



REPORT

CLOSURE PLAN ADDENDUM NO. 1

*Oak Grove Steam Electric Station - Ash Landfill 1
Robertson County, Texas*

Submitted to:

Oak Grove Management Company LLC

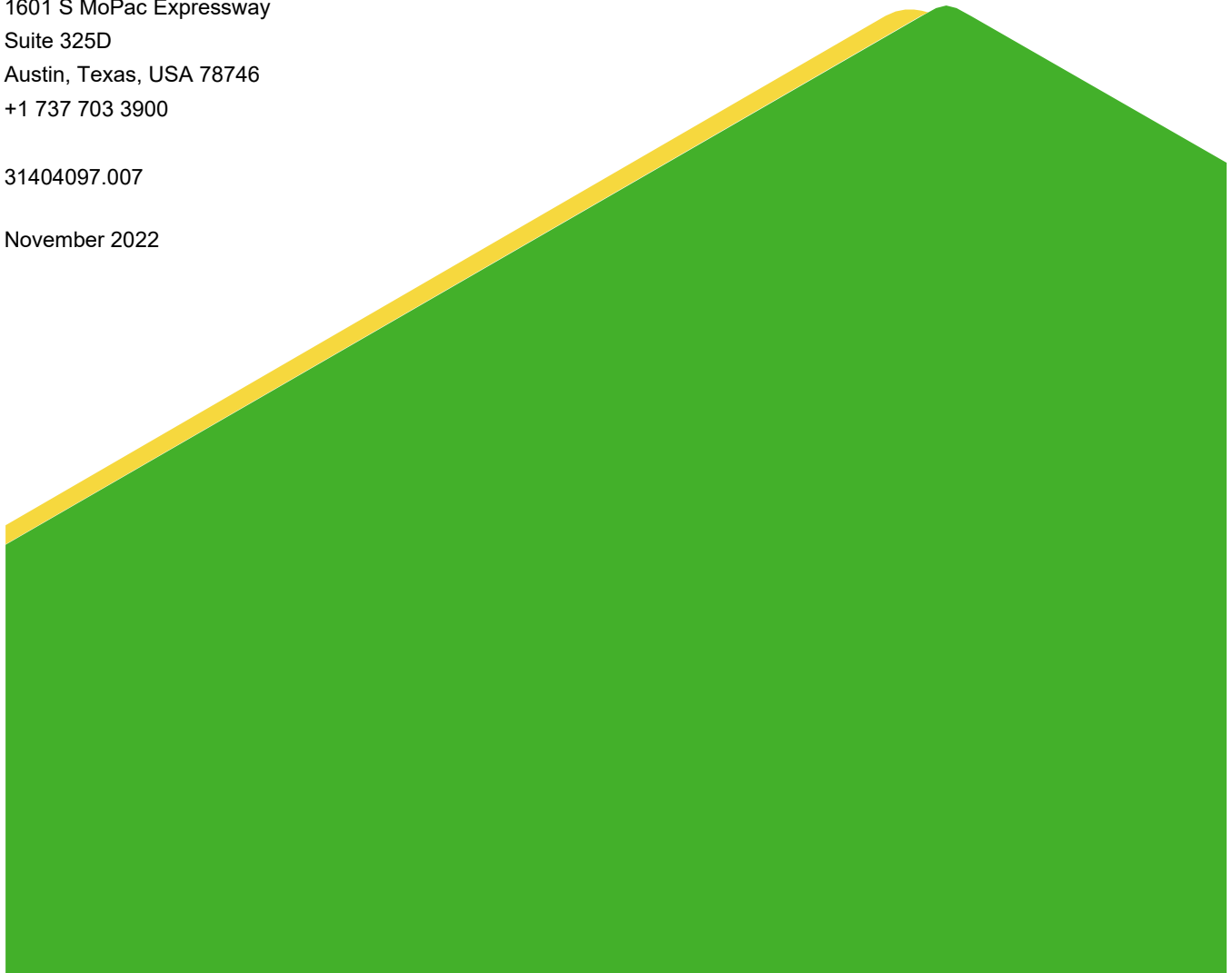
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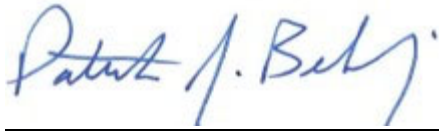
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November 2022



PROFESSIONAL CERTIFICATION

This document and all attachments were prepared by WSP Golder 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 Addendum No.1 to the Closure Plan for Ash Landfill 1 at the Oak Grove Steam Electric Station has been prepared in accordance with the requirements of 40 C.F.R. §257.102(b).



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DOCUMENT REVISION RECORD

Issue No.	Date	Details of Revisions
Revision 0	October 2016	Original Document
Addendum 1	November 2022	Added confirmation that landfill cap slope stability will be modeled using site-specific geotechnical data during final closure design

1.0 INTRODUCTION

On behalf of Oak Grove Management Company LLC (Luminant), WSP Golder (Golder) has prepared this Addendum No. 1 to the Closure Plan for Ash Landfill 1(ALF1) located at the Oak Grove Steam Electric Station (OGSES) in Robertson County, Texas (hereafter, the “Site”). Coal Combustion Residuals (CCR) including flue gas desulfurization (FGD) wastewater and bottom ash generated as part of OGSES operation are managed in ALF1. ALF1 is regulated as an Existing CCR Landfill under 40 C.F.R. § 257, Subpart D (the “CCR Rule”).

The original Closure Plan for ALF1 was prepared in October 2016 in accordance with 40 C.F.R. §257.102(b) and placed in the OGSES operating record in accordance with 40 C.F.R. §257.105(h)(10) (Golder, 2016). This Addendum No. 1 updates the Closure Plan to reflect the following:

- Confirmation that the slope stability of the ALF1 cap/cover system will be modeled using site-specific geotechnical data during design of the final closure of the landfill.

2.0 LANDFILL CAP/COVER SYSTEM SLOPE STABILITY MODELING

ALF 1 is the primary disposal facility for CCR generated at the OGSES and consists of four landfill cells (Cells 1 through 4), each constructed with a 3-foot thick compacted clay liner (hydraulic conductivity $\leq 1 \times 10^{-7}$ cm/sec). The landfill is constructed above-grade and is surrounded by earthen perimeter berms that extend 10 to 20 feet or more above ground surface. The perimeter berms are also provided with a 3-foot thick compacted clay liner on the interior face of the berms.

A final cap/cover system will be constructed over the CCR in ALF1 as part of unit closure as described in the 2016 Closure Plan (Golder, 2016). The final cover system for ALF1 as described in the 2016 Closure Plan consisted of the following (from bottom to top):

- Minimum 6 inches of select fill on top of CCR to serve as levelling layer/cap subgrade;
- 40-mil linear low-density polyethylene (LLDPE) textured geomembrane;
- Geosynthetic drainage layer; and
- 18-inch erosion layer consisting of 12 inches of general fill overlain with 6 inches of soil capable of supporting native vegetation.

The ALF1 Closure Plan will be updated to include cap/cover system slope stability modeling using site-specific geotechnical data during design of the final cap/closure system for the landfill.

3.0 REFERENCES

Golder Associates (Golder), 2016. Closure Plan – Ash Landfill 1, Oak Grove Steam Electric Station. October.