



Gibbons Creek Environmental Redevelopment Group, LLC

May 9, 2022

Eun Ju Lee, Ph.D., P.E.  
Industrial & Hazardous Waste Permits Section  
Waste Permits Division  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

Re: Technical NOD1 New CCR Registration  
Gibbons Creek Environmental Redevelopment Group, LLC – Anderson, Grimes County  
New Coal Combustion Residuals (CCR) Registration No. CCR113  
Industrial Solid Waste Registration No. 32271  
EPA Identification No. TXD000751073  
Tracking No. 27262344; RN100214550/CN6505860162

Dear Ms. Lee,

In response to your review comments dated April 25, 2022, the following includes the clarifications and/or revisions to complete the Permit Application for the Gibbons Creek Environmental Redevelopment Group (GCERG) facility.

**1. Application Cover Sheet**

This facility has been assigned the registration identification number: CCR113. Use this ID number to reference this application in future correspondence.

*Noted. In addition, a revised cover sheet is provided in Attachment 1 to this response.*

**2. Publicly Accessible Website**

Post the registration application, revisions, and other required information.

*Application, revisions, and other required information can be found at <https://gcerg-crrule.com>.*

### 3. Table 1.6

Correct unit status for surface impoundments (CCR Unit Nos. 004 and 006) and include Site A landfill unit that is depicted on the Site Location Map.

*The revised Table 1.6 with corrected unit status for surface impoundments (CCR Unit Nos. 004 and 006) can be found in Attachment 2.*

*The CCR material in the Scrubber Sludge Pond and Ash Pond B has been removed and these ponds are closed pending acceptance by the TCEQ. The Engineer's certification is included in Attachment 2. The Engineer's certification of closure for Ash Pond A and Ash Pond C is pending final inspection and removal of an additional 6-inches of soil from the bottom of each pond.*

*The Site A Landfill is not a CCR unit and is not included in the map. Please see Response 11 below for more information.*

### 4. Table 1.6.A

Provide waste volume managed from active landfill.

*The TMPA shutdown the power plant in September 2018 and the facility is currently being decommissioned. Solid waste is no longer being generated.*

*From the Permit Application Attachment V: Closure Post Closure Plan, Section 2.0 CCR Unit Description:*

*The volume of CCR material managed at the site:*

- *TMPA landfilled waste materials*
  - *Waste No. 1-8: 7,398,000 cy CCR combined total at Site F Landfill*
  
- *Decommissioning activities moving solid waste to Site F Landfill*
  - *Waste No. 5 - 360,000 cy Bottom Ash at Ash Ponds*
  - *Waste No. 1 - 95,000 cy Scrubber Sludge at Scrubber Sludge Pond*
  - *Waste No. 4 - 35,000 Clean 6" dirt removed from bottom/sides of Ash Ponds and Scrubber Sludge Pond*
  - *Waste No. 4 - 155,000 Coal yard, drainage ditches and Plant Collection Pond cleaning*
  - *Waste No. 6 - 35,000 cy Boiler Island and FGD area closure*

*Upon completion of closure by removal activities at the Ash Ponds and Scrubber Sludge Ponds, the volume of CCR material at the Site F Landfill will be approximately 8,078,000 cy. Closure of the Site F Landfill will commence upon completion of closure by removal activities at the Ash Ponds and Scrubber Sludge Pond.*

**5. Notice Publishing**

Identify the agent in service and their contact information.

*C T Corporation System  
1999 Bryan Street  
Suite 900  
Dallas, TX 75201*

**6. Property/Legal Description**

Provide a legal metes and bounds description.

*See Attachment 3 for the site's plat map and legal metes and bounds description of the property.*

**7. Property/Legal Description**

Provide a property owner affidavit. Although this affidavit is not specifically listed in the Registration form or instructions, it is prescribed information. We have attached for your assistance a sample affidavit for your use.

*See Attachment 4 for the property owner affidavit.*

**8. Legal Authority**

Provide the one-page certificate of incorporation issued by the Secretary of State.

*See Attachment 5 for the certificate of incorporation issued by the Secretary of State.*

## 9. Core Data Form

Provide a completed core data form.

*See Attachment 6 for the completed core data form.*

## 10. Attachment A

Provide the following:

- a. Map(s) that show information the nature of development of adjacent lands.
- b. Latitude and Longitude.
- c. Registration boundary on the site location map.
- d. A narrative for the process flow diagram.
- e. Pre-printed or electronic mailing labels.
- f. A list of mineral interest ownership under the facility.

*See Attachment 7 for the revised drawings.*

*Per clarification meeting held with the TCEQ on April 28, the GCERG is currently in the process of selling off portions of their property and the adjacent land-owner list and drawing provided with the original permit application submittal is obsolete. Per direction received from the TCEQ, an updated adjacent landowner drawing, contact list, and mailing labels will be provided as a response to the first technical NOD.*

*The GCERG has mineral interest ownership under the facility.*

## 11. Attachment B

Provide verification of compliance supporting documentation for the Site A Landfill.

*The Site A Landfill (SAL) was designed and operated to manage Class II and Class III industrial non-hazardous waste which consisted primarily of fly ash, bottom ash, and stabilized FGD sludge. The SAL stopped receiving CCR material in 1992 and was subsequently capped with a 2-foot thick compacted clay layer and vegetated with a grass cover in 1992 and 1993. The landfill's cover and liner were constructed of the same clay with the same thickness to provide equivalent permeabilities. The design and operation of the SAL was consistent with the*

*requirements of the Texas Water Commission, The Texas Natural Resource Conservation Commission, and Guideline Number 3 which, at the time, recommended a liner and final cover with a thickness of 2-feet for Class I and Class II industrial non-hazardous waste. The final cover was sloped 1% - 4% to prevent ponding of stormwater on its final cap.*

*Since the SAL was closed on or about 1993 and has not received any CCR material since its closure, it is not considered as a CCR Unit subject to the requirements of 40 CFR 257 or 30 TAC 352.*

*The GCERG is currently performing maintenance activities on the SAL to stop the continued generation of leachate. These maintenance activities include the installation of a 40-mil LLDPE geomembrane over the surface of the landfill. The geomembrane is overlain with a geocomposite to promote drainage. The geosynthetics are then covered with a 18-inch thick soil infiltration layer and 6-inch thick soil erosion layer. Vegetation will then be established on top of the soil erosion layer.*

*The GCERG has also installed a horizontal well which traverses east to west across the landfill to expedite the removal of leachate. All leachate is treated and released in accordance with the requirements of the site's TPDES permit.*

*The GCERG is including the 1991 Closure Plan, 1993 Risk Reduction Standard Number 3 Closure Plan, and transmittal correspondence with the TNRCC for your records (See Attachment 8).*

## **12. Attachment D**

Depict Site F and Site A Landfills on the FEMA map.

*See Attachment 9 for the revised FEMA Map.*

## **13. Geology Report**

Submit a summary of geologic conditions.

*Please see original registration application submittal Attachment R: Safety Factor Assessment, Section 3.0 Soil Study for the geological summary of the facility.*

#### **14. Attachment H**

Include Site A Landfill in Sections 1.0, 3.0, and Table 3.1.

*The Site A Landfill is not a CCR Unit subject to the requirements of 40 CFR 257 or 30 TAC 352. Please see Response 11 above for additional clarification.*

If you have any questions regarding this response, please give Dave Vogt a call at 972-960-4400 or Norman Divers at 704-472-3919. We look forward to continuing to work with you to complete the registration process.

Sincerely,



David C. Vogt, P.E.  
HDR Engineering, Inc.