



January 21, 2021

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 - Semi-Annual Progress Report for Remedy Selection and Design for the Ash Disposal Area II**

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 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 the last letter we discussed the selection of a planned path forward for the environmental closure of this area. Closure in Place/Capping with a Compacted Clay Cap was selected as being 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 Coal Combustion Residual (CCR) material in place. This cap option will utilize a low permeability compacted clay liner covered by a vegetative soil layer and permanent vegetation.

CCR material from the bottom ash pond closures will be hauled to the ADA II in prior to capping. The bottom ash material will be used to facilitate grades close to those proposed in the original closure plan. This disposal area is well short of the original designed capacity and area due to the plant closure, but the intent is to close the areas that have received waste with final grades close to the original design. This disposal area has only utilized Cells 1 through 10. Cell 11 has a bottom liner constructed but has not received any waste materials. . The final grades of the cap design are currently being adjusted to allow for the large variance between utilized waste capacity and designed capacity, these design modifications will be completed soon and presented to TCEQ for review prior to cap installation.

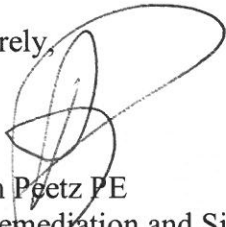
The 2019 CCR Assessment and Corrective Measures report also described several potential options for groundwater response technologies:

- Monitored Natural Attenuation
- Groundwater Extraction and Treatment
- Vertical Hydraulic Barrier

Of these options, which were presented in the last letter, no final choice has been selected. Concentrations of groundwater contaminants will continue to be 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 modifications to the design of the final cap are 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,

A handwritten signature in black ink, appearing to read 'Adam Preetz', written over a circular stamp or seal.

Adam Preetz PE  
VP Remediation and Site Development  
**ATON LLC**

CC: Falcon Development, LLC