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June 10, 2022

Ms. Kirsten Hillyer, Environmental Engineer  
Environmental Protection Agency  
Office of Resource Conservation & Recovery  
Materials Recovery & Waste Management Division  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Martin Lake Steam Electric Station Alternative Closure Demonstration – Update to Schedule

Dear Ms. Hillyer:

Luminant Generation Company LLC (Luminant) hereby submits this update to our schedule associated with the alternative closure demonstration for the Martin Lake Steam Electric Station near Tatum, TX. This submittal also supplements its prior response dated February 25, 2022, to EPA's request via email on February 14, 2022, for additional information associated with the alternative closure demonstration.

As detailed in the alternative closure demonstration submitted to EPA on November 25, 2020, Luminant requested site-specific deadlines to initiate closure for the Ash Pond Area (which consists of three ponds—East Ash Pond, West Ash Pond, and New Scrubber Pond) and Permanent Disposal Pond 5 (PDP5).

As described in the alternative closure demonstration, the three ponds that comprise the Ash Pond Area were scheduled to be retrofitted sequentially with no more than one pond undergoing retrofit at any point in time in order to maintain adequate water storage capacity. To date, two of the three ponds have been successfully removed from service, retrofitted, and returned to service. CCR is currently being removed from the third pond in preparation for its retrofit. Specifically, the East Ash Pond retrofit was completed in October 2020, and the West Ash Pond retrofit was completed in December 2021.

The November 25, 2020 demonstration estimated that the retrofit of the New Scrubber Pond would be completed by October 31, 2022. However, for the reasons noted below, this milestone has been significantly delayed. As noted in the February 25, 2022 response, Martin Lake anticipated challenges in removing the material in the New Scrubber Pond (which is different in consistency from the material in the other two ponds), and those challenges have now materially delayed the retrofit work on the New Scrubber Pond. Specifically, the wet consistency of the remaining scrubber sludge in the New Scrubber Pond requires additional time for consolidation with dry material, excavation, and removal. The CCR material that is currently being removed from the New Scrubber Pond has been the most unstable of any the three ponds and is difficult to dewater (the material does not easily yield or release water). Thus, sufficient drying of the New Scrubber Pond material is necessary for stabilization and to prevent leakage from the railcars that transport the material to the onsite landfill, and therefore mixing with other material in the New Scrubber Pond is necessary for its removal.

Further, the nature of the scrubber sludge combined with any additional rainfall will have an impact on the cleanout of the New Scrubber Pond, reducing the contractor's rate of production due to the need for added water management and drying of saturated pond materials. When the New Scrubber Pond was taken out of service for the cleanout, all surface water was pumped from the New Scrubber Pond at the onset of the cleanout activities. However, when rain events occur, the accumulated rainwater must be pumped from New Scrubber Pond before cleanout activities can resume. Moreover, the added water from these rain events causes significant

production issues for the contractor, as the CCR materials remain wet with limited drying or release of water from the ponded materials. Along with ensuring that the access ramps to the North Scrubber Pond are sufficiently dry, it is necessary to further pump and dry the remaining material to facilitate the continued removal of material.

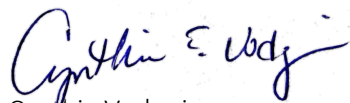
The remaining New Scrubber Pond CCR volume is an estimated 240,000 cubic yards. Based on cleanout operations to date, the contractor estimates up to a minimum of 60,000 cubic yards of dry material is needed for mixing with the remaining saturated material in the New Scrubber Pond. The plant can move approximately 1,500 cubic yards per day via rail car, which will require nine additional months for the complete cleanout of the New Scrubber Pond.

Accordingly, we now anticipate that the removal of all material from the New Scrubber Pond will not be completed until March 31, 2023, and that the retrofit of the New Scrubber Pond will be completed summer 2023, as opposed to the October 2022 date projected in our alternative capacity demonstration submitted in November 2020. As necessary, we will update the retrofit plan to reflect the new completion date of the Ash Pond Area retrofit.

The situation with PDP5 remains the same as described in the February 25, 2022 response.

As with the previous submittal in February 2022, an electronic PDF of this letter is being submitted to Richard Huggins, Frank Behan and Kirsten Hillyer via email. Additionally, this letter will be posted to Luminant's public CCR website: [www.luminant.com/ccr/](http://www.luminant.com/ccr/). If you have any questions regarding this submittal, please contact Renee Collins at 214-875-8338 or [renee.collins@luminant.com](mailto:renee.collins@luminant.com).

Sincerely,



Cynthia Vodopivec

SVP – Environmental, Health & Safety