



**CORRESPONDENCE COVER SHEET  
WASTE PERMITS DIVISION  
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

Date: 5/21/2021  
 Facility Name: Monticello Steam Electric Station  
 Permit or Registration No.: SWR30081

Nature of Correspondence:  
 Initial/New  
 Response/Revision\*

\*If Response/Revision, please provide previous TCEQ Tracking No.:

(Previous TCEQ Tracking No. can be found in the Subject line of the TCEQ's response letter to your original submittal.)

This cover sheet should accompany all correspondences submitted to the Waste Permits Division and should be affixed to the front of your submittal as a cover page. Please check the appropriate box for the type of correspondence being submitted. For questions regarding this form, please contact the Waste Permits Division at (512) 239-2335.

**Table 1 - Municipal Solid Waste**

APPLICATIONS	REPORTS and RESPONSES
<input type="checkbox"/> New Notification	<input type="checkbox"/> Closure Report
<input type="checkbox"/> New Permit (including Subchapter T)	<input type="checkbox"/> Groundwater Alternate SRC Demonstration
<input type="checkbox"/> New Registration (including Subchapter T)	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Statistical Evaluation
<input type="checkbox"/> Limited Scope Major Amendment	<input type="checkbox"/> Landfill Gas Corrective Action
<input type="checkbox"/> Notice Modification	<input type="checkbox"/> Landfill Gas Monitoring
<input type="checkbox"/> Non-Notice Modification	<input type="checkbox"/> Liner Evaluation Report
<input type="checkbox"/> Transfer/Name Change Modification	<input type="checkbox"/> Soil Boring Plan
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Special Waste Request
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Other:
<input type="checkbox"/> Subchapter T Workplan	
<input type="checkbox"/> Other:	

**Table 2 - Industrial & Hazardous Waste**

APPLICATIONS	REPORTS and RESPONSES
<input type="checkbox"/> New	<input type="checkbox"/> Annual/Biennial Site Activity Report
<input type="checkbox"/> Renewal	<input type="checkbox"/> CfPT Plan/Result
<input type="checkbox"/> Post-Closure Order	<input type="checkbox"/> Closure Certification/Report
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Construction Certification/Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> Class 3 Modification	<input type="checkbox"/> Extension Request
<input type="checkbox"/> Class 2 Modification	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Class 1 ED Modification	<input type="checkbox"/> Interim Status Change
<input type="checkbox"/> Class 1 Modification	<input type="checkbox"/> Interim Status Closure Plan
<input type="checkbox"/> Endorsement	<input type="checkbox"/> Soil Core Monitoring Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Treatability Study
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Trial Burn Plan/Result
<input type="checkbox"/> 335.6 Notification	<input type="checkbox"/> Unsaturated Zone Monitoring Report
<input type="checkbox"/> Other:	<input type="checkbox"/> Waste Minimization Report
	<input checked="" type="checkbox"/> Other: Updated Closure Plan

# UPDATED CCR CLOSURE PLAN

## Bottom Ash Ponds

*Former Monticello Steam Electric Station  
Titus County, Texas*

Prepared for:  
**GOLDEN EAGLE DEVELOPMENT LLC**

Prepared by:  
**ATON LLC**  
2275 Cassens Drive, Suite 118  
Fenton, Missouri 63026

May 2021

On behalf of Golden Eagle Development, LLC (Golden Eagle), ATON, LLC (ATON) has prepared this Updated Coal Combustion Residue (CCR) Closure Plan (30 TAC 352.1221/40 CFR 257.102(b)) for the Bottom Ash Ponds (BAPs) at the Monticello Steam Electric Station (MOSES) (Figure 1). This plan is an update to the updated closure plan submitted in January 2020 by Golden Eagle (ATON, 2020). The 2016 closure plan design proposed to close one of the BAPs by CCR removal and cap the other two ponds. Per the updated plans all three BAPs will be closed by removal. The May 2020 update provides an updated schedule and soil sample collection.

## **1.0 BOTTOM ASH PONDS**

The site contains three BAPs subject to CCR closure requirements, Northeast Ash Water Retention Pond (WMU 11), West Ash Settling Pond (WMU 12), and Southwest Ash Settling Pond (WMU 22) that comprise of approximately 19-acres (Figure 2). The adjacent Stormwater Collection Pond (WMU 9) is not subject to CCR regulations. The BAPs were built in 1974; however, they were relined in 1990 with 3-foot clay liners.

The BAPs received recovered overflow from bottom ash dewatering bins and other MOSES process wastewater sources. The ponds also acted as a surge basin for various water streams in the ash-water system. Recovered sluice water, process waters and storm water runoff from the MOSES ash-water system were pumped to each pond through a series of above grade pipes on the east end. The BAPs also served as settling basins to remove residual bottom ash and fines from recovered sluice water associated with the dewatering bins. Water was pumped from the SW Pond, as needed, and returned for reuse in the bottom ash system. When sufficient ash had accumulated in either the NE or West Ponds, the recovered sluice water was diverted to the other pond. Ash was then removed from the first pond and transported via train car to the G Ash Area. Based on the design of the BAPs, minimal accumulation of solids occurred within the SW Pond.

## **2.0 BOTTOM ASH PONDS CLOSURE - CLOSURE BY REMOVAL OF CCR**

### **2.1 Closure by Removal**

The purpose of this Updated CCR Closure Plan is to describe the steps required to close the BAPs at MOSES consistent with recognized and generally accepted good engineering practices. Closure of the BAPS will be designed to reduce the need for long-term maintenance and control the post-closure release of constituents into environmental pathways. The BAPS will be closed through the removal of CCR, and the closure will be performed pursuant to 40 CFR 257.102(c).

The ash material from the BAPs will be dewatered of free liquids via pumping to the North Operating Pond (WMU 007) starting with the SW Pond. Following removal of free liquids, the bottom ash material from the ponds will be excavated and hauled to the B-Area Landfill (WMU 002) for beneficial structure fill starting with the SW Pond. Water and bottom ash will then be removed from the NE Pond and West Pond, respectively. The embankments and bottom clay liner will also be removed following

the bottom ash and used as B-Area fill. Pipelines that are above be removed from the around the impoundments. Underground pipelines entering the impoundments will be excavated and removed or closed in place as necessary for future grading.

Upon closure completion, certification from a qualified Texas professional engineer will be provided verifying that closure has been completed in accordance with the closure plan. Following closure certification, the area will be graded to the southwest toward Lake Monticello via an existing surface water culvert that is currently permitted stormwater Outfall 001. Interior surface grading will provide a 3 to 5 percent slope for drainage relief from the footprint of the former impoundments to ensure (to the maximum extent feasible) that post-closure run-off is conveyed off the former impoundment area. The Stormwater Collection Pond will be closed per Texas Risk Reduction Rule (TRRP) 30 TAC 350.

## **2.2 Closure Schedule**

- Mobilization and dewatering SW Pond – completed February 2021
- Bottom Ash Removal – SW Pond – completed April 2021
- Dewatering NE Pond – ongoing since January 2021
- Bottom Ash Removal – NE Pond - June 2021
- Dewatering West Pond – June 2021
- Bottom Ash Removal – West Pond - August 2021
- Liner and Embankment Removal - September 2021
- BAP Closure – September/October 2021
- BAP Area Re-Grading - November 2021

## **3.0 GROUNDWATER MONITORING**

Golden Eagle currently conducts groundwater sampling in the BAP area on a semi-annual basis for Detection Monitoring in accordance with 40 CFR 257.94. Pursuant to 40 CFR 257.102(c), groundwater protection standards (GWPS) have not been established. The impoundment will remain in detection monitoring during implementation of the closure activities. If groundwater has been determined to not be impacted, the ongoing detection monitoring program will cease after completion of the closure activities and posting of the Notification of Completion of Closure to the CCR website. The monitoring wells making up the bottom ash ponds groundwater monitoring system will then be properly closed and abandoned per applicable State of Texas requirements.

#### 4.0 CERTIFICATION STATEMENT

This closure plan and all attachments were prepared by ATON LLC under my direction and supervision. This closure plans meets the requirements of 30 TAC 352.1221/40 CFR 257.102 and been prepared in a manner consistent with recognized and generally accepted good engineering practices.



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Adam J. Kaiser, PE



5/21/2021

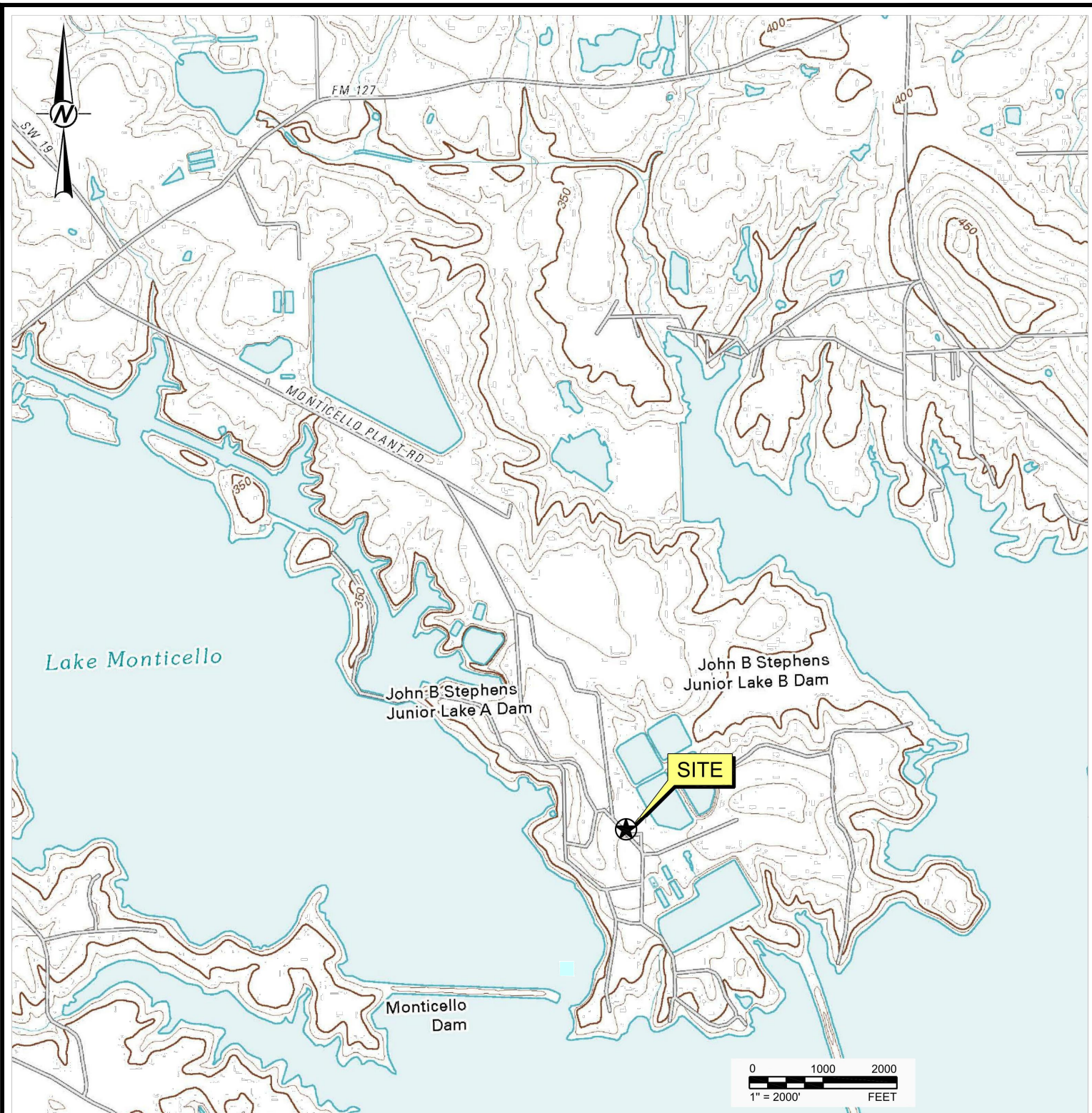
## 5.0 REFERENCES

ATON, 2021. *Updated CCR Closure Plan, Monticello Steam Electric Station*. May

Golder, 2020. *Annual Groundwater Monitoring Report, Monticello Steam Electric Station*. July 10.

Pastor, Behling & Wheeler, LLC (PBW), 2016. *CCR Closure Plan, Monticello Steam Electric Station, Bottom Ash Ponds*. October.

Pastor, Behling & Wheeler, LLC (PBW), 2016. *CCR Post-Closure Plan, Monticello Steam Electric Station, Bottom Ash Ponds*. October.



REFERENCE(S)  
 BASE MAP TAKEN FROM WWW.TNRIS.GOV, MONTICELLO, TX 7.5 MIN. USGS QUADRANGLE  
 DATED 2010.



QUADRANGLE LOCATIONS

C:\Users\lorcc\OneDrive\Documents\DWG\ATON\Projects\Monticello\dwg\fig1\_SiteLocMap.dwg



**ATON**

Figure 1  
 Site Location Map  
 Former MOSES Site

Chkd:	AK
Drawn:	EFC
Page:	
Date:	9/30/2020
Scale:	As Shown



Source: Google Earth

Date: 2020

Figure 2

NOT TO SCALE



**ATON**

**Site Name:**

**Monticello Steam Engine  
Electric Station  
Mount Pleasant, Texas**

**Project:**

**SWR 30081**