



## Gibbons Creek Environmental Redevelopment Group, LLC

April 9, 2021

Texas Commission for Environmental Quality  
Industrial and Hazardous Waste Permits Section MC-130  
PO Box 13087  
Austin, Texas 78711-3087  
Attn.: Brent Wade

*submitted via email*

RE: Notice of Intent to Close CCR Units  
Gibbons Creek Reservoir – Solid Waste Registration 32271.

Dear Mr. Wade:

In accordance with 40 C.F.R. § 257.102(g), the owner or operator of a coal combustion residuals (CCR) unit must prepare a notification of intent to close a CCR unit no later than the date the owner or operator initiates the closure of the CCR unit.

As detailed in the Closure and Post-Closure Plan for the Gibbons Creek steam Electric Station dated April 9, 2021, the Gibbons Creek Environmental Redevelopment Group, LLC (GCERG) intends to close the CCR units at the facility. Specifically, the GCERG intends to close the Scrubber Sludge Pond (SSP), Ash Ponds (APs), and Site F Landfill (SFL) consistent with the Closure and Post Closure Plan. The SSP and APs will be closed by removing the CCR material in accordance with 40 C.F.R. § 257.102(c) and the SFL will be closed by leaving CCR materials in place in accordance with 40 C.F.R. § 257.102(d). The closure activities are expected to be completed in 2023.

The GCERG intends to dewater the surface impoundments and then remove the CCR material. The CCR material will be hauled to the SFL for final disposal. A final cover system consisting of the following elements will be installed at the SFL consistent with 40 CFR §257.102(d)(3)(i):

- Cap Topsoil Layer: The Cap Topsoil layer will be a 6-inch thick layer of topsoil suitable for seeding and establishment of cover vegetation and support of each stage of related cap construction and maintenance equipment and materials, with a surface slope of 3% to 5% graded to drain to relief, and with a substantially continuous stand of erosion-resistant native or adapted perennial shortgrass cover vegetation in accordance with 40 CFR §257.102(d)(3)(i)(C).
- Cap Soil Fill Layer: The Cap Soil Fill layer will be an 18-inch thick layer of soil fill suitable for supporting the Cap Topsoil layer and related cap construction and maintenance equipment and materials in accordance with 40 CFR §257.102(d)(3)(i)(B).
- Cap Barrier: The Cap Barrier will be 60-mil HDPE or 40-mil LLDPE FML supported on a 12-inch thick layer of compacted clay rich soil with a hydraulic conductivity of  $1 \times 10^{-5}$  cm/sec, resulting in a permeability equal to or less than the permeability of the 3-foot thick compacted clay

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bottom liner, with a hydraulic conductivity of  $1 \times 10^{-7}$  cm/sec; has a top surface slope of 3% to 5% that is graded to drain to perimeter relief; is suitable for supporting each stage of overlying cap layers and related cap construction and maintenance equipment and materials in accordance with 40 CFR §257.102(d)(3)(i)(A); and is supported by stable CCR, which is solidified if necessary, and stable compacted soil fill in accordance with 40 CFR §257.102(d)(3)(i)(D).

Best regards,

**Gibbons Creek Environmental Redevelopment Group, LLC**

A handwritten signature in blue ink, appearing to read 'Norman E. Divers, III', is positioned below the company name.

Norman E. Divers, III, VP – Quality, Environment, Health & Safety  
/nd

Cc: Scott Reschly, President, GCERG  
Mike Dunn, VP/PM, GCERG  
File

Enclosure:  
Engineer's Certification



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### ENGINEER'S CERTIFICATION

Pursuant to the requirements of 40 CFR §257.102(d)(3)(iii), I hereby certify that the proposed design of the final cover system of the Site F Landfill, as discussed above, meets the requirements of 40 CFR §257.102(d)(3) and that the closure of the Scrubber Sludge Pond and Ash Ponds by removal of CCR meets the requirements of 40 CFR §257.102(c).



David C. Vogt, PE

P.E. License #93905

Project Manager

HDR Engineering, Inc.

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