

Luminant
1601 Bryan Street
Dallas, TX 75201

**RE: CERTIFICATION OF LINED CONSTRUCTION
CCR SURFACE IMPOUNDMENTS, OAK GROVE SES
ROBERTSON COUNTY, TX**

1.0 INTRODUCTION

The “Disposal of Coal Combustion Residuals (CCR) from Electric Utilities rule” (40 Code of Federal Regulations (CFR) Part 257), effective October 19, 2015, requires a certification attesting that existing CCR units meet the requirements of §257.71(a). This certification must be included in the Operating Record and posted to a publicly accessible internet site by October 17, 2016.

Pursuant to 40 CFR §257.71(b), this letter provides documentation and certification that existing surface impoundments at the Oak Grove Steam Electric Station (OGSES) were constructed with liner systems that meet the requirements in §257.71(a).

2.0 REGULATION REQUIREMENT

40 CFR §257.71(a)(1)(i)-(iii) requires documentation that each existing CCR surface impoundment is constructed with one of the following liner systems.

- (i) A liner consisting of a minimum 2 feet of compacted soil with a hydraulic conductivity (k) $\leq 1 \times 10^{-7}$ centimeters per second (cm/sec);
- (ii) A composite liner that meets the requirements of §257.70(b), which consists of:
 - A 30-mil geomembrane (GM) or 60-mil if using high density polyethylene (HDPE), in direct and uniform contact with the underlying layer; and
 - A minimum 2-foot thick layer of compacted clay liner with a hydraulic conductivity less than or equal to 1×10^{-7} cm/sec;
- (iii) An equivalent alternative composite liner that meets the requirements of §257.70(c), which allows replacement of the compacted clay layer with a layer with a leakage rate no greater than the 2 feet of clay with a hydraulic conductivity of 1×10^{-7} cm/sec.

3.0 OAK GROVE SURFACE IMPOUNDMENTS

Coal combustion byproducts such as fly ash, bottom ash, gypsum/scrubber sludge, and process wastewater are being generated during operation of the OGSES. Gypsum/scrubber sludge that cannot be recycled, and selected process wastewaters are currently managed in FGD-A, FGD-B, and FGD-C Ponds.

Golder Associates Inc. (Golder) provided construction quality assurance (CQA) services during construction of the liner systems within the FGD-A, FGD-B, and FGD-C Ponds. Golder prepared CQA reports summarizing the liner system installation for each of the ponds documenting that they were constructed with liner systems in compliance with the CCR Rule.

ogses_lined-unlined_ccr_unit_determination_rev0a.docx

Golder Associates Inc.
500 Century Plaza Drive, Suite 190
Houston, TX 77073 USA

Tel: (281) 821-6868 Fax: (281) 821-6870 www.golder.com



Golder Associates: Operations in Africa, Asia, Australasia, Europe, North America and South America

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3.1 FGD-A Pond

Golder was retained by Fluor Enterprises, Inc. (Fluor) to provide third party CQA monitoring and testing services during the construction of the clay liner for FGD-A, previously referred to as the 'FGD Blowdown Pond'. Construction of the FGD Blowdown Pond clay liner system took place from August 28 to October 18, 2008. The following documents were referred to for guidance in the construction and quality assurance of the subgrade and clay liner:

- Contractor's Quality Assurance/Quality Control Plan, Oak Grove Project, Waste Containment Units, FGD Impoundment, Fluor Enterprises, June 2008.

After completion of construction, on November 17, 2008, Golder submitted a report titled *FGD Pond Soil Liner Evaluation Report* to Fluor summarizing the CQA monitoring activities, observations, and the results of the tests conducted during the preparation of the subgrade and construction of the clay liner. Field test sample location maps and a clay liner thickness verification map were included in this report.

FGD-A Pond's liner consists of a minimum 3-foot thick clay liner with a hydraulic conductivity of no greater than 1.0×10^{-7} cm/sec. The surveyed clay liner thickness verification drawing was provided by Survey and Mapping, Inc. (SAM) of Austin, Texas and is included as Figure 10 in the *FGD Pond Soil Liner Evaluation Report*. This figure is included in Attachment 1.

Hydraulic conductivity samples were collected from each 6-inch lift at least once every 40,000 square feet of the compacted clay liner. The compacted clay samples were sent to and tested at either Golder's Atlanta, Georgia or Houston, Texas soils testing laboratories. The hydraulic conductivity was determined according to ASTM D5084, Method D in Atlanta and Method F in Houston. Sixty-two samples of the FGD-A Pond's clay liner were tested for saturated hydraulic conductivity. The results indicate that the maximum measured hydraulic conductivity was 9.9×10^{-7} cm/sec; the minimum value was 1.5×10^{-9} cm/sec; and the geometric mean was 2.14×10^{-8} cm/sec.

The liner system in FGD-A Pond meets the liner design criteria in §257.71(a)(1)(i) and the testing requirements in §257.71(a)(2).

3.2 FGD-B Pond

Golder was retained by Luminant to provide third party CQA monitoring and testing services during the construction of the composite liner for the FGD-B Pond. Construction of the FGD-B Pond composite liner system took place from October 7 to November 9, 2011. The following documents were referred to for guidance in the construction and quality assurance of the subgrade, clay, and geomembrane liner:

- Golder Associates Inc. (March 2011). Soil Liner Quality Control Plan, Oak Grove Steam Electric Station, Robertson County, TX.
- Golder Associates Inc. (October 2011). Geomembrane Liner Quality Control Plan, Oak Grove Steam Electric Station, Robertson County, TX.

After completion of construction in January 2012, Golder submitted a report titled *Liner Evaluation Report, Oak Grove SES, FGD-B Pond* to Luminant summarizing the CQA monitoring activities, observations, and the results of the tests conducted during the preparation of the subgrade and construction of the clay liner. Field testing location maps, a clay liner thickness verification map, and geomembrane panel layout and testing maps were included in this report. Excerpts from this report, showing the liner details and as-built elevations, are included in Attachment 2 to this letter.

FGD-B Pond was constructed with a minimum 2-foot thick compacted clay liner directly overlain by a textured 60-mil HDPE geomembrane liner. A 1-foot thick layer of protective soil cover was placed over the geomembrane.

Hydraulic conductivity testing was performed at least once every 40,000 square feet of compacted clay liner, for each 6-inch (compacted) lift. Soil samples were sent to and tested at Golder's Atlanta, Georgia or Houston, Texas geotechnical laboratory. The coefficient of hydraulic conductivity was determined according to ASTM D5084, Method D in Atlanta or Method F in Houston. Fifty-two samples of the FGD-B Pond's clay liner were tested for saturated hydraulic conductivity. The results indicate that the maximum measured hydraulic conductivity was 8.80×10^{-7} cm/sec; the minimum value was 4.3×10^{-9} cm/sec; and the geometric mean was 1.92×10^{-8} cm/sec.

The liner system in FGD-B Pond meets the liner design criteria in §257.70(a)(1)(ii) and the testing requirements in §257.71(a)(2).

3.3 FGD-C Pond

Golder was retained by Luminant to provide third party CQA monitoring and testing services during the construction of the composite liner system in FGD-C Pond. Placement of the FGD-C Pond composite liner began on August 21, 2015. The protective cover placement was completed in August 2016.

The following documents were referred to for guidance in the construction and quality assurance of the subgrade, clay, and geomembrane liner:

- Golder Associates Inc. (June 2015). Soil Liner Quality Control Plan, Oak Grove Steam Electric Station, Robertson County, TX.
- Golder Associates Inc. (June 2015). Geomembrane Liner Quality Control Plan, Oak Grove Steam Electric Station, Robertson County, TX

A report titled *FGD-C Pond Liner Evaluation Report* summarizing the CQA monitoring activities, observations and the results of the tests conducted by Golder during the preparation of the subgrade and installation of the clay and geomembrane liners was submitted to Luminant in October 2016. Field testing location maps, a clay liner thickness verification map, and geomembrane panel layout and testing maps were included in this report. Attachment 3 contains excerpts from this report.

FGD-C pond composite liner system comprises a 2-foot thick clay liner overlain by a textured 60-mil HDPE geomembrane and a 2-foot thick ash protective cover layer.

Hydraulic conductivity testing was performed at least once every 40,000 square feet of compacted clay liner, for each 6-inch (compacted) lift. Soil samples were sent to and tested at Golder's Houston, Texas geotechnical laboratory. The coefficient of hydraulic conductivity was determined according to ASTM D5084, Method F. Eighty-three samples of the FGD-C Pond's clay liner were tested for saturated hydraulic conductivity. The results indicate that the maximum measured hydraulic conductivity was 9.48×10^{-7} cm/sec; the minimum value was 1.26×10^{-8} cm/sec; and the geometric mean was 3.55×10^{-8} cm/sec.

The liner system in FGD-C Pond meets the liner design criteria in §257.70(a)(1)(ii) and the testing requirements in §257.71(a)(2).

4.0 CONCLUSION

Based on a review of the CQA reports for the liner systems in FGD-A Pond, FGD-B Pond, and FGD-C Pond, Golder certifies that the existing surface impoundments at OGSES meet the requirements of §257.71(a) and classify as lined CCR surface impoundments.

If further information is required, please call the undersigned at (281) 821-6868.

Sincerely,

GOLDER ASSOCIATES INC.



Varenya Kumar
Staff Engineer

VK/JBF/kc



Jeffrey B. Fassett, PE
Senior Consultant and Associate

Attachments:

- Attachment 1 – FGD-A Liner Information
- Attachment 2 – FGD-A Liner Information
- Attachment 3 – FGD-C Liner Information

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CERTIFICATION

I hereby certify that the documentation as to whether the existing CCR units at the Oak Grove Steam Electric Station meets the requirements of §257.71(a) is accurate and that I am a duly Licensed Professional Engineer under the laws of the state of Texas.



Jeffrey B. Fassett, PE
Golder Associates Inc.
Firm Registration Number F-2578

Luminant

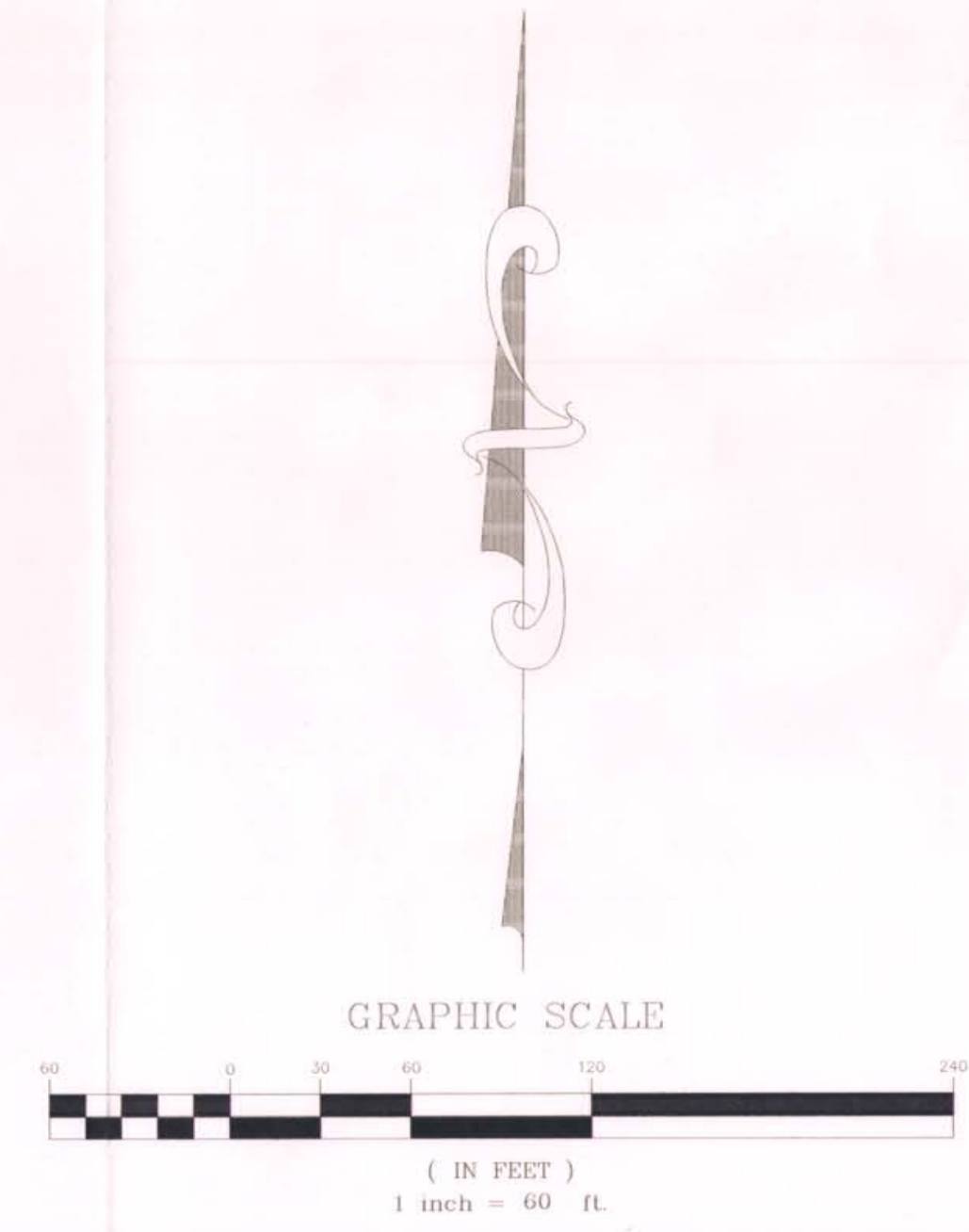
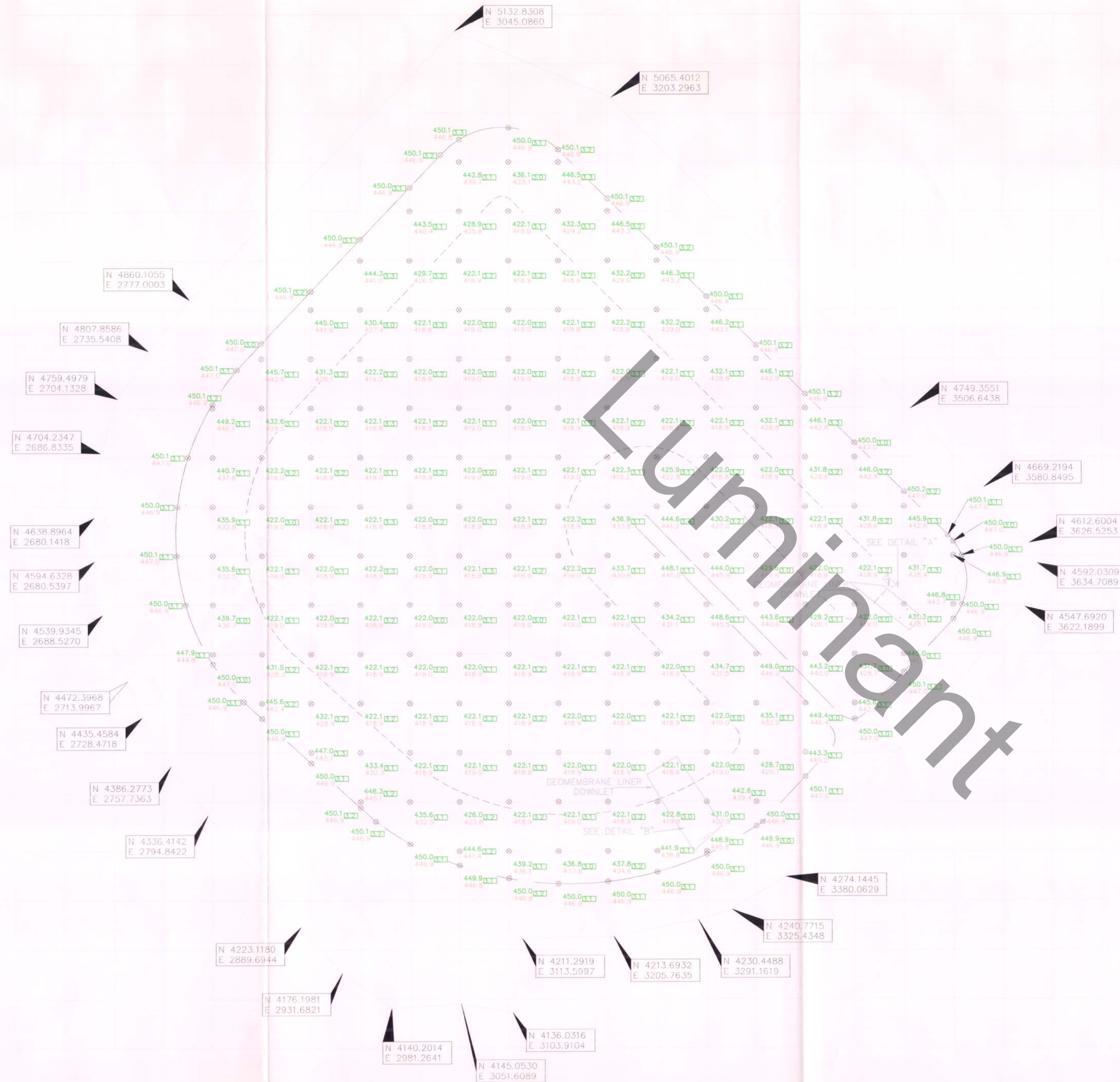
5.0 REFERENCES:

- Fluor Enterprises, Inc. (June 2008). Contractor's Quality Assurance/Quality Control Plan, Oak Grove Project, Waste Containment Units.
- Golder Associates Inc. (November 2008). FGD Pond Soil Liner Evaluation Report.
- Golder Associates Inc. (March 2011). Soil Liner Quality Control Plan (Oak Grove Steam Electric Station).
- Golder Associates Inc. (October 2011). Geomembrane Liner Quality Control Plan (Oak Grove Steam Electric Station).
- Golder Associates Inc. (January 2012). Liner Evaluation Report, Oak Grove SES, FGD-B Pond.
- Golder Associates Inc. (June 2015). Soil Liner Quality Control Plan, Oak Grove Steam Electric Station, Robertson County, TX.
- Golder Associates Inc. (June 2015). Geomembrane Liner Quality Control Plan, Oak Grove Steam Electric Station, Robertson County, TX.
- Golder Associates Inc. (October 2016). FGD-C Pond Liner Evaluation Report.

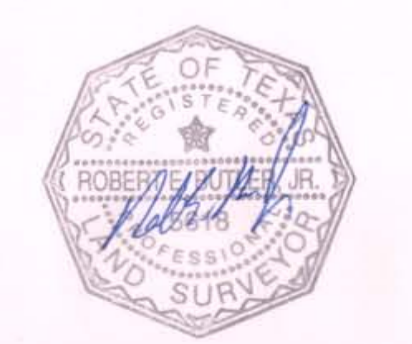
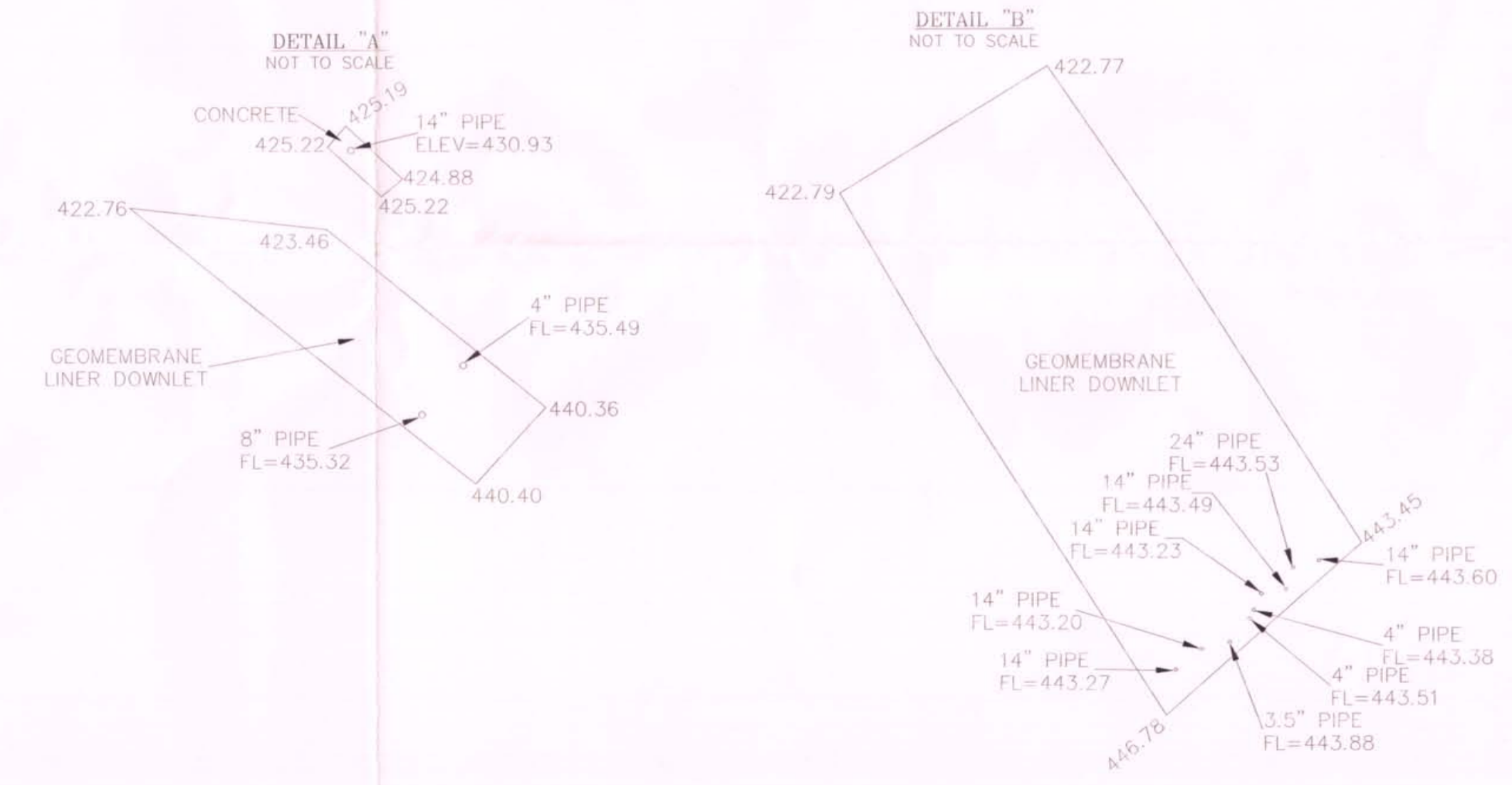
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**ATTACHMENT 1
FGD-A LINER INFORMATION**

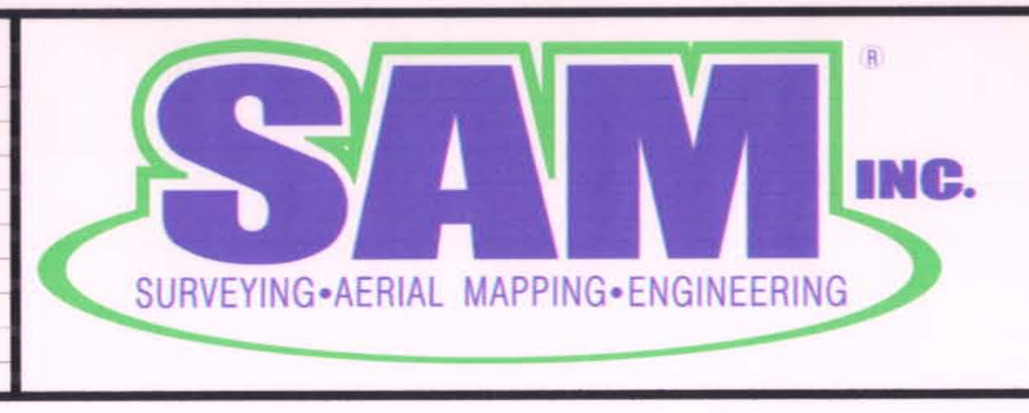


LEGEND
 NORTHING N 10097536.58 F.G.D. POND BOUNDARY
 EASTING E 3145608.31
 CERTIFIED CLAY LINER ELEVATION 547.0' CLAY LINER THICKNESS
 CERTIFIED SUBGRADE ELEVATION 545.0'



NO.	REVISIONS	BY	DATE

PROJECT: JAMES CONSTRUCTION
 OAK GROVE FGD POND
 JOB NUMBER: 28172-09
 DATE: NOVEMBER 19, 2008
 SCALE: 1" = 60'
 SURVEYOR: R.E.B.
 TECHNICIAN: G.HANSON
 DRAWING: OAK GROVE POND.DWG
 FIELDNOTES: N/A
 PARTYCHIEF: J.SANDOVAL
 FIELDBOOKS: 6283



5508 WEST HIGHWAY 290
 BUILDING B
 AUSTIN TEXAS, 78735
 (512) 447-0575
 FAX: (512) 326-3029
 EMAIL: SAM@SAMINC.BIZ

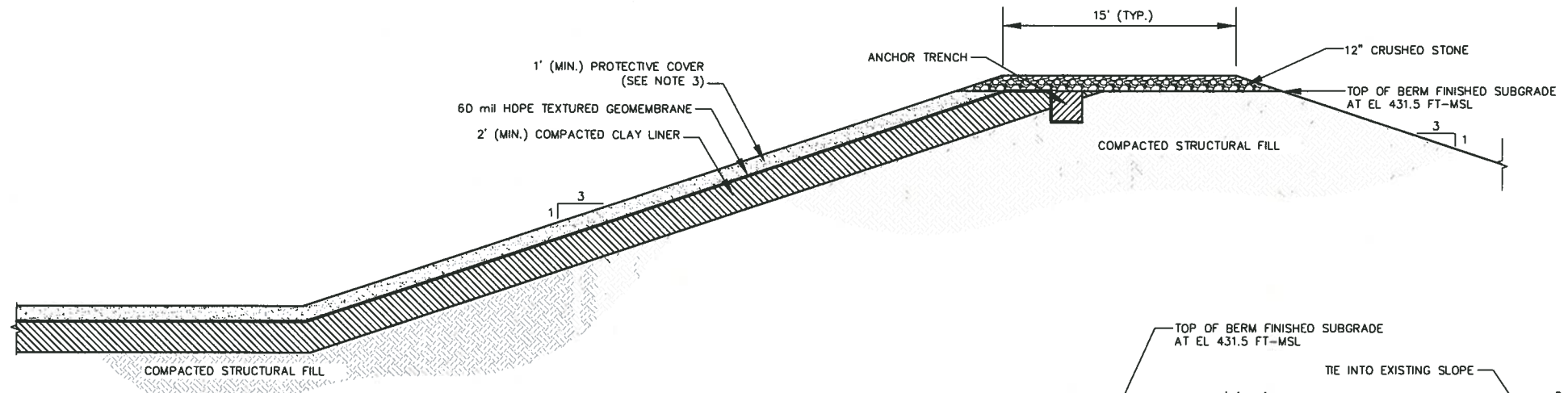
SUBGRADE AND CLAY LINER ELEVATIONS
 AS OF OCTOBER 23, 2008
 OAK GROVE POWER PLANT - F.G.D. POND
 ROBERTSON COUNTY, TEXAS

SHEET 1
 OF 1

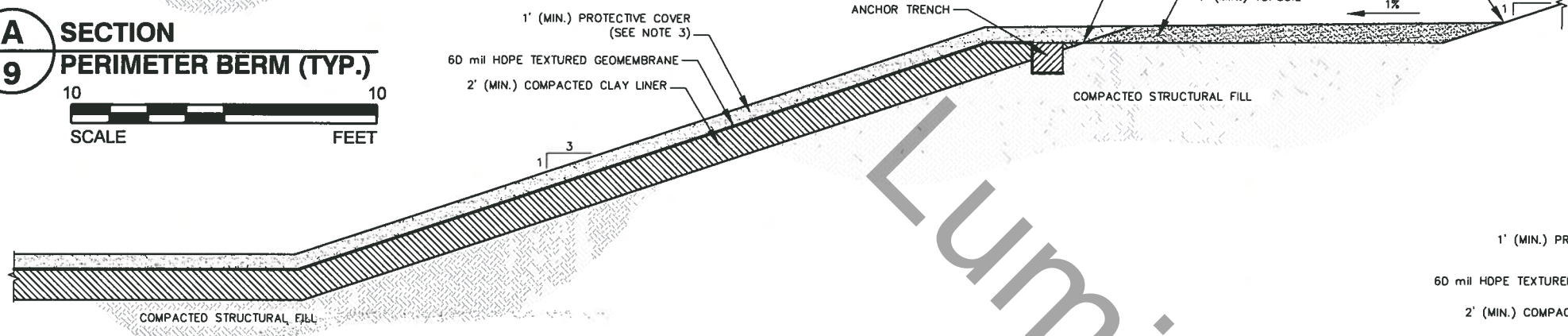
Luminant

**ATTACHMENT 2
FGD-B LINER INFORMATION**

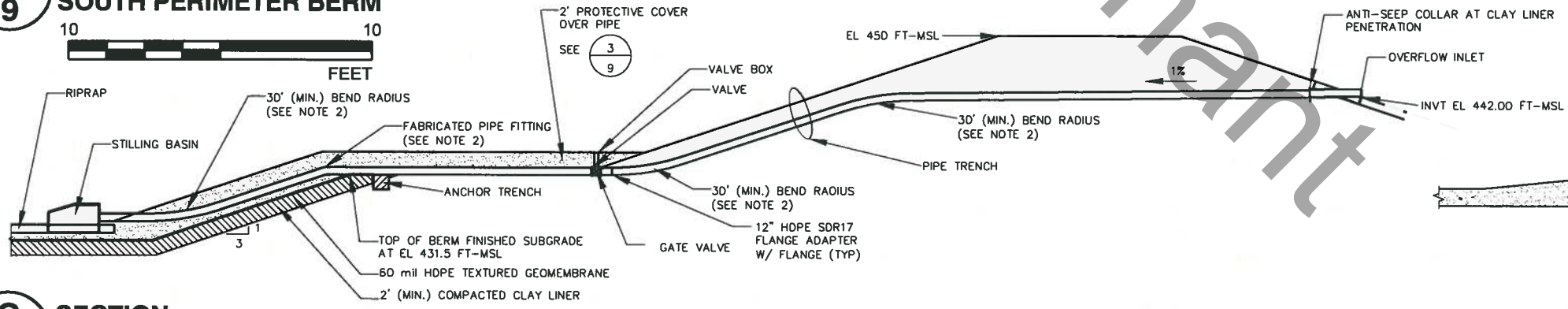
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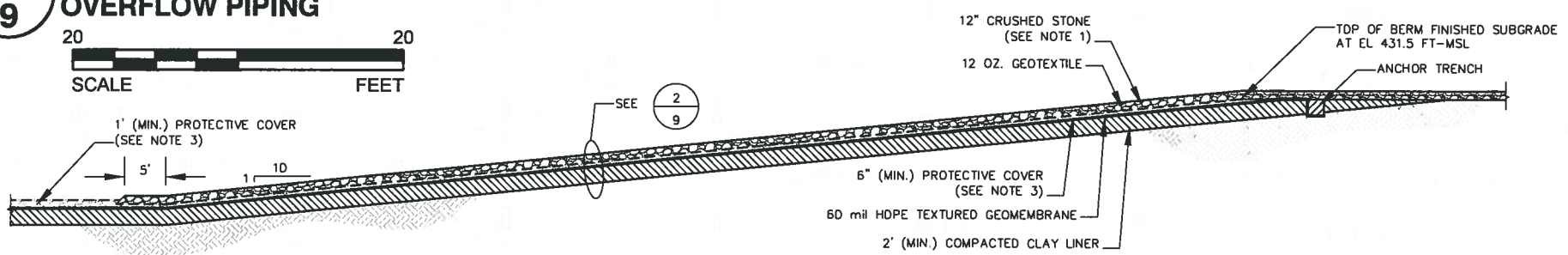
A SECTION 9 PERIMETER BERM (TYP.)
 10 10
 SCALE FEET



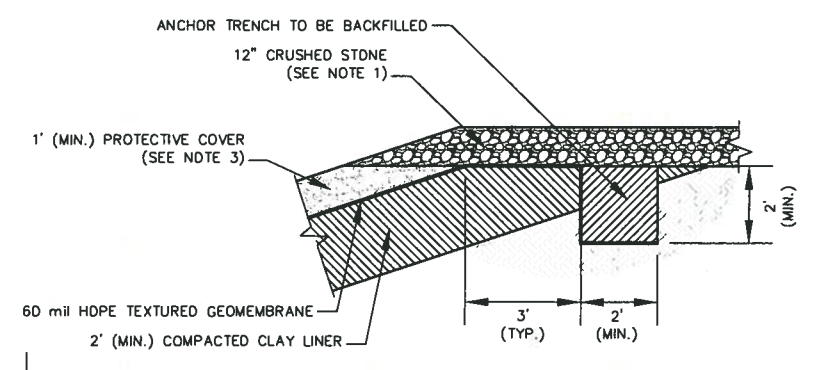
B SECTION 9 SOUTH PERIMETER BERM
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 SCALE FEET



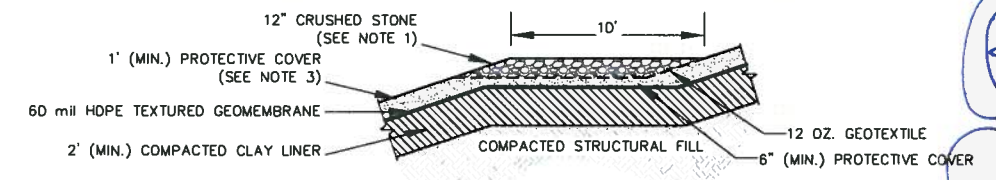
C SECTION 9 OVERFLOW PIPING
 20 20
 SCALE FEET



D SECTION 9 ACCESS ROAD
 20 20
 SCALE FEET



1 DETAIL 9 ANCHOR TRENCH
 5 5
 SCALE FEET



2 DETAIL 9 ACCESS ROAD
 10 10
 SCALE FEET

3 SECTION 9 OVERFLOW PIPE COVER
 10 10
 SCALE FEET

- NOTES**
1. COMPACTED CRUSHED STONE ROAD BASE.
 2. USE FABRICATED PIPE FITTINGS WHERE 30' (MIN.) BEND RADIUS IS EXCEEDED.
 3. PROTECTIVE COVER WILL CONSIST OF ONSITE SOILS.

REV	DATE	DES	CHK	R/W	REVISION DESCRIPTION



PROJECT
 LUMINANT
 OAK GROVE SES
 FGD - B POND CONSTRUCTION
 ROBERTSON COUNTY, TEXAS

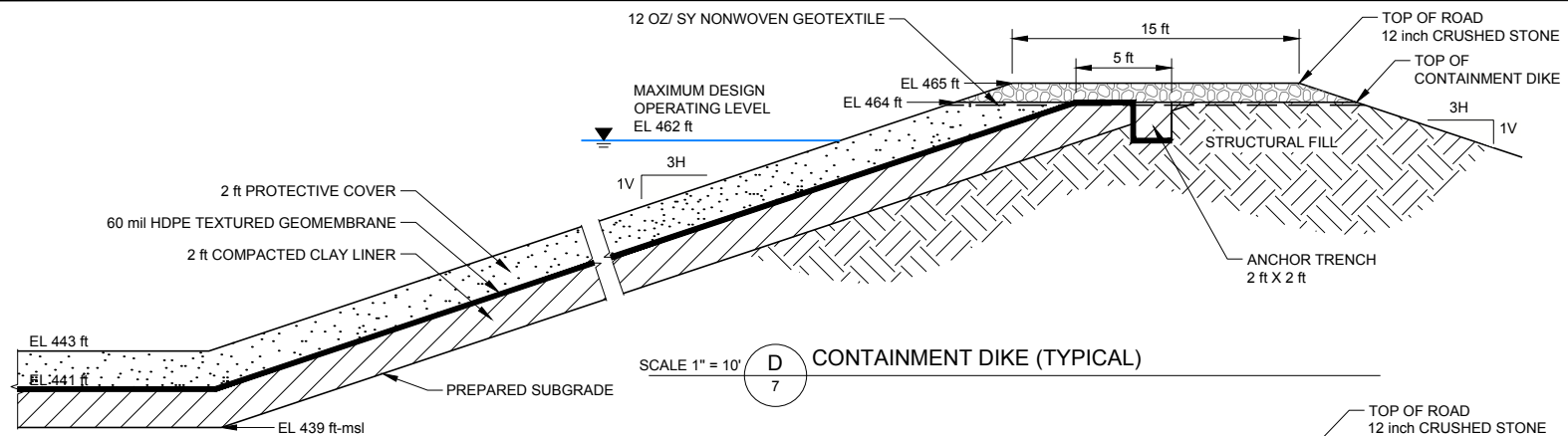
TITLE
LINER DETAILS

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CADD	VJE 09/2011
CHECK	CFR 09/2011
REVIEW	09/2011

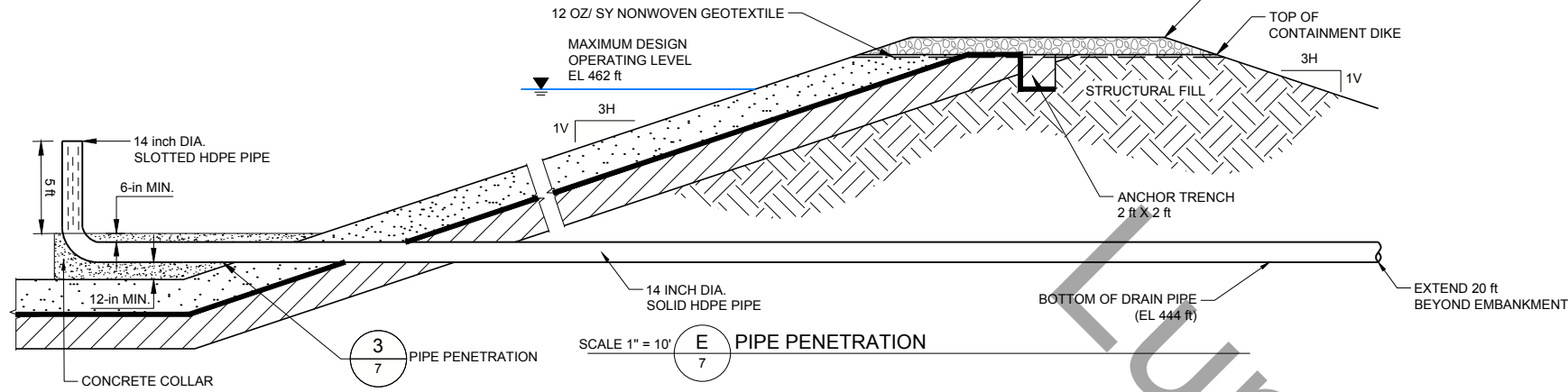
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Luminant

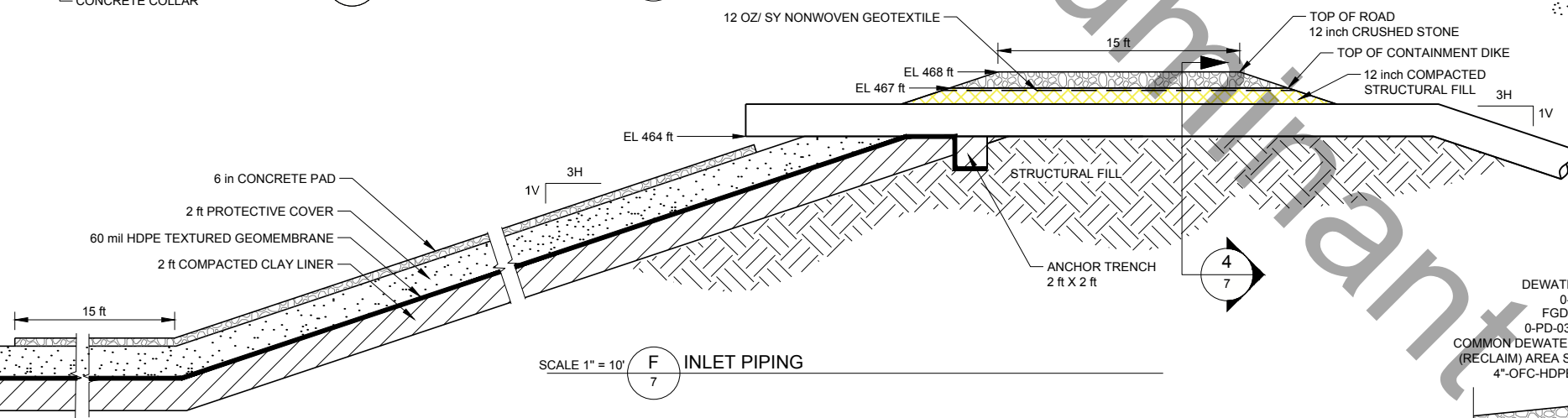
**ATTACHMENT 3
FGD-C LINER INFORMATION**



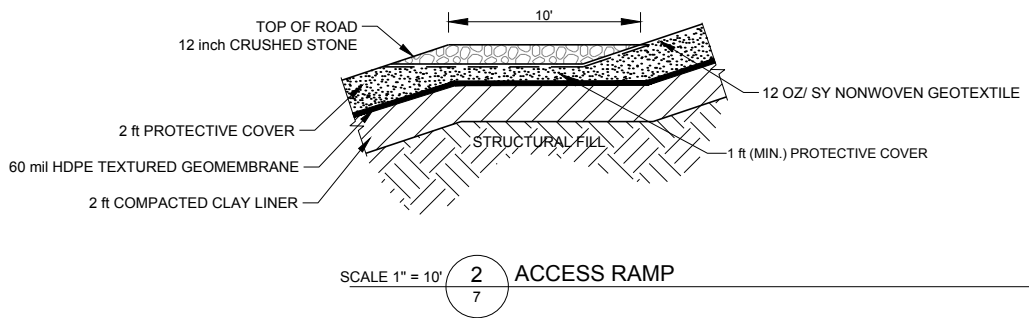
SCALE 1" = 10' **D** CONTAINMENT DIKE (TYPICAL)



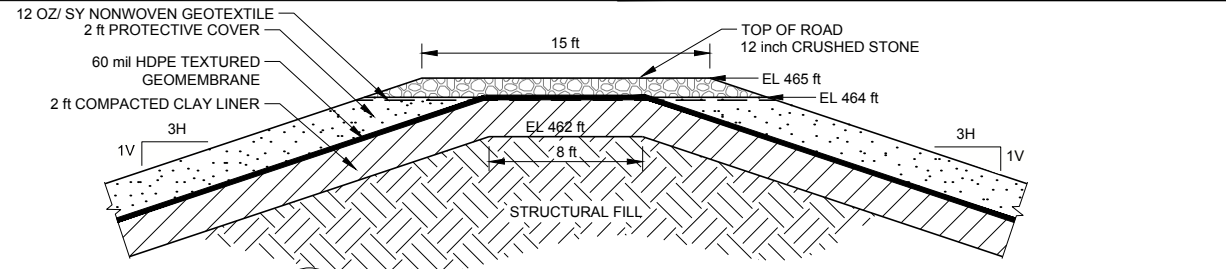
SCALE 1" = 10' **E** PIPE PENETRATION



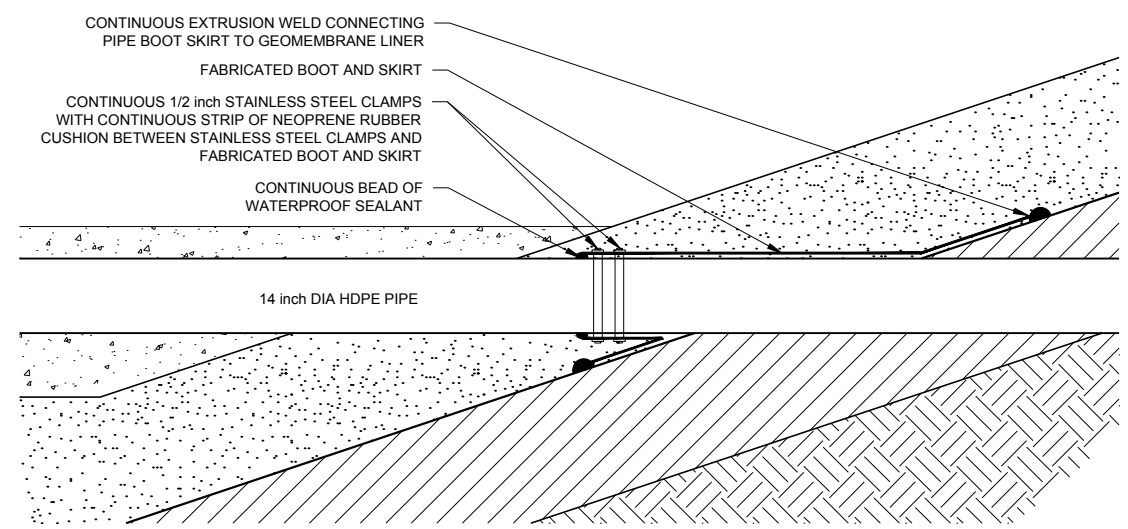
SCALE 1" = 10' **F** INLET PIPING



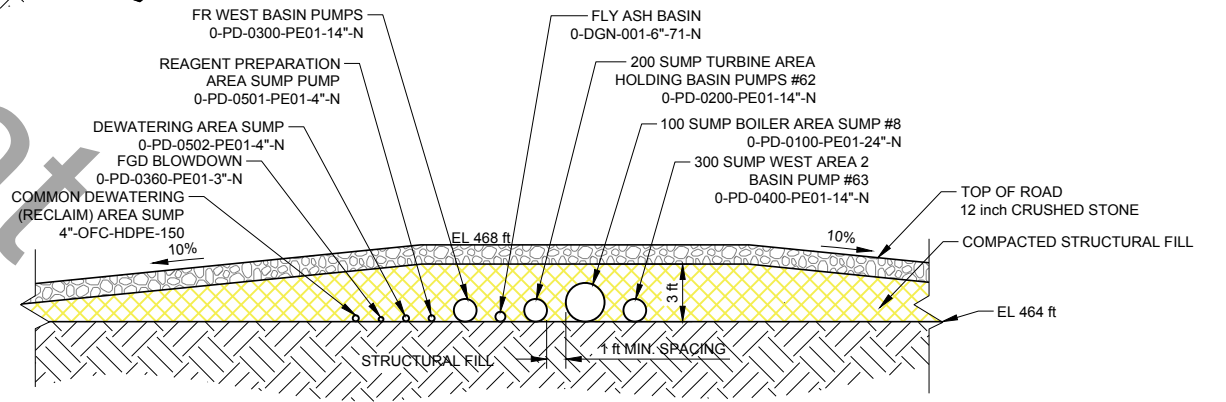
SCALE 1" = 10' **2** ACCESS RAMP



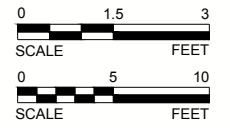
SCALE 1" = 10' **G** INTERBERM



SCALE 1" = 3' **3** PIPE PENETRATION DETAIL



SCALE 1" = 10' **4** INLET PIPING



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Rev.	YYYY-MM-DD	DESCRIPTION	PREPARED	DESIGN	REVIEW	APPROVED
0	2015-04-29	ISSUED FOR CONSTRUCTION	AA	CEI	CEI	JBF
B	2015-04-23	ISSUED FOR CLIENT REVIEW	AA	CEI	CEI	JBF
A	2015-03-30	ISSUED FOR CLIENT REVIEW	AA	CEI	CEI	JBF



CLIENT

Luminant

CONSULTANT

Golder Associates

HOUSTON OFFICE
500 CENTURY PLAZA DR
HOUSTON, TEXAS 77073
USA
(281) 821-6868
www.golder.com

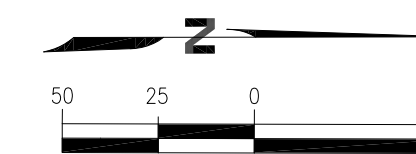
PROJECT
OAK GROVE STEAM ELECTRIC STATION
FGD-C POND
ROBERTSON COUNTY, TEXAS

TITLE
DETAILS

PROJECT No. 1406296 LUMINANT DRAWING NO. A2YF00-0-CV-0-SW.PL-07 Rev. 7 of 7 FIGURE 7

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

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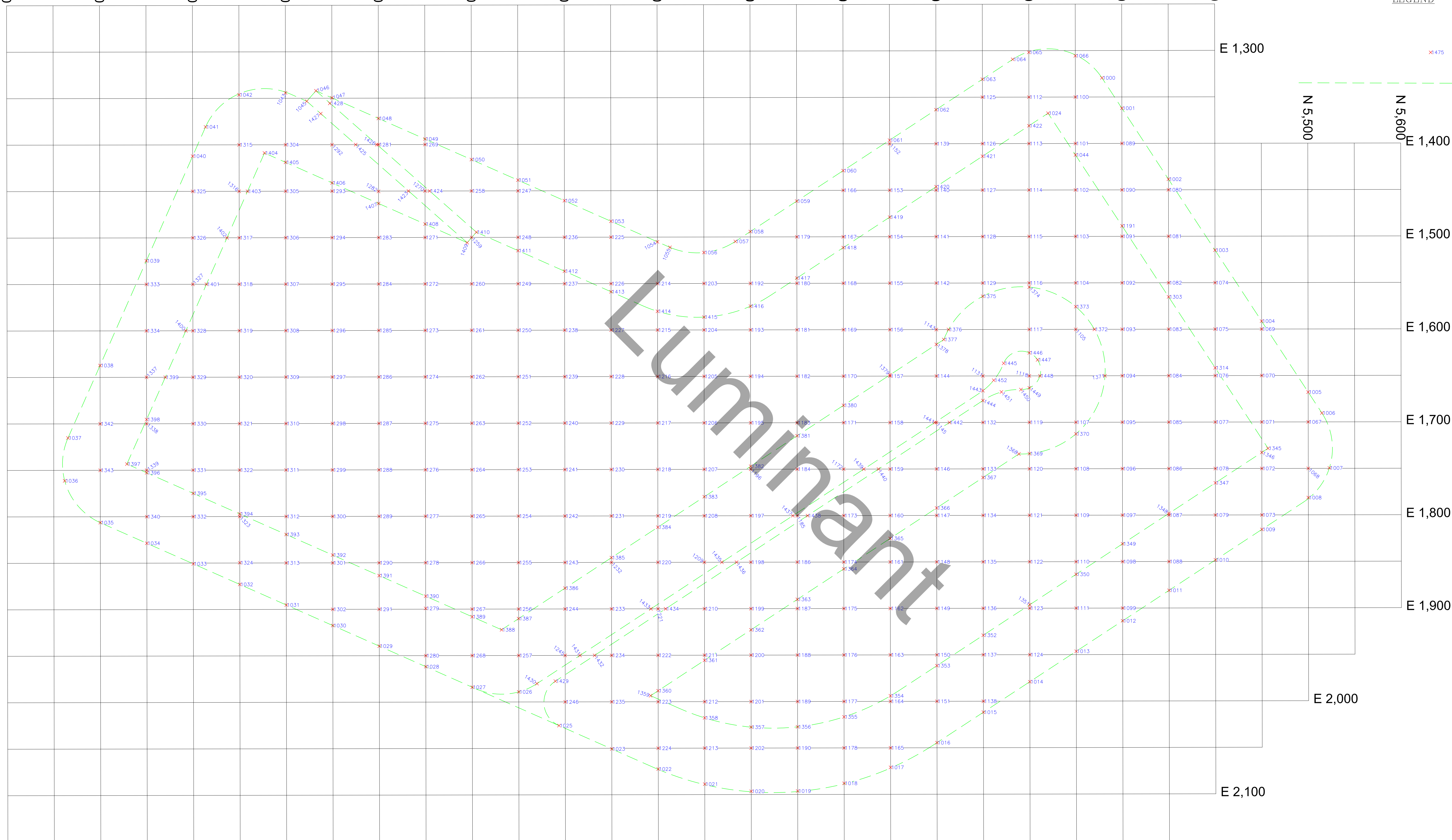


GRAPHIC SCALE

LEGEND

x475 CERTIFICATION POINT

BREAKLINE



N 5,500

N 5,600

E 1,300

E 1,400

E 1,500

E 1,600

E 1,700

E 1,800

E 1,900

E 2,000

E 2,100

NO.	REVISIONS	BY	DATE

PROJECT: GOLDER ASSOCIATES
 JOB NUMBER: 35813-09
 DATE: AUGUST 18, 2016
 SCALE: 1"=50'
 SURVEYOR: S.K.W.
 TECHNICIAN: W.G.H.
 DRAWING: 35813 FGD POND C.DWG
 FIELDNOTES: N/A
 PARTYCHIEF: J.SANDOVAL
 FIELDBOOKS: 9999



7101 ENVVOY COURT
 DALLAS, TEXAS 75247
 (214) 631-7888
 FAX: (214) 631-7103
 EMAIL: SAM@SAM.BIZ

SUBGRADE AND CLAY LINER ELEVATIONS
 AS OF SEPTEMBER 29, 2015
 FGD POND C
 OAK GROVE POWER PLANT
 ROBERTSON COUNTY, TEXAS

SHEET 1
 OF 2

DWG. NO.: 35813-09

