2	194	179	0.889	6.57	1,930	3,270
	12/14/15	20.4	236	147	0.692	6.60	1,740	2,250
	02/23/16	22.3	252	199	0.921	5.33	2,510	4,180
	04/05/16	21.1	250	186	1.36	6.46	2,450	3,920
	06/07/16	22.2	244	241	0.783	6.42	2,720	4,570
	08/09/16	24.1	251	217	0.216 J	4.38	2,730	4,440
	10/18/16	20	236	187	0.298 J	6.82	1,960	3,690
	12/11/16	22.3	246	201	0.892	6.82	2,640	4,170
	09/21/17	23.8	260	227	0.308 J	6.87	2,870	4,570
	06/12/18	16.6	246	205	0.646	6.61	2,390	4,100
	09/07/18	0.838	12.2	17.7	<0.275	6.77	136	457
	05/14/19	20	234	225	0.96	6.42	2,470	4,230
	09/10/18	19.7	234	232	2.1	6.78	2,640	4,220
H-32	10/20/15	1.22	42.2	120	0.374 J	6.18	309	797
	12/14/15	1.39	37.4	122	0.619	6.29	325	860
	02/23/16	1.48	45.3	123	0.701	4.82	323	842
	04/05/16	1.65	44.3	125	1.05	6.17	337	831
	06/07/16	1.82	45.6	137	0.858	6.05	350	829
	08/09/16	1.69	45.4	132	0.68	3.64	342	839
	10/18/16	1.72	50.5	121	0.904	6.75	319	888
	12/11/16	2.5 J	44.3	120	1.00	6.83	341	759
	09/21/17	2.07 J	52.8	129	0.519	6.82	337	807
	06/12/18	1.82 J	52.6	126	1.02	6.75	339	793
	09/07/18	0.292 J	10.9	17.8	0.551	6.79	53.8	283
	05/14/19	2.08	45.2	135	1.15	6.02	320	910
	09/10/19	1.87	45.9	127	0.923	6.68	365	810

Notes:
1. Abbreviations: mg/L - milligrams per liter; TDS - total dissolved solids; s.u. - standard units.
2. J - concentration is below method quantitation limit; result is an estimate.

TABLE 4
APPENDIX IV ANALYTICAL DATA
MLSES ASH POND AREA

Sample Location	Date Sampled	Sb (mg/L)	As (mg/L)	Ba (mg/L)	Be (mg/L)	Cd (mg/L)	Cr (mg/L)	Co (mg/L)	Fl (mg/L)	Pb (mg/L)	Li (mg/L)	Hg (mg/L)	Mo (mg/L)	Se (mg/L)	Tl (mg/L)	Ra 226 (pCi/L)	Ra 228 (pCi/L)	Ra 226/228 Comb.^ (pCi/L)
Upgradient Wells																		
H-26	10/21/15	<0.0008	0.0036 J	0.0785	0.000349 J	<0.0003	<0.002	0.0385	<0.1	<0.0003	0.0139	<0.00008	<0.002	<0.002	<0.0005	0.919	<1.64	2.56
	12/14/15	<0.0008	<0.002	0.0401	0.000458 J	<0.0003	<0.002	0.0244	<0.1	<0.0003	0.0769	<0.00008	<0.002	<0.002	<0.0005	0.619	<1.95	2.57
	02/23/16	<0.0008	<0.002	0.0423	<0.0003	<0.0003	0.0077	0.00813	0.151 J	0.000315 J	0.0124	<0.00008	0.00248 J	0.0022 J	<0.0005	0.37	<2.06	2.43
	04/05/16	<0.0008	<0.002	0.0408	<0.0003	<0.0003	0.00798	0.0125	0.199 J	<0.0003	0.0121	<0.00008	<0.002	<0.002	<0.0005	<0.243	<1.06	<1.303
	06/07/16	<0.0008	<0.002	0.0467	0.000721 J	<0.0003	<0.002	0.0217	<0.1	<0.0003	0.0132	<0.00008	<0.002	<0.002	<0.0005	0.245	1.67	1.92
	08/09/16	<0.0008	0.0029 J	0.0431	0.00136	<0.0003	<0.002	0.0352	<0.1	<0.0003	0.0155	<0.00008	<0.002	<0.002	<0.0005	<0.2	<0.932	<1.132
	10/18/16	<0.0008	<0.002	0.0497	0.000709 J	<0.0003	<0.002	0.0214	0.127 J	<0.0003	0.0136	<0.00008	<0.002	0.0027 J	<0.0005	0.243	<0.622	0.87
	12/11/16	<0.0008	<0.002	0.0468	0.00146	<0.0003	0.0031 J	0.0275	0.161 J	0.000358 J	0.014	<0.00008	<0.002	<0.002	<0.0005	0.248	1.82	2.07
	06/13/18	<0.0008	<0.002	0.0659	0.0016	<0.0003	0.00213 J	0.0261	<0.100	<0.0003	0.032	<0.00008	<0.002	<0.002	<0.0005	<0.297	3.72	4.017
	09/07/18	NA	<0.002	0.0470	0.00155	<0.0003	0.00319 J	0.0247	<0.100	<0.0003	0.0489	NA	NA	<0.002	NA	<0.473	<0.665	<1.138
	05/14/19	<0.0008	0.0041 J	0.1900	0.00147	<0.0003	0.0406	0.0795	0.140 J	0.000972 J	0.147	<0.00008	<0.002	0.0022 J	<0.0005	1.43	0.598	2.028
	9/10/2019	NA	<0.002	0.046	0.00165	<0.0003	<0.002	0.0237	<0.1	0.000313 J	0.0141	NA	NA	0.0109	NA	0.115	2.74	2.85
H-27	10/21/15	<0.0008	<0.002	0.0378	<0.0003	<0.0003	<0.002	0.0043 J	<0.1	<0.0003	0.0607	<0.00008	<0.002	<0.002	<0.0005	<0.553	<1.67	<2.223
	12/14/15	<0.0008	0.0021 J	0.039	<0.0003	<0.0003	<0.002	0.00326 J	0.156 J	0.000339 J	0.0624	<0.00008	<0.002	<0.002	<0.0005	0.468	<1.68	2.15
	02/23/16	<0.0008	<0.002	0.0266	<0.0003	<0.0003	<0.002	<0.003	0.101 J	<0.0003	0.0601	<0.00008	<0.002	<0.002	<0.0005	0.921	<1.62	2.54
	04/05/16	<0.0008	<0.002	0.0245	<0.0003	<0.0003	<0.002	<0.003	0.124 J	<0.0003	0.0573	<0.00008	<0.002	<0.002	<0.0005	0.269	<2.05	2.32
	06/07/16	<0.0008	<0.002	0.0342	0.000609 J	<0.0003	<0.002	0.016	<0.1	<0.0003	0.0107	<0.00008	<0.002	<0.002	<0.0005	0.269	<0.658	0.927
	08/09/16	<0.0008	<0.002	0.0241	<0.0003	<0.0003	<0.002	<0.003	<0.1	<0.0003	0.0616	<0.00008	<0.002	<0.002	<0.0005	0.408	<0.632	1.04
	10/18/16	<0.0008	<0.002	0.0248	<0.0003	<0.0003	<0.002	<0.003	0.144J	<0.0003	0.0576	<0.00008	<0.002	<0.002	<0.0005	<0.178	1.07	1.25
	12/11/16	<0.0008	<0.002	0.0236	<0.0003	<0.0003	<0.002	<0.003	0.161 J	<0.0003	0.0606	<0.00008	<0.002	<0.002	<0.0005	0.143	1.54	1.68
	06/13/18	<0.0008	<0.002	0.0237	<0.0003	<0.0003	0.00964	<0.003	0.208 J	<0.0003	0.108	<0.00008	<0.002	<0.002	<0.0005	0.267	<1.4	1.667
	09/07/18	NA	<0.002	0.0196	<0.0003	<0.0003	0.0453	<0.003	0.140 J	<0.0003	0.306	NA	NA	0.00773	NA	<0.285	1.43	1.715
	05/14/19	<0.0008	<0.002	0.0208	<0.0003	<0.0003	<0.002	<0.003	0.159 J	<0.0003	0.0678	<0.00008	<0.002	<0.002	<0.0005	1.10	0.928	2.028
	9/10/2019	NA	<0.002	0.384	<0.0003	<0.0003	0.00668	<0.003	<0.1	<0.0003	0.103	NA	NA	0.0027 J	NA	0.185	3.57	3.76
H-33	10/20/15	<0.0008	0.0021 J	0.0586	0.000351 J	<0.0003	<0.002	0.0274	<0.1	<0.0003	0.0814	<0.00008	<0.002	<0.002	<0.0005	1.76	1.64	3.40
	12/14/15	<0.0008	0.00205 J	0.0473	0.000382 J	<0.0003	<0.002	0.0293	0.136 J	<0.0003	0.0903	<0.00008	<0.002	<0.002	<0.0005	1.94	<1.79	3.73
	02/23/16	<0.0008	<0.002	0.0529	0.000311 J	<0.0003	0.0194	0.0163	0.125 J	<0.0003	0.182	<0.00008	<0.002	<0.002	<0.0005	0.906	<2.32	3.23
	04/05/16	<0.0008	<0.002	0.0576	0.000302 J	<0.0003	0.0171	0.016	0.14 J	<0.0003	0.16	<0.00008	<0.002	<0.002	<0.0005	0.328	1.08	1.41
	06/07/16	<0.0008	<0.002	0.0774	0.000604 J	<0.0003	0.0153	0.0196	<0.1	<0.0003	0.163	<0.00008	<0.002	<0.002	<0.0005	0.276	0.897	1.17
	08/09/16	<0.0008	<0.002	0.0424	0.000519 J	<0.0003	0.0029 J	0.0284	<0.1	<0.0003	0.102	<0.00008	<0.002	<0.002	<0.0005	<0.149	0.649	0.80
	10/18/16	<0.0008	0.0035 J	0.0464	0.000617 J	<0.0003	0.0309	0.0644	<0.1	0.000329 J	0.118	<0.00008	<0.002	<0.002	<0.0005	0.096	<0.517	0.61
	12/11/16	<0.0008	0.0022 J	0.0537	0.000865 J	<0.0003	0.0368	0.0408	0.132 J	0.000495 J	0.115	<0.00008	<0.002	<0.002	<0.0005	0.159	1.29	1.45
	06/13/18	<0.0008	0.00283 J	0.0741	0.0004 J	<0.0003	0.0182	0.0266	0.105 J	0.0009 J	0.183	<0.00008	<0.002	<0.002	<0.0005	0.795	<0.712	1.507
	09/07/18	NA	0.00239 J	0.0757	0.0003 J	<0.0003	0.0105	0.0288	0.135 J	<0.0003	0.160	NA	NA	<0.002	NA	0.334	<0.645	0.979
	05/14/19	<0.0008	0.00355 J	0.158	0.00114	<0.0003	0.0342	0.0648	0.166 J	0.000772 J	0.161	<0.00008	<0.002	<0.002	<0.0005	0.850	1.35	2.200
	9/10/2019	NA	<0.002	0.111	0.000518 J	<0.0003	0.00637	0.0347	0.01	<0.0003	0.142	NA	NA	<0.002	NA	0.6	2.97	3.57
Downgradient Wells																		
H-28	10/21/15	<0.0008	0.0028 J	0.0396	0.00148	0.00121	<0.002	0.188	<0.1	0.000491 J	0.154	<0.00008	<0.002	0.00682	<0.0005	<0.558	<1.65	<2.208
	12/14/15	<0.0008	<0.002	0.0224	<0.0003	0.000572 J	<0.002	0.0225	<0.1	<0.0003	0.021	<0.00008	<0.002	<0.002	<0.0005	0.707	<1.18	1.89
	02/23/16	<0.0008	0.00225 J	0.0202	0.00133	0.00151	<0.002	0.201	<0.1	0.00053 J	0.159	<0.00008	<0.002	0.00222 J	<0.0005	<0.396	2.24	2.64
	04/05/16	<0.0008	<0.002	0.0173	0.0011	0.00252	<0.002	0.199	<0.1	0.00087 J	0.15	<0.00008	<0.002	0.00237 J	<0.0005	<0.231	1.76	1.99
	06/07/16	<0.0008	<0.002	0.0468	0.000934 J	0.000664 J	<0.002	0.0944	<0.1	<0.0003	0.0959	<0.00008	<0.002	<0.002	<0.0005	0.310	1.48	1.79
	08/09/16	<0.0008	<0.002	0.0155	0.00275	0.0016	<0.002	0.195	<0.1	0.000774 J	0.155	<0.00008	<0.002	0.0029 J	<0.0005	<0.451	1.41	1.86
	10/18/16	<0.0008	0.00284J	0.0174	0.00685	0.000744 J	<0.002	0.169	0.165J	0.00108	0.155	<0.00008	<0.002	0.0027 J	<0.0005	<0.228	0.645	0.87
	12/11/16	<0.0008	<0.002	0.0471	0.000698 J	0.000668 J	<0.002	0.0924	0.114 J	<0.0003	0.0869	<0.00008	<0.002	<0.002	<0.0005	<0.149	1.13	1.28
	06/13/18	<0.0008	<0.002	0.0186	0.00393	0.0038	<0.002	0.169	0.126 J	0.000448 J	0.18	<0.00008	<0.002	<0.002	<0.0005	0.327	<1.56	1.887
	09/07/18	NA	<0.002	0.0192	0.00704	0.00115	<0.002	0.162	<0.100	0.00118 J	0.203	NA	NA	0.00281 J	NA	<0.243	0.845	1.088
	05/14/19	<0.0008	<0.002	0.0141	0.00281	0.00212	<0.002	0.187	<0.100	0.000595 J	0.172	<0.00008	<0.002	0.00619	<0.0005	0.444	0.615	1.059
	9/10/2019	NA	<0.002	0.145	0.0058	0.000951	<0.002	0.146	<0.1	0.00132	0.169	NA	NA	0.00461	NA	0.205	4.26	4.47
H-29	10/21/15	<0.0008	<0.002	0.159	0.000359 J	<0.0003	<0.002	0.0301	<0.1	<0.0003	0.0156	<0.00008	<0.002	<0.002	<0.0005	0.464	1.82	2.28
	12/14/15	<0.0008	<0.002	0.277	<0.0003	<0.0003	0.062	<0.003	0.56	0.000542 J	0.0202	<0.00008	0.00819	0.0282	<0.0005	<0.53	<1.25	<1.78
	02/23/16	<0.0008	0.00203 J	0.151	<0.0003	<0.0003	0.019	<0.003	0.239 J	<0.0003	0.0135	<0.00008	0.00603	0.0148	<0.0005	<0.374	<2.22	<2.594
	04/05/16	<0.0008	<0.002	0.167	<0.0003	<0.0003	0.042	<0.003	0.363 J	<0.0003	0.0175	<0.00008	0.00697	0.0232	<0.0005	<0.228	<0.897	<1.125
	06/07/16	<0.0008	<0.002	0.136	<0.0003	<0.0003	0.0274	<0.003	0.27 J	<0.0003	0.0188	<0.00008	0.00551	0.0152	<0.0005	0.173	<0.834	1.01
	08/09/16	<0.0008	0.00995	0.315	<0.0003	<0.0003	0.003 J	0.0047 J	<0.1	<0.0003	0.0143	<0.00008	<0.002	<0.002	<0.0005	0.261	<0.578	0.84
	10/18/16	<0.0008	<0.002	0.118	<0.0003	<0.0003	0.0041 J	<0.003	1.15	0.000427J	0.0056 J	<0.00008	0.0031 J	0.0681	<0.0005	0.155	<0.439	0.59
	12/11/16	<0.0008	<0.002	0.0779	<0.0003	<0.0003	<0.002	<0.003	1.4	<0.0003	<0.005	<0.00008	0.0031 J	0.0642	<0.0005	<0.113	<0.599	<0.712
	06/13/18	<0.0008	<0.002	0.0157	0.00345	0.00318	<0.002	0.153	0.123 J	0.000779 J	0.153	<0.00008	<0.002	<0.002	<0.0005	<0.274	<1.62	<1.894
	09/07/18	NA	<0.002	0.0374	0.00513	0.000938	<0.002	0.119	<0.100	0.00172	0.145	NA	NA	0.00374 J	NA	<0.371	<0.71	<1.081
	5/14/2019	<0.0008	<0.002	0.0138	0.00341	0.00219	<0.002	0.183	0.104 J	0.000543 J	0.173	<0.00008	<0.002	0.00616	<0.0005	<0.339	<0.707	<1.046
	9/10/2019	NA	<0.002	0.0135	0.00233	0.00127	<0.002	0.164	<0.1	0.000916 J	0.157	NA	NA	0.004 J	NA	0.364	4.99	5.35

TABLE 4
APPENDIX IV ANALYTICAL DATA
MLSES ASH POND AREA

Sample Location	Date Sampled	Sb (mg/L)	As (mg/L)	Ba (mg/L)	Be (mg/L)	Cd (mg/L)	Cr (mg/L)	Co (mg/L)	Fl (mg/L)	Pb (mg/L)	Li (mg/L)	Hg (mg/L)	Mo (mg/L)	Se (mg/L)	Tl (mg/L)	Ra 226 (pCi/L)	Ra 228 (pCi/L)	Ra 226/228 Comb.^ (pCi/L)
H-31	10/20/15	<0.0008	0.0168	0.0732	0.0126	0.0032	0.00687	0.434	0.889	<0.0003	0.137	<0.00008	<0.002	0.116	<0.0005	0.943	<1.88	2.82
	12/14/15	<0.0008	0.00513	0.0388	0.00702	<0.0003	0.00456 J	0.0651	0.692	<0.0003	0.149	<0.00008	<0.002	0.0231	<0.0005	1.61	<1.29	2.90
	02/23/16	<0.0008	0.00436 J	0.0243	0.0101	<0.0003	<0.002	0.0594	0.921	<0.0003	0.146	<0.00008	<0.002	0.0209	<0.0005	<0.419	<1.64	<2.059
	04/05/16	<0.0008	0.00514	0.0241	0.00925	<0.0003	0.00435 J	0.0685	1.36	<0.0003	0.146	<0.00008	<0.002	0.0226	<0.0005	<0.334	<0.897	<1.231
	06/07/16	<0.0008	0.0038 J	0.0242	0.00789	<0.0003	<0.002	0.0406	0.783	<0.0003	0.157	<0.00008	<0.002	0.0307	<0.0005	0.257	<0.555	0.81
	08/09/16	<0.0008	0.00886	0.0191	0.00734	<0.0003	<0.002	0.286	0.216 J	<0.0003	0.17	<0.00008	<0.002	0.0202	<0.0005	1.31	0.900	2.21
	10/18/16	<0.0008	0.0035 J	0.0215	0.00167 J	<0.0003	<0.002	0.0304 J	0.298 J	<0.0003	0.165	<0.00008	<0.002	0.0057 J	<0.0005	0.169	1.18	1.35
	12/11/16	<0.0008	0.0088 J	0.0189	0.0197	<0.0003	0.0039 J	0.23 J	0.892	<0.0003	0.198	<0.00008	<0.002	0.0365	<0.0005	0.195	<0.754	0.95
	06/12/18	<0.0008	0.00532	0.0194	0.00545	<0.0003	0.003 J	0.236	0.646	<0.0003	0.214	<0.00008	<0.002	0.00475 J	<0.0005	<0.26	<0.597	<0.857
	09/07/18	NA	<0.002	0.0287	<0.0003	<0.0003	<0.002	0.00353 J	0.275 J	<0.0003	0.0187	NA	NA	0.00424 J	NA	<0.261	<0.567	<0.828
	05/14/19	<0.0008	0.00675	0.0163	0.00928	<0.0003	0.0032 J	0.389	0.96	<0.0003	0.219	<0.0004	<0.002	0.0261	<0.0005	2.62	<0.789	3.409
	9/10/2019	NA	0.00845	0.0158	0.0312	<0.0003	0.0031 J	0.41	2.1	<0.0003	0.225	NA	NA	0.0642	NA	0.247	2.92	3.17
H-32	10/20/15	<0.0008	0.0028 J	0.16	0.00266	<0.0003	<0.002	0.163	0.374 J	<0.0003	0.0788	<0.00008	<0.002	0.003 J	<0.0005	1.05	<1.90	2.95
	12/14/15	<0.0008	0.0123	0.0384	0.00313	<0.0003	<0.002	0.155	0.619	<0.0003	0.0733	<0.00008	<0.002	<0.002	<0.0005	0.712	<2.21	2.92
	02/23/16	<0.0008	0.00712	0.0277	0.00452	<0.0003	<0.002	0.188	0.701	0.000326 J	0.0821	<0.00008	<0.002	<0.002	<0.0005	1.12	1.60	2.72
	04/05/16	<0.0008	0.00648	0.0237	0.00527	0.00128	<0.002	0.208	1.05	0.00182	0.0818	<0.00008	<0.002	<0.002	<0.0005	<0.364	<1.15	<1.514
	06/07/16	<0.0008	0.0045 J	0.0238	0.00583	0.000997 J	<0.002	0.207	0.858	0.00168	0.087	<0.00008	<0.002	0.003 J	<0.0005	<0.165	0.613	0.778
	08/09/16	<0.0008	0.0034 J	0.0234	0.00548	0.000713 J	<0.002	0.19	0.68	0.00115	0.0774	<0.00008	<0.002	0.0028 J	<0.0005	2.56	<0.446	3.01
	10/18/16	<0.0008	0.0029 J	0.02	0.00567	0.00254	<0.002	0.204	0.904	0.00332	0.0834	<0.00008	<0.002	0.0027 J	<0.0005	<0.139	0.683	0.82
	12/11/16	<0.0008	0.0025 J	0.0205	0.00609	0.00108	<0.002	0.208	1	0.00137	0.0838	<0.00008	<0.002	0.0024 J	<0.0005	<0.163	<0.753	<0.916
	06/12/18	<0.0008	<0.002	0.0175	0.00681	0.000586 J	<0.002	0.215	1.02	0.000701 J	0.0957	<0.00008	<0.002	<0.002	<0.0005	<0.275	0.917	1.192
	09/07/18	NA	<0.002	0.0404	<0.0003	<0.0003	<0.002	0.00347 J	0.551	<0.0003	0.0195	NA	NA	0.0157	NA	0.343	1.25	1.593
	05/14/19	<0.0008	0.002 J	0.0162	0.00713	0.000366 J	<0.002	0.202	1.15	0.000574 J	0.0978	<0.00008	<0.002	0.00675	<0.0005	0.303	<0.546	<0.849
	9/10/2019	NA	<0.002	0.016	0.00678	0.000467 J	<0.002	0.185	0.923	0.00056 J	0.0935	NA	NA	0.0049 J	NA	0.0404	4.74	4.78

Notes:
1. Abbreviations: mg/L - milligrams per liter; pCi/L - picocuries per liter.
2. ^ - Sum of Ra 226 and Ra 228 concentrations. Non-detect isotope results were assigned a value equal to the minimum detectable concentration.
3. J - concentration is below method quantitation limit; result is an estimate.
4. NA = Not analyzed.

ATTACHMENT 1

JUSTIFICATION FOR EXTENSION TO COMPLETE ASSESSMENT OF CORRECTIVE MEASURES

July 3, 2019 Project No. 19122434

Kim Mireles
Sr. Director, Environmental Services
Luminant
200 West John Carpenter Freeway
Irving, TX 75039

RE: JUSTIFICATION FOR EXTENSION TO COMPLETE ASSESSMENT OF CORRECTIVE MEASURES UNDER 40 C.F.R. § 257.96
ASH POND AREA – MARTIN LAKE STEAM ELECTRIC STATION
RUSK COUNTY, TEXAS

Dear Ms. Mireles,

Golder Associates, Inc. (Golder) is providing Luminant with this letter certifying that, based on our knowledge of the status of the groundwater monitoring and assessment of corrective measure activities at the Ash Pond Area coal combustion residual (CCR) units at the Martin Lake Electric Station, a 60-day extension to complete the assessment of corrective measures is justified and valid.

Golder understands the assessment of corrective measures was initiated on April 8, 2019, following identification of a groundwater protection standard exceedance under 40 C.F.R. § 257.95. Activities for the assessment of corrective measures are ongoing, and due to Site-specific circumstances, the assessment of corrective measures cannot be completed within 90-days. Accordingly, 60 additional days are warranted based on the following site-specific circumstances:

- Abnormally wet weather has limited the access for heavy drilling equipment. The site has received approximately 25 inches of rainfall during the second quarter of 2019, which is >12 inches above average for the same period historically;
- A 41-day delay in mobilization to perform required fieldwork due to limited driller availability; and
- An extended laboratory analytical schedule due to monitored natural attenuation parameter analyses (e.g., standard extraction procedure (SEP) analyses) taking 28 days or more to complete.

As used herein, the word “certification” or “certifying” shall mean an expression of the Engineer’s professional opinion to the best of his or her information, knowledge, and belief, and does not constitute a warranty or guarantee by the Engineer.

Golder Associates Inc.
2201 Double Creek Dr, Suite 4004, Round Rock, Texas, USA 78664 T: +1 512 671-3434 F: +1 512 671-3446

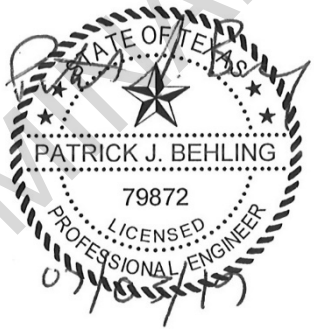
PROFESSIONAL CERTIFICATION

I hereby certify that a 60-day extension to the 90-day completion timeframe for the assessment of corrective measures is justified and valid pursuant to 40 CFR § 257.96(a).

Patrick J. Behling, P.E.

Principal Engineer

GOLDER ASSOCIATES INC.



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