



Gibbons Creek Environmental Redevelopment Group, LLC

June 2, 2022

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: Closure Completion CCR Surface Impoundments
Gibbons Creek Reservoir – Solid Waste Registration 32271, CCR Registration CCR113

Dear Mr. Wade:

In accordance with 40 C.F.R. § 257.102(h) and 30 TAC § 352.1221, the owner or operator of a coal combustion residuals (CCR) unit must prepare a notification of closure of a 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) closed CCR units at the facility. Specifically, GCERG closed the Scrubber Sludge Pond (SSP) and Ash Ponds (APs) consistent with the Closure and Post Closure Plan. The SSP and APs were closed by removing the CCR material in accordance with 40 C.F.R. § 257.102(c). The closure activities for these surface impoundments were completed on May 16, 2022.

Per 40 C.F.R. § 257.102(f), this closure notification includes the written certification (please see attached) by a qualified professional engineer that the surface impoundments were closed in accordance with the Closure Plan.

Per 40 C.F.R. § 257.102(h), GCERG has completed the notification when the closure notification has been placed in the facility's operating record per 40 C.F.R. § 257.105(i)(8). This closure notification can be found in the facility's operating record at [GCERG – Data & Information \(gcerg-ccrule.com\)](http://gcerg-ccrule.com).

Per 40 C.F.R. § 257.102(i), an owner or operator that closes a CCR unit through the closure by removal process is not subject to the requirements to record a notation on the deed that the land has been used as a CCR unit and is restricted under the post-closure care requirements. As such, a revised deed for these surface impoundments will not be completed or placed in the facility's operating record.

Best regards,

Gibbons Creek Environmental Redevelopment Group, LLC

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

12601 Plantside Drive
Louisville, KY 40299
(502) 245-1353

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 A

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 A 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 A was visually inspected on April 18, 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.

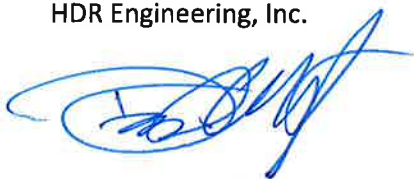
The groundwater monitoring has not indicated any exceedances of groundwater protection standards based on the submission of a successful Alternate Source Demonstration

In accordance with 40 C.F.R. § 257.102, 30 TAC § 352.1221, and the visual inspections completed on April 18, 2022, I certify that the CCR material was removed from Ash Pond A.

HDR appreciates the opportunity to serve as your consultant on this Project and to submit this completion report for the Ash Pond A. 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



6/11/2022

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

Ash Pond C

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 C 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 C was visually inspected on May 16, 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 May 16, 2022, I certify that the CCR material was removed from Ash Pond C.

HDR appreciates the opportunity to serve as your consultant on this Project and to submit this completion report for the Ash Pond C. 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



6/1/2022