

POST-CLOSURE PLAN

POST-CLOSURE PLAN FGD PONDS

Oak Grove Steam Electric Station

Submitted To: Luminant 1601 Bryan Street Dallas, TX 75201

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



Professional Engineering Firm Registration Number F-2578

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Project No. 1648164





Table of Contents

1.0	INTRODUCTION	1
1.1	Purpose	1
1.2	Site Background	1
2.0	POST-CLOSURE MONITORING AND MAINTENANCE PLAN [§257.104(d)(1)(i)]	2
3.0	GROUNDWATER MONITORING	3
4.0	FACILITY CONTACT INFORMATION (§257.104(d)(1)(ii))	4
5.0	POST-CLOSURE LAND USE (§257.104(d)(1)(iii)	5
6.0	NOTIFICATION OF COMPLETION OF POST-CLOSURE CARE PERIOD (§257.104(e)	6
7.0	CONCLUSION	7
8.0	CERTIFICATION	8

List of Tables

Table 1	Post-Closure Care Maintenance
Table 2	Contact Information

List of Figures

Figure 1 General Site Map





1.0 INTRODUCTION

1.1 Purpose

The "Disposal of Coal Combustion Residuals (CCR) from Electric Utilities rule" (40 Code of Federal Regulations (40 CFR) Part 257), effective October 19, 2015, requires that existing CCR units closed in accordance with §257.102 must meet the requirements of §257.104 – Post-closure care requirements. In accordance with §257.104(d), this Post-Closure Plan provides the following information for the Oak Grove Steam Electric Station's (OGSES's) CCR Impoundments identified as flue gas desulphurization (FGD) Ponds FGD-A, FGD-B, and FGD-C.

- A description of the required post-closure monitoring and maintenance activities and the frequency at which these activities will be performed;
- The name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure care period; and
- A description of the planned uses of the closed unit property during the post-closure period. Post-closure use of the property must not disturb the integrity of the final cover, liner, or any other component of the unit containment system, or the function of the monitoring systems.

Post-closure care must be conducted for 30 years after the CCR unit has been closed.

1.2 Site Background

The OGSES generates bottom ash, fly ash, boiler slag and flue gas desulfurization (FGD) sludge (gypsum) during electricity generation. The following surface impoundments, shown on Figure 1, are in operation at the OGSES:

- FGD-A Pond;
- FGD-B Pond; and
- FGD-C Pond.

The Post-Closure Plan addresses the existing CCR surface impoundments at the OGSES. A separate Post-Closure Plan addresses the existing ash landfill (Ash Landfill 1).



2.0 POST-CLOSURE MONITORING AND MAINTENANCE PLAN [§257.104(d)(1)(i)]

Monitoring and maintenance activities will be performed to maintain the integrity and effectiveness of the final cover system as specified in §257.104(b)(1). During the post-closure monitoring and maintenance period of the site, the final cover of the closed CCR unit will be inspected at the frequency indicated in Table 1 below.

Table 1:	Post-Closure	Care	Maintenance
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Post-Closure Care Maintenance Item	Frequency of Inspections	Types of Deficiency Conditions to be looked for during inspections
Final Cover Condition	Annually	Inspection for vegetation, erosion, settlement, ponding water, and functionality and the surface water drainage system
Vegetation	Annually	Erosion rills and depressions, vegetative stress
Drainage structures	Annually	Sediment and debris build up, component damage, blockages, erosion, ponding of water in non-designated areas, excessive vegetative growth

Each monitoring and maintenance activity will be documented and include the date, components and items monitored, name of the individual performing the monitoring/maintenance, a description of the deficiencies observed (if any), maintenance/repairs performed (if any), and related information.

At a minimum, maintenance will be performed as needed prior to the next scheduled inspection.



3.0 GROUNDWATER MONITORING

As specified in 257.104(b)(3), groundwater monitoring activities will continue throughout the post-closure care period in accordance with §257.90 through §257.98. All groundwater monitoring wells that are part of the groundwater monitoring network will be monitored and maintained during the post-closure care period in accordance with the Groundwater Sampling and Analysis Plan, which will be finalized and placed in the Operating Record by October 17, 2017.

If at the end of the 30-year post-closure care period, groundwater assessment monitoring is being performed at the unit in accordance with §257.95, post-closure care of the unit must continue until the unit has returned to groundwater detection monitoring under §257.95.



4.0 FACILITY CONTACT INFORMATION (§257.104(d)(1)(ii))

Table 2: Contact Information

Name	Luminant - Environmental Services	
Address	1601 Bryan St., Dallas, Texas 75201	
Telephone Number	214-875-8654	
Email	CCRPostClosurePlan@Luminant.com	



5.0 POST-CLOSURE LAND USE (§257.104(d)(1)(iii)

Post-closure use of the property will not disturb the integrity of the final cover, liner system, or any other component of the containment system, or function of the monitoring system in accordance with §257.104(d)(1)(iii) unless necessary to comply with the maintenance requirements of this subpart or as otherwise provided as allowed under this subpart.

Post-closure land use is anticipated to be undeveloped/unchanged and the area will be deed recorded and deed restricted to prevent disturbance of the closed waste management unit.



6.0 NOTIFICATION OF COMPLETION OF POST-CLOSURE CARE PERIOD (§257.104(e)

No later than 60 days following completion of the post-closure care period, a certification will be prepared by a qualified professional engineer verifying that the post-closure care has been completed in accordance with this Post-Closure Plan.





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7.0 CONCLUSION

This Post-Closure Plan has been prepared by Golder Associates Inc., to describe post-closure monitoring and maintenance activities, to provide contact information, and to describe land use after the post-closure period.

GOLDER ASSOCIATES INC.

Varenya Kumar Staff Engineer

B. Front

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JBF/VK





8.0 CERTIFICATION

I hereby certify that this Post-Closure Plan has been prepared in general accordance with normally accepted civil engineering practices and in accordance with the requirements of 40 CFR §257.104.



<u>Jeffrey B. Fassett, PE</u> Golder Associates Inc. Firm Registration Number F-2578





CLIENT LUMINANT POWER OAK GROVE

CONSULTANT

-	DES
Golder	PRE
Golder	RE
	4.00

YYYY-MM-DD	2016-09-29
DESIGNED	VK
PREPARED	TNB
REVIEWED	MX
APPROVED	JBF

REFERENCE(S) AERIAL PHOTO SOURCED FROM GOOGLE EARTH PRO DATED 2016



Professional Engineering Firm Registration Number F-2578

0	400	800
1" = 800'		FEET

PROJECT 2016 COAL COMBUSTION RESIDUALS ENGINEERING SERVICES

TITLE GENERAL SITE MAP

PROJECT NO. 1648164

REV.

FIGURE

Established in 1960, Golder Associates is a global, employee-owned organization that helps clients find sustainable solutions to the challenges of finite resources, energy and water supply and management, waste management, urbanization, and climate change. We provide a wide range of independent consulting, design, and construction services in our specialist areas of earth, environment, and energy. By building strong relationships and meeting the needs of clients, our people have created one of the most trusted professional services organizations in the world.

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