



July 28, 2020

Texas Commission on Environmental Quality
Industrial and Hazardous Waste Permits Section
MC-130
PO Box 13087
Austin, Texas 78711-3087

RE: Big Brown Steam Electric Station (SWR30080) - Semi-Annual Progress Report for Remedy Selection and Design for the Ash Disposal Area II

To Whom It May Concern:

On behalf of Falcon Development, LLC (Falcon Development), ATON, LLC (ATON) is submitting this letter to serve as a semi-annual report on the progress of the remedy design and selection for the closure of Ash Area Disposal II (ADA II) (WMU #005) at the former Luminant Big Brown Steam Electric Station (BBSES), per 40 CFR § 257.97(a). The facility is currently owned and maintained by Falcon Development. The former BBSES power generating units are in the process of being dismantled and the surface impoundments and WMUs will be closed to the appropriate regulatory standards.

In September 2019, the Coal Combustion Residual (CCR) Assessment of Corrective Measures report was prepared, which described two potential remedies for closure of ADA II:

- Closure in place/capping with either a compacted clay cap or a geomembrane cap; and,
- Removal and off-site disposal off CCR Materials.

Site surveys and characterization indicates that closure in place/capping with a compacted clay cap is the best option. This provides source control as it is achieved through construction of a low permeability cap on the surface of the landfill to capture and isolate CCR material in place. This cap option will utilize a low permeability compacted clay liner covered by a vegetative soil layer and permanent vegetation. Capping is a proven method of source control and provides reliable, long-term containment to prevent, or significantly reduce, exposure to the source material and migration from precipitation through the source area.

CCR material from the bottom ash ponds is currently being graded in ADA II in anticipation of capping. The cap is currently in the design phase of the project and will be designed to capture and isolate the CCR material in the landfill and minimize the potential for migration of CCR constituents to groundwater by controlling infiltration of precipitation through CCR material in the landfill in accordance with all State and Federal CCR regulations. Upon completion, the design will be submitted to the Texas Commission on Environmental Quality (TCEQ) for review and approval to ensure compliance with all applicable regulations.

The 2019 CCR Assessment and Corrective Measures report also described several potential options for groundwater response technologies:

- Monitored Natural Attenuation;
- Groundwater Extraction and Treatment; and,
- Vertical Hydraulic Barrier.

Based on initial screening of the groundwater response technologies, all options are viable and currently under review to determine the best option. Concentrations of groundwater contaminants will be continuously monitored in accordance with CCR rule and respective Groundwater Protection Standards (GWPS) in the future. These monitoring results, along with statistical analysis and alternate source demonstrations, will be considered as part of the remedy selection process.

As previously stated, the design of the final cap is underway, and it is anticipated to be submitted for review prior to the next semiannual progress report. Please contact me at (636) 349-0202 or at adam@atonenv.com if you have any questions or comments.

Sincerely,



Adam Peetz, P.E.
VP Remediation and Site Development

cc: Ron Froh - Falcon Development, LLC