



Cynthia Vodopivec
Luminant Generation Company LLC
Luminant
6555 Sierra Dr.
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February 25, 2022

Ms. Kirsten Hillyer, Environmental Engineer
Environmental Protection Agency
Office of Resource Conservation & Recovery
Materials Recovery & Waste Management Division
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Martin Lake Steam Electric Station Alternative Closure Demonstration – Response to EPA Request for Additional Information

Dear Ms. Hillyer:

Luminant Generation Company LLC (Luminant) hereby submits additional information associated with the alternative closure demonstration submitted for the Martin Lake Steam Electric Station near Tatum, Texas, as requested by EPA via email on February 14, 2022. Below are responses to the four requested items.

1. *A narrative explaining the progress made and current activities and phase/step at the facility to achieve alternative capacity.*

As detailed in the alternative closure demonstration submitted to EPA on November 25, 2020, Luminant requested a site-specific cease placement deadline for the Ash Pond Area of June 29, 2022. The Ash Pond Area at Martin Lake consists of three ponds (East Ash Pond, West Ash Pond, and New Scrubber Pond). In addition, a site-specific cease placement deadline of July 1, 2023, was requested for Permanent Disposal Pond 5 (PDP5) to allow for the retrofit of PDP5 if necessary, after an EPA decision on the alternative liner application and demonstration submitted by Luminant under the Part B rule on November 25, 2020, and November 30, 2021, respectively.

As described in the alternative closure demonstration, the three ponds that comprise the Ash Pond Area were scheduled to be retrofitted sequentially with no more than one pond undergoing retrofit at any point in time in order to maintain adequate water storage capacity. To date, two of the three ponds have been successfully removed from service, retrofitted, and returned to service. CCR is currently being removed from the third pond in preparation for its retrofit.

The East Ash Pond retrofit was completed in October 2020. The West Ash Pond was removed from service in the spring of 2021. Cleanout operations of the West Ash Pond were challenged by over 9 inches of above average rainfall (April 2021 through August 2021); however, retrofit of the pond was completed as scheduled in December 2021 and returned to service. Cleanout operations for the New Scrubber Pond began in December of 2021 and continue today. Although Martin Lake anticipates additional challenges removing the material in the New Scrubber Pond, the proposed cease placement date of June 29, 2022, is expected to be met.

2. *A discussion of the issues that led to the delay (if a delay has occurred) to the requested date to cease receipt of waste.*

Luminant is on schedule to meet the cease placement date of June 29, 2022, for the Ash Pond Area as outlined in the November 25, 2020, demonstration.

3. *An updated requested date to cease receipt of waste (if the original date requested has changed).*

The original requested date to cease receipt of waste has not changed for the Ash Pond Area.

EPA has determined that Luminant's Part B application for PDP5, submitted on November 25, 2020, is complete. However, EPA has not taken final action to approve the application or the demonstration that was subsequently submitted on November 30, 2021. The original requested cease receipt date of July 1, 2023, for PDP5 was based on the assumption that EPA would take timely action on the application and demonstration. Since EPA has not yet taken action and we cannot predict when EPA will act, Martin Lake will not take any action towards cleanout and retrofit of PDP5 until EPA acts on the pending alternate liner demonstration under Part B and, if necessary, will provide EPA with an updated cease receipt date for PDP5 at the appropriate time.

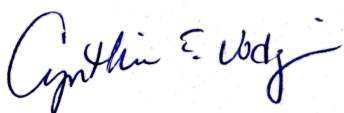
4. *An updated narrative justifying the new date to cease receipt of waste (if the original date requested has changed).*

The original requested date to cease receipt of waste has not changed for the Ash Pond Area.

EPA has determined that Luminant's Part B application for PDP5, submitted on November 25, 2020, is complete. However, EPA has not taken final action to approve the application or the demonstration that was subsequently submitted on November 30, 2021. The original requested cease receipt date of July 1, 2023, for PDP5 was based on the assumption that EPA would take timely action on the application and demonstration. Since EPA has not yet taken action and we cannot predict when EPA will act, Martin Lake will not take any action towards cleanout and retrofit of PDP5 until EPA acts on the pending alternate liner demonstration under Part B and, if necessary, will provide EPA with an updated cease receipt date for PDP5 at the appropriate time.

As allowed by the agency, in lieu of hard copies of these documents, electronic files were submitted to Richard Huggins, Frank Behan and Kirsten Hillyer via email. Additionally, as requested, this letter will be posted to Luminant's public CCR website: www.luminant.com/ccr/. If you have any questions regarding this submittal, please contact Renee Collins at 214-875-8338 or renee.collins@luminant.com.

Sincerely,



Cynthia Vodopivec
SVP – Environmental, Health & Safety