

## ATTACHMENT 2

NOD1 ITEM 3: REVISED TABLE 1.6

**Table I.6. – CCR Waste Management Units**

CCR Unit No. <sup>1</sup>	Unit Name	N.O.R. No. <sup>1</sup>	Unit Description <sup>3</sup>	Capacity	Unit Status <sup>2</sup>
001	Site F Landfill	32271	Landfill	7,398,346 cy	Active
004	Scrubber Sludge Pond	32271	Surface Impoundment	115-acre feet	<del>Undergoing Closure by Removal</del> <a href="#">Active</a>
006	Ash Ponds A, B and C	32271	Surface Impoundment	150-acre feet per pond	<del>Undergoing Closure by Removal</del> <a href="#">Active</a>

1 Registered Unit No. and N.O.R. No. cannot be reassigned to new units or used more than once.  
 2 Unit Status options: Active, Closed, Inactive (built but not managing waste), Proposed (not yet built), Never Built, Transferred, Post-Closure.  
 3 If a unit has been transferred, the applicant should indicate which facility/permit it has been transferred to in the Unit Description column.

[Revision 1: May 9, 2022, to correct unit status for surface impoundments CCR Unit Nos. 004 and 006.](#)

Scrubber Sludge Pond  
CCR Removal Certification

The Gibbons Creek Environmental Redevelopment Group is closing the Scrubber Sludge Pond utilizing the closure by removal option for CCR units as described in 40 C.F.R. § 257.102 and 30 TAC § 352.1221. The CCR material was excavated from the pond and hauled to the onsite Site F Landfill, an authorized CCR landfill, where it was permanently disposed.

The closure by removal process was performed in accordance with the following project documents:

- Notice of Intent to Close CCR Units dated April 9, 2021
- CCR Closure and Post Closure Plan dated April 9, 2021
- Construction Drawings for the Gibbons Creek Electric Station Scrubber Sludge Pond and Ash Ponds dated June 7, 2021

The Scrubber Sludge Pond was visually inspected on February 23 and March 1, 2022 to confirm that all CCR material had been removed by David Vogt, a qualified professional engineer in the state of Texas.

Upon completion of the visual inspection, the Owner excavated an additional 6-inches of soil material from the bottom of the pond and disposed of it at the onsite authorized landfill to remove any potentially impacted underlying soils from the surface impoundment.

The groundwater monitoring has not indicated any exceedances of groundwater protection standards based on the submission of a successful Alternate Source Demonstration

In accordance with 40 C.F.R. § 257.102, 30 TAC § 352.1221, and the visual inspections completed on March 1, 2022, I certify that the CCR material was removed from the Scrubber Sludge Pond.

HDR appreciates the opportunity to serve as your consultant on this Project and to submit this completion report for the Scrubber Sludge Pond. If you have any questions concerning this certification, please contact the undersigned.

Sincerely,

HDR Engineering, Inc.



David C. Vogt, PE

P.E. License #93905  
Project Manager  
HDR Engineering, Inc.  
17111 Preston Road, Suite 300  
Dallas, TX 75248  
Texas Engineering Firm No. 754



4/4/2022

## Ash Pond B

### CCR Removal Certification

The Gibbons Creek Environmental Redevelopment Group is closing the Ash Ponds utilizing the closure by removal option for CCR units as described in 40 C.F.R. § 257.102 and 30 TAC § 352.1221. The CCR material was excavated from Ash Pond B and hauled to the onsite Site F Landfill, an authorized CCR landfill, where it was permanently disposed.

The closure by removal process was performed in accordance with the following project documents:

- Notice of Intent to Close CCR Units dated April 9, 2021
- CCR Closure and Post Closure Plan dated April 9, 2021
- Construction Drawings for the Gibbons Creek Electric Station Scrubber Sludge Pond and Ash Ponds dated June 7, 2021

The Ash Pond B was visually inspected on March 11 and March 21, 2022 to confirm that all CCR material had been removed by David Vogt, a qualified professional engineer in the state of Texas.

Upon completion of the visual inspection, the Owner excavated an additional 6-inches of soil material from the bottom of the pond and disposed of it at the onsite authorized landfill to remove any potentially impacted underlying soils from the surface impoundment.

The groundwater monitoring has not indicated any exceedances of groundwater protection standards based on the submission of a successful Alternate Source Demonstration

In accordance with 40 C.F.R. § 257.102, 30 TAC § 352.1221, and the visual inspections completed on March 21, 2022, I certify that the CCR material was removed from Ash Pond B.

HDR appreciates the opportunity to serve as your consultant on this Project and to submit this completion report for the Ash Pond B. If you have any questions concerning this certification, please contact the undersigned.

Sincerely,

HDR Engineering, Inc.



David C. Vogt, PE

P.E. License #93905

Project Manager

HDR Engineering, Inc.

17111 Preston Road, Suite 300

Dallas, TX 75248

Texas Engineering Firm No. 754



4/25/2022