

REPORT

Dam Safety Assessment of CCW Impoundments

Luminant Generation Co., LLC/MONTICELLO STEAM ELECTRIC STATION

United States Environmental Protection Agency Washington, DC

June 3, 2014



Dam Safety Assessment of CCW Impoundments

Luminant Generation Co., LLC./Monticello Steam Electric Station

> Prepared for: US Environmental Protection Agency Washington, DC

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TABLE OF CONTENTS

1. Introduction	1
1.1. General	1
1.2. Project Purpose and Scope	
2. Project/Facility Description	3
2.1 Management Unit Identification	3
2.2. Hazard Potential Classification	4
2.3. Impounding Structure Details	5
2.3.1. Embankment Configuration	5
2.3.2. Type of Materials Impounded	6
2.3.3. Outlet Works	7
3. Records Review	8
3.1. General	8
3.2. Design Documents	9
3.2.1. General	9
3.2.2. Stormwater Inflows	
3.2.3. Stability Analyses	10
3.2.4. Summary of Design Modifications	12
3.2.5. Instrumentation	12
3.3. Previous Inspections	12
3.4. Operator Interviews	12
3.5. Site Geology	13
4. Visual Assessment	14
4.1. General	14
4.2. Summary of Findings	14
5. Conclusions	16
6. Recommendations	17
6.1. Urgent Action Items	17
6.2. Long Term Improvement/Maintenance Items	17
6.3. Monitoring and Future Inspection	17
6.4. Recommended Schedule for Completion of Action Items	17
6.5. Certification Statement	17

Figures

Figure 1 – Site Location Map Figure 2 – Facility Layout Plan and Photo Location

Appendices

Appendix A – Visual Inspection Checklist Appendix B – Photographs Appendix C – Pertinent Documentation

ii | FINAL: June 3, 2014 I:\US-EPA.13498\46122.ASSESS-OF-DAM-S\DOCS\REPORTS\Luminant - Monticello\Report\FINAL\(3) Monticello Assess Report_FIN



1. INTRODUCTION

1.1. GENERAL

In response to the coal combustion waste (CCW) impoundment failure at the TVA/Kingston coal-fired electric generating station in December of 2008, the Environmental Protection Agency has initiated a nationwide program of structural integrity and safety assessments of CCW impoundments or "management units". A CCW management unit is defined as a surface impoundment or similar diked or bermed management unit or management units designated as landfills that receive liquid-borne material and are used for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. Management units also include inactive impoundments that have not been formally closed in compliance with applicable federal or state closure/reclamation regulations.

The U.S. EPA has authorized O'Brien & Gere to provide site specific impoundment assessments at selected facilities. This project is being conducted in accordance with the terms of BPA# EP10W000673, Order EP-B12S-00065, dated July 18, 2012.

1.2. PROJECT PURPOSE AND SCOPE

The purpose of this work is to provide Dam Safety Assessment of CCW management units, including the following:

- Identify conditions that may adversely affect the structural stability and functionality of a management unit and its appurtenant structures
- Note the extent of deterioration, status of maintenance, and/or need for immediate repair
- Evaluate conformity with current design and construction practices
- Determine the hazard potential classification for units not currently classified by the management unit owner or by state or federal agencies

O'Brien & Gere's scope of services for this project includes performing a site specific dam safety assessment of all CCW management units at the subject facility. Specifically, the scope includes the following tasks:

- Perform a review of pertinent records (prior inspections, engineering reports, drawings, etc.) made available at the time of the site visit (or shortly thereafter) to review previously documented conditions and safety issues and gain an understanding of the original design and modifications of the facility.
- Perform a site visit and visual inspection of each CCW management unit and complete the visual inspection checklist to document conditions observed.
- Perform an evaluation of the adequacy of the outlet works, structural stability, quality and adequacy of the management unit's inspection, maintenance, and operations procedures.
- Identify critical infrastructure within 5 miles down gradient of management units.
- Evaluate the risks and effects of potential overtopping and evaluate effects of flood loading on the management units.
- Immediate notification of conditions requiring emergency or urgent corrective action.
- Identify all environmental permits issued for the management units
- Identify all leaks, spills, or releases of any kind from the management units within the last 5 years.



Prepare a report summarizing the findings of the assessment, conclusions regarding the safety and structural integrity, recommendations for maintenance and corrective action, and other action items as appropriate.

This report addresses the above issues for the Monticello Bottom Ash Pond and Scrubber Pond Management Units at the Luminant Power Monticello Steam Electric Station near Mount Pleasant, TX. This power generation facility is owned and operated by Luminant Generation Co., LLC (Luminant). In the course of this assessment, O'Brien & Gere obtained information from Luminant representatives.



2. PROJECT/FACILITY DESCRIPTION

The Monticello Steam Electric Station (SES) is located near Mt. Pleasant, Titus County, Texas (see Figure 1 for location plan). The generating facility has three units; two at 610 megawatts and one at 850 megawatts for a combined capacity of 2,070 MW. Unit 1 began operation in 1974, Unit 2 became operational in 1975, and Unit 3 became operational in 1978. The plant burns lignite obtained from a Luminant-owned mine located near the Monticello SES along with coal imported from the Powder River Basin.

All fly ash generated at the facility is handled in a dry manner. It is collected through electrostatic precipitators and pneumatically conveyed to silos. It is transported off site via rail cars. Other CCW is handled in "hydrobins" or dry handled at the Monticello SES. Water is used to quench and transport the waste after burning the coal but the waste is not sluiced to the CCW impoundment. Rather, the CCW is separated from the transport water and sent to landfills or sold at approximately 5% moisture content. The transport water, which contains small amounts of CCW, is returned to the Bottom Ash Pond. Water is pumped from the impoundment to the plant for and reused for transport. The Scrubber Pond receives excess wastewater from the facility's flue gas desulphurization (FGD) system wet scrubber blowdown.

The ponds are covered by a Texas State Pollutant Discharge Elimination System (TPDES) permit (Permit No. WQ0001528000). There is, however, no discharge structure from the ponds and site personnel indicate that, due to evaporation and water management, the ponds have never discharged any of their contents.

2.1 MANAGEMENT UNIT IDENTIFICATION

The Bottom Ash Pond is located southeast of the generating facility (see Figures 1 and 2), has three hydraulically connected ponds or cells that receive CCW and an adjacent pond which collects stormwater runoff from the facility. This "Runoff Collection Pond" is not hydraulically connected to the CCW impoundment. The Bottom Ash Pond was originally constructed in 1974.

The three ponds have been referred to as the Northeast Ash Settling Pond, the West Ash Settling Pond, and the Southwest Ash Settling Pond by site personnel. However, for the purposes of this report, the identifying names used in a 2012 stability analysis report for the CCW impoundment will be used. These names are: Settling Pond (Northeast); North Pond (West); and South Pond (Southwest). The locations of the Ponds are presented on Figure 2. As shown on Figure 2, the Settling Pond forms the northeast quadrant of the Bottom Ash Pond. It is hydraulically connected only to the North Pond which forms the northwest quadrant of the Bottom Ash Pond. The North Pond is, in turn, hydraulically connected only to the Settling Pond permits water to move from the Settling Pond into the North Pond permits water to move from the Settling Pond into the North Pond. A chute in the dividing dike between the Settling Pond and the North Pond and the South Pond permits water to move from the Settling Pond into the North Pond. A chute in the dividing dike between the South Pond. The total impoundment area of the Bottom Ash Pond is approximately 22 acres. A site plan is provided as Figure 2.

The Scrubber Pond is located south of the Bottom Ash Pond. It was designed in 1996, but its completion date was not presented in the available data. The total impoundment area of the Scrubber Pond is approximately 1.4 acres. Its location is also shown on Figures 1 and 2.



2.2. HAZARD POTENTIAL CLASSIFICATION

The State of Texas classifies dams or embankments in accordance with Title 30 Texas Administrative Code (TAC), Chapter 299, Dams and Reservoirs. The regulations are administered by the Texas Commission on Environmental Quality (TCEQ), Texas Dam Safety Program. The TCEQ Dam Safety program regulations apply to "design, review, and approval of construction plans and specifications; and construction, operation and maintenance, inspection, repair, removal, emergency management, site security, and enforcement of dams that:

- 1. have a height greater than or equal to 25 feet and a maximum storage capacity greater than or equal to 15 acre-feet, as described in paragraph (2) of this subsection;
- 2. have a height greater than 6 feet and a maximum storage capacity greater than or equal to 50 acre-feet;
- 3. are a high- or significant-hazard dam as defined in §299.14 of this title (relating to Hazard Classification Criteria), regardless of height or maximum storage capacity; or
- 4. are used as a pumped storage or terminal storage facility.

Dam and embankment hazard classifications are established by 30 TAC §299.14 and provide standards regarding impoundment facility structure classification:

The executive director shall classify dams for hazard based on either potential loss of human life or property damage, in the event of failure or malfunction of the dam or appurtenant structures, within affected developments, that are existing at the time of the classification. The hazard classification may include use of a breach analysis that addresses the incremental impact of the potential breach over and above the impact of the flood that may have caused the breach, as defined in §299.15(a)(4)(A)(i) of this title (relating to Hydrologic and Hydraulic Criteria for Dams). The classification must be according to the following.

(1) Low. A dam in the low-hazard potential category has:

(A) no loss of human life expected (no permanent habitable structures in the breach inundation area downstream of the dam); and

(B) minimal economic loss (located primarily in rural areas where failure may damage occasional farm buildings, limited agricultural improvements, and minor highways as defined in §299.2(38) of this title (relating to Definitions)).

(2) Significant. A dam in the significant-hazard potential category has:

(A) loss of human life possible (one to six lives or one or two habitable structures in the breach inundation area downstream of the dam); or

(B) appreciable economic loss, located primarily in rural areas where failure may cause:

- (i) damage to isolated homes;
- (ii) damage to secondary highways as defined in §299.2(58);
- (iii) damage to minor railroads; or
- (iv) interruption of service or use of public utilities, including the design purpose of the utility.
- (3) High. A dam in the high-hazard potential category has:

(A) loss of life expected (seven or more lives or three or more habitable structures in the breach inundation area downstream of the dam); or

(B) excessive economic loss, located primarily in or near urban areas where failure would be expected to cause extensive damage to:

(i) public facilities;

(ii) agricultural, industrial, or commercial facilities;

- (iii) public utilities, including the design purpose of the utility;
- (iv) main highways as defined in §299.2(33); or



(v) railroads used as a major transportation system.

The TCEQ Dam Safety Program currently does not regulate the Bottom Ash or Scrubber Pond and, therefore, Hazard Potentials have not been previously designated. In the absence of a state-assigned classification, the FEMA guidelines, *Hazard Potential Classification System for Dams* (2004) have been applied in this assessment to recommend a hazard potential classification for the impoundment. The definitions for the four hazard potentials (Less than Low, Low, Significant and High) to be used in this assessment are included in the EPA CCW checklist found in Appendix A.

Based on site evaluation, both units are considered **Low** Hazard Potential. This classification assumes that no probable loss of human life and low economic and/or environmental losses would occur in the event of a dam failure. The area that would potentially be inundated by a breach of any embankment of the Bottom Ash Pond is limited to property owned by Luminant. The potential exists for some discharge to reach the Monticello Reservoir, which is also owned by Luminant. The Reservoir provides cooling water for the Monticello SES and is used for recreation, but is not a water supply reservoir. It is located adjacent to Lake Bob Sandlin, which is used for municipal and industrial water supply and for recreation. Water can be pumped from Lake Bob Sandlin Reservoir to Bob Sandlin Reservoir. The Monticello Reservoir has a reported storage volume of 35,000 acre feet. The volume of water and CCWs impounded in the Bottom Ash and Scrubber Ponds is approximately 380 acre-feet. Thus, the quantity of a release from an embankment breach would represent approximately 1% of total available reservoir storage and the environmental damage would be limited to the adjacent area in the southern end of the reservoir.

2.3. IMPOUNDING STRUCTURE DETAILS

The following sections summarize the structural components and basic operations of the subject impoundments. The location of the impoundments on the plant grounds is shown on Figure 2.

2.3.1. Embankment Configuration

As indicated above, the Bottom Ash Pond is comprised of three smaller ponds or cells. All cells are impounded by earthen embankments constructed above grade and are separated by dividing dikes. Concrete sluices through the dividing dikes connect the ponds hydraulically. The total embankment length is approximately 4,630 linear feet (lf) and the combined storage of the Bottom Ash Pond is approximately 375 acre-feet (ac-ft). The embankment crest design elevation is EL. 386.5, the interior toe design elevation is EL. 361.0, and the elevation of the exterior toe varies according to drawings provided by Luminant. A breakdown of embankment lengths and storage by pond is provided in Table 2.1 below:

5 | FINAL: June 3, 2014 I:\US-EPA.13498\46122.ASSESS-OF-DAM-S\DOCS\REPORTS\Luminant - Monticello\Report\FINAL\(3) Monticello Assess Report_FIN



Pond	Embankment ID	Length (ft.)	Notes
	Northern	490	
	Eastern	475	
Settling Pond	Southern	475	Forms Dividing Dike to Runoff Collection Pond
Setting Fond	Western	480	Forms Dividing Dike to North Pond
	Storage	100 acft.	
	Northern	475	
	Eastern	625	Forms Dividing Dike to Settling Pond
North Pond	Southern	475	Forms Dividing Dike to South Pond
North Polia	Western	620	
	Storage	130 acft.	
	Northern	475	Forms Dividing Dike to North Pond
	Eastern	825	Forms Dividing Dike to Runoff Collection Pond
South Pond	Southern	245	
South Polia	Western	910	Distance includes curvature
	Storage	145 acft.	
	Northern	190	
	Eastern	430	
Scrubber Pond	Southern	175	
	Western	350	
	Storage	8 acft.	

Table 2.1 Summary of Embankment Lengths and Pond Storage

The drawings also indicate that the inboard slope of the Bottom Ash Pond embankment is approximately 2.5 horizontal to 1 vertical (2.5H:1V) and the outboard slope is approximately 3H:1V. The inboard faces have a clay liner approximately three feet thick. A 4" thick concrete revetment mat was installed over the clay liner within the Settling Pond and over the clay liner on the dividing dike between the Settling Pond and the North Pond. The outboard toe varies in elevation with the natural ground, low-point elevations are not provided on the drawings. There is no discharge from the pond; water is either evaporated or pumped to the steam electric station to be recycled.

The crest elevation of the Scrubber Pond is EL. 384.0 and the interior floor elevation is EL. 371.0, according to the provided documentation. The elevation of the outboard toe varies. The design slope is shown as 2.5H to 3H:1V on the Design Drawings. The constructed slope appears to be approximately 3H:1V, based on a visual inspection of the impoundment. The inboard face of the Scrubber Pond is covered with a 100-mil HDPE liner.

2.3.2. Type of Materials Impounded

Bottom ash, which is conveyed in small amounts in transport water after attempts to remove it in the hydrobins, is the principal product stored in the Bottom Ash Pond. FGD scrubber waste is the primary material that is impounded in the Scrubber Pond. Minor amounts of fly ash and other combustion by-products should be expected to be found in the ponds as well.

2.3.3. Outlet Works

The Bottom Ash and Scrubber Ponds do not have functioning outlet works. Luminant reported that pumps are used to draw water from the impoundments as needed. A concrete chamber located south of the South Pond was originally installed to allow discharge from the Bottom Ash Pond. Flow into the chamber was designed to be controlled by a valve housed in the South Pond. The valve is accessed via a walkway (see Photo 2). This system has reportedly never been used.



3. RECORDS REVIEW

3.1. GENERAL

A review of the available records related to design, construction, operation and inspection of the Bottom Ash and Scrubber Ponds was performed as part of this assessment. The documents provided by Luminant are listed below:

 Table 3.1 Summary of Documents Reviewed

Document	Dates	Ву	Description
Texas Utilities Services, Inc. Monticello Steam Electric Station Geotechnical Investigation, Scrubber Pond	November, 1980	NFS/National Soil Services, Inc.	Subsurface investigation related to the original scrubber pond (now drained and out of service)
Contract Drawing: Monticello S.E.S. Operating Scrubber Pond	July 29, 1981	Texas Utilities Generating Co	Dwg. TUSI MO-2308 Sections, Notes and Details related to construction of operating scrubber pond
Geologic Investigation of the Monticello Steam Electric Station "West" Bottom Ash Pond	April 1985	Cook-Joyce, Inc.	Subsurface investigation of the original "West" Bottom Ash Pond
Contract Drawing: Monticello S.E.S. Bottom Ash Pond Modification. Embankment Cross Sections	December 11, 1989	Texas Utilities Generating Co	As-Built Dwg. No. 129-1009-301-01 Rev. 1 Sections and details for placement of clay liner within the Bottom Ash Pond
Contract Drawing: Monticello Steam Electric Station. Ash Disposal System. Gen Plan & Misc Det's	May 18, 1992	Ebasco Services Inc., New York	INDG-9788 G-672 As-Built PID 129-1423 Plan view of Bottom Ash Pond with proposed dividing dike. ASSUMED TO BE LATER MODIFICATIONS SHOWN ON A 1985 DRAWING RELATED TO DIVIDING THE WESTERN POND
Contract Drawings: Monticello S.E.E. Units 1, 2 & 3. Runoff Collection Pond Intake Structure. Plan, Sections & Details	May 18, 1992	Ebasco Services Inc., New York	DWG. No. 129-1423-302, Sh. 01, Rev. As-Built PID 129-1423, T#10657 Structural details for construction of intake structure
Contract Drawings: Monticello S.E.E. Units 1, 2 & 3. Ash Pond Sections & Details	May 18, 1992	Ebasco Services Inc., New York	DWG. No. 129-1423-302, Sh. 02, Rev. 3 As-Built PID 129-1423, T#10657 Sections and details for placement of concrete revetment matting within the Bottom Ash Pond



DAM SAFETY ASSESSMENT OF CCW IMPOUNDMENTS

LUMINANT GENERATION CO., LLC – MONTICELLO STEAM ELECTRIC STATION

Document	Dates	Ву	Description
Contract Drawings: Monticello S.E.S. – Unit 3. Construct New Operating Scrubber Pond	June 4 & 5, 1996	TU Electric	Dwg. No. 123-2174-302 Sht. No. 01 – Plan and Sections Dwg. No. 123-2174-303 Sht. No. 01 – Plan and Sections Dwg. No. 123-2174-303 Sht. No. 02 – Leachate Sump Details Plan, Sections, Notes and Details related to construction of the new Operating Scrubber Pond
Monticello S.E.S. Unit 3 - Flow Diagram New Scrubber Pond Piping	Unknown	TU Electric	Dwg. No. 123-2174-401
Critical Impoundment Inspection Report for Monticello SES	March 29, 2011	Luminant	Report of annual inspection of the Bottom Ash and Scrubber Pond
Critical Impoundment Inspection Report for Monticello SES	April 26, 2012	HDR Engineering	Report of annual inspection of the Bottom Ash and Scrubber Pond
Flow Diagrams	Unknown	Luminant	Flow diagrams for Bottom Ash Pond and Scrubber Pond
Ash and Scrubber Pond Stability Investigation Report	December 2012	Golder Associates	Subsurface investigation and slope stability analyses for the Bottom Ash and Scrubber Ponds
Addendum to Ash and Scrubber Pond Stability Investigation Report	March 11, 2014	Golder Associates	Updated/revised subsurface investigation and slope stability analyses for the Bottom Ash and Scrubber Ponds

3.2. DESIGN DOCUMENTS

3.2.1. General

9 | FINAL: June 3, 2014

Review of the available drawings and reports revealed the following:

- The Bottom Ash Pond was originally constructed in 1974 as a two-basin system. It is known that one basin was referred to as the "West Basin", the name of the other basin was not provided. Additionally, it is not known if the Runoff Basin was constructed at this time.
- No documentation related to foundation preparation for the original embankment construction was provided.
- The "West Basin" appears to have been split into the North and South Ponds in 1989.
- The Bottom Ash and Scrubber Pond embankments are constructed of sandy clay/clayey sand, presumably from an on-site borrow area.
- The original Scrubber Pond was constructed in 1989 and the "New" Scrubber Pond was designed in 1996. The completion date of the "New" Scrubber Pond is not presented in the available data.
- No breach or overtopping event of either impoundment has been reported.



3.2.2. Stormwater Inflows

No hydrologic & hydraulic analyses have been conducted to evaluate stormwater inflow to the Bottom Ash or Scrubber Ponds. However, the impounding structures are above-grade on all sides except for the west side of the Scrubber Pond, therefore, storm runoff is limited to direct precipitation on the impoundments. Available volume provided by the normal operating freeboard is sufficient to contain a 24-hour, 100-year storm without overtopping the embankments. The 24-hour, 100-year rainfall at the site presented in Technical Paper 40 (TP-40) is approximately ten (10) inches and the generally-available freeboard is approximately three and a half (3.5) feet. Thus, the Ponds have the capacity to handle approximately 4 times the 100-year rainfall before the impoundments would be overtopped.

3.2.3. Stability Analyses

O'Brien & Gere reviewed the December 2012 Golder Associates (Golder) "Ash and Scrubber Pond Stability Investigation Report" as part of the investigation of the CCW impoundment at the Monticello Steam Electric Station. This report documents the stability analyses for the scrubber pond and the three cells of the bottom ash ponds. One cross-section, representing the existing conditions for each of the four ponds (identified as the North, South, Settling, and Scrubber Ponds), was analyzed using the slope stability software program SLIDE, version 6.019. The load cases analyzed include long term and short term steady-state seepage under both the "empty pond" and "full pond" conditions. Rapid drawdown and short term "empty pond" under seismic loading were also analyzed. All load cases analyzed were performed on the inboard slopes. The Golder stability report is included in Appendix C.

An addendum to the above Golder report dated March 11, 2014 was submitted to address some of the questions raised during the review of the December 2012 report, and presented in the draft assessment report. The March 2014 Addendum included stability analyses of the exterior slopes of all ponds at full pool, which were the missing load cases in the December 2012 report.

Soil shear strength parameters used in the slope stability analyses were based on a combination of laboratory testing and information obtained during the field (sampling) program. The vast majority of the fine-grained soils were sampled with pushed thin-walled steel Shelby tubes. The coarse-grained soils and a few fine-grained soil samples were obtained using Standard Penetration Tests (SPT). Selected samples were tested for grain-size analysis, Atterberg Limits, and natural moisture content. In addition, unconsolidated-undrained (UU) and consolidated-undrained (CU) triaxial compression tests were performed on undisturbed samples. The soil properties utilized for the slope stability analyses are presented in Table 3.2.

Table 3.2 Soil Material Properties

Location	Stratum	Description	Ymoist	Ysaturated		ed Shear ngth	Drained Stre	d Shear ngth
			(pcf) (pcf)	C (psf)	φ (°)	C (psf)	φ (°)	
Settling Pond	I	Sandy Clay / Clayey Sand	127	132	1400	0	1000	14
North and South Pond	I	Sandy Clay / Clayey Sand	127	132	2000	0	1300	18
South Polia	II	Sand	120	125	0	30	0	30
Scrubber Pond	I	Sandy Clay / Clayey Sand	127	132	1500	0	1000	14

Based on review of the stability investigation report, it is unclear how the provided shear strength parameters (both undrained and drained) were assumed. A minimum of two specimens of the same soil, but typically three or more, must be performed at different confining pressures on each specimen for the UU tests. Similarly, a minimum of two specimens of the same soil, but typically three or more, must be performed at different consolidation stresses on each specimen for the CU tests. Multiple specimens tested at differing confining or consolidation pressures are necessary to develop Mohr strength envelopes. All of the samples presented in Appendix C of the stability investigation report were only sheared at one confining or consolidation pressure. Therefore, it is unclear how the triaxial compression tests aided in the development of the shear strength parameters. This question was not addressed in the March 2014 Addendum; however, after reviewing the laboratory and field testing data, the assumed strength parameters appear to be reasonable.

Table 3.3 below provides a summary of the minimum computed factors of safety for slope stability of the four ponds:

Location	Case	Description	Factor of Safety
	1	North Slope; Empty Pond; Undrained Conditions	2.8
	2	North Slope; Empty Pond; Drained Conditions	3.2
	3	North Slope; Full Pond; Undrained Conditions	5.7
Settling Pond	4	North Slope; Full Pond; Drained Conditions	7.3
	5	North Slope; Rapid Drawdown	2.8
	6	North Slope; Empty Pond; Undrained Conditions under Seismic Loading	2.2
	7	North Slope; Empty Pond; Undrained Conditions	3.8
	8	North Slope; Empty Pond; Drained Conditions	3.4
North Pond	9	North Slope; Full Pond; Undrained Conditions	8.5
	10	North Slope; Full Pond; Drained Conditions	8.7
	11	North Slope; Rapid Drawdown	3.0
	12	West Slope; Empty Pond; Undrained Conditions	3.3
	13	West Slope; Empty Pond; Drained Conditions	3.1
South Pond	14	West Slope; Full Pond; Undrained Conditions	8.5
	15	West Slope; Full Pond; Drained Conditions	8.2
	16	West Slope; Rapid Drawdown	2.3
	17	South Slope; Empty Pond; Undrained Conditions	4.1
	18	South Slope; Empty Pond; Drained Conditions	4.1
Scrubber Pond	19	South Slope; Full Pond; Undrained Conditions	6.7
	20	South Slope; Full Pond; Drained Conditions	5.6
	21	South Slope; Rapid Drawdown	3.5
	Slope	Stability Results Presented in March 11, 2014 Addendum:	
Settling Pond	22	North Exterior Slope, Full Pond; Undrained Conditions	4.7
Setting Folia	23	North Exterior Slope, Full Pond; Drained Conditions	5.2
South Pond	24	East Exterior Slope, Full Pond, Undrained Conditions	3.6
Journ Fond	25	East Exterior Slope, Full Pond, Drained Conditions	3.4

Table 3.3 Summary of	f Minimum Comp	uted Factors of Sa	Ifety for Slope Stability

The results of the slope stability analyses indicated that the computed factors of safety exceed the minimum standard set by Golder (Factor of Safety = 1.5) for all load cases.

11 | FINAL: June 3, 2014



Pseudostatic slope stability analysis was performed for the critical slope section of the Settling Pond. The results of this analysis indicated that the embankment has a factor of safety of 2.2 for the 2,500-year return period earthquake. The Golder report stated that the site soils were considered not susceptible to liquefaction based on the soil, site, and seismic conditions. The basis for this determination was not presented in the report; however, it is standard practice to perform a cursory liquefaction susceptibility screening as part of this assessment.

3.2.4. Summary of Design Modifications

The 1985 "Geologic Investigation of the Monticello Steam Electric Station "West Bottom Ash Pond" by Cook-Joyce, Inc. (CJI), 1985, and the 1985 and 1992 Ebasco Contract Drawings indicate that the current North and South Ponds were originally one pond referred to as the "West Bottom Ash Pond". The Contract Drawings represent the only information related to the division of the West Bottom Ash Pond provided by Luminant. The "New" Scrubber Pond was designed in 1996, but the Pond's construction time frame is not known. The "New" Pond replaced the previous pond located directly south of the "New" structure.

3.2.5. Instrumentation

Instrumentation at the site is limited to a staff gage located on the access walkway to the non-functioning outlet control valve in the South Pond.

3.3. PREVIOUS INSPECTIONS

Two previous inspection reports were provided by Luminant. The report dated March 2011 was prepared by Luminant and the April 2012 report was prepared by HDR Engineering Inc. Inspection reports from 2009 and 2010 were referenced in the 2011 and 2012 reports, but were not provided. Similar issues related to the embankments were noted in the two reports. These include minor rutting on the crests, animal burrows on the outboard faces and near the toe, and an apparent slide of the outboard face of the West Pond embankment at the northwest corner. The condition of the slide was noted as being stable throughout the years it was inspected.

3.4. OPERATOR INTERVIEWS

Numerous plant personnel took part in the inspection proceedings along with a representative of the United States Environmental Protection Agency (USEPA). The following is a list of participants for the September 2012 assessment of the Bottom Ash and Scrubber Ponds:

Name	Affiliation
Jim Barton	Luminant
George Sanford	Luminant
Mark Kelly	Luminant
Jeff Jones	Luminant
Pat Marshall	Luminant
Joe Griffin	Luminant
Gary Spicer	Luminant
Golam Mustafa, PhD	USEPA
Robert C. Ganley, PE	O'Brien & Gere
Johan Anestad, PE	O'Brien & Gere

 Table 3.4 Personnel Present at the Assessment of the Monticello SES CCW Impoundments

Facility personnel provided a good working knowledge of the CCW impoundments, provided general plant operation background and provided requested historical documentation. These personnel also accompanied O'Brien & Gere and the USEPA representative throughout the visual inspections to answer questions and to provide additional information as needed in the field.

12 | FINAL: June 3, 2014

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3.5. SITE GEOLOGY

The 1980 and 1985 reports provide descriptions of the underlying site geology. The reports state that the Wilcox Group is the principal exposed bedrock unit in the site area. The Wilcox Group is reportedly composed of "interbedded sand, silt, silty shale, clay and lignite". This description is borne out by the results of the various subsurface investigations of the embankments and foundations. It also indicates that local borrow materials were used to construct the embankments.



4. VISUAL ASSESSMENT

4.1. GENERAL

A visual assessment of the Bottom Ash Pond and the Scrubber Pond was performed on September 18, 2012. The individuals listed in Table 3.3 were present during the assessment.

The weather on the date of the assessment was sunny and approximately 70 degrees. A field checklist prepared by O'Brien & Gere to summarize the visual assessment is included as Appendix A. Photographs were taken by both Luminant and O'Brien & Gere. Pertinent photos taken by O'Brien & Gere are included as Appendix B.

4.2. SUMMARY OF FINDINGS

Prior to the visual assessment, staff from Luminant provided an overview of the facility operation, including the method of fly ash handling with the help of the flow diagrams listed in Table 3.1. The fly ash is handled in a dry manner and only trace amounts are discharged to the Bottom Ash Pond. Transport water discharge from the Steam Electric Station is directed to the Settling Pond and flows from there to the North and South Ponds via chutes through the dividing dikes. During the visual inspection of the Bottom Ash Pond, the full length of the crest and outboard faces of the embankment were walked and representative features observed. The following observations were made during the assessment:

Settling Pond

- Sluice water enters the pond through inflow pipes located above the water line on the northern embankment.
- Erosion gullies were observed on the northern embankment.
- The concrete revetment on the inside slopes of the pond has cracked in the southeast corner.
- Some water is retained in the Runoff Collection Pond located to the south of the Settling Pond at the toe of the southern embankment.
- Evidence of prior releases, failures or patchwork of the impoundment was not observed.

North Pond

- Inflow to the pond is limited to flow from the Settling Pond through sluices in the dividing dike.
- Small (6-12") riprap is visible on the inboard slopes of the embankment. The riprap is not shown on the available design drawings.
- Some erosion was observed beneath the pipes located on the west side of the western embankment. This erosion has been noted previously.
- Minor sloughing/sliding was observed near the toe of the western embankment.
- The outboard slope of the northwest corner of the northern embankment appears to be steeper than the design slope of 2.5H:1V. Additionally, sliding, sloughing or possibly excavation of the embankment material was observed. Luminant representatives noted that additional fill may have been placed against the original embankment along the north side of the North and Settling Ponds and the material movement could be within the additional fill, not the embankment. The slide/slough was noted in the previous inspection reports.
- Signs of uneven settlement of the concrete revetment (grout-filled bags) were observed on the inboard slope of the eastern embankment (dividing dike to the Settling Pond).
- Minor erosion of the concrete revetment was observed near the crest at the southeast corner.



• Evidence of prior releases, failures or patchwork of the impoundment was not observed.

South Pond

- Inflow to the pond is limited to flow from the North Pond through the sluices in the dividing dike.
- Small (6-12") riprap is visible on the inboard faces of the embankment. The riprap is not shown on the available design drawings.
- Minor erosion was observed near the base of the access walkway that extends north from the southern embankment. A staff gage is located on the walkway.
- A gate operator is located at the north end of the access platform. The gate is reportedly inoperable.
- Some rutting was observed on the roadway on the embankment crest. The rutting is minor and has been noted in previous inspection reports.
- Minor erosion was observed on the outboard slope. This erosion has also been noted during previous inspections.
- Some water is retained in the Runoff Collection Pond located to the east of the South Pond at the toe of the eastern embankment.
- Evidence of prior releases, failures or patchwork of the impoundment was not observed.

FGD blowdown discharge from the Steam Electric Station is directed to the Scrubber Pond from decant basins through a pipe in the western embankment. During the visual inspection of the Scrubber Pond, the full length of the crest and outboard slopes of the embankment were walked and representative features observed. The following observations were made during the assessment:

Scrubber Pond

- A small amount of overflow from the decant basins enters the pond through a pipe in the western embankment.
- The HDPE liner appeared to be in good condition, with no signs of cracking observed.
- Evidence of prior releases, failures or patchwork of the impoundment was not observed.



O'BRIEN & GERE

5. CONCLUSIONS

Based on the ratings defined in the USEPA Task Order Performance Work Statement (Satisfactory, Fair, Poor and Unsatisfactory), the information reviewed and the visual inspection, the overall condition of Bottom Ash Pond and the Scrubber Pond is considered to be **SATISFACTORY**. Acceptable performance is expected; however, some deficiencies exist that require repair.

Minor deficiencies include the following:

- Minor erosion gullies on the northern embankment of the Settling Pond
- Sloughing/sliding of material on the outboard slope of the northern embankment of the North Pond.





6. RECOMMENDATIONS

Based on the findings of our visual assessment and review of the available historical documents for the Bottom Ash Pond and the Scrubber Pond, O'Brien & Gere recommended further evaluation of embankment stability and continued monitoring of the two sloughs noted in the inspection on the northern embankment of the Settling Pond and at the northwest corner of the northern embankment of the North Pond. The additional slope stability analyses were performed by Golder Associates and reviewed by O'Brien & Gere in 2014.

6.1. URGENT ACTION ITEMS

None of the recommendations are considered to be urgent, since the issues noted above do not appear to threaten the structural integrity of the dam in the near term.

6.2. LONG TERM IMPROVEMENT/MAINTENANCE ITEMS

- Monitor/repair erosion on the northern embankment of the Settling Pond
- Monitor/repair sloughs/slides at the northwest corner of the North Pond, unless an investigation
 indicates that this material was placed against the embankment post-construction and that the stability
 of the embankment is not dependent on any stabilizing effects of the fill.
- NOTE: Luminant noted in their comments on the Draft Assessment Report that these improvement/ maintenance items have been completed as part of their routine maintenance program.

6.3. MONITORING AND FUTURE INSPECTION

Daily visual inspections are reportedly performed and the results of annual detailed inspections have been recorded in inspection reports. Deficiencies noted during the annual inspections and in this CCW assessment report should be addressed in a timely manner to maintain dam integrity. Consideration should be given to development of an O&M Plan that would establish a firm schedule for operations, maintenance and inspection activities.

6.4. RECOMMENDED SCHEDULE FOR COMPLETION OF ACTION ITEMS

The facility should address any items noted during visual inspections in a timely manner, depending on the severity and location of the deficiency. The regular inspection schedule should be maintained.

6.5. CERTIFICATION STATEMENT

I acknowledge that the Bottom Ash Pond and Scrubber Pond management units referenced herein were personally assessed by me on September 18, 2012 and were found to be in the following condition:

SATISFACTORY

FAIR

POOR

UNSATISFACTORY

Abert Hanley

Signature:

Robert C. Ganley, PE TX PE License # 67323

Date: June 3, 2014

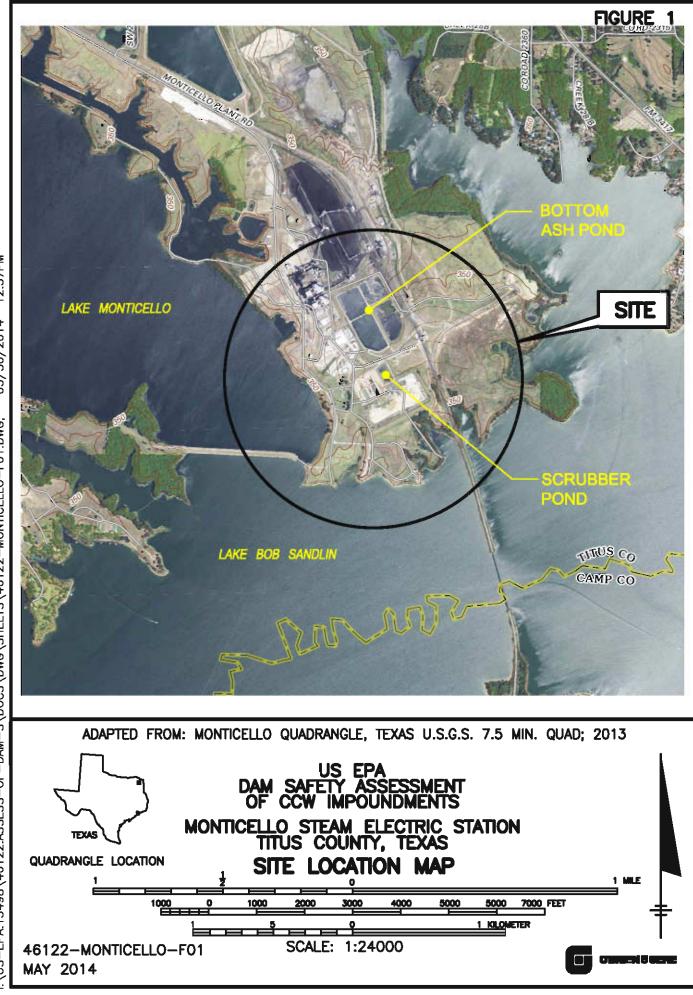
17 | FINAL: June 3, 2014

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C BRIEN 5 GERE

US EPA ARCHIVE DOCUMENT

FIGURES



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FIGURE 2





PHOTOGRAPH NUMBER AND ORIENTATION

US EPA DAM SAFETY ASSESSMENT OF CCW IMPOUNDMENTS LUMINANT GENERATION CO., LLC MONTICELLO STEAM ELECTRIC STATION TITUS COUNTY, TEXAS

SITE AERIAL PHOTOGRAPH AND PHOTOGRAPH LOCATION MAP



FILE NO. 13498.46122.F02 MAY 2014



O'BRIEN 5 GERE

APPENDIX A

Visual Inspection Checklist

				TANAL PROTECT	¢.
Site Name: Monticello Steam Elect	ric Sta	tion	Date: September 18, 2012		
Unit Name: SPD-4	8		Operator's Name: Luminant P	ower	
Unit I.D.: Bottom Ash Pond - 3	Cells		Hazard Potential Classification: High s	ignificant	Lov
Inspector's Name: NJ Anestad, PE & RC	Ganle	y, PE			
Check the appropriate box below. Provide comments whe construction practices that should be noted in the commen embankment areas. If separate forms are used, identify ap	ts section	n. For la	not applicable or not available, record "N/A". Any unusual or rge diked embankments, separate checklists may be used f at the form applies to in comments.	conditions for differer Yes	or nt No
1. Frequency of Company's Dam Inspections?	Da	aily	18. Sloughing or bulging on slopes?		
2. Pool elevation (operator records)?	37	8.0	19. Major erosion or slope deterioration?		1
3. Decant inlet elevation (operator records)?	0	.0	20. Decant Pipes:		
4. Open channel spillway elevation (operator records)?	0	.0	Is water entering inlet, but not exiting outlet?		
5. Lowest dam crest elevation (operator records)?	38	3.5	Is water exiting outlet, but not entering inlet?		
6. If instrumentation is present, are readings recorded (operator records)?		\checkmark	Is water exiting outlet flowing clear?		-
7. Is the embankment currently under construction?		\checkmark	21. Seepage (specify location, if seepage carries fines, and approximate seepage rate below):		
8. Foundation preparation (remove vegetation,stumps, topsoil in area where embankment fill will be placed)?	\checkmark		From underdrain?		1
 Trees growing on embankment? (If so, indicate largest diameter below) 		✓	At isolated points on embankment slopes?		√
10. Cracks or scarps on crest?		<	At natural hillside in the embankment area?		1
11. Is there significant settlement along the crest?		~	Over widespread areas?		1
12. Are decant trashracks clear and in place?			From downstream foundation area?		1
13. Depressions or sinkholes in tailings surface or whirlpool in the pool area?	3	\checkmark	"Boils" beneath stream or ponded water?		\checkmark
14. Clogged spillways, groin or diversion ditches?			Around the outside of the decant pipe?		
15. Are spillway or ditch linings deteriorated?			22. Surface movements in valley bottom or on hillside?		1
16. Are outlets of decant or underdrains blocked?			23. Water against downstream toe?	\checkmark	
17. Cracks or scarps on slopes?	1		24. Were Photos taken during the dam inspection?	1	

US Environmental

Major adverse changes in these items could cause instability and should be reported for further evaluation. Adverse conditions noted in these items should normally be described (extent, location, volume, etc.) in the space below and on the back of this sheet.

Inspection Issue #

Comments 3, 4, 12, 14, 15, 16, 20: N/A. Impoundment does not have decant pipes or spillway. Water is pumped from impoundment to facility for reuse. 17, 18: Minor erosion and some sloughs observed on western embankment of the West Cell and northern embankment of the Northwest and Northeast Cells.

23: Water in the "Runoff Pond" sits against the toe of the Northeast Cell's southern embankment and the against the toe of the West Cell's eastern embankment.



Coal Combustion Waste (CCW) Impoundment Inspection

Impoundment NPDI	ES Permit # <u>WQ</u> 0001 18, 2012	528000	INSPECTOR_	NJ Anestad, PE & RC Ganley, PE
Date <u>September</u>	18, 2012		I	RC Ganley, PE
	me <u>SPD-4</u> (aka Bo		d - 3 Cells)
Impoundment Co	mpany Luminant	Power		
EPA Region _6	eld Office) Addresss			
State Agency (Fie	eld Office) Addresss	1445 Ross Av	renue	
		Dallas, Texa	.s 75202-273	33
Name of Impound	lmentSPD-4			
(Report each impo Permit number)	oundment on a separ	ate form under th	e same Impou	indment NPDES
New U	pdate			
Is impoundment c	currently under const	ruction?	Yes	No X
-	urrently being pumpe			
the impoundment	?		X	
IMPOUNDMEN from hydrobin	TFUNCTION: bottom ash/sluic	mporary stora e water separ	ge of sluid ator prior	ce water discharged to reuse in facility.
Noorost Downstra	eam Town : Name	n/a: facility s	its adjacent	to Lake Monticello
Distance from the	e impoundment	Approx. 1,500'		
Impoundment				
	Longitude 95	Degrees 02	Minutes 17	Seconds
	Latitude <u>33</u>			
	State Texas	County Titus		2 0 0 0 0 0 0 0 0
	cy regulate this impo	oundment? YES	NO	

EPA ARCHIVE DOCUMENT

<u>HAZARD POTENTIAL</u> (In the event the impoundment should fail, the following would occur):

LESS THAN LOW HAZARD POTENTIAL: Failure or misoperation of the dam results in no probable loss of human life or economic or environmental losses.

 $__{\rm X}$ LOW HAZARD POTENTIAL: Dams assigned the low hazard potential classification are those where failure or misoperation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the owner's property.

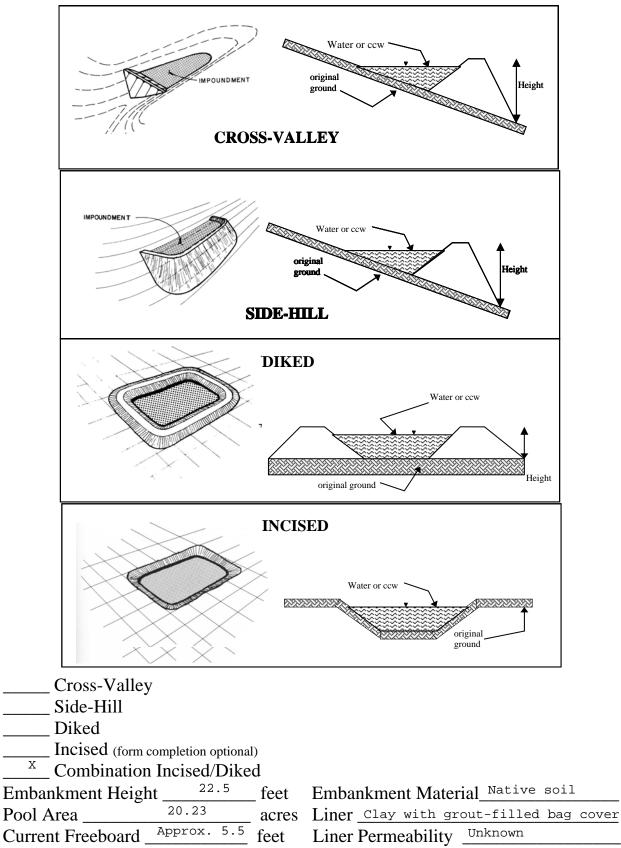
_____SIGNIFICANT HAZARD POTENTIAL: Dams assigned the significant hazard potential classification are those dams where failure or misoperation results in no probable loss of human life but can cause economic loss, environmental damage, disruption of lifeline facilities, or can impact other concerns. Significant hazard potential classification dams are often located in predominantly rural or agricultural areas but could be located in areas with population and significant infrastructure.

_____ HIGH HAZARD POTENTIAL: Dams assigned the high hazard potential classification are those where failure or misoperation will probably cause loss of human life.

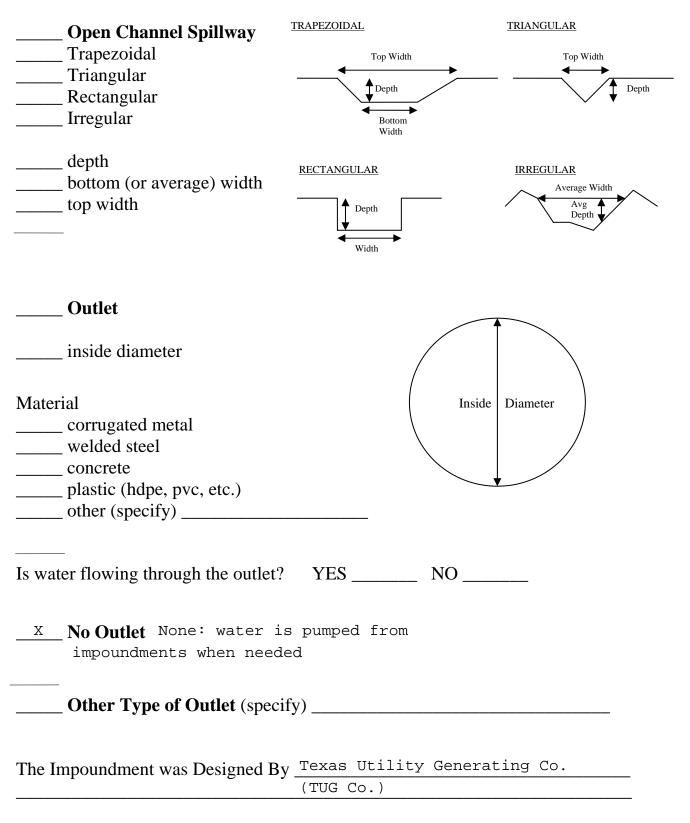
DESCRIBE REASONING FOR HAZARD RATING CHOSEN:

The area potentially inundated by a breach of any embankment of the CCW impoundment is limited to property owned by Luminant Power. The potential exists for some discharge to reach Lake Monticello which is also owned by Luminant Power. Environmental impacts with the waterbody are unknown due to unknown nature of stored materials constituent.

CONFIGURATION:



<u>TYPE OF OUTLET</u> (Mark all that apply)



Has there ever been a failure at this site? YES	NO	X
If So When?		
If So Please Describe :		

f So When? F So Please Describe: 	Has there ever been significant seepages at this site?	YES	NOX
F So Please Describe:	If So When?		
	IF So Please Describe:		

Has there ever been any measures undertaken to monitor/lower									
Phreatic water table levels based on past see at this site?	epages or breaches YES	NO	X						
If so, which method (e.g., piezometers, gw	pumping,)?								
If so Please Describe :									



Additional Inspection Questions

Concerning the embankment foundation, was the embankment construction built over wet ash, slag, or other unsuitable materials? If there is no information just note that.

No information on original embankment foundation available

Did the dam assessor meet with, or have documentation from, the design Engineer-of-Record concerning the foundation preparation?

No

From the site visit or from photographic documentation, was there evidence of prior releases, failure, or patchwork on the dikes?

No



Site Name:	Monticello Steam Electric Station		Date: Sept	September 18, 2012			
Unit Name:	Scrubber Pond		Operator's Name: Luminant Power				
Unit I.D.:	Scrubber Pond			Hazard Potential Class	Classification: High		Lov
Inspector's Na	ame: NJ Anestad, PE & RC	Ganle	y, PE				
	box below. Provide comments whe that should be noted in the comment						
	separate forms are used, identify ap				ecklists may be use		_
		Yes	No			Yes	No
1. Frequency of Com	Company's Dam Inspections? Daily		18. Sloughing or bulging on slopes	g on slopes?		v	
2. Pool elevation (op	levation (operator records)? 377.5		19. Major erosion or slope deteriora		`		
3. Decant inlet eleva	vation (operator records)? 0.0		20. Decant Pipes:				
4. Open channel spil	spillway elevation (operator records)? 0.0		Is water entering inlet, but not exiting outlet?				
5. Lowest dam crest elevation (operator records)? 384.		4.0	Is water exiting outlet, but not e	Is water exiting outlet, but not entering inlet?			
6. If instrumentation recorded (operato	is present, are readings r records)?		\checkmark	Is water exiting outlet flowing cl	ear?		
7. Is the embankmer	nt currently under construction?		\checkmark	21. Seepage (specify location, if se and approximate seepage rate belo		,	
	ration (remove vegetation,stumps, e embankment fill will be placed)?	\checkmark		From underdrain?			✓
9. Trees growing on largest diameter b	embankment? (If so, indicate below)		\checkmark	At isolated points on embankme	ent slopes?		٧
10. Cracks or scarps	on crest?		\checkmark	At natural hillside in the embank	ment area?		V
11. Is there significar	nt settlement along the crest?		\checkmark	Over widespread areas?			V
12. Are decant trash	racks clear and in place?			From downstream foundation a	rea?		v
13. Depressions or s whirlpool in the p	inkholes in tailings surface or ool area?		\checkmark	"Boils" beneath stream or ponde	ed water?		\checkmark
14. Clogged spillway	s, groin or diversion ditches?			Around the outside of the deca	nt pipe?		✓
15. Are spillway or d	itch linings deteriorated?			22. Surface movements in valley be	ottom or on hillside	?	v
16. Are outlets of dee	cant or underdrains blocked?			23. Water against downstream toe	?		✓
17. Cracks or scarps	on slopes?	1		24. Were Photos taken during the o	am inspection?		

further evaluation. Adverse conditions noted in these items should normally be described (extent, location, volume, etc.) in the space below and on the back of this sheet.

Inspection Issue #

Comments

3, 4, 12, 14, 15, 16, 20: N/A. Impoundment does not have decant pipes or spillway. Water is pumped from impoundment if needed.



Coal Combustion Waste (CCW) Impoundment Inspection

Impoundment NPD	ES Permit # WQ 000	1528000	INSPECTOR ¹	NJ Anestad, PE &
Date September	ES Permit # WQ 000 r 18, 2012		Ē	RC Ganley, PE
	nme Scrubber Por Scrubber Por			
Impoundment Co	mpany Luminant	Power		
EPA Region ⁶	r			
State Agency (Fig	eld Office) Address	\overline{s} 1445 Ross Ave	enue	
		Dallas, Texas	5 75202-273	33
Name of Impound	dment <u>Scrubber</u>	Pond		
	oundment on a sepa		e same Impou	indment NPDES
Permit number)				
X X	T 1 .			
New U	Jpdate			
			Yes	No
Is impoundment of	currently under cons	struction?	103	X
-	urrently being pump			
the impoundment				Х
1				
IMPOUNDMEN to reuse in fa	NT FUNCTION: _ ^T acility.	emporary storag	ge of FGD b	olowdown water prior
Nearest Downstre	eam Town : Name	n/a: facility si	ts adjacent	to Lake Monticello
	e impoundment			
Impoundment				
	Longitude 95	Degrees ⁰² M	Minutes 17	Seconds
	Latitude 33			
	State Texas	County		
	cy regulate this imp	ooundment? YES _		X
II SO WHICH State	e Agency?			

JS EPA ARCHIVE DOCUMENT

<u>HAZARD POTENTIAL</u> (In the event the impoundment should fail, the following would occur):

LESS THAN LOW HAZARD POTENTIAL: Failure or misoperation of the dam results in no probable loss of human life or economic or environmental losses.

x **LOW HAZARD POTENTIAL:** Dams assigned the low hazard potential classification are those where failure or misoperation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the owner's property.

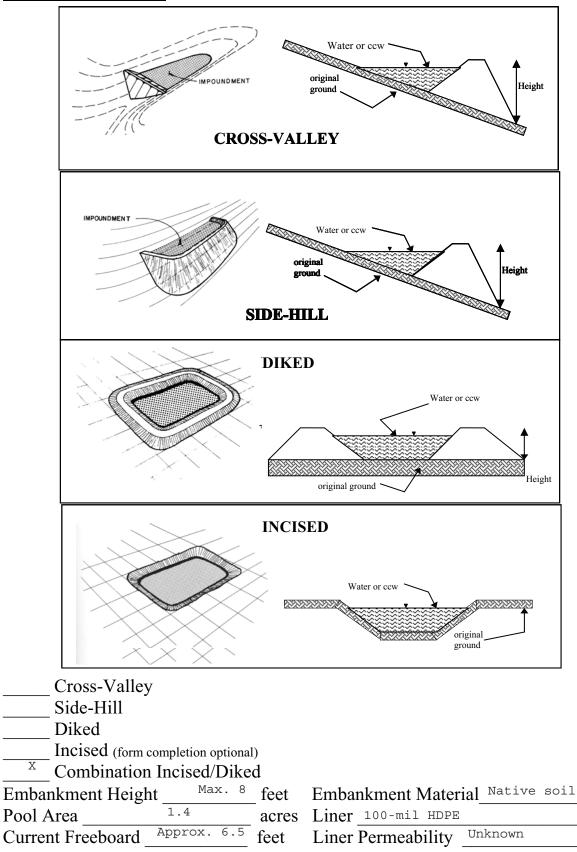
SIGNIFICANT HAZARD POTENTIAL: Dams assigned the significant hazard potential classification are those dams where failure or misoperation results in no probable loss of human life but can cause economic loss, environmental damage, disruption of lifeline facilities, or can impact other concerns. Significant hazard potential classification dams are often located in predominantly rural or agricultural areas but could be located in areas with population and significant infrastructure.

HIGH HAZARD POTENTIAL: Dams assigned the high hazard potential classification are those where failure or misoperation will probably cause loss of human life.

DESCRIBE REASONING FOR HAZARD RATING CHOSEN:

The area potentially inundated by a breach of any embankment of the CCW impoundment is limited to property owned by Luminant Power. The potential exists for some discharge to reach Lake Monticello which is also owned by Luminant Power. Environmental impacts with the waterbody are unknown due to unknown nature of stored materials constituent.

CONFIGURATION:



<u>TYPE OF OUTLET</u> (Mark all that apply)

Open Channel Spillway Trapezoidal Triangular Rectangular Irregular depth bottom (or average) width top width	TRAPEZOIDAL Top Width Depth Bottom Width RECTANGULAR	Top Width Top Width Depth Depth
Outlet inside diameter Material corrugated metal concrete plastic (hdpe, pvc, etc.) other (specify)		nside Diameter
Is water flowing through the outlet	? YES NO	
<u>X</u> No Outlet None: water i impoundment when neede		
Other Type of Outlet (spec	ify)	
The Impoundment was Designed B	y_TU Electric	

Has there ever been a failure at this site? YES	NO	X
If So When?		
If So Please Describe :		

Has there ever been significant seepages at this site? Y	'ES	NO	Χ
If So When?			
If So When?			
			-
			-
		· · · · · · · · · · · · · · · · · · ·	

Has there ever been any measures undertaken to monitor/lower							
Phreatic water table levels based on past seepages at this site?	or breaches YES	NO	X				
If so, which method (e.g., piezometers, gw pumpir	ng,)?						
If so Please Describe :							



Additional Inspection Questions

Concerning the embankment foundation, was the embankment construction built over wet ash, slag, or other unsuitable materials? If there is no information just note that.

No information on embankment foundation available

Did the dam assessor meet with, or have documentation from, the design Engineer-of-Record concerning the foundation preparation?

No

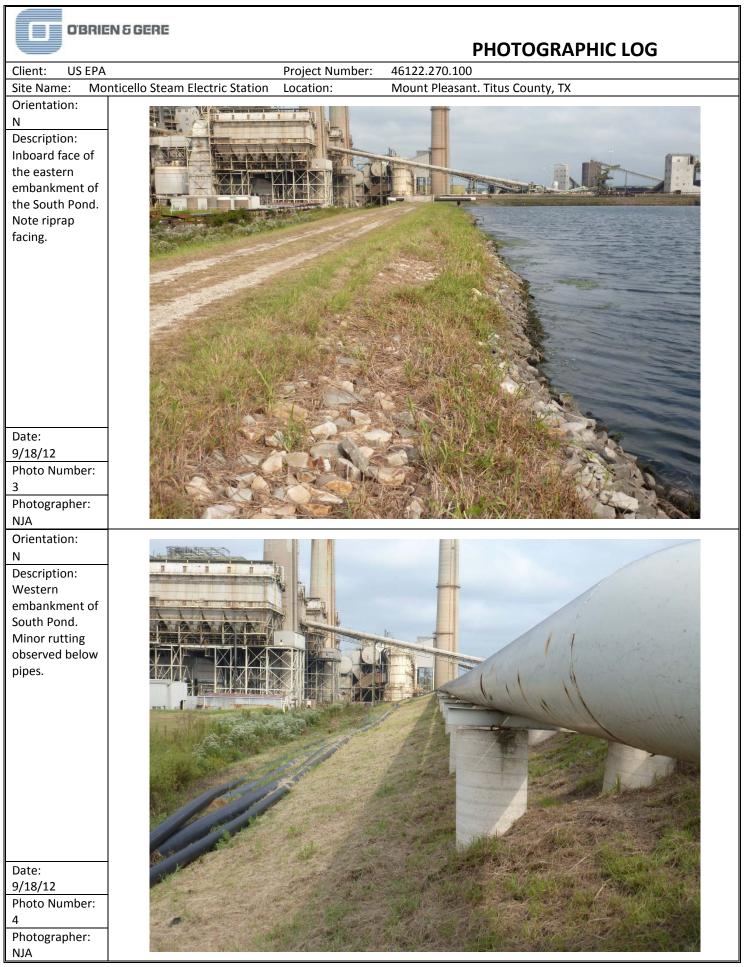
From the site visit or from photographic documentation, was there evidence of prior releases, failure, or patchwork on the dikes?

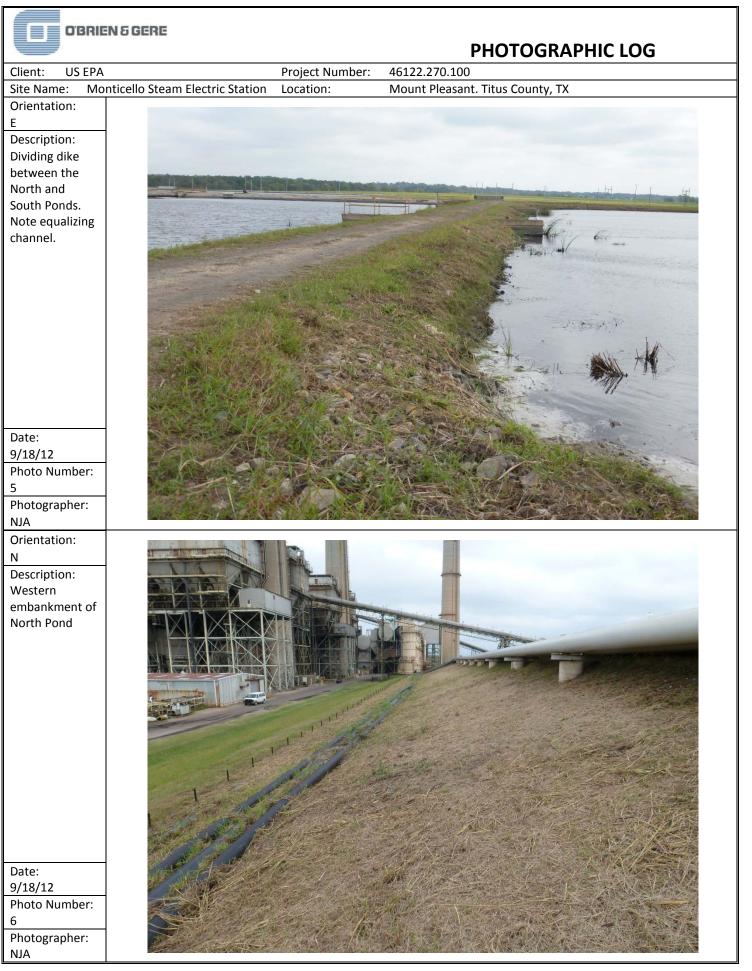
No

APPENDIX B

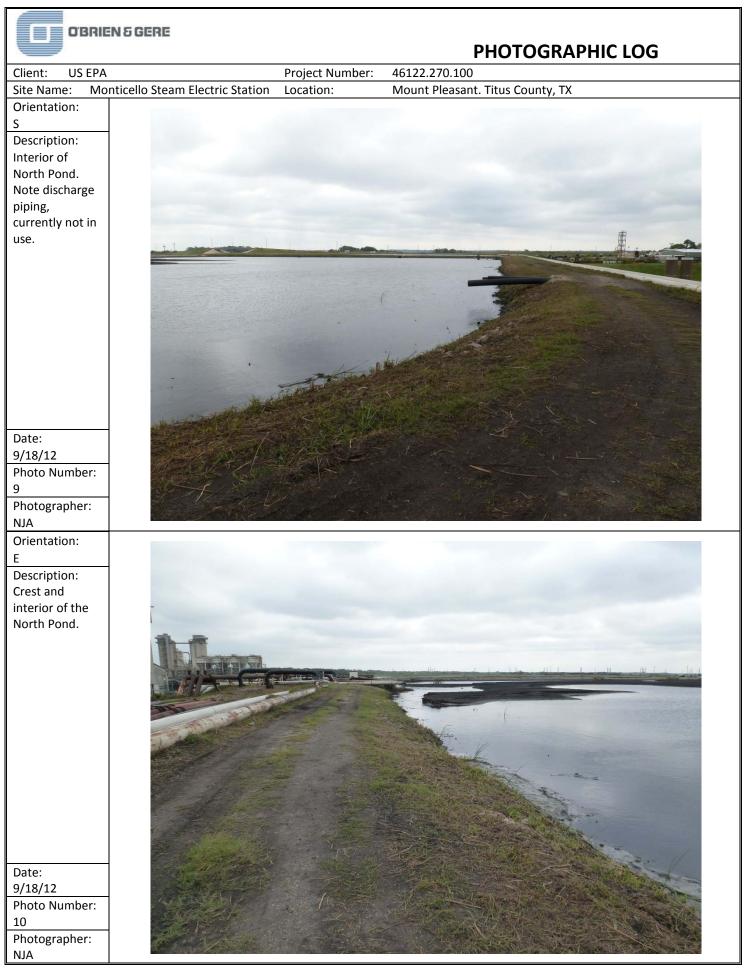
Photographs

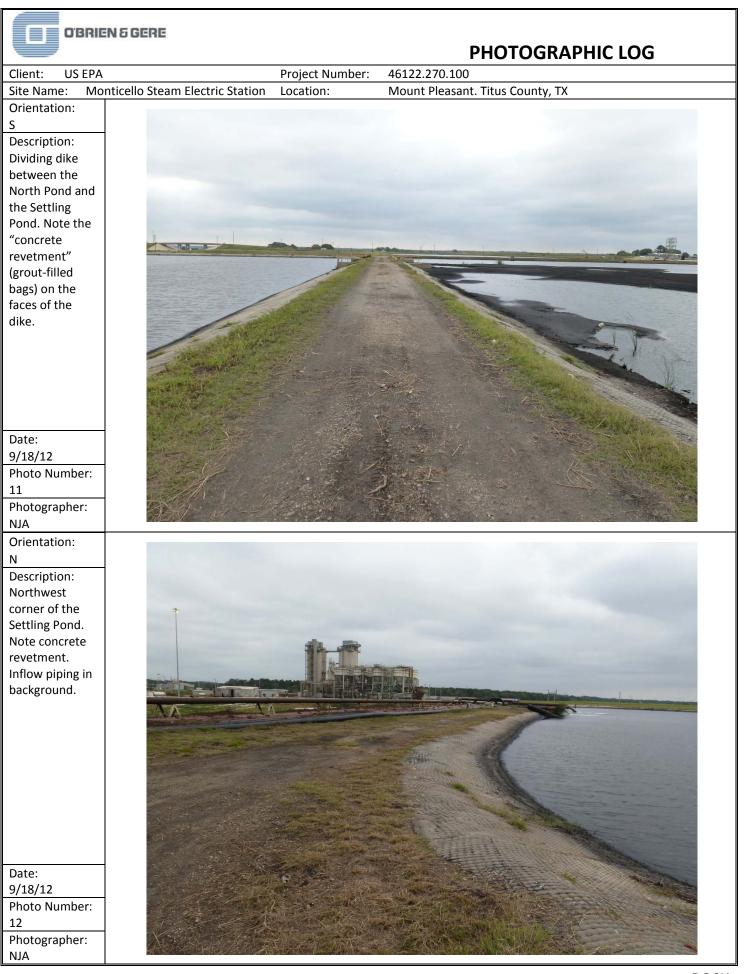




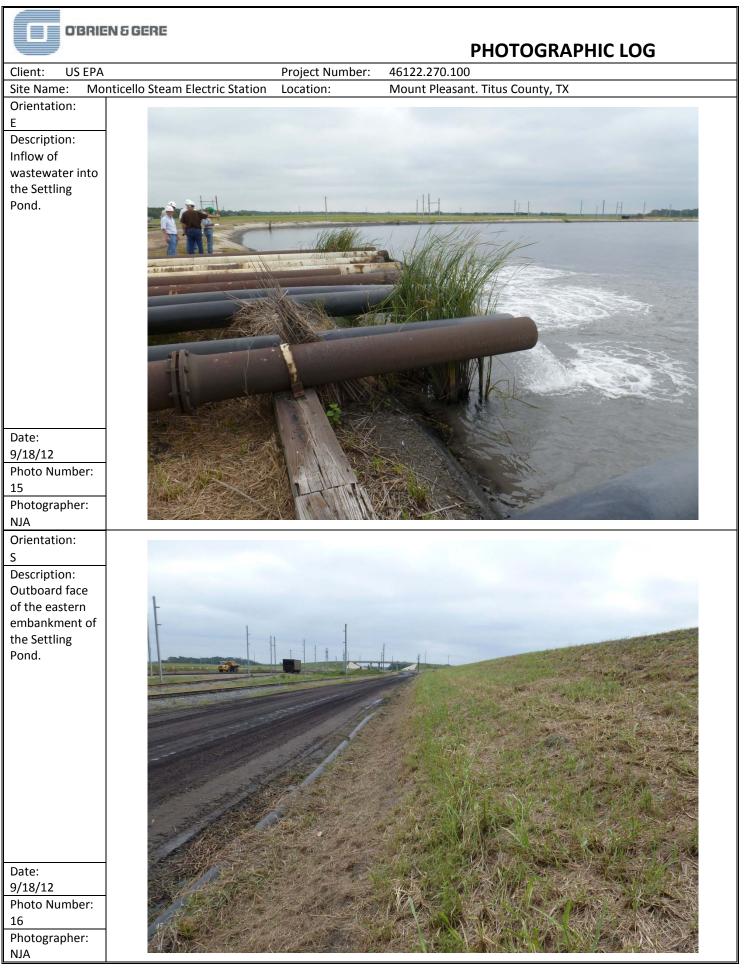


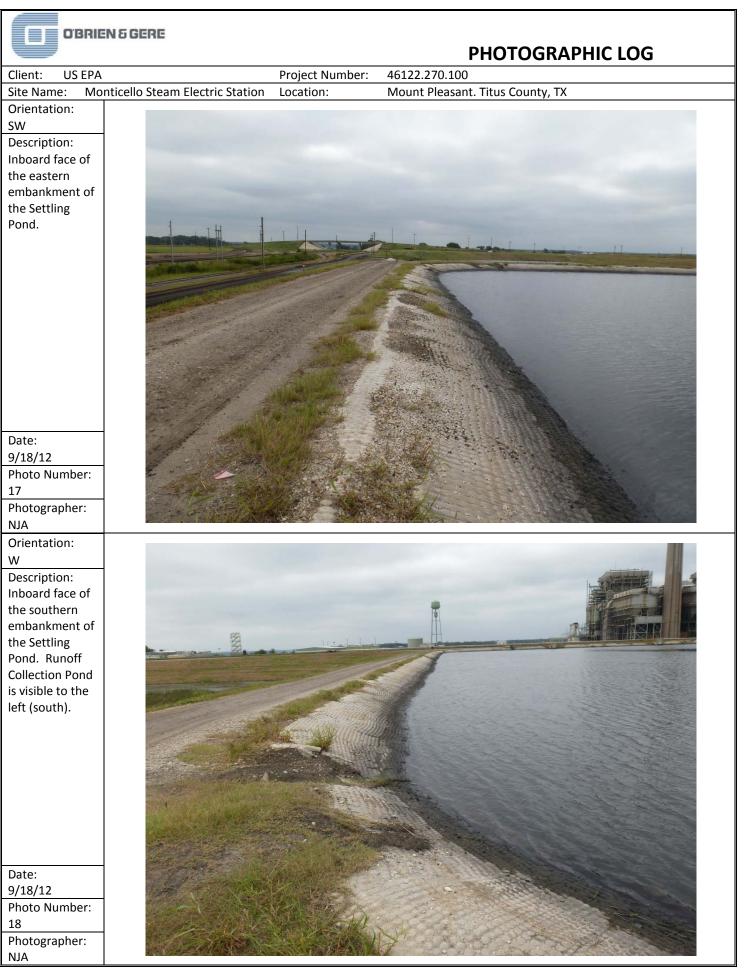


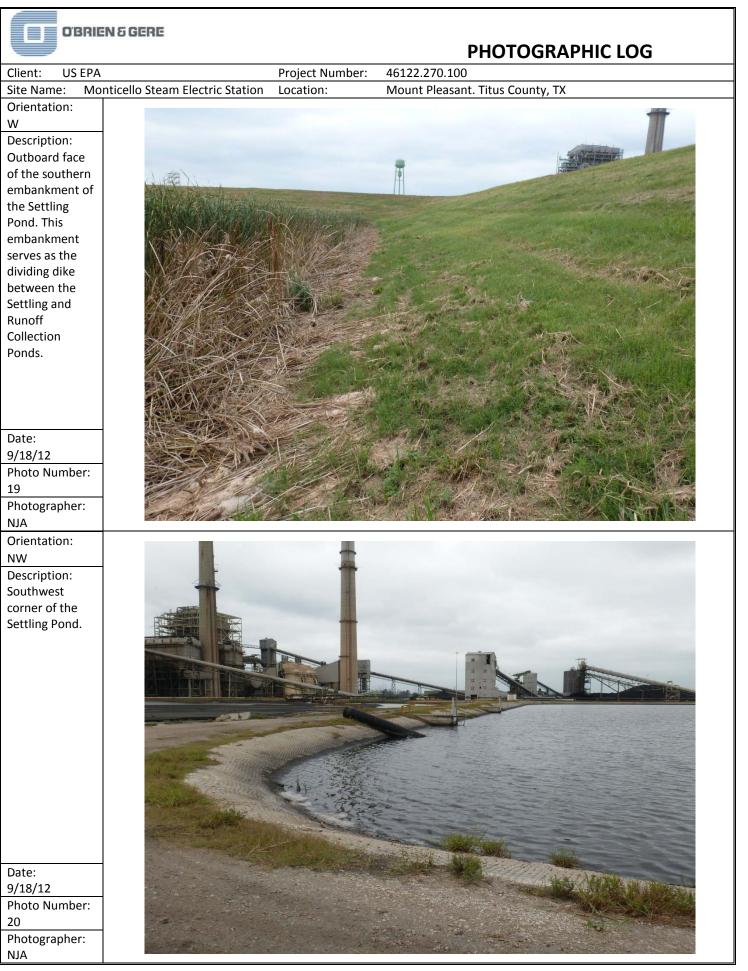






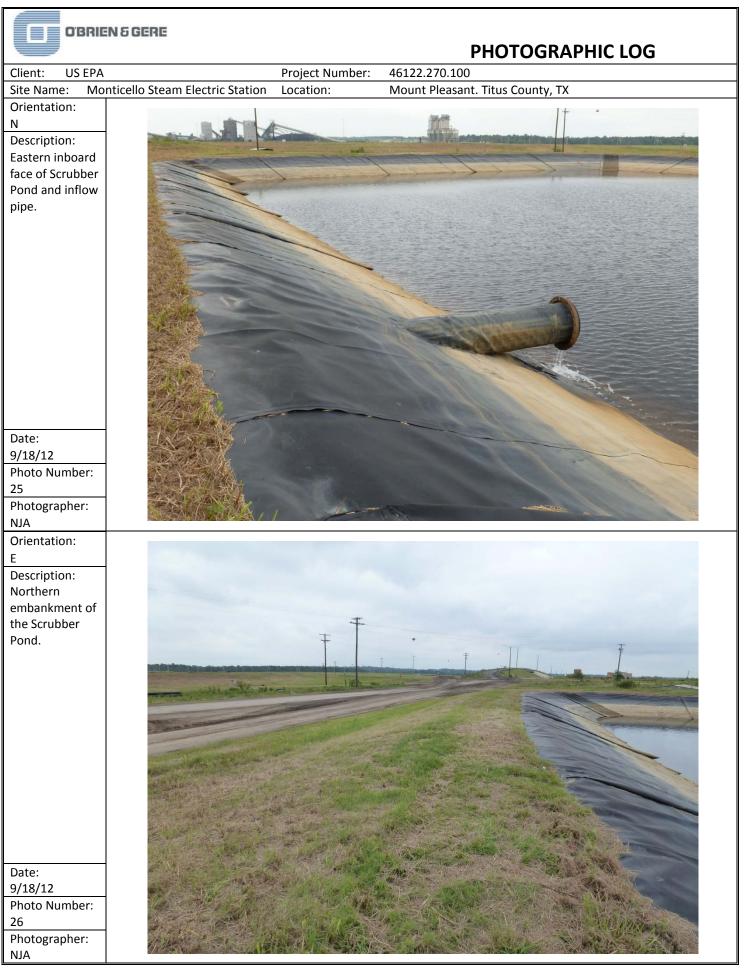




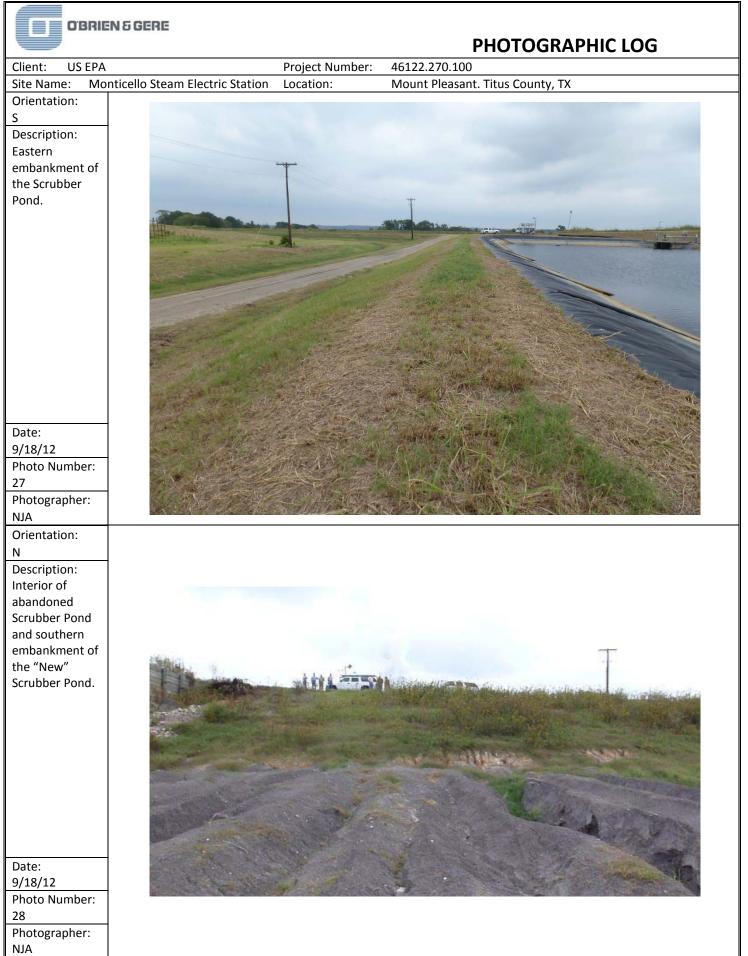








EPA ARCHIVE DOCUMENT



APPENDIX C

Pertinent Documentation



ASH AND SCRUBBER POND STABILITY INVESTIGATION REPORT

Luminant Monticello Power Plant, Titus County, Texas

Submitted To: Luminant – Systems Engineering Energy Plaza, Floor 27 1601 Bryan Street Dallas, Texas 75201

Submitted By: Golder Associates Inc. 500 Century Plaza Drive Suite 190 Houston, TX 77073 USA Texas Registration Number: F-2578



December 2012

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123-94128.002





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Table of Contents

1.0	INTRODUCTION	1
1.1	Project Description	1
1.2	Scope of Investigation	1
1.3	Coordinate System and Unit System	1
2.0	SUBSURFACE EXPLORATION	2
2.4	Soil Boring Procedures	2
2.5	Laboratory Testing	3
2.6	Subsurface Conditions	4
3.0	STABILITY ANALYSES	5
3.1	Soil Properties	
3.2	Slope Stability Results	
4.0	USE OF THIS REPORT	8
5.0	CLOSING	. 9

List of Tables

Table 1	Boring Coordinates	2
	Soil Material Properties for Settling Pond Section	
Table 3	Soil Material Properties for North and South Pond Sections	
Table 4	Soil Material Properties for Scrubber Pond Section	
Table 5	Slope Stability Factors of Safety	

List of Figures

Figure	1	Bori	ing	I L	ocati	on	Plan
	-						

Figure 2 Analysis Locations

List of Appendices

- Appendix A Boring Logs
- Appendix B Laboratory Test Summary Sheets
- Appendix C Laboratory Test Results
- Appendix D Slope Stability Calculations
- Appendix E Important Information About This Geotechnical Report

1.0 INTRODUCTION

1.1 **Project Description**

Luminant–Systems Energy (Luminant) operates the Monticello Power Plant, a lignite-fueled power plant near Mount Pleasant, Titus County, Texas. As part of regulatory compliance, the existing ash ponds and scrubber pond are being characterized for slope stability. The ash and scrubber ponds are located northeast and southeast of the power plant. The ash ponds consist of three adjacent ponds identified as the north pond in the northwest quadrant, the south pond in the southwest quadrant, and the settling pond in the northeast quadrant. The scrubber pond is a standalone structure located to the south of the ash ponds. Relative pond locations are depicted on Figure 1 included herein. A stormwater runoff collection pond is not included within the scope of this report.

Golder Associates Inc. (Golder) has been contracted by Luminant to perform a geotechnical site investigation at the facility and analyze the ash and scrubber pond slope stability. This report presents the findings of the field investigation, boring logs, laboratory test results, a description of the subsurface soil conditions, and results of the slope stability analyses.

1.2 Scope of Investigation

The scope of this investigation included:

- Drilling and sampling of eight (8) geotechnical soil borings at the ash ponds and two (2) at the scrubber pond,
- Laboratory testing of representative soil samples,
- Characterization of subsurface conditions, and
- Slope stability analyses.

The subsurface investigation was performed between October 22 and 24, 2012.

1.3 Coordinate System and Unit System

Soil boring locations were measured by Golder using a handheld GPS device. Elevations were estimated by Golder using existing topographic maps. We have reported coordinates with reference to latitude and longitude with WGS84 datum. All elevations are referenced to mean sea level (msl).

This report is presented using U.S. customary (or English) units.



2

2.0 SUBSURFACE EXPLORATION

Golder performed a total of ten (10) subsurface explorations at the Site. Eight (8) borings were drilled to a depth of 50 feet below ground surface (bgs) at the ash ponds and two (2) borings were drilled to a depth of 20 feet bgs at the scrubber pond. Table 1 provides the boring coordinates and elevations. Soil boring locations were measured by Golder using a handheld GPS device. Elevations were estimated by Golder using existing topographic maps. Boring locations are shown on Figure 1.

Boring Number	Latitude	Longitude	Elevation (ft-msl)	Boring Depth (ft)				
Ash Ponds								
BH-101	33.0908° N	95.0333° W	386.5	50				
BH-102	33.0920° N	95.0340° W	386.5	50				
BH-103	33.0879° N	95.0333° W	386.5	50				
BH-104	33.0893° N	95.0342° W	386.5	50				
BH-105	33.0913° N	95.0355° W	386.5	50				
BH-106	33.0908° N	95.0369° W	386.5	50				
BH-107	33.0893° N	95.0360° W	386.5	50				
BH-108	33.0877° N	95.0348° W	386.5	50				
Scrubber Pond								
BH-109	33.0866° N	95.0333° W	384	20				
BH-110	33.0869° N	95.0338° W	384	22				

TABLE 1. BORING COORDINATES

2.4 Soil Boring Procedures

The borings were drilled by W.E.S.T. Drilling (West) of Waxahachie, Texas using an all-terrain truckmounted drilling rig and rotary drilling methods with hollow stem augers. Soil samples were collected at 2-foot intervals within the top 10 feet of the boring and at 5-foot intervals below 10 feet. The boring logs from the site investigation are included as Appendix A.

Disturbed soil samples were obtained in sand using an ASTM standard split spoon sampler, i.e., 2-inch outer diameter and 1-3/8-inch inner diameter. Standard Penetration Tests (SPT) were conducted during sampling. Sampling and testing were carried out in general agreement with the guidelines in ASTM D1586.

SPTs involve counting the number of blows of a 140 lb hammer dropping 30 inches needed for the sampler to penetrate three successive 6-inch increments into the soil. The reported N value is the number of blows required to penetrate the second and third 6-inch intervals, with units of blows/12 inches. In some hard clays and very dense sands, 50 blows were insufficient to advance the sampler 6 inches and penetration "refusal" was encountered. In this case the N value is not obtained and the incomplete





3

penetration is recorded. This is registered in the boring logs as, for example, 50/5 in., i.e. 50 blows with only 5 inches of penetration.

For clayey soils, thin-walled steel Shelby tubes were pushed to obtain the relatively undisturbed samples for laboratory testing. Shelby tubes were 30-inch long and 3-inch outer diameter (OD). The inside diameter was 2.87 inch giving an area ratio of 9% (Ca = $100 \times (OD2 - ID2)/ID2$). These Shelby tubes have a cutting edge diameter (De) of 2.85 in., thus an inside clearance ratio (Ci = $100 \times (ID-De)/De$) equal to 0.7%. The recovery ratio (length recovered/length pushed) is typically variable and dependent on the soil stiffness, with higher recovery values generally obtained in softer clays. The recovery ratio is reported in the individual boring logs.

All borings were sampled by a Golder field engineer and the soils were described using a modified version of the Unified Soil Classification System (ASTM D 2487). The soil description included a density or consistency qualifier, color, structural characteristics when evident, composition with major component in capital letters, and minor characteristics.

After visual classification, recovered samples from SPTs were placed in plastic bags to preserve the natural moisture content. After retrieval and visual soil identification of each Shelby tube sample, a pocket penetrometer test was performed at the bottom end of the sample. Shelby tubes pushed in stiff to hard clayey soils were extruded in the field and the recovered samples were placed in plastic storage tubes and plastic bags to preserve the moisture content. All samples were labeled and transported back to the Golder's Houston office for laboratory soils testing.

Boring logs were prepared from the field logs using the software package gINT v. 8.1.021. The boring logs are provided in Appendix A.

Following the completion of each soil boring, the boreholes were backfilled with bentonite pellets to the surface.

2.5 Laboratory Testing

Laboratory testing was performed on selected samples, in accordance with commonly accepted methods and practices. Undisturbed and disturbed soil samples were tested to determine water content, Atterberg limits, grain size distribution, and shear strength. Water content determination was performed in accordance with ASTM D2216; Atterberg limits were determined in accordance with ASTM D4318; and grain size distribution was performed in accordance with ASTM D422. Shear strength testing consisted of unconsolidated-undrained (UU) and consolidated-undrained (CU) triaxial compression tests in general accordance with ASTM D2850 and D4767, respectively. Laboratory data summary sheets are presented in Appendix B. Laboratory test result sheets are presented in Appendix C.



2.6 Subsurface Conditions

The soils encountered in the borings generally consisted of stiff to hard sandy clays and compact to dense sands. The subsurface stratigraphy generally consisted of interchanging layers of clayey sand and sandy clay. The clayey sand layers ranged in thickness from 2 to 20 feet where encountered. The sandy clay and clay layers varied in thickness from 2 to 33 feet where encountered. Boring BH-101, BH-102, BH-106, BH-108 and BH-110 all terminated in clayey sand layers. BH-109 terminated in a hard, sandy clay layer.

A layer of compact to dense, silty or poorly graded sand was encountered beneath the sandy clay/clayey sand layers in borings BH-103, BH-104, BH-105 and BH-107. These borings all terminated in this silty/poorly-graded sand layer. In borings BH-106 and BH-109 a layer of sand ranging from 2 to 10 feet was encountered in between the clayey sand/sandy clay layers.

Groundwater was encountered in 6 of the 10 borings. Groundwater elevations encountered during drilling ranged from EL 335.85 to 357.05 ft-msl with an average of El. 340.7 ft-msl. Our analyses were conducted assuming groundwater elevation at each cross section based on the boring closest to that cross section.



3.0 STABILITY ANALYSES

Slope stability analyses were performed using the commercial slope stability software program, SLIDE Version 6.019. The site topography and geometry used in the analyses were determined from site survey and design drawings provided by Luminant.

The typical containment dike section has an interior (wet side) slope of 3 horizontal to 1 vertical (3H:1V) and a minimum exterior (dry side) slope of 2.5H:1V at the ash ponds. Slopes range from 2.5H:1V to 3H:1V at the scrubber pond interior (wet side). The crest elevation of the containment dikes are at approximately 358.6 ft-msl and 384 ft-msl at the ash and scrubber ponds, respectively. The ash ponds are lined with 3 feet of compacted clay with a top of liner elevation on the pond floors of approximately 361 ft-msl. The scrubber pond is lined with a 60 mil HDPE liner with a top of liner elevation on the pond floor of approximately 370 to 371 ft-msl.

Stability analyses were performed for three (3) separate slope sections at the ash ponds (north, south and settling pond) and one (1) section at the scrubber pond to assess the various soil conditions and slope geometries around the ponds; analysis locations are shown on Figure 2. Stability analyses considered "empty pond" and "full pond" conditions.

A rapid drawdown scenario was analyzed for one full pond condition at each section. The analysis was completed on the drained or undrained section with the lower factor of safety in the full condition. The analysis was completed using the B-bar method to simulate the effects of rapid drawdown in a low permeability material such as the sandy clays and clayey sands encountered at Monticello. The initial water level was modeled as the full condition and the final water level was modeled at the pond floor, representing a final condition after drawdown where the pond is empty.

The most critical slope geometry was identified along the north slide slope at the settling pond, consisting of an approximately 25-foot high, 3H:1V slope. The effect of pseudo-static earthquake loading was also analyzed at this location. Based on the "US Seismic Hazard 2008 Map" by the USGS the peak ground acceleration (PGA) for a 2% probability of exceedance in 50 years event is about 6%g for the subject site. A seismic coefficient of 0.06g was therefore used in the earthquake loading analysis.

Based on a review of soil, site, and seismic conditions, the site soils are not susceptible to liquefaction.

3.1 Soil Properties

For each slope section, a conservative, generalized subsurface stratigraphy was developed based on soil boring information and laboratory soil testing results from the borings conducted as part of this investigation. The soil properties assumed for the slope sections are provided in Tables 2, 3 and 4.





TABLE 2. SOIL MATERIAL PROPERTIES FOR SETTLING POND SECTION

Soil Material	Description	Moist Unit Weight (Ib/ft ³)	Saturated Unit Weight (lb/ft ³)	Undrained Soil Properties		Drained Soil Properties	
				Undrained Shear Strength, su (Ib/ft ²)	Friction Angle, φ (°)	Cohesion, c' (Ib/ft ²)	Friction Angle, φ' (°)
I	Sandy Clay/Clayey Sand	127	132	1400	0	1000	14

TABLE 3. SOIL MATERIAL PROPERTIES FOR NORTH AND SOUTH POND SECTIONS

		Moist Sa		Undrained Soil Properties		Drained Soil Properties		
М	Soil Material	Description	Unit Weight (Ib/ft ³)	Saturated Unit Weight (Ib/ft ³)	Undrained Shear Strength, su (Ib/ft ²)	Friction Angle, φ (°)	Cohesion, c' (Ib/ft ²)	Friction Angle, φ' (°)
	I	Sandy Clay/Clayey Sand	127	132	2000	0	1300	18
	II	Sand	120	125	0	30	0	30

TABLE 4. SOIL MATERIAL PROPERTIES FOR SCRUBBER POND SECTION

Soil Material	Description	Moist Unit Weight (Ib/ft ³)	Saturated Unit Weight (Ib/ft ³)	Undrained Soil Properties		Drained Soil Properties	
				Undrained Shear Strength, su (Ib/ft ²)	Friction Angle, φ (°)	Cohesion, c' (Ib/ft ²)	Friction Angle, φ' (°)
I	Sandy Clay/Clayey Sand	127	132	1500	0	1000	14

3.2 Slope Stability Results

Slope stability analyses were performed for both short-term and long-term conditions using undrained and drained soil properties, respectively. The results of the analyses are provided in Table 5. SLIDE output files are included in Appendix D. A factor of safety of 1.5 is typically considered adequate for permanent slopes. The minimum calculated factor of safety from our analyses is 2.8 for normal loading conditions.





7

Therefore, our analyses indicate that the proposed slopes will be stable. Additionally slope analyses for rapid drawdown and earthquake conditions have factors of safety greater than 1.5 as well.

TABLE 5. SLOPE STABILITY FACTORS OF SAFETY

Case	Description	Factor of Safety
1	Settling pond; north slope; empty pond; short term (undrained) conditions	2.8
2	Settling pond; north slope; empty pond; long term (drained) conditions	3.2
3	Settling pond; north slope; full pond; short term (undrained) conditions	5.7
4	Settling pond; north slope; full pond; long term (drained) conditions	7.3
5	Settling pond; north slope; rapid drawdown	2.8
6	Settling pond; north slope; empty pond; short term (undrained) conditions (seismic loading)	2.2
7	North pond; north slope; empty pond; short term (undrained) conditions	3.8
8	North pond; north slope; empty pond; long term (drained) conditions	3.4
9	North pond; north slope; full pond; short term (undrained) conditions	8.5
10	North pond; north slope; full pond; long term (drained) conditions	8.7
11	North pond; north slope; rapid drawdown	3.0
12	South pond; west slope; empty pond; short term (undrained) conditions	3.3
13	South pond; west slope; empty pond; long term (drained) conditions	3.1
14	South pond; west slope; full pond; short term (undrained) conditions	8.5
15	South pond; west slope; full pond; long term (drained) conditions	8.2
16	South pond; west slope; rapid drawdown	2.3
17	Scrubber pond; south slope; empty pond; short term (undrained) conditions	4.1
18	Scrubber pond; south slope; empty pond; long term (drained) conditions	4.1
19	Scrubber pond; south slope; full pond; short term (undrained) conditions	6.7
20	Scrubber pond; south slope; full pond; long term (drained) conditions	5.6
21	Scrubber pond: south slope: rapid drawdown	3.5





4.0 USE OF THIS REPORT

Attention is drawn to the document - "Important Information About Your Geotechnical Engineering Report", which is included in Appendix E of this report. This document has been prepared by the ASFE (Professional Firms Practicing in the Geosciences), of which Golder is a member. The statements presented in this document are intended to advise owners of what their realistic expectations of this report should be, and to present recommendations on how to minimize the risks associated with the groundworks for this project. The document is not intended to reduce the level of responsibility accepted by Golder, but rather to ensure that all parties who may rely on this report are aware of the responsibilities each assumes in so doing.





December 2012

5.0 CLOSING

Golder appreciates the opportunity to assist Luminant with this project. If you have any questions, or require further assistance from Golder, please contact the undersigned at (281) 821-6868.

Very truly yours, GOLDER ASSOCIATES INC.

Maysill G. Pascal Senior Geotechnical Engineer

Charles F. Rickert, P.E. Associate

P. Chis Phyll

P. Chris Marshall, P.E. Senior Project Engineer





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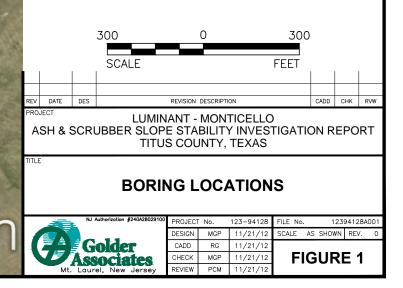
LEGEND

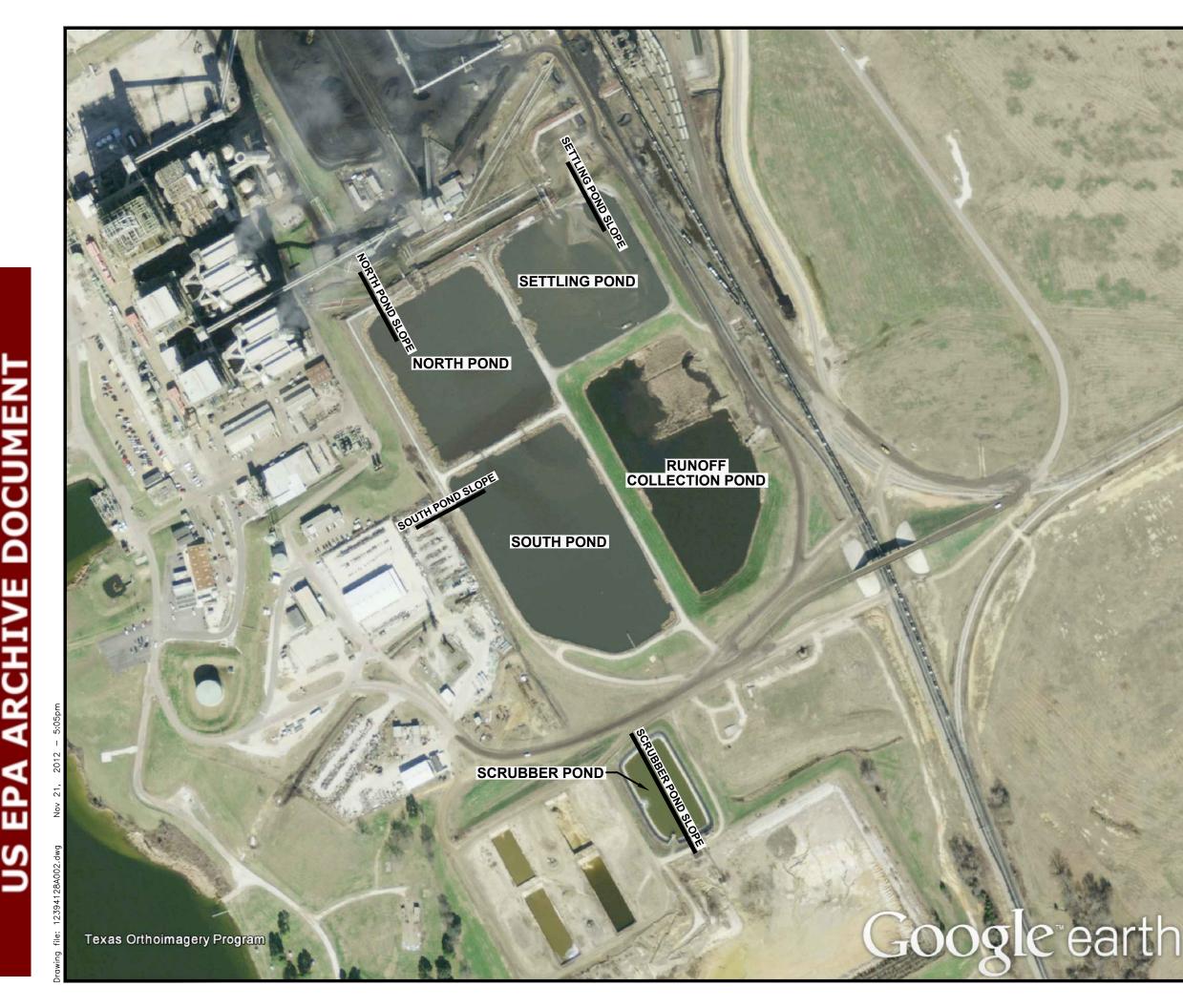
●^{BH-101}

BORING LOCATION

REFERENCE

1.) AERIAL SHOWN LICENSED FROM GOOGLE EARTH PROFESSIONAL.





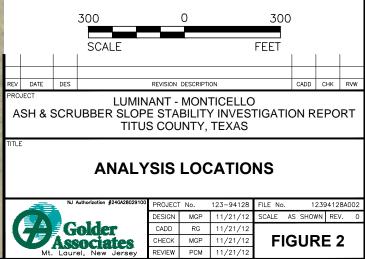


LEGEND

ANALYSIS LOCATION

REFERENCE

1.) AERIAL SHOWN LICENSED FROM GOOGLE EARTH PROFESSIONAL.



APPENDIX A BORING LOGS

Gold	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870	BORING NUMBER BH-101 PAGE 1 OF 2								
	minant	PROJECT		Pond	Slope Sta	bility				
PROJECT N	IUMBER 123-94128	PROJECT LOCATION Monticello								
DATE STAR	TED 10/22/12 COMPLETED 10/22/12	GROUND ELEVATION 386.5 ft HOLE SIZE 8 inches								
DRILLING C	ONTRACTOR WEST Drilling									
DRILLING N	IETHOD Hollow Stem Auger	$ar{\mathbf{\nabla}}$ at	TIME OF	DRIL	LING	45 ft / E	Elev 37	75.05 ft		
LOGGED B	Y_FW CHECKED BY _MP	AT	END OF	DRILL	.ING					
NOTES		AF	ter dri	LLING						
o DEPTH (ft) GRAPHIC LOG	MATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 20 40 60 80 □ FINES CONTENT (% 20 40 60 80		
	(CL) SANDY CLAY, low plasticity, some to little silt, tan ar dry, firm	ıd gray,	SH 1	54		3.5		••••		
			SH 2	54		3.25		•		
5	medium to low plasticity, dark gray sandy gravel seam at 4	1.0'	SH 3	56		4.0		•		
			SH 4	88		2.25		••••		
_ 	(SC) CLAYEY SAND, fine, uniform graded, subrounded, s red and brown, dry	ome silt,	SH 5	75		3.0				
		d,	SH	54		3.5				
<u>15</u> -			6							
20	medium plasticity at 18.0'		SH 7	63		2.0		•		
	dark gray clayey sand seam, stiff to hard at 23.0'		SH 8	54		4.75		•		
30	(CH) Fat CLAY, grading to a sandy clay, some silt, red an mottled, hard to stiff, moist	d gray,	SH 9	58		2.0		•		
	(CL) SANDY CLAY, fine, tan and brown, moist		SH 10	71		5.0		I		



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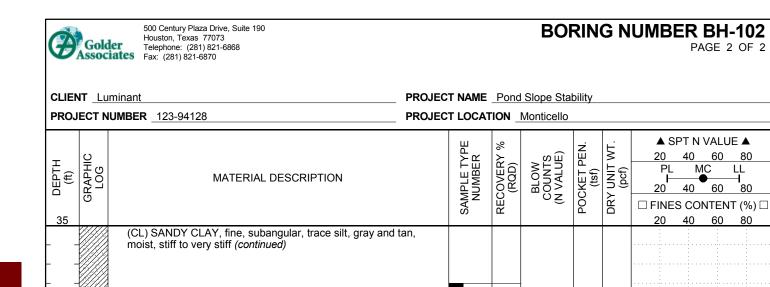
BORING NUMBER BH-101

PAGE 2 OF 2

CLIENT Luminant

PROJECT NAME Pond Slope Stability

Ð	Gold	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870				BO	RIN	G N	UMBER BH-10 PAGE 1 OF		
CLIE	NT Lur	ninant	PROJEC	T NAME	Pond	Slope Sta	bility				
PRO.	JECT NI	UMBER 123-94128	PROJECT LOCATION Monticello								
DATE		TED 10/22/12 COMPLETED 10/22/12	GROUND ELEVATION 386.5 ft HOLE SIZE 8 inches								
DRIL	LING CO	ONTRACTOR WEST Drilling									
DRIL	LING MI	ETHOD Hollow Stem Auger	$ar{2}$ at	TIME OF	F DRILI	LING	20 ft / I	Elev 3	55.30 ft		
LOG	GED BY	FW CHECKED BY MP	AT	END OF	DRILL	ING					
NOTE	ES										
o DEPTH (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 20 40 60 80 □ FINES CONTENT (% 20 40 60 80		
		(SC) CLAYEY SAND, fine sand, low plasticity clay, little or dark brown, dry	-	SH 1	56		5.0		•		
-		subangular grains, some silt, little gravel, dark brown and t 2.0'	an at	SH 2	33		5.0		•		
5		low plasticity, red and brown at 4.0'		SH 3	42		5.0		•		
		high plasticity, 3" clay seam, soft at 6.0'		SH 4	50		5.0		•		
10		grading to sandy clay, tan and gray, mottled, stiff to hard a	t 8.0'	SH 5	63		3.5		•		
15		(CL) SANDY CLAY, find sand, low plasticity clay, tan and very stiff	gray,	SH 6	50		3.5		•		
-		(SC) CLAYEY SAND, fine sand, low plasticity clays									
20		red and gray, mottled, moist at 18.0'		SH 7	58		5.0		•		
25				SH 8	58		3.25		· · · · •		
30		decreased clay content, tan and brown at 28.0' $\overline{\nabla}$		SH 9	58		3.5		•		
35		(CL) SANDY CLAY, fine, subangular, trace silt, gray and ta moist, stiff to very stiff	an,	SH 10	73		2.0		••••••		



SH

11

SH

12

SH

13

58

75

65

2.0

0.5

3.5

60

60

60

80 __<u>80</u> _________

80

GEOTECH BH PLOTS - GINT STD US LAB.GDT - 12/4/12 15:59 - PY_2012 PROJECT FOLDERS/123-94128 LUMINANT POND SLOPE STABILITYMONTICELL0/94128MONTICELLO.GPJ

40

45

50

wet at 43.0'

gray, wet

Bottom of borehole at 50.0 feet.

(SC) CLAYEY SAND, fine, subangular, some clay seams, dark

Gold	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870	BORING NUMBER BH-103 PAGE 1 OF 2									
CLIENT _Lu	ıminant I	PROJECT NAME Pond Slope Stability									
PROJECT N	IUMBER 123-94128	PROJECT LOCATION Monticello									
DATE STAR	COMPLETED 10/22/12										
DRILLING C	CONTRACTOR WEST Drilling										
DRILLING N	IETHOD Hollow Stem Auger	$\overline{\mathbf{v}}$ at t		DRILI	LING _ 26.3	80 ft / E	Elev 36	60.20 ft no reading, cave in a			
LOGGED BY	Y_FWCHECKED BY_MP	AT E	ND OF	DRILL	ING						
		AFTE	ER DRI	LLING							
DEPTH (ft) GRAPHIC LOG	MATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 20 40 60 80 □ FINES CONTENT (%) □			
0			S	œ		<u>م</u>		<u>20 40 60 80</u>			
	Roadway gravel removed (CL) LEAN CLAY, low plasticity, some fine sand, tan and g	rav	SH	50		5.0					
	dry, hard	y,	1								
			SH 2	65		5.0		•			
5	medium plasticity, sand and gravel seam, white at 4.0'		SH 3	65		5.0		•			
	(CL) SANDY CLAY, fine, subangular, low plasticity, brown a red, dry, hard	and	SH 4	63		4.0		•			
10			SH 5	50		5.0		•			
15	(SC) CLAYEY SAND, fine, subangular, low plasticity, little s gray and red, moist	silt,	SH 6	71		4.0		•			
20	(CH) SANDY CLAY, medium to high plasticity, gray and rec moist, hard	J,	SH 7	50		4.5					
	(SM) SILTY SAND, fine, sub angular, some clay, orange ar moist	nd tan,	SH 8	42				•			
11111111111111111111111111111111111111	∇		SS 9 SH	71	6-6-7 (13)						
30	wet, compact at 30.0'	\geq	311 10 SS 11	0	7-5-6 (11)			•			
	medium to fine at 33.0'		SS 12	100	4-9-19 (28)			••			



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BORING NUMBER BH-103

PAGE 2 OF 2

CLIENT Luminant

PROJECT NAME Pond Slope Stability

PROJECT NU		PROJECT NAME _Pond Slope Stability PROJECT LOCATION _Monticello							
25 DEPTH (ft) GRAPHIC LOG	MATERIAL DESCRIPTION	SAMPLE TYPE NUMBER	RECOVERY % (RQD)		POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 40 60 80 □ FINES CONTENT (%) 20 40 60 80		
	(SM) SILTY SAND, fine, sub angular, some clay, orange and t moist <i>(continued)</i>	tan,							
40	(SM) SILTY SAND, fine, little clay, gray and red, wet, compact	t SS 13	89	4-7-10 (17)	_				
45 - 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	some oxidation at 43.0'	SS 14	100	4-8-13 (21)	_		▲●□		
50		SS 15	94	6-9-12 (21)					

	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870				BO	RIN	G N	UMBER BH-10 PAGE 1 OF		
CLIENT Lu	iminant	PROJECT	NAME	Pond	Slope Sta	bility				
PROJECT N	IUMBER _ 123-94128									
DATE STAR	COMPLETED 10/23/12	GROUND ELEVATION _386.5 ft HOLE SIZE _8 inches								
DRILLING C	CONTRACTOR WEST Drilling									
DRILLING N	IETHOD Hollow Stem Auger	${ar ar \Sigma}$ at t	TIME OF	DRILI	_ING _25.2	20 ft / E	Elev 36	61.30 ft		
LOGGED B	Y _FW CHECKED BY _MP	AT E	IND OF	DRILL	ING					
NOTES										
o DEPTH (ft) GRAPHIC LOG	MATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 20 40 60 80 □ FINES CONTENT (% 20 40 60 80		
	Remove gravel from road before drilling		SH	22		50				
	(CL) LEAN CLAY, low plasticity, little to trace sand, brown a gray, dry, hard	and	1 SH	33		5.0				
5	high plastic (CH), soft at 4.0'		2	40		5.0		••••••••••••••••••••••••••••••••••••••		
	(CL) SANDY CLAY, low plasticity, some to little silt, red and	d grav.	SH 3	46		1.25		 		
	hard, dry at 6.0'	5 ,,	SH 4			1.0		•		
10			SH 5	46		3.25		•••		
	(SC) CLAYEY SAND, fine, subangular, brown, moist		SH 6	46				•		
20	(CH) SANDY CLAY, fine, subangular, medium to high plast red and gray, moist, hard	ticity,	SH 7	-		4.5		••••••		
25	little silt, moist, soft at 23.0' \arrow		SH 8	67		1.5		•		
	(SC) CLAYEY SAND, fine, subangluar, low plasticity, red a gray, mottled, wet	and	SH 9	71		1.5		•••••		
	(SP) SAND, fine, poorly graded, trace silt and clay, gray an wet, compact	nd red,	SS 10	94	6-8-11 (19)	-		. 🗆 . 🌨		



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BORING NUMBER BH-104

PAGE 2 OF 2

CLIENT Luminant

PROJECT NAME Pond Slope Stability

			PROJECT NAME Production Monticello						
FROJ		INDER 123-94120	PROJEC	LUCAI		Monticello	1	1	
35 DEPTH (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 20 40 60 80 □ FINES CONTENT (%) 20 40 60 80
-		(SP) SAND, fine, poorly graded, trace silt and clay, gray an wet, compact <i>(continued)</i>	nd red,						
40		(SP) SAND, medium to fine, subangular, poorly graded, so and fine gravel, red and brown, wet, compact	ome silt	SS 11	100	6-12-12 (24)	_		
- 45 -		(SM) SILTY SAND, fine, subangular, some clay seams, tar gray, wet, compact	n and	SS 12		3-12-16 (28)	_		•
- - 50		some oxidation, trace clay seams at 48.0'		SS 13	89	7-9-13 (22)	-		

e	Gold	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870				BO	RIN	G N	UMBE	R BH	
CLI	ENT Lur	ninant	PROJEC	T NAME	Pond	Slope Sta	bility				
PRO		JMBER _123-94128									
		COMPLETED 10/23/12						HOLE	SIZE 8 ind	ches	
		DNTRACTOR WEST Drilling									
		ETHOD Hollow Stem Auger				LING _34.4	40 ft / F	Elev 3	52 10 ft		
		_FWCHECKED BY _MP									
		0.120122 21 <u></u>									
DEPTH	(II) GRAPHIC LOG	MATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	1	DRY UNIT WT. (pcf)		40 60	80 LL 80 T (%) □
0.6		(CH) FAT CLAY, high plastic, tan and red, dry, soft		SH							
GELL	~0~J	(OH) SILT, low plastic, organic, trace roots, black]	1	33		1.0		••••		
		 (GP) SANDY GRAVEL, fine, subangular, white (CL) LEAN CLAY, low plasticility, some sand, tan and gray firm 	, dry,	SH 2	50		4.5		•		
CELLO/941		(CL) SANDY CLAY, low plasticity, red and gray, mottled, d	ry, hard	SH 3	67		5.0		•		
		some sand seams at 6.0'		SH 4	92		3.0		•		
	-	(SC) CLAYEY SAND, fine, subangular, gray, dry		SH 5	54		1.5		•		
94128 LUMINANT POND SLOPE STABILITYMONTICELL0994128MONTICELL0.6PJ		compact at 10.0'		SS 6	67	3-4-6 (10)	-				
		(CL) SANDY CLAY, low plasticity, some clayey sand seam and red, mottled, dry, hard	ns, gray	SH 7	54		5.0		••••	4	
				SH 8	60		3.75		•••••		
15:59 - P:_2012 PF		increased sand content, moist at 23.0'		SH							
- GINT STD US LAB. GDT - 12/4/12 15:59 - PY_2012 PROJECT FOLDERS/123- 0 0 0 0 0 0 0 0 0 0				8	67		5.0				·····
		(SC) CLAYEY SAND, fine, subangular, low plasticity, red a gray, moist, loose	ind	SS 9	100	4-4-4 (8)	-		•		
GEOTECH BH PLOTS		some clay seams, trace fine gravel, tan and gray, wet, con $\underline{\nabla}$ 33.0'	npact at	SS 10	100	7-7-9 (16)					· · · · · · · · · · · · · · · · · · ·

Ð	Gold	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870			BO	RIN	G N	IUMB			• 105 OF 2
CLIEN	NT Lur	ninant PROJE		Pond	Slope Sta	bility					
PROJ	ECT N	UMBER 123-94128 PROJE	PROJECT LOCATION Monticello								
DEPTH (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	20 PL 20 D FINE	40 ES COI	60 C 60 NTEN	80 LL ⊣ 80 Γ (%) □
<u>35</u> 		(SC) CLAYEY SAND, fine, subangular, low plasticity, red and gray, moist, loose <i>(continued)</i>						20	40	60	80
 _ 40 		no gravel at 38.0'	SS 11	100	5-7-10 (17)	_		•	▶		
 - 45 			SS 12	100	5-6-9 (15)	_			b		
 50		(SM) SILTY SAND, fine with trace medium, subangular, little clay, tan, wet, compact	SS 14	100	5-7-9 (16)				<u>،</u>	• • • • • •	
		Bottom of borehole at 50.0 feet.									
40 45 50											

US EPA ARCHIVE DOCUMENT GEOTECH BH PLOTS - GINT STD US LAB.GDT - 12/4/12 15:59 - P.(_2012 PROJECT FOLDERS/123

B ASS	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870	BORING NUMBER BH-10 PAGE 1 OF									
	Luminant	PROJEC		Pond	Slope Sta	bility					
PROJEC	NUMBER 123-94128	PROJECT LOCATION Monticello									
DATE ST	ARTED _10/23/12 COMPLETED _10/23/12	GROUND ELEVATION _386.5 ft HOLE SIZE _8 inches									
ORILLING	CONTRACTOR WEST Drilling										
ORILLING	METHOD Hollow Stem Auger	$ar{2}$ at	TIME OF	DRIL	LING 31.0	00 ft / E	Elev 35	55.50 ft no reading, cave in a			
	BY FW CHECKED BY MP	AT END OF DRILLING AFTER DRILLING									
		, .									
o UEPTH (ft) GRAPHIC	MATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 40 60 80 □ FINES CONTENT (%) □ 20 40 60 80			
	(CL) GRAVELLY CLAY, low plastic, some sand, brown, d	ry, hard	SH 1	33		5.0		•			
	(CH) FAT CLAY, medium to high plasticity, little silt and so brown, dry, hard		SH 2	46		5.0		•••••••••••••••••••••••••••••••••••••••			
5	(CL) SANDY CLAY, medium plasticity, trace silt, red and	gray, dry	SS 3	33	3-4-5 (9)			AO			
			SH 4	67		3.5		•			
10	(SC) CLAYEY SAND, low plasticity for last 6", gray, dry		SH 5	67		3.0		•			
- - - - - - - - - - - - - - - - - - -	low to non plastic, dark gray at 13.0'		SH 6	46		5.0		•			
20	fine, subangular, tan and gray at 18.0'		SH 7	50		2.0		•			
	little silt, red, compact at 20.0'		SS 8	100	5-7-11 (18)	-		•			
25	(CL) SANDY CLAY, low plasticity, tan and gray, moist, firr	n to stiff	SH 9	67		3.5		•			
30	(SM) SILTY SAND, fine, subangular, nonplastic, trace to I tan, moist	ittle clay,	SH 10	67				•			
	(SM) SILTY SAND, medium to fine, poorly graded, nonpla	astic,	√ ss	89	5-5-6						
- 4-	trace gravel, tan and red, wet, compact		X 11	89	(11)						

Ø	Gold	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870			BOI	RIN	G N	UMB			- 106 OF 2
	ENT <u>Lu</u> DJECT N		PROJECT NAME PROJECT LOCA			bility					
HTHA 32	GRAPHIC LOG	MATERIAL DESCRIPTION	SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SI 20 PL 20 □ FINES 20	PT N \ 40 40 40 5 CON 40	60 C 60	80 LL -1 80
-		(SM) SILTY SAND, medium to fine, poorly graded, nonplas trace gravel, tan and red, wet, compact <i>(continued)</i>	stic,								
		(SC) CLAYEY SAND, fine, subangular, some clay seams, oxidation, tan and gray, mottled, wet, compact	SS 12	72	4-8-11 (19)	-			•		
		no visible oxidation at 43.0'	SS 13	44	5-7-10 (17)	-		•			
STABILI			SS 14	100	7-8-13 (21)	-					

Bottom of borehole at 50.0 feet.

US EPA ARCHIVE DOCUMENT

GEOTECH BH PLOTS - GINT STD US LAB.GDT - 12/4/12 16:00 - P_2012 PROJECT FOLDERS/123-94128 LUMINANT POND SLOPE STA

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Ð	Golden	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870	BORING NUMBER BH- PAGE 1								
CLIEN	NT Lumi	inant	PROJECT		Pond	Slope Sta	bility				
PROJ	ECT NUI	MBER 123-94128	PROJECT LOCATION Monticello								
DATE	STARTE	ED <u>10/23/12</u> COMPLETED <u>10/23/12</u>	GROUND ELEVATION _386.5 ft HOLE SIZE _8 inches								
DRILL		NTRACTOR WEST Drilling	GROUND WATER LEVELS:								
DRILL	ING ME	THOD _ Hollow Stem Auger	Σ at	TIME OF	DRIL	ING 31.	75 ft / I	Elev 38	54.75 ft		
LOGG	ED BY	FW CHECKED BY MP	AT	END OF	DRILL	ING					
NOTE	S										
o DEPTH (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 20 40 60 80 □ FINES CONTENT (%) 20 40 60 80		
	000	remove 1' of sandy gravel from roadway		SH	40		50				
-		(CL) LEAN CLAY, low plasticity, some sand, gray, dry, har	d	1	42		5.0				
-				SH 2	56		5.0		•		
5		some sand seams at 4.0'		SH 3	46		5.0		•••••		
-		(CL) SANDY CLAY, low plasticity, some silt, gray and red, hard	dry,	SH 4	71		4.25		•		
-		(SC) CLAYEY SAND, fine, subangular, low plasticity, gray,	dry	SH 5	54		1.75				
- - - 15 -				SH 6	67		3.5		• •		
- - 20 -		(CL) SANDY CLAY, low plasticity, little silt, red and gray, d to stiff	ry, firm	SH 7	54		2.75		••••••••••••••••••••••••••••••••••••••		
- - 25		increased sand content, moist at 23.0'		SH 8	58		4.0		•		
- - 30 -		(SP) SAND, nonplastic, poorly graded, some silt, little clay, moist	tan,	SH 9	58				•••		
- - 35	Į Į Į	(SM) SILTY SAND, fine with little medium, little clay, tan ar wet, compact	nd gray,	SS 10	89	5-5-6 (11)	_		· · · · · · · · · · · · · · · · · · ·		



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BORING NUMBER BH-107

PAGE 2 OF 2

CLIENT Luminant

PROJECT NAME Pond Slope Stability

	CLIENT Luminant PROJECT NAME Poind Slope Stability PROJECT NUMBER 123-94128 PROJECT LOCATION Monticello						
PROJEC	FINUMBER 123-94120				1	1	
CEPTH (ft) GRAPHIC	MATERIAL DESCRIPTION	SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 20 40 60 80 □ FINES CONTENT (%) □ 20 40 60 80
	(SM) SILTY SAND, fine with little medium, little clay, tan and wet, compact <i>(continued)</i>	d gray,					
	3" dark gray clay seam (CL), little gravel at 38.0'	SS 11	89	5-5-9 (14)	-		
MONTICELLO094128MONTICE	subangular, trace clay, oxidation, tan at 43.0'	SS 12	-	5-9-11 (20)	-		.
PE STABILITYM	some clay seams, tan and gray at 48.0' Bottom of borehole at 50.0 feet.	SS 13	89	4-8-9 (17)	_		•
GEOTECH BH PLOTS - GINT STD US LAB.GDT - 12/4/12 16:00 - PA_2012 PROJECT FOLDERS/123-94128 LUMINANT POND SLOPE STABILITYMONTICELLO994128MONTICELLO6PU							
GEOTECH ВН И.							

Ø	Gold	500 Century Plaza Driv Houston, Texas 7707 Telephone: (281) 821- Fax: (281) 821-6870					BOI	RIN	G N	UMB		8H-1 Е 1 С	
CLIE	NT Lu	iminant		PROJEC		Pond	Slope Sta	bilitv					
								-					
			COMPLETED _10/24/12			_			HOI F	SIZE 8	inches		
			Drilling							<u> </u>			
			Nuger				LING <u>32.6</u>	S5 ft / 5		53 85 ft			
					TER DRI		.ING						
								1	1				
DEPTH O DEPTH (ft)	GRAPHIC LOG	М	ATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	(N VALUE) COUNTS BLOW	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ S 20 PL 20 □ FINE 20	PT N VA 40 6 40 6 5 CONT 40 6	60 8 LL 60 8 ENT ('	30 - 30 %) 🗆
ICELLO.G		remove 4" of gravel (CL) LEAN CLAY, Ic brown, dry, firm	from roadway w plasticity, some to little sand,	trace silt,	SH 1	38		2.5		• • • • • • • • • • • • •		· · · ·	
128MONT			gray, firm to stiff at 2.0'		SH 2	75		2.75		•		· · · · · · · · · · · · · · · · · · ·	
		trace gravel, tan, reo	l, and gray, stiff at 4.0'		SH 3	54		3.0		•	• • • • • • • • • • • • • • • • • • • •	÷	-
		increased sand cont	ent, little silt, hard at 6.0'		SH 4	83		5.0				-	
		(CL) SANDY CLAY,	low plasticity, some silt, gray ar	nd red, dry, stiff	SH 5	44		3.75		••••		: 	
94128 LUMINANT POND SLOPE STABILITYMONTICELL094128MONTICELL0.6PJ												· · · · · · · · · · · · · · · · · · ·	
		(CL) SANDY CLAY,	low plasticity, fine, subangular,	dark gray, dry	SH 6	75				:		:	1
	-	some silt, tan and g	ay at 18.0'		SH 7	50				•			
GEOTECH BH PLOTS - GINT STD US LAB/GDT - 12/4/12 16:00 - PY_2012 PROJECT FOLDERSV123- 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		(CL) SANDY CLAY,	low plasticity, little silt, tan and	gray, dry, hard	SH 8	83				••••	4		
25 - 25 													
015 - GINT STD US		low plasticity, some	silt, moist, firm at 28.0'		SS 9	89	6-3-4 (7)	-		•			
ECH BH PLC), fine, subangular, low plasticity	y, little silt,	SH							· · · · · · · · · · · · · · · · · · ·	
10 35 35		some clay seams, ta	in and gray, moist		10	46							· · · · · · · · · · · · · · · · · · ·

(Continued Next Page)

Ð	Golde	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870	BORING NUMBER BH-108 PAGE 2 OF 2													
	NT <u>Lun</u>		ROJECT NAME Pond Slope Stability ROJECT LOCATION Monticello WONDON													
H DEPTH (ft) 35	GRAPHIC LOG	MATERIAL DESCRIPTION	SAMPLE TYPE NUMBER	%			DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 40 60 80 □ FINES CONTENT (%) □ 20 40 60 80								
40		(SC) CLAYEY SAND, fine, subangular, low plasticity, little s some clay seams, tan and gray, moist <i>(continued)</i> little medium at 35.0'			(15)	-										
45		some silt, little oxidation, wet, compact at 43.0'			(19)	-										
- 50		Bottom of borehole at 50.0 feet.			(24)			..								

Ø	Gold	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870				BO	RIN	G N	UMBER BH-109 PAGE 1 OF 1
CLIER	NT Lu	minant	PROJEC	T NAME	Pond	Slope Sta	bility		
PROJ	ECT N	UMBER 123-94128	PROJEC	T LOCAT		Monticello			
DATE	STAR	TED 10/24/12 COMPLETED 10/24/12	GROUND	ELEVA		384 ft		HOLE	SIZE 8 inches
DRILI	ING C	ONTRACTOR WEST Drilling	GROUND	WATER	LEVE	LS:			
DRILL	ING M	ETHOD Hollow Stem Auger	Σ at	TIME OF	DRILI	_ING _17.2	20 ft / E	Elev 36	66.80 ft no reading, cave in at
		FW CHECKED BY MP							
NOTE	:s		AF	TER DRI	LLING			,	
o DEPTH (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 40 60 80 □ FINES CONTENT (%) □ 20 40 60 80
0.0		(OL) SILT and SAND, high organic, non plastic, black		SH	58		5.0		
		(SC) CLAYEY SAND, fine, subangular, low plasticity, trace organics, gray and red, dry	9	1	50		5.0		
		medium to fine at 2.0'		SH 2	42				. •
5				SH 3	50		5.0		•
		(SM) SILTY SAND, medium to fine, subangular, non plasti clay nodules, tan, moist	ic, some	SH 4	42				• •
		(SC) CLAYEY SAND, fine, subangular, little silt, tan and gr moist, compact	ray,	SS 5	67	4-6-6 (12)	-		
		(CL) SANDY CLAY, low plasticity, some to little silt, red an mottled, moist, hard	ıd gray,	SH 6	67		4.0		•
		$\overline{\mathcal{V}}$ increased sand content at 18.0'		SH	75				
20				7	15				
-		Bottom of borehole at 20.0 feet.							

Ø	Gold	500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Telephone: (281) 821-6868 Fax: (281) 821-6870				BO	RIN	G N	UMBER BH-110 PAGE 1 OF 1				
CLIEN	NT <u>Lu</u>	iminant	PROJECT	NAME	Pond	Slope Stal	bility						
PROJ	IECT N	IUMBER 123-94128	PROJECT LOCATION Monticello										
DATE	STAR	TED 10/24/12 COMPLETED 10/24/12	GROUND ELEVATION _384 ft HOLE SIZE _8 inches										
DRILL	LING C	CONTRACTOR WEST Drilling	GROUND	WATER	LEVE	LS:							
DRILL	LING N	IETHOD Hollow Stem Auger	$\overline{\Delta}$ at .	TIME OF	DRIL	LING 18.1	0 ft / E	Elev 36	65.90 ft no reading, cave in at				
LOGO	GED B	Y _FW CHECKED BY _MP	AT	END OF	DRILL	ING							
NOTE	S		AFT	ER DRI	LLING								
o DEPTH (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION		SAMPLE TYPE NUMBER	RECOVERY % (RQD)	BLOW COUNTS (N VALUE)	POCKET PEN. (tsf)	DRY UNIT WT. (pcf)	▲ SPT N VALUE ▲ 20 40 60 80 PL MC LL 20 40 60 80 □ FINES CONTENT (%) □ 20 40 60 80				
		(CL) LEAN CLAY and SILT, some organics (CL) SILTY CLAY, low plasticity, trace organics, tan and gr.	av. dn/	SH	56		5.0						
		hard	_	1			0.0						
		(CL) SANDY CLAY, low plasticity, some silt, tan, red, and g dry, hard	gray,	SH 2	25				•••				
		increased sand content at 4.0'		SH 3	46		5.0		•				
		(SC) CLAYEY SAND, fine, subangular, low to plasticity, so tan, red, and gray, dry	me silt,	SH 4	58		4.0		••••				
		(CL) SANDY CLAY, low plasticity, little silt, tan and gray, m moist, firm to stiff	ottled,	SS 5	67	2-4-4 (8)	-						
		some high plasticity seams, trace gravels at 10.0'		SH 6	50				·····•				
– – – – 15		(SC) CLAYEY SAND, fine, subangular, non plastic to low plasticity, some silt, tan and gray, mottled, compact	4	SS 7	89	2-4-7 (11)							
20		$\overline{ au}$ red and gray, moist at 18.0'		SH 8 SS 9	67 89	8-13-13 (26)	5.0		•				
	1.1.1	Bottom of borehole at 22.0 feet.											

APPENDIX B LABORATORY TEST SUMMARY SHEETS



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SUMMARY OF LABORATORY RESULTS

PAGE 1 OF 3

ROJECT NUMBE	R <u>123-941</u>	28			PRO	JECT LOCA	TION Mont	icello			
			Atterberg Limits					Unit V			
Sample ID	Depth	Natural Moisture (%)	Liquid Limit	Plastic Limit	Plasticity Index	%<#200 Sieve	Class- ification	Moisture Content (%)	Dry Density (psf)	Permeability (cm/sec)	Additiona Lab Testing
BH-101	0	17.0									
BH-101	2	22.6									
BH-101	4	23.4									
BH-101	6	15.7	36	14	22						
BH-101	8	16.6									
BH-101	13	19.0									
BH-101	18	12.4									
BH-101	23	16.2									
BH-101	28	14.8									
BH-101	33	17.1	28	13	15						
BH-101	38	17.5				34					
BH-101	43	28.5									
BH-101	48	27.0									
BH-102	0	15.3									
BH-102	2	10.9									
BH-102	4	15.7									
BH-102	6	16.0									
BH-102	8	16.1									
BH-102	13	16.9				54					
BH-102	18	20.4									
BH-102	23	14.6									
BH-102	28	16.4									
BH-102	33	27.5				69					
BH-102	38	25.6									
BH-102	43	28.6									
BH-102	48	27.7									
BH-103	0	19.4									
BH-103	2	19.2									
BH-103	4	16.5									
BH-103	6	11.4									
BH-103	8	16.5									
BH-103	13	15.5									
BH-103	18	23.1	60	19	41						
BH-103	23	22.3									
BH-103	25	20.4				21					
BH-103	30	24.0									
BH-103	33	21.0									
BH-103	38	26.7									
BH-103	43	28.4				35					
BH-103	48	26.1									
BH-104	0	17.6									



INVESTIGATION/94128MONTICELLO.GPJ

STABILITYMONTICELLO FIELD

PROJECT FOLDERS/123-94128 LUMINANT POND SLOPE

2012

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14:48

11/20/12

GDT

GINT STD US LAB.

COA

LAB SUMMARY

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SUMMARY OF LABORATORY RESULTS

PAGE 2 OF 3

PROJECT NAME Pond Slope Stability CLIENT Luminant PROJECT NUMBER 123-94128 PROJECT LOCATION Monticello Atterberg Limits Unit Weight Natural Moisture Additional Dry Liquid Plastic Plasticity %<#200 Class-Permeability Sample ID Density Depth Moisture Content Lab Limit Index Sieve ification (cm/sec) Limit (%) (%) (psf) Testing BH-104 2 19.5 BH-104 4 23.7 55 17 38 BH-104 6 17.6 BH-104 8 12.2 27 13 14 BH-104 13 13.8 BH-104 50 34 18 17.1 16 BH-104 23 20.0 BH-104 28 18.6 BH-104 33 22.5 7 BH-104 38 18.8 BH-104 43 29.1 BH-104 48 28.9 BH-105 12.9 0 BH-105 2 21.6 BH-105 4 12.3 BH-105 6 15.5 BH-105 8 9.8 10 BH-105 16.9 BH-105 13 16.7 44 15 29 BH-105 18 15.1 BH-105 23 14.3 66 BH-105 28 16.7 BH-105 33 19.7 BH-105 38 26.6 BH-105 43 28.7 BH-105 48 26.9 BH-106 0 11.0 BH-106 2 16.0 59 18 41 BH-106 4 16.5 BH-106 6 17.4 BH-106 8 15.8 12.5 BH-106 13 BH-106 18 11.7 20 BH-106 16.1 BH-106 23 14.5 BH-106 28 8.6 BH-106 33 20.9 32 BH-106 38 30.6 BH-106 43 28.9 BH-106 48 28.2 0 BH-107 17.5



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SUMMARY OF LABORATORY RESULTS

PAGE 3 OF 3

PROJECT NAME Pond Slope Stability CLIENT Luminant PROJECT NUMBER 123-94128 PROJECT LOCATION Monticello Atterberg Limits Unit Weight Natural Moisture Additional Dry Plasticity Liquid Plastic %<#200 Class-Permeability Sample ID Density Depth Moisture Content Lab Limit Limit Index Sieve ification (cm/sec) (%) (%) (psf) Testing BH-107 2 18.4 BH-107 4 19.0 BH-107 6 17.1 BH-107 13 14.9 36 16 20 BH-107 18 17.7 42 17 25 BH-107 23 18.6 BH-107 28 12.7 18 BH-107 33 20.2 BH-107 38 34.1 BH-107 43 27.8 BH-107 48 34.7 BH-108 0 19.7 BH-108 2 26.1 BH-108 4 23.2 BH-108 6 13.0 BH-108 8 14.7 BH-108 13 14.9 64 BH-108 18 13.4 BH-108 23 13.2 33 12 21 BH-108 28 26.7 BH-108 33 22.7 BH-108 35 27.7 BH-108 38 27.3 27.0 BH-108 43 BH-108 48 24.8 BH-109 0 15.4 BH-109 2 6.1 BH-109 4 9.3 BH-109 6 10.5 27 BH-109 8 13.6 BH-109 13 15.4 BH-109 18 14.2 27 11 16 BH-110 0 16.5 2 BH-110 8.7 BH-110 4 12.1 BH-110 6 12.7 37 BH-110 8 14.1 BH-110 10 17.4 48 16 32 BH-110 13 15.1 BH-110 18 14.0 BH-110 20 16.4

PROJECT FOLDERS/123-94128 LUMINANT POND SLOPE

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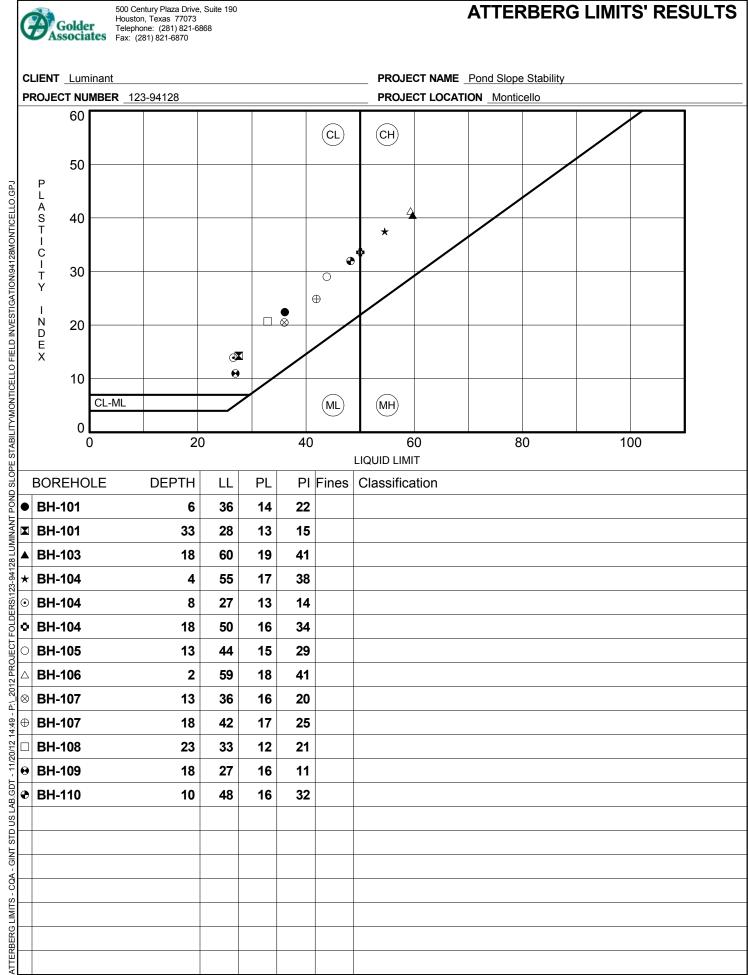
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LAB SUMMARY

STABILITY/MONTICELLO FIELD INVESTIGATION/94128MONTICELLO.GPJ

APPENDIX C LABORATORY TEST RESULTS

ATTERBERG LIMIT RESULTS



GRAIN SIZE ANALYSIS



500 Century Plaza Drive, Suite 190 Houston, Texas 77073 Golder Telephone: (281) 821-6868 Fax: (281) 821-6870

GRAIN SIZE DISTRIBUTION

PROJECT NAME Pond Slope Stability CLIENT Luminant PROJECT NUMBER 123-94128 PROJECT LOCATION Monticello U.S. SIEVE NUMBERS | 810 14 16 20 30 40 50 60 100 140 200 U.S. SIEVE OPENING IN INCHES HYDROMETER 1/23/8 3 6 4 3 2 1.5 1 3/4 6 100 ❣ 95 Ù 90 85 80 × 75 70 65 PERCENT FINER BY WEIGHT 60 55 X 50 45 40 X 35 X 30 T 25 20 • 15 10 5 0 100 10 0.1 0.01 0.001 1 **GRAIN SIZE IN MILLIMETERS** GRAVEL SAND COBBLES SILT OR CLAY fine medium coarse coarse fine BOREHOLE DEPTH PL Сс Classification LL ΡI Cu • **BH-101** 38 **BH-102** 13 **BH-102** 33 \star **BH-103** 25 \odot **BH-103** 43 DEPTH BOREHOLE D100 D60 D30 D10 %Gravel %Sand %Silt %Clay 2 \bullet **BH-101** 38 0.165 0.033 0.0 66.0 11.6 22.4 2 0.089 **BH-102** 13 0.009 0.0 45.5 28.9 25.6 4.75 **BH-102** 33 0.0 30.9 69.1 **BH-103** 25 4.75 0.179 0.099 0.0 79.2 20.8 \star \odot

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2012 PROJECT FOLDERS/123-94128 LUMINANT POND SLOPE STABILITY/MONTICELLO FIELD INVESTIGATION/94128MONTICELLO.GPJ . آغا STD US LAB.GDT - 11/20/12 14:49 -GINT - AQO **GRAIN SIZE**

BH-103

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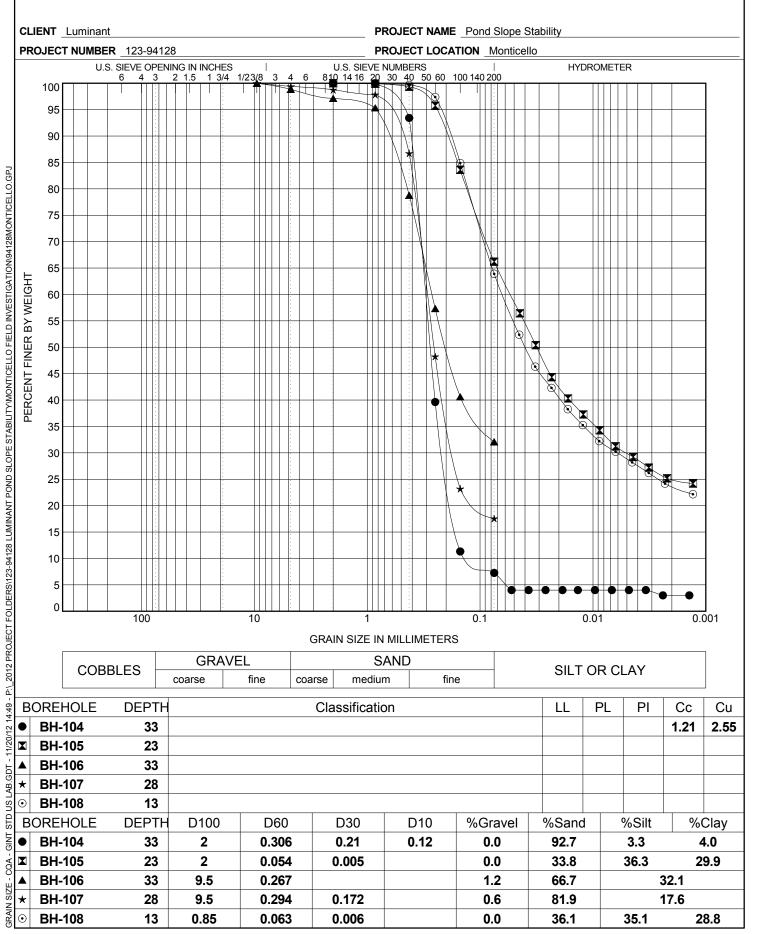
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DOCUMENT



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GRAIN SIZE DISTRIBUTION





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GRAIN SIZE DISTRIBUTION

CLIENT Luminant PROJECT NAME Pond Slope Stability PROJECT NUMBER 123-94128 PROJECT LOCATION Monticello U.S. SIEVE NUMBERS | 810 14 16 20 30 40 50 60 100 140 200 U.S. SIEVE OPENING IN INCHES HYDROMETER 1 3/4 1/23/8 3 4 6 6 4 3 2 1.5 100 95 90 85 80 X 75 • 70 65 PERCENT FINER BY WEIGHT 60 55 ×. 50 45 40 35 30 X 25 20 X 15 X X 10 5 0 100 10 0.1 0.01 0.001 1 **GRAIN SIZE IN MILLIMETERS** GRAVEL SAND COBBLES SILT OR CLAY fine medium coarse coarse fine ΡI BOREHOLE DEPTH PL Classification LL Сс Cu **BH-109** 6 **BH-110** 6 BOREHOLE DEPTH D100 D60 D30 D10 %Gravel %Sand %Silt %Clay 2 0.205 \bullet **BH-109** 6 0.085 0.0 72.6 13.0 14.4 **BH-110** 6 2 0.174 0.042 0.0 63.0 19.6 17.3

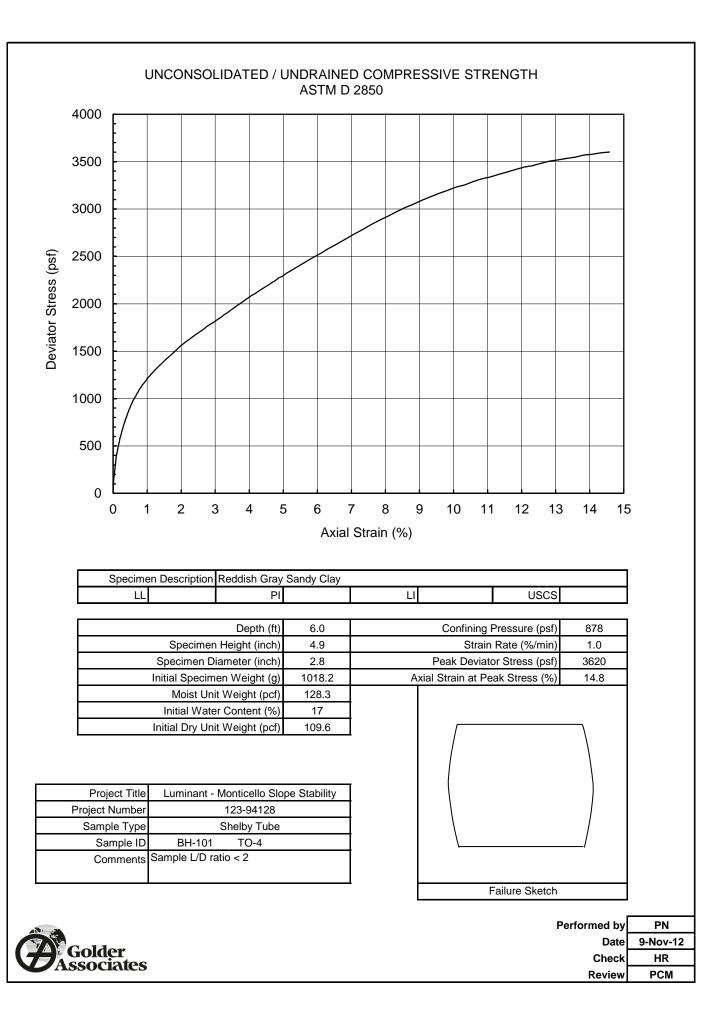
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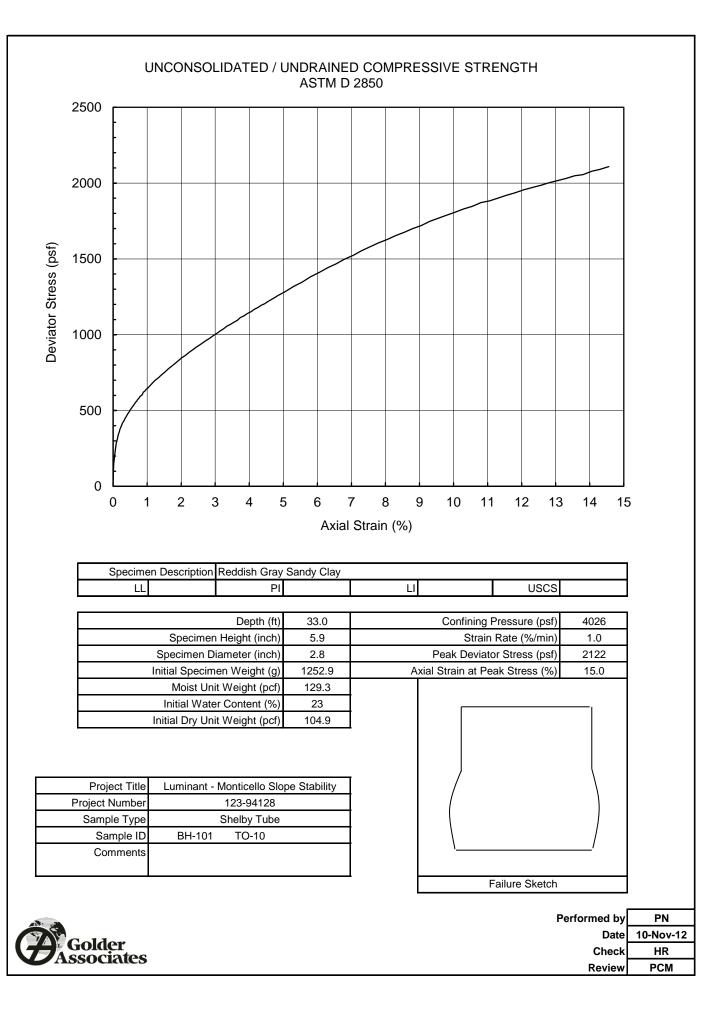
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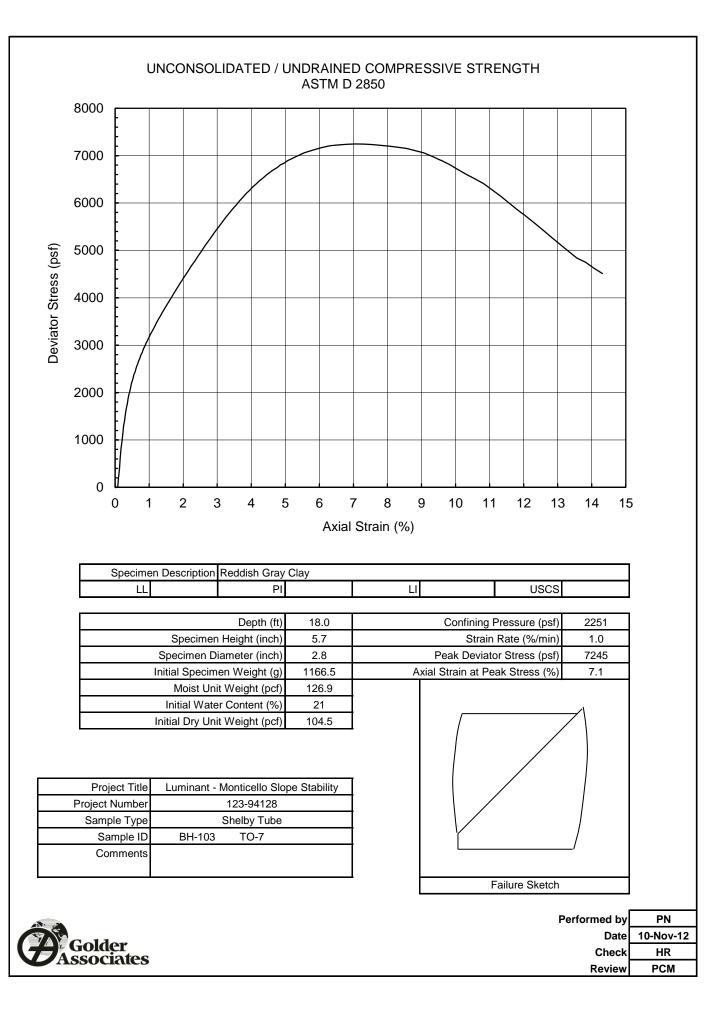
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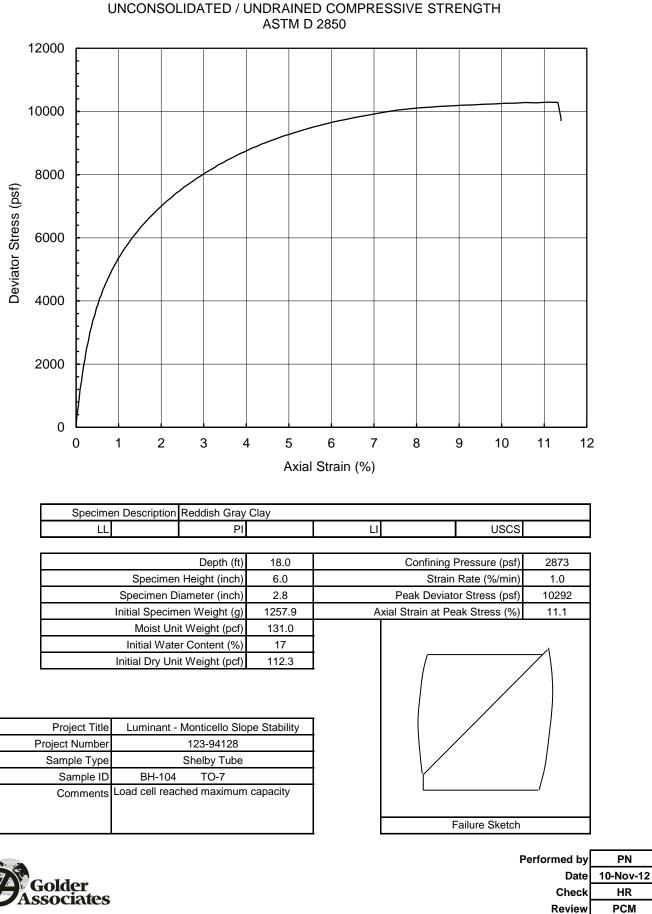




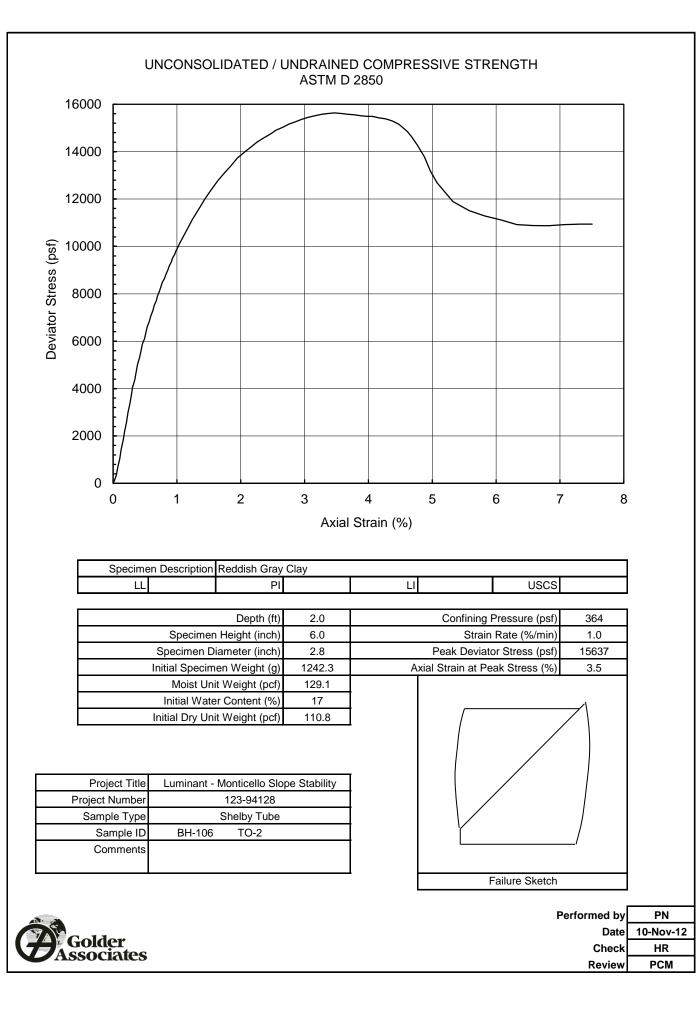


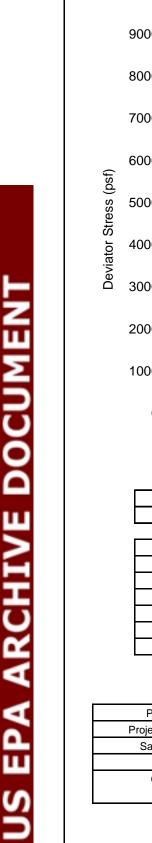


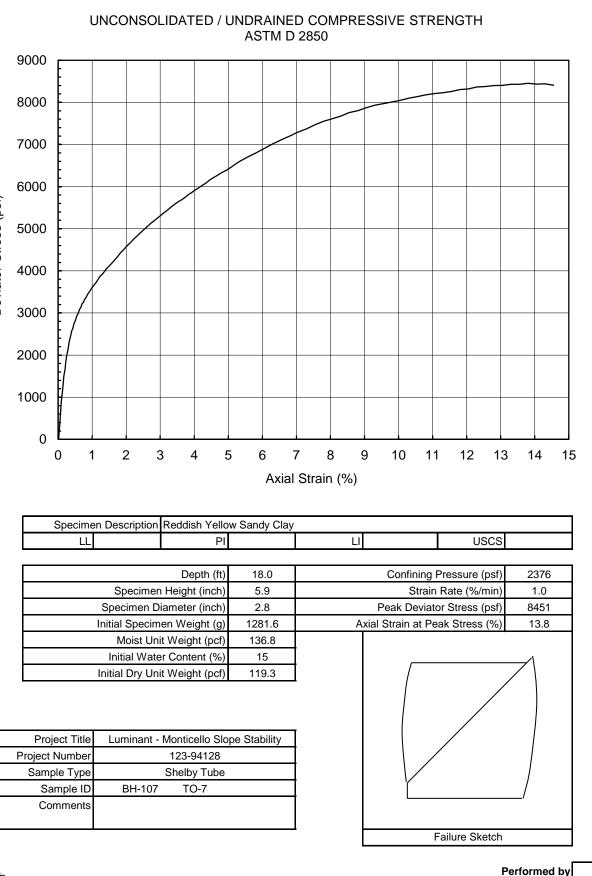












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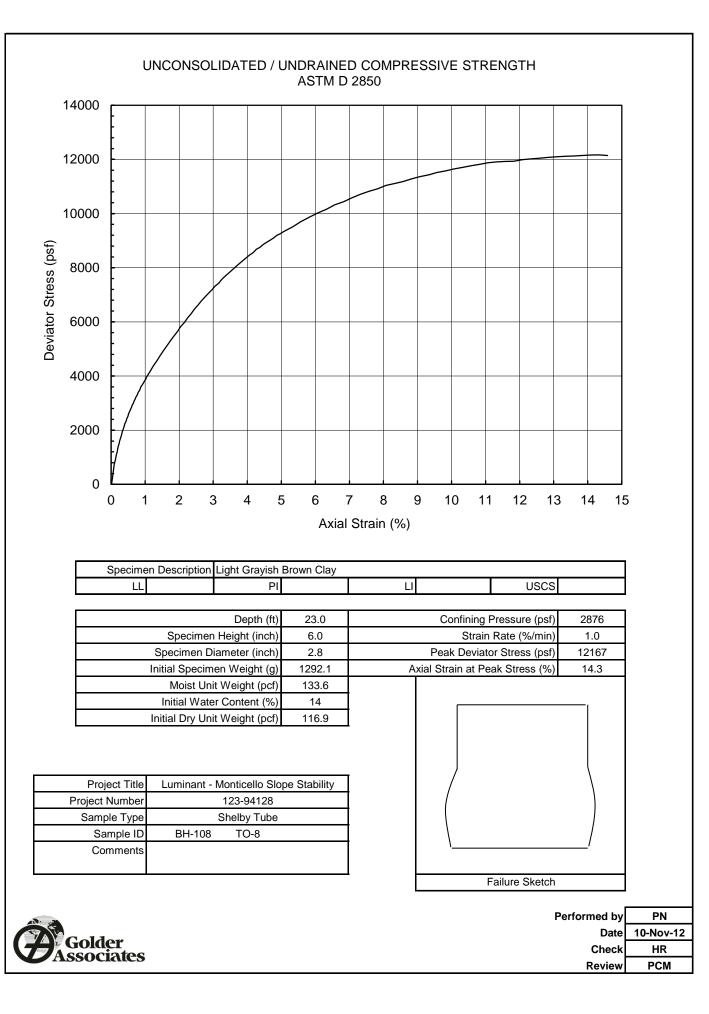
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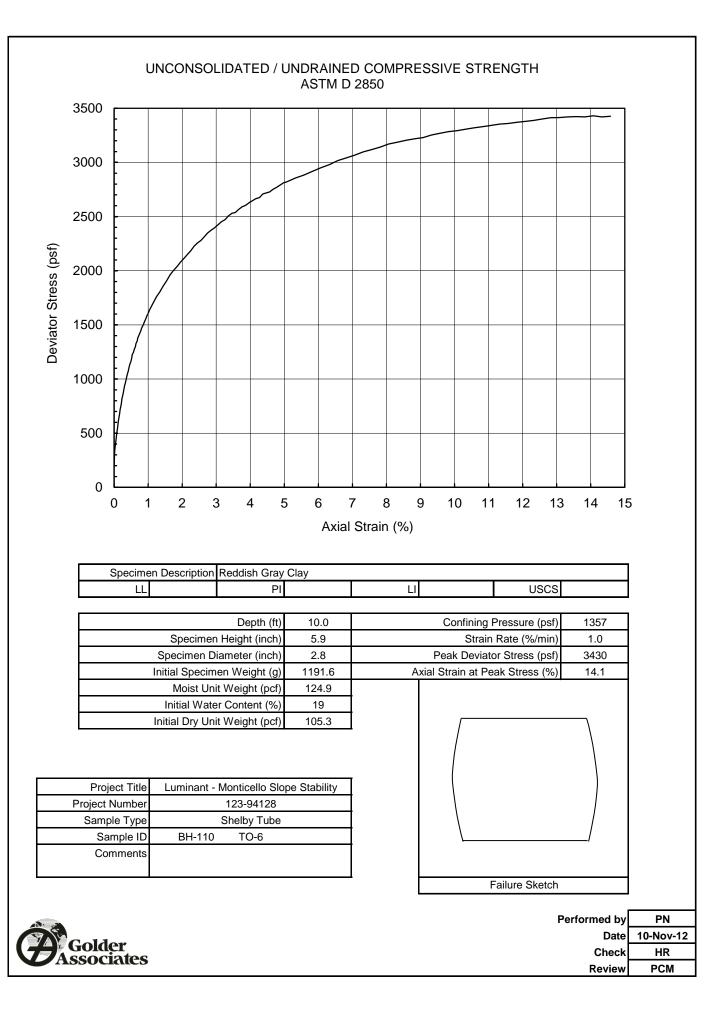
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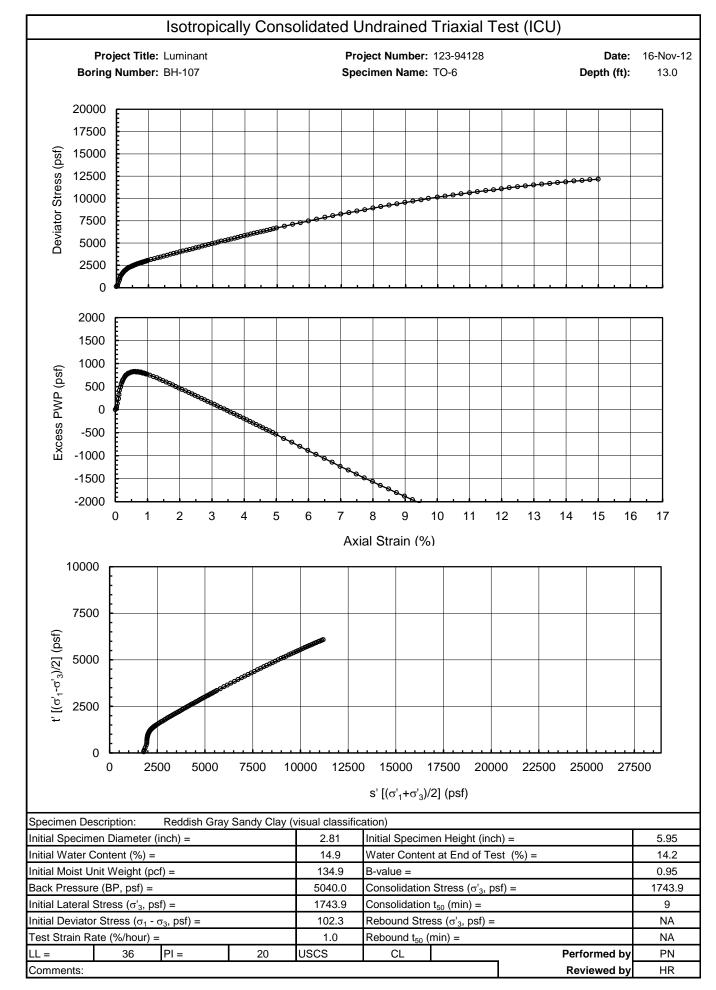
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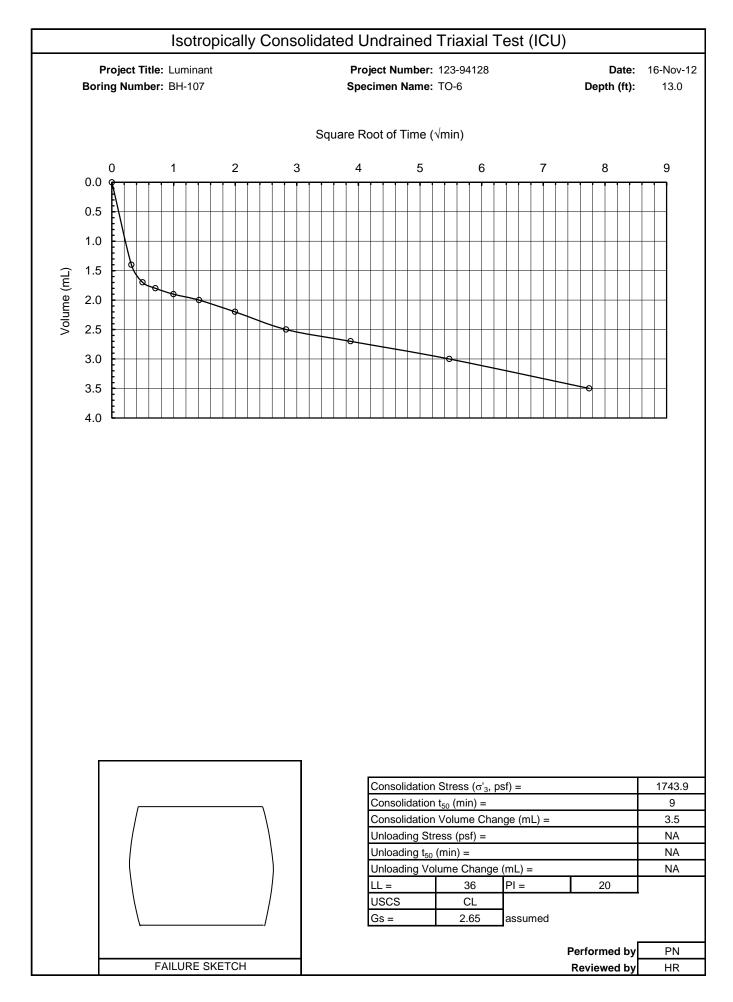


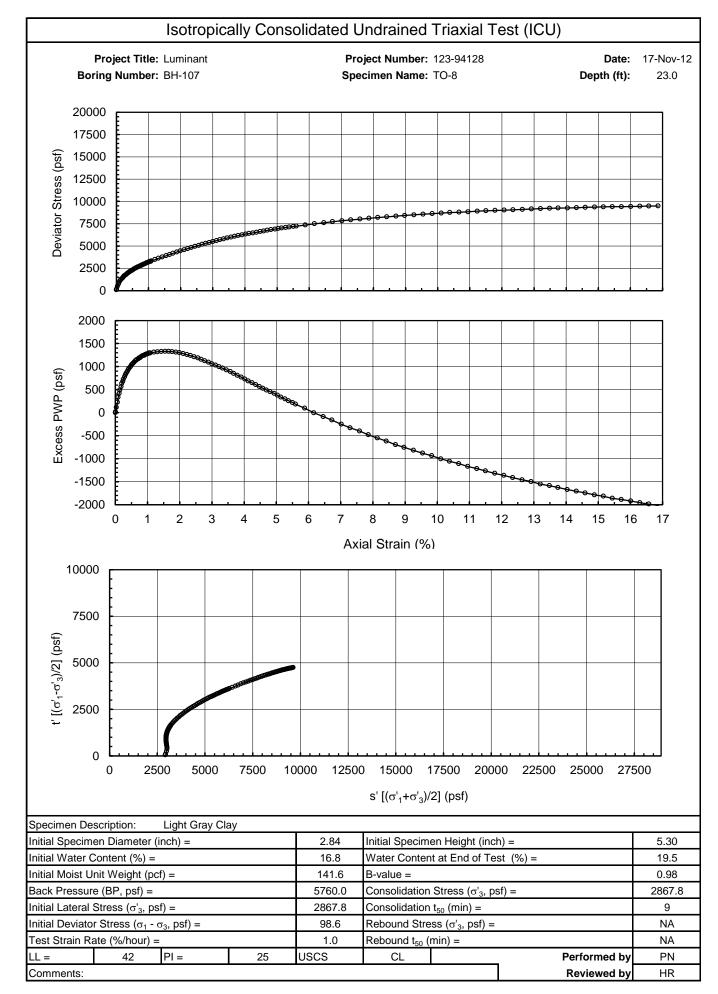




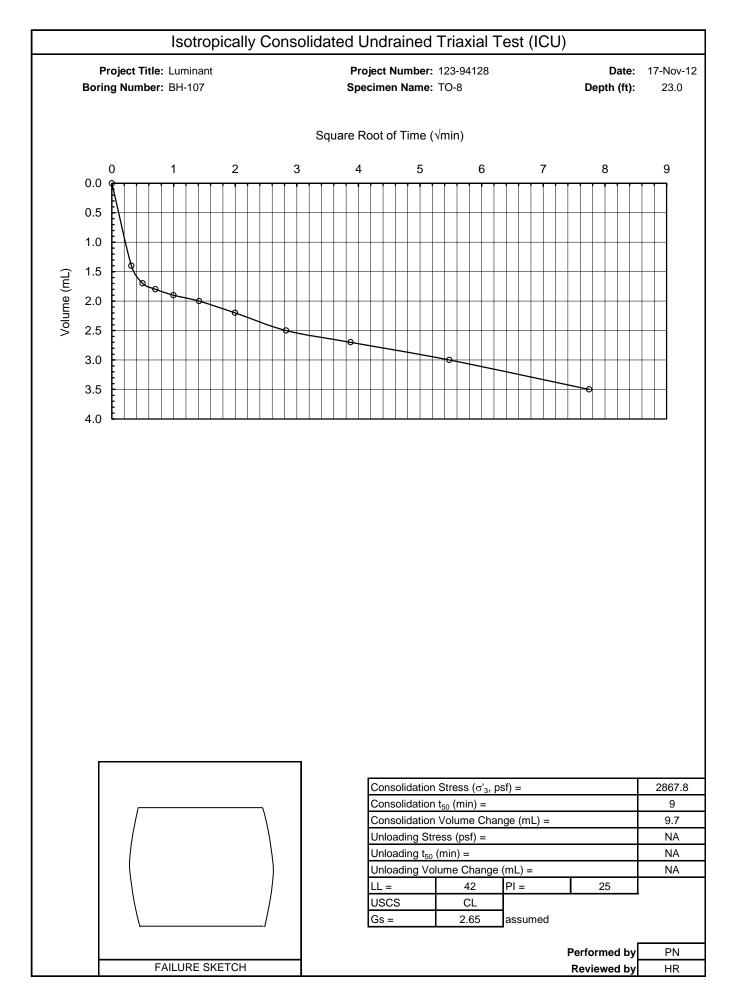
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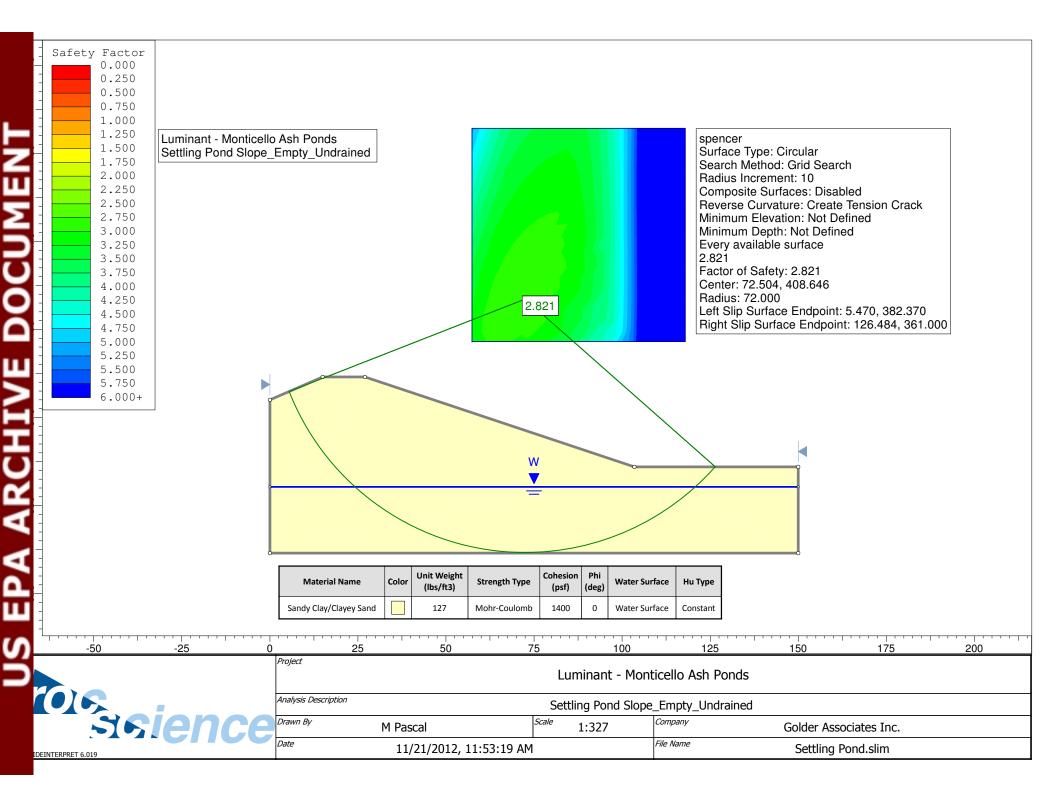


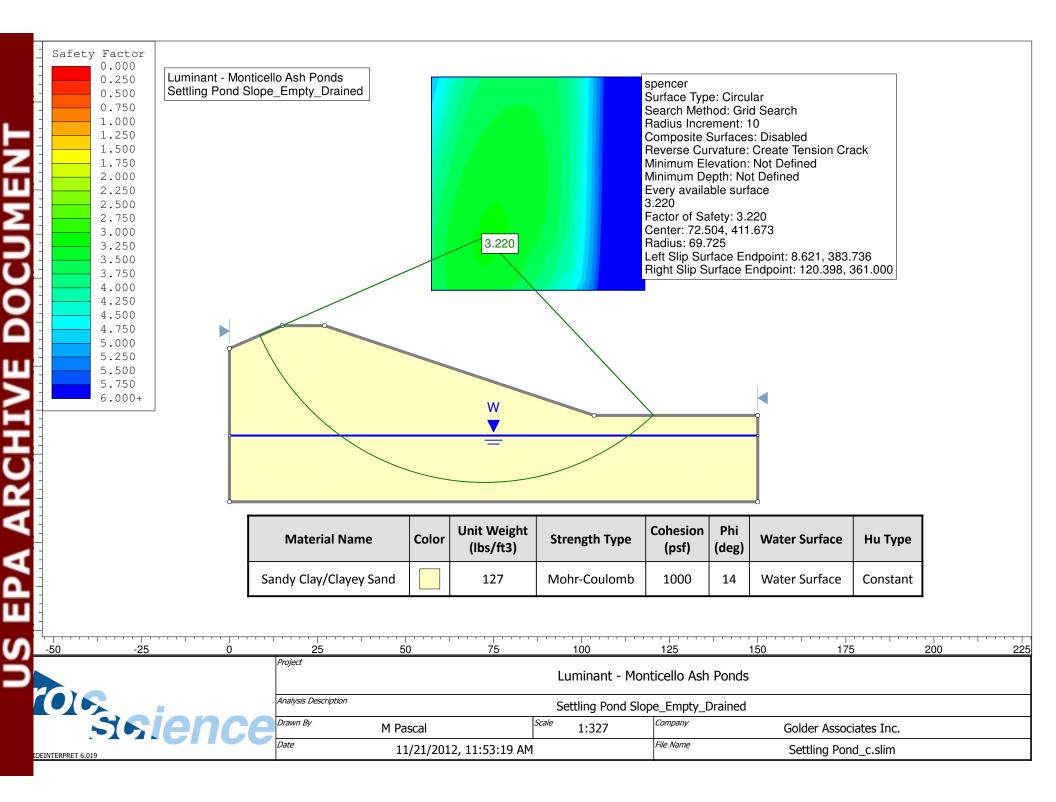


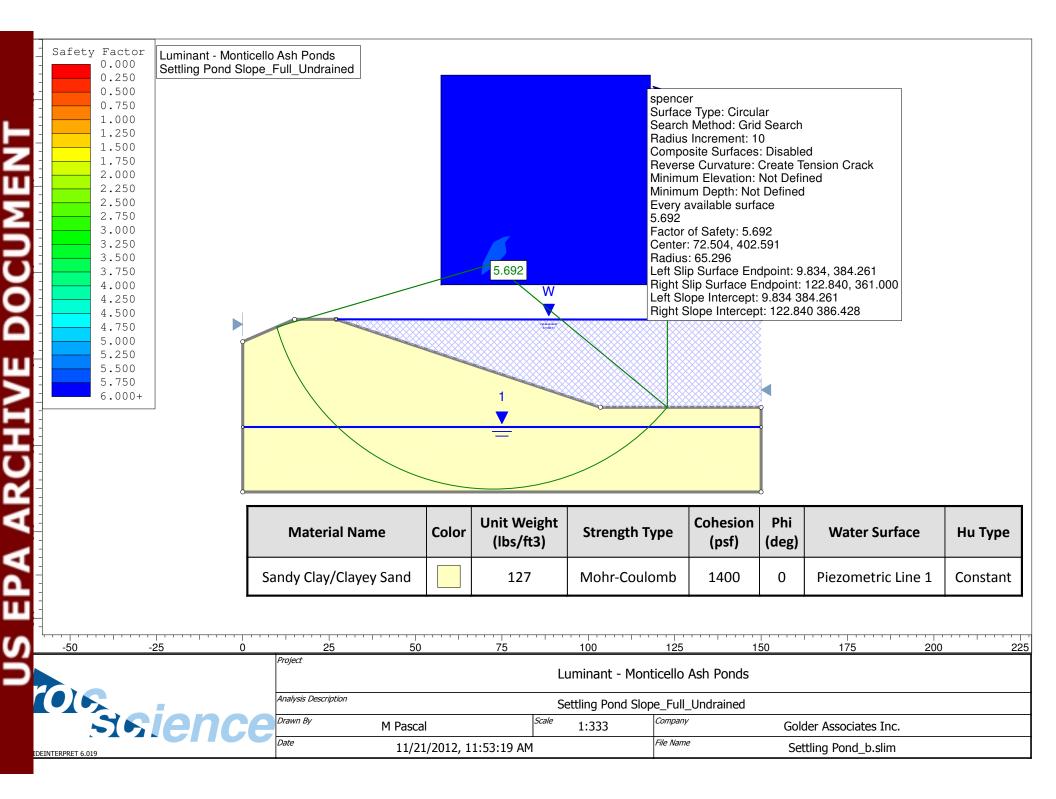
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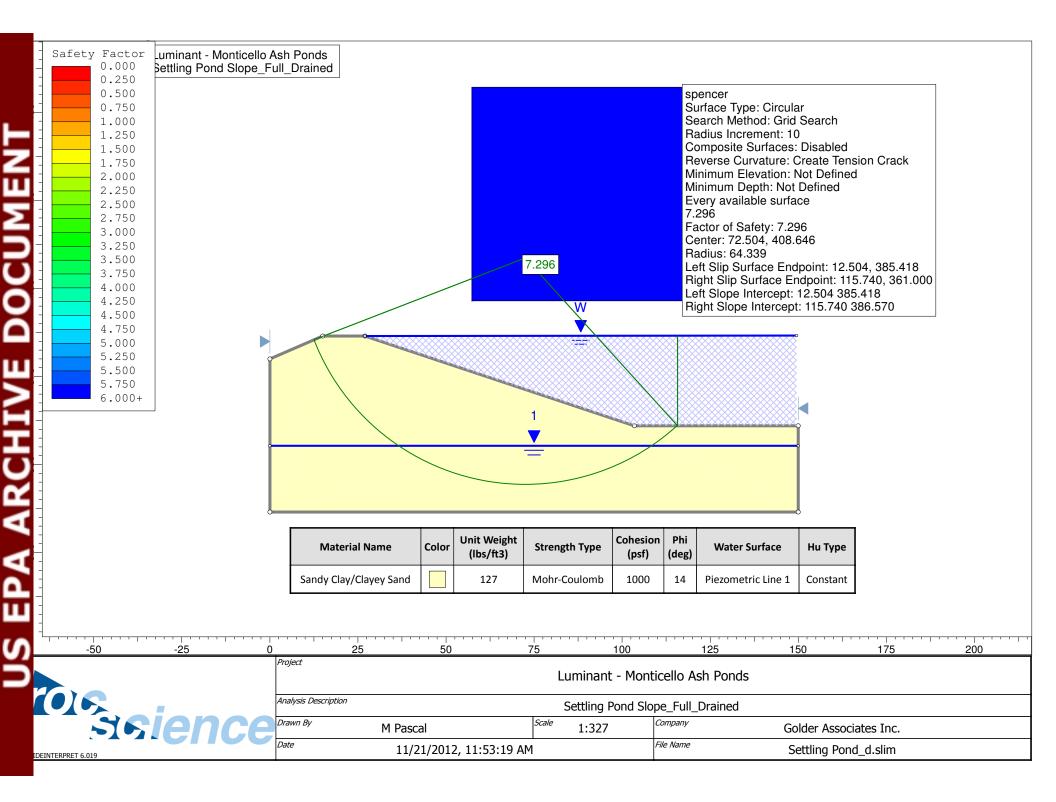


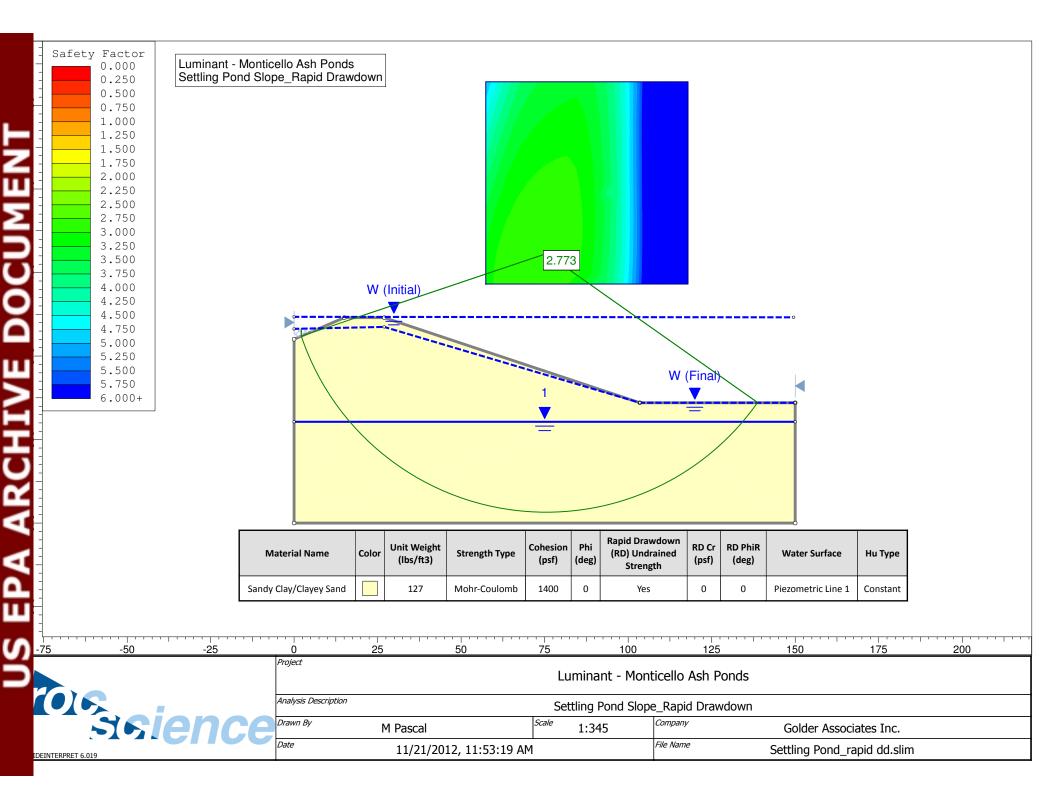
APPENDIX D SLOPE STABILITY CALCULATIONS

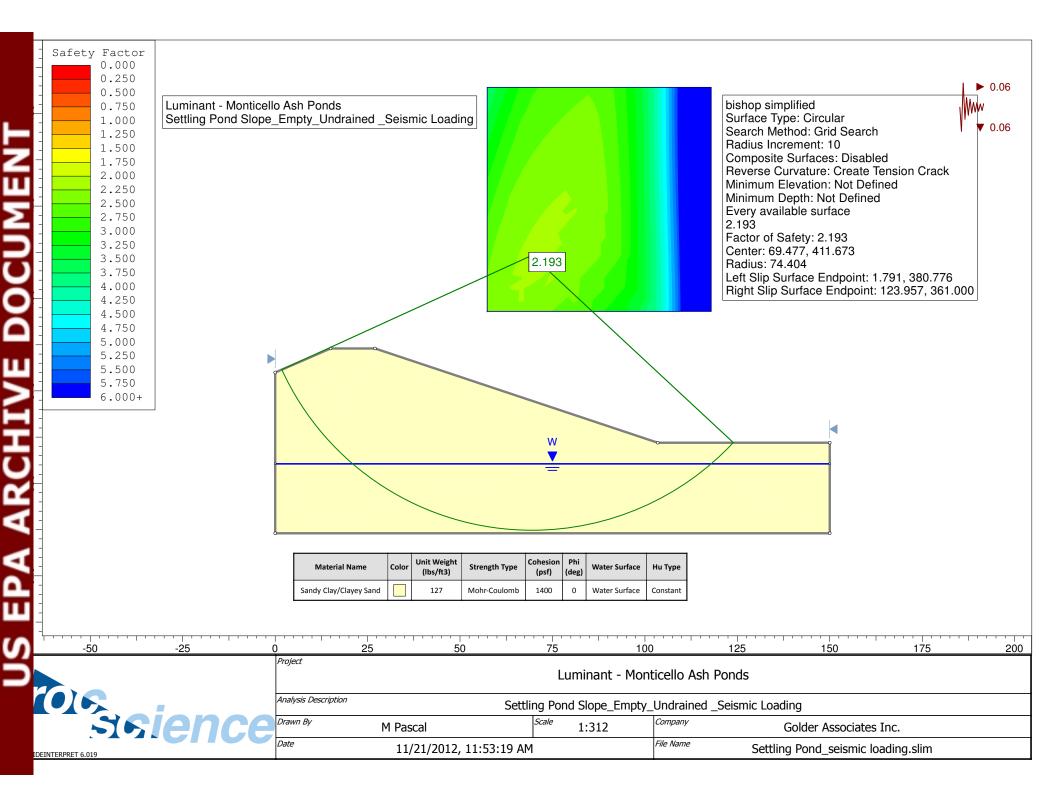


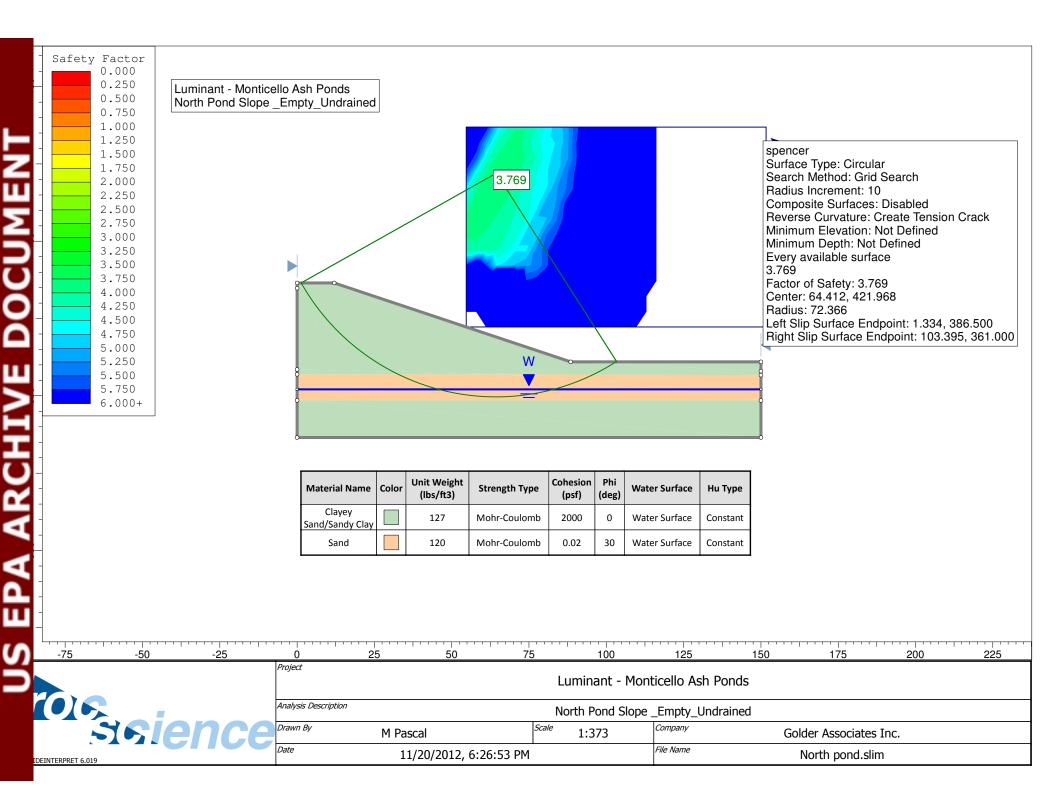


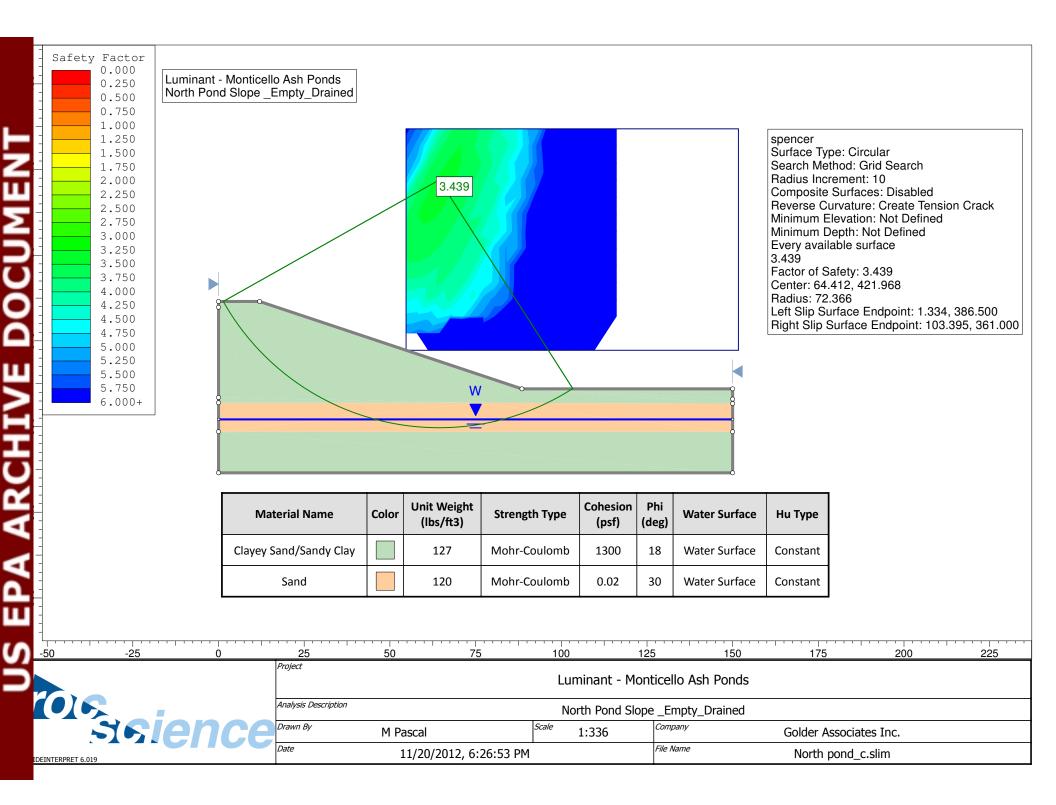


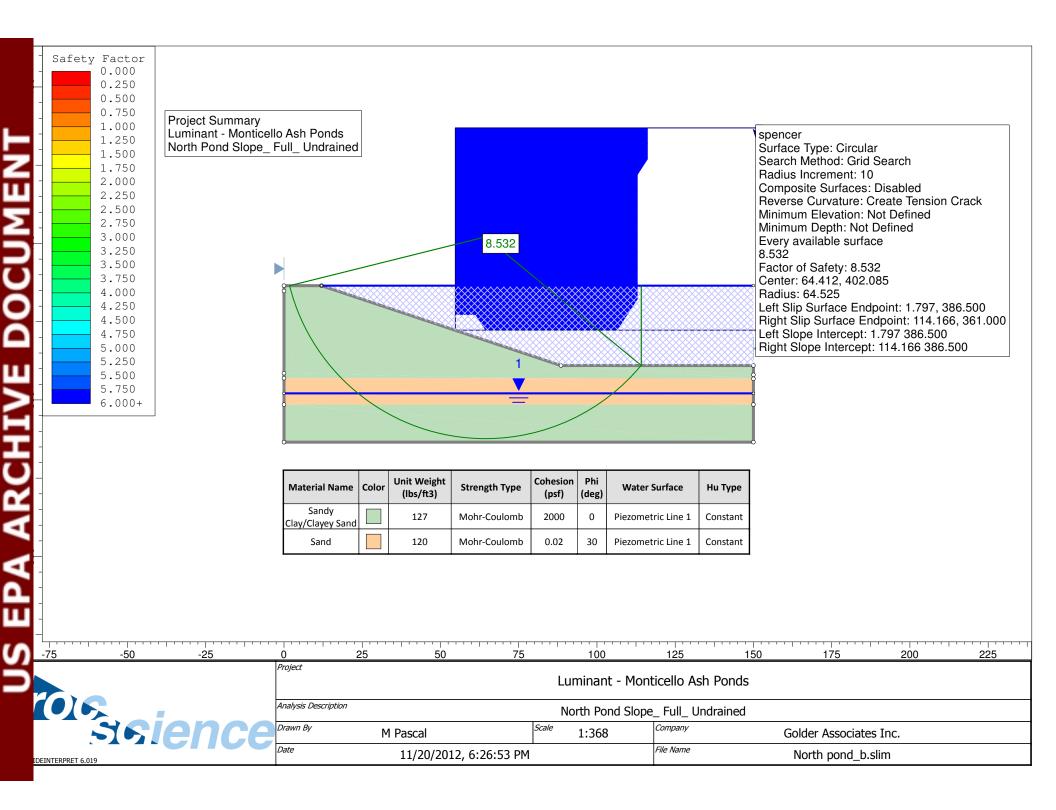


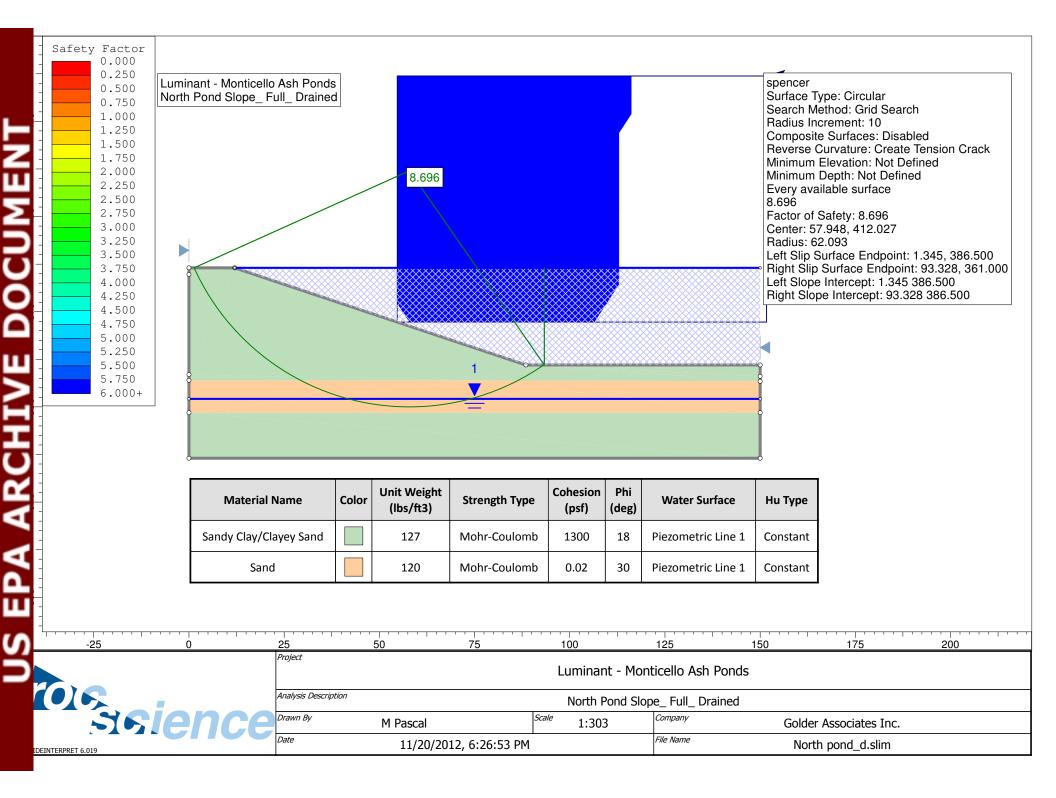


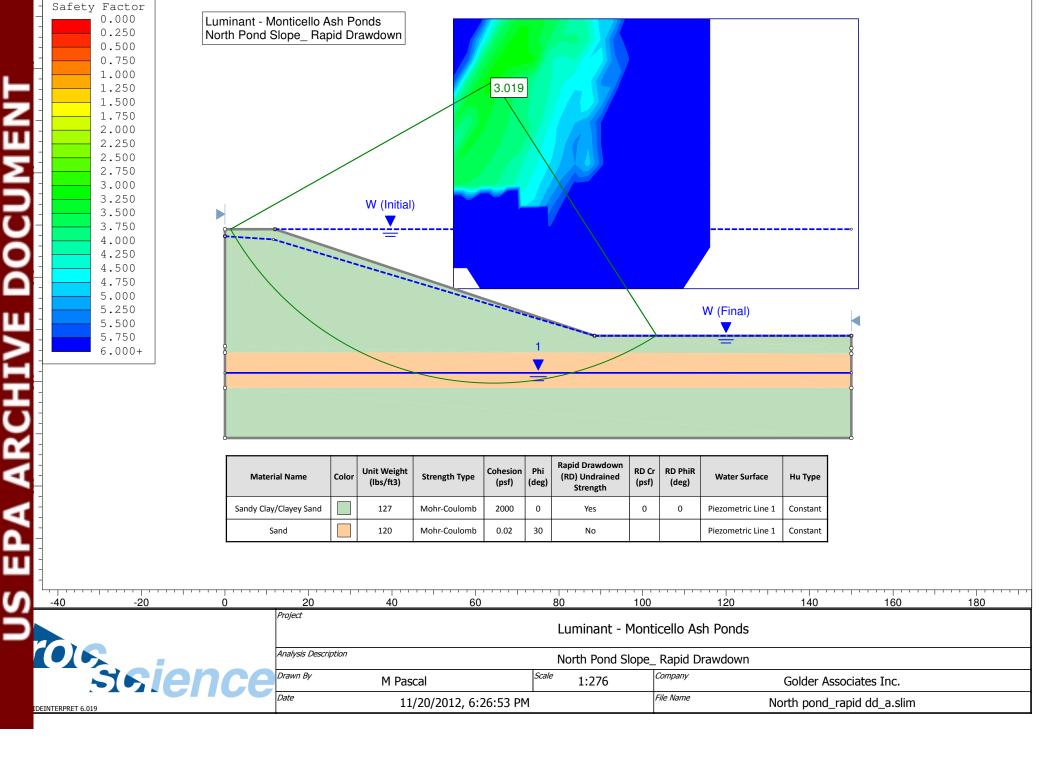


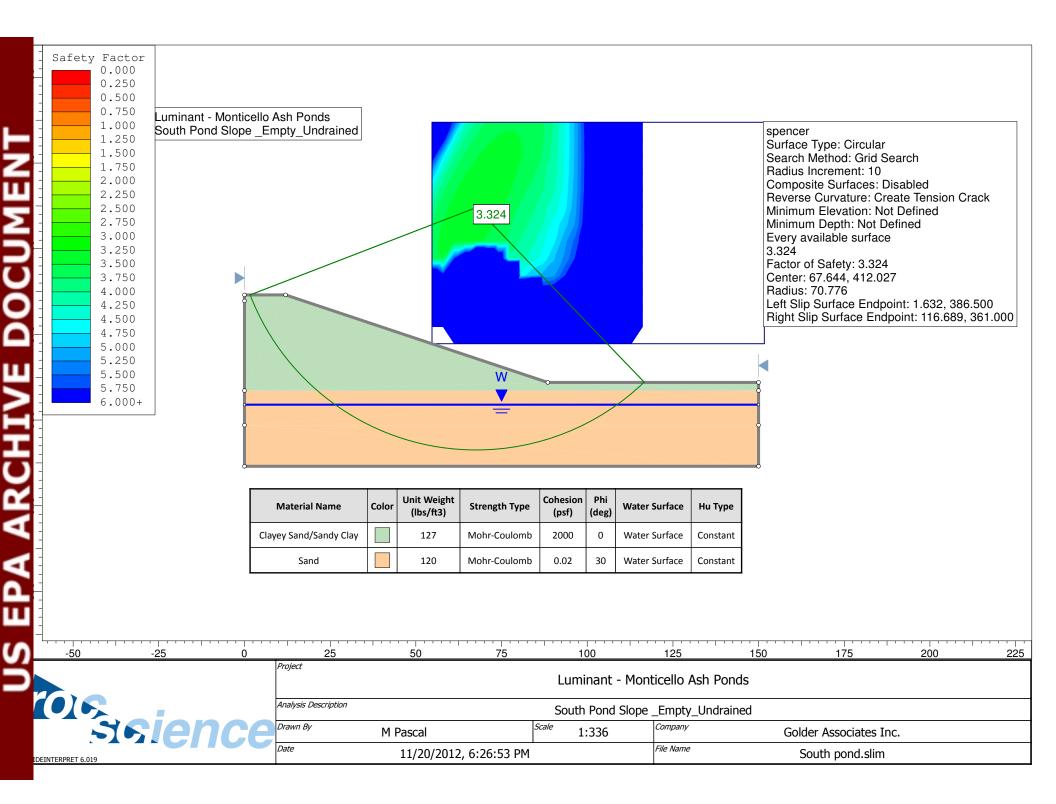




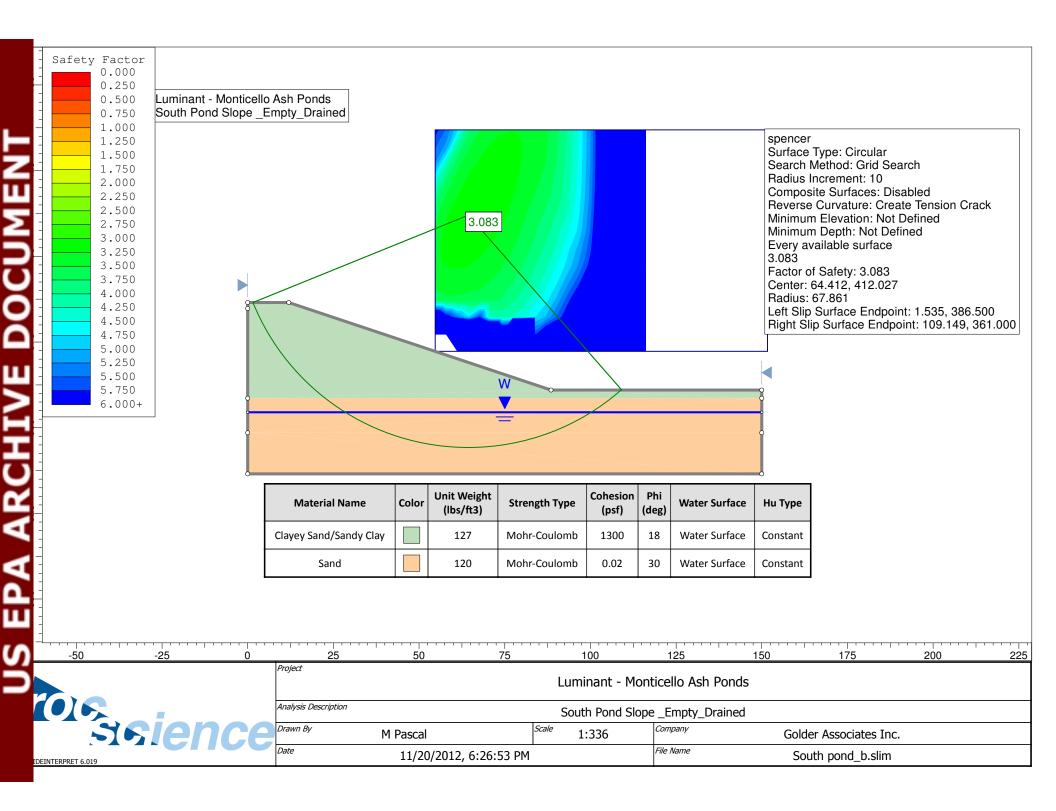


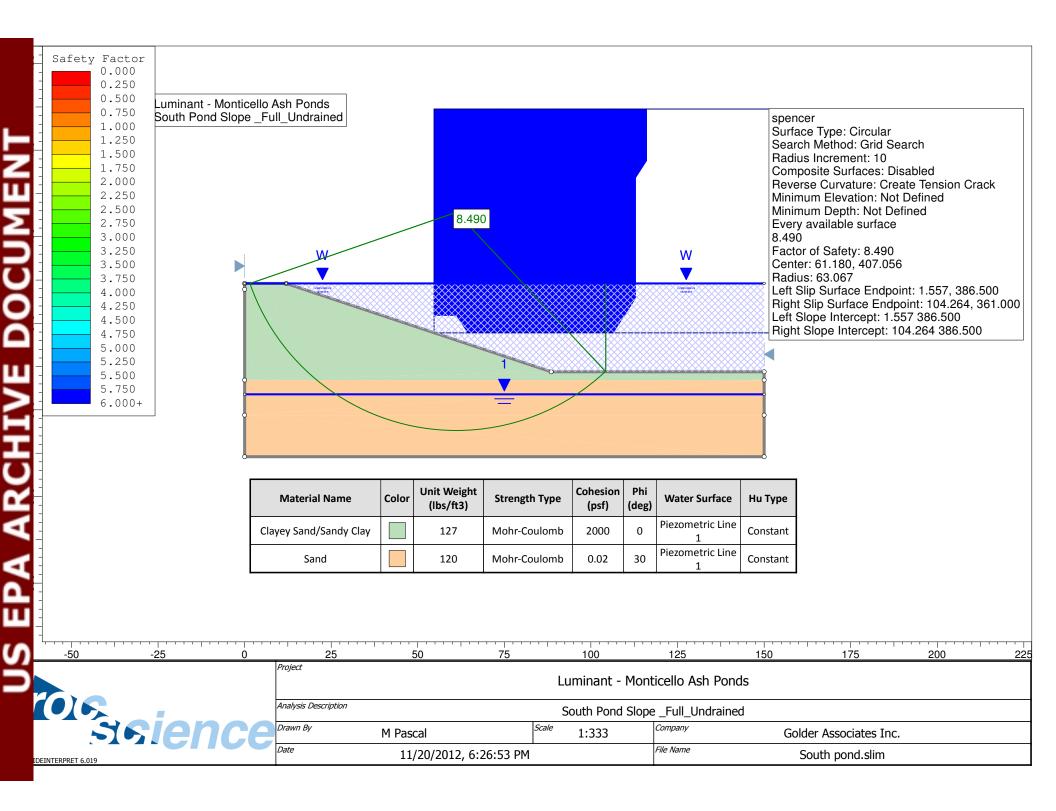


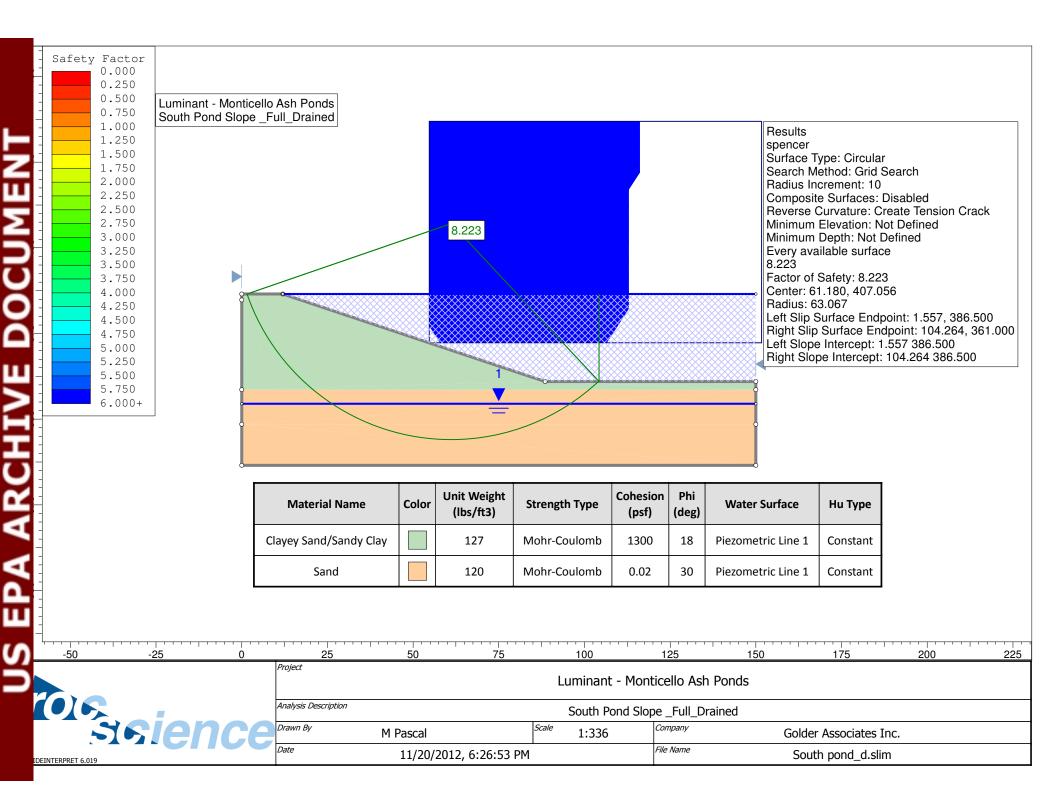


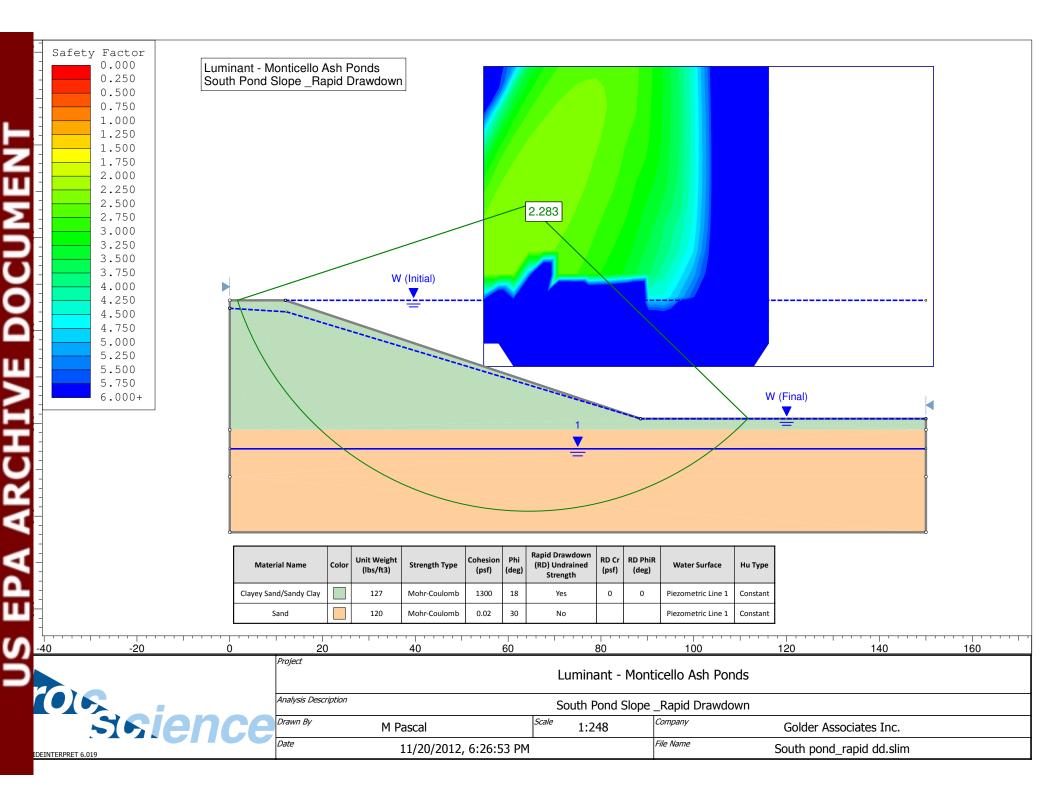


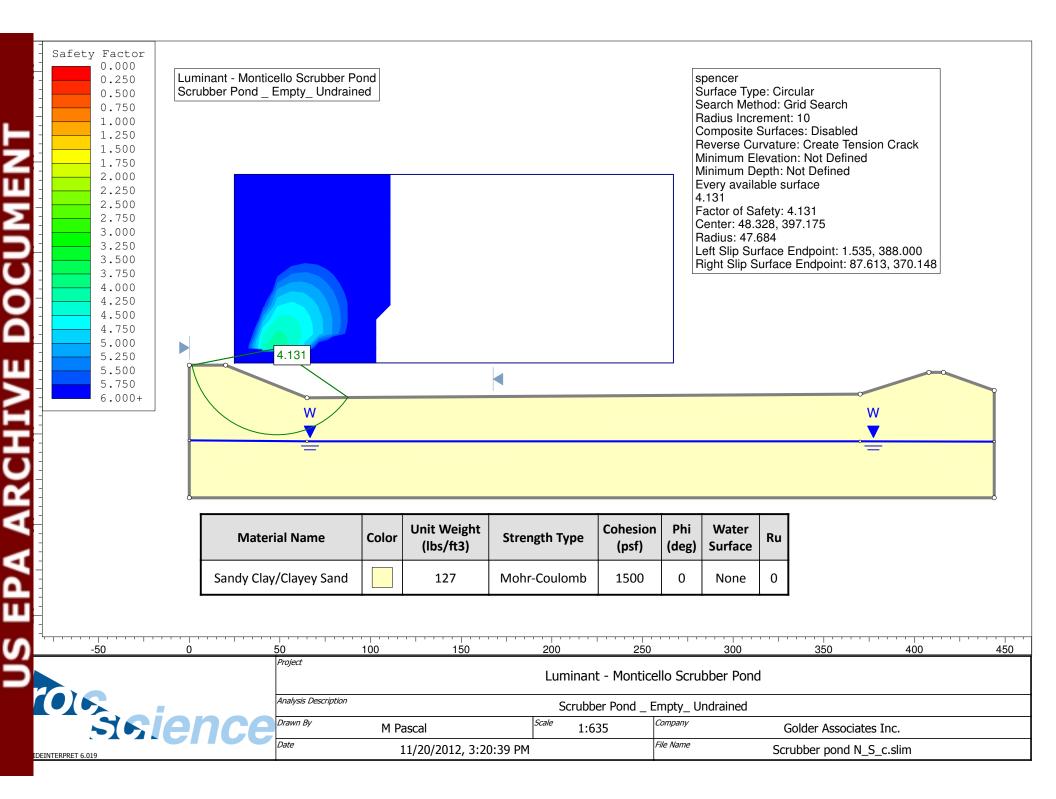
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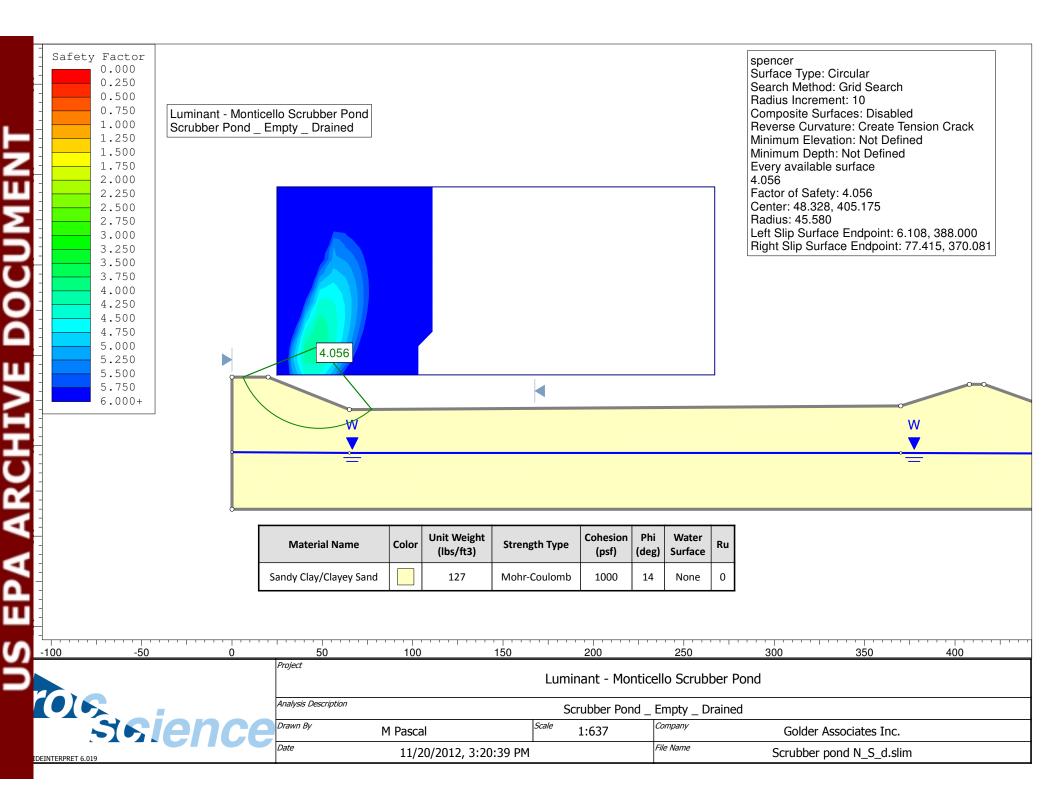


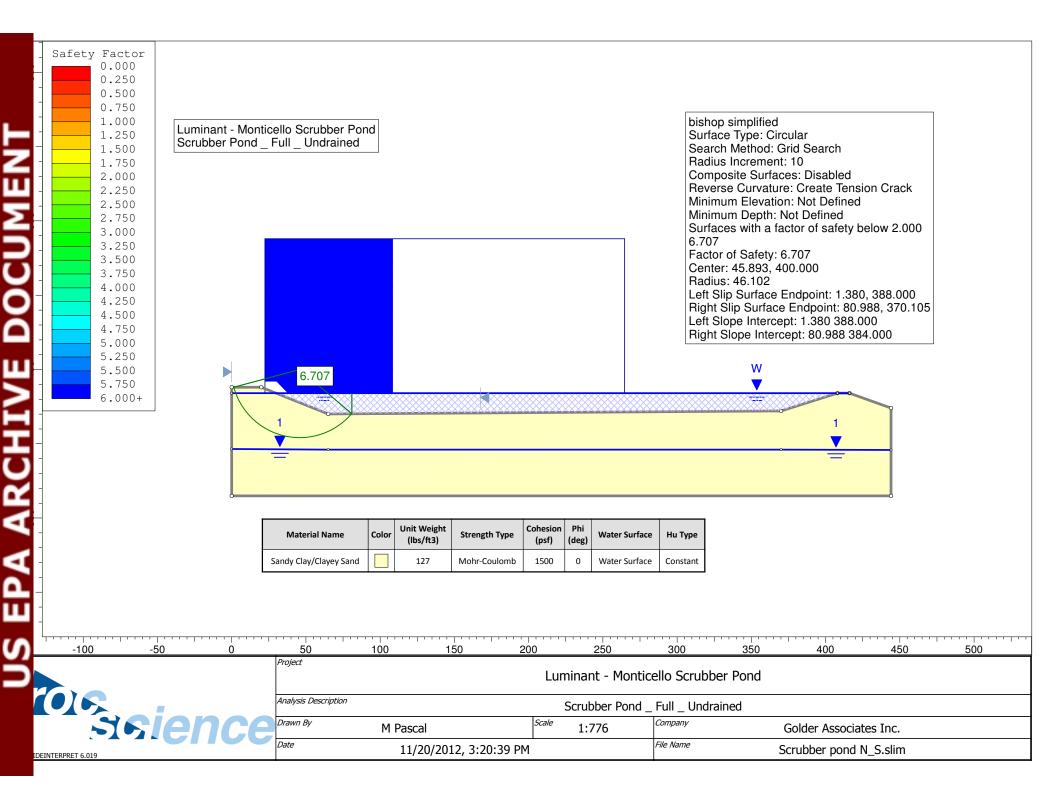


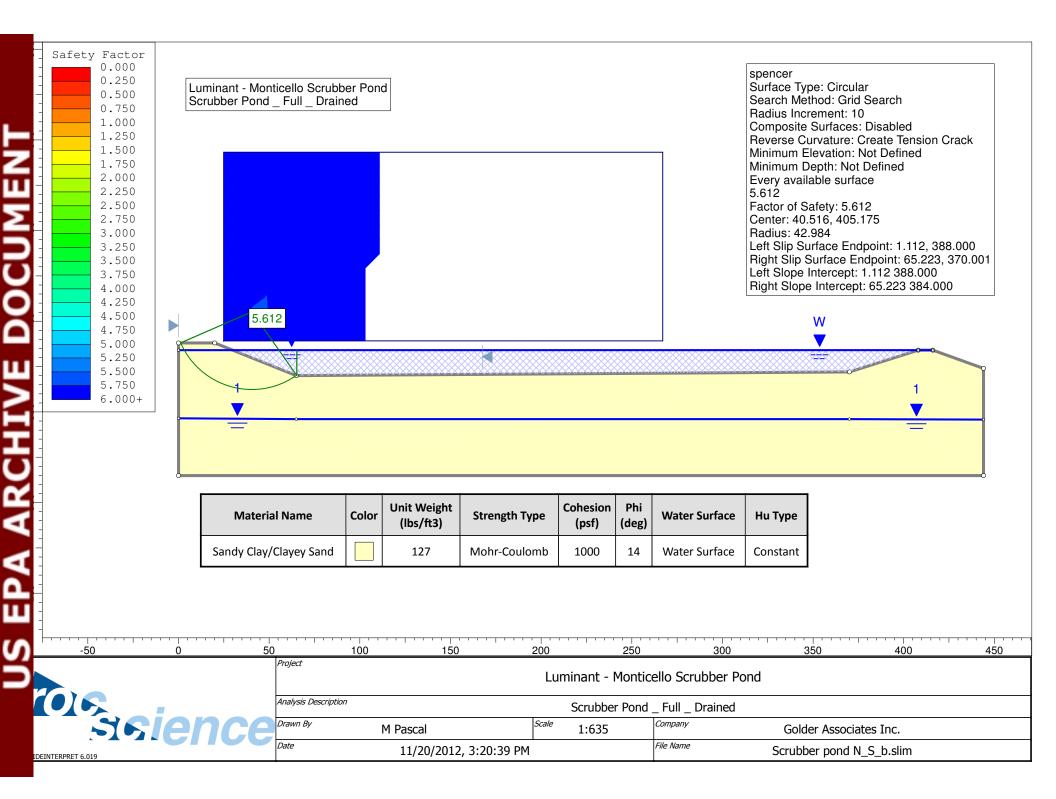


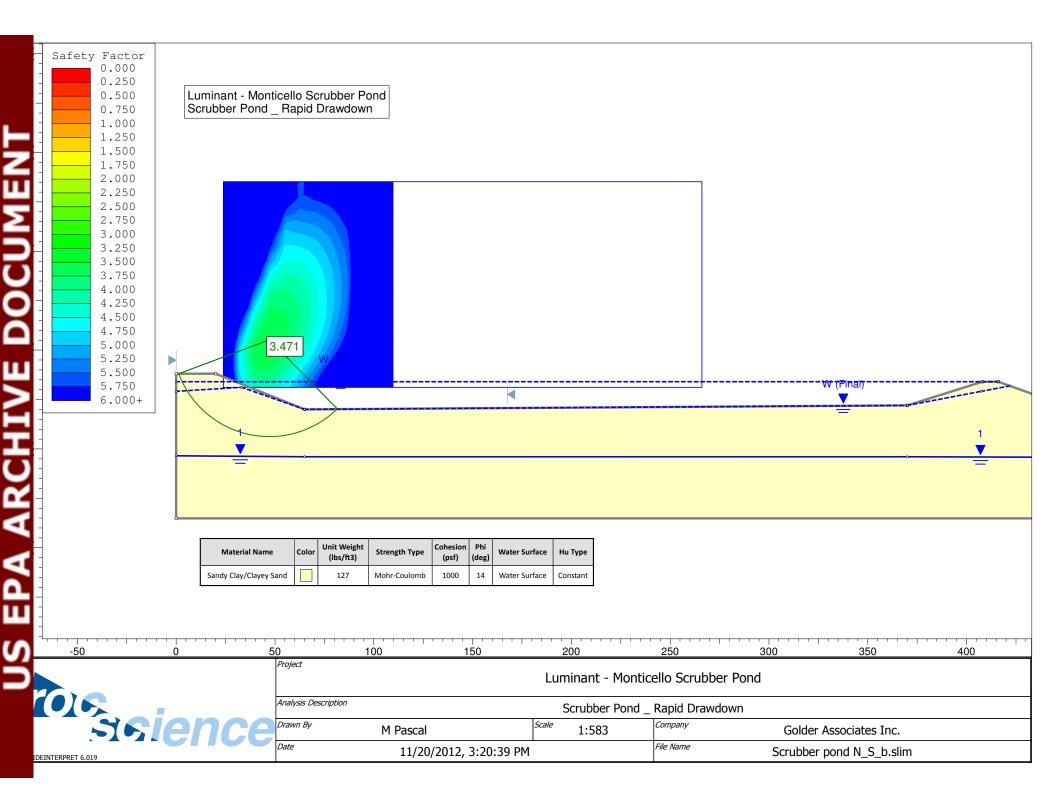












APPENDIX E IMPORTANT INFORMATION ABOUT THIS GEOTECHNICAL REPORT

Important Information About Your Geotechnical Engineering Report

Subsurface problems are a principal cause of construction delays, cost overruns, claims, and disputes. The following information is provided to help you manage your risks.

Geotechnical Services Are Performed for Specific Purposes, Persons, and Projects

Geotechnical engineers structure their services to meet the specific needs of their clients. A geotechnical engineering study conducted for a civil engineer may not fulfill the needs of a construction contractor or even another civil engineer. Because each geotechnical engineering study is unique, each geotechnical engineering report is unique, prepared solely for the client. *No one except you* should rely on your geotechnical engineering report without first conferring with the geotechnical engineer who prepared it. *And no one - not even you -* should apply the report for any purpose or project except the one originally contemplated.

A Geotechnical Engineering Report Is Based on A Unique Set of Project-Specific Factors

Geotechnical engineers consider a number of unique, Project-specific factors when establishing the scope of a study. Typical factors include the client's goals, objectives, and risk management preferences; the general nature of the structure involved, its size, and configuration; the location of the structure on the site; and other planned or existing site improvements, such as access roads, parking lots, and underground utilities. Unless the geotechnical engineer who conducted the study specifically indicates otherwise, *do not rely on a geotechnical engineering report that was:*

- not prepared for you,
- not prepared for your project.
- not prepared for the specific site explored, or
- completed before important project changes were made.

Typical changes that can erode the reliability of an existing geotechnical engineering report include those that affect:

- the function of the proposed structure, as when it's changed from a parking garage to an office building, or from a light industrial plant to a refrigerated warehouse,
- elevation, configuration, location, orientation, or weight of the proposed structure,
- composition of the design team, or
- project ownership.

As a general rule, always inform your geotechnical engineer of project changes-even minor ones-and request an assessment of their impact. *Geotechnical engineers cannot accept responsibility or liability for problems that occur because their reports do not consider developments of which they were not informed.*

Subsurface Conditions Can Change

A geotechnical engineering report is based on conditions that existed at the time the study was performed. *Do not rely on a geotechnical engineering report* whose adequacy may have been affected by: the passage of time; by man-made events, such as construction on or adjacent to the site; or by natural events, such as floods, earthquakes, or groundwater fluctuations. *Always* contact the geotechnical engineer before applying the report to determine if it is still reliable. A minor amount of additional testing or analysis could prevent major problems.

Most Geotechnical Findings Are Professional Opinions

Site exploration identifies subsurface conditions only at those points where subsurface tests are conducted or samples are taken. Geotechnical engineers review field and laboratory data and then apply their professional judgment to render an *opinion* about subsurface conditions throughout the site. Actual sub-surface conditions may differ - sometimes significantly - from those indicated in your report. Retaining the geotechnical engineer who developed your report to provide construction observation is the most effective method of managing the risks associated with unanticipated conditions

A Report's Recommendations Are *Not* Final

Do not over-rely on the construction recommendations included in your report. Those *recommendations are not final,* because geotechnical engineers develop them principally from judgment and opinion. Geotechnical engineers can finalize their recommendations only by observing actual subsurface conditions revealed during construction. *The geotechnical engineer who developed your report cannot assume responsibility or liability* for the report's recommendations if that engineer does not perform construction observation.

A Geotechnical Engineering Report Is Subject To Misinterpretation

Other design team members' misinterpretation of geotechnical engineering reports has resulted in costly problems. Lower that risk by having your geotechnical engineer confer with appropriate members of the design team after submitting the report. Also retain your geotechnical engineer to review pertinent elements of the design team's plans and specifications. Contractors can also misinterpret a geotechnical engineering report. Reduce that risk by having your geotechnical engineer participate in prebid and preconstruction conferences, and by providing construction observation.

Do Not Redraw the Engineer's Logs

Geotechnical engineers prepare final boring and testing logs based upon their interpretation of field logs and laboratory data. To prevent errors or omissions, the logs included in a geotechnical engineering report should never be redrawn for inclusion in architectural or other design drawings. Only photo graphic or electronic reproduction is acceptable, *but recognize that separating logs from the report can elevate risk.*

Give Contractors a Complete Report and Guidance

Some owners and design professionals mistakenly believe they can make contractors liable for unanticipated subsurface conditions by limiting what they provide for bid preparation. To help prevent costly problems, give contractors the complete geotechnical engineering report, but preface it with a clearly written letter of transmittal. In that letter, advise contractors that the report was not prepared for purposes of bid development and that the report's accuracy is limited; encourage them to confer with the geotechnical engineer who prepared the report (a modest fee may be required) and/or to conduct additional study to obtain the specific types of information they need or prefer. A brand conference can also be valuable. *Be sure contractors have sufficient time* to perform additional study. Only then might you be in a position to give contractors the best information available to you, while requiring them to at least share some of the financial responsibilities stemming from unanticipated conditions.

Read Responsibility Provisions Closely

Some clients, design professionals, and contractors do not recognize that geotechnical engineering is far less exact than other engineering disciplines. This lack of understanding has created unrealistic expectations that have led to disappointments, claims, and disputes. To help reduce such risks, geotechnical engineers commonly include a variety of explanatory provisions in their reports. Sometimes labeled "limitations", many of these provisions indicate where geotechnical engineers responsibilities begin and end, to help others recognize their own responsibilities and risks. Read these provisions closely. Ask questions. Your geotechnical engineer should respond fully and frankly.

Geoenvironmental Concerns Are Not Covered

The equipment, techniques, and personnel used to perform a geoenvironmental study differ significantly from those used to perform a geotechnical study. For that reason, a geotechnical engineering report does not usually relate any geoenvironmental findings, conclusions, or recommendations: e.g., about the likelihood of encountering underground storage tanks or regulated contaminants. *Unanticipated environmental problems have led to numerous project failures*. If you have not yet obtained your own geoenvironmental information, ask your geotechnical consultant for risk management guidance. *Do not rely on an environmental report prepared for someone else.*

Rely on Your Geotechnical Engineer for Additional Assistance

Membership in ASFE exposes geotechnical engineers to a wide army of risk management techniques that can be of genuine benefit for everyone involved with a construction project. Confer with your ASFE-member geotechnical engineer for more information.



8811 Colesville Road Suite 3106 Silver Spring. MD 20910 Telephone: 301-565-2733 Facsimile: 301-589-2017 email: info@asde.org www.asfe.org

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 Asia
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 Australasia
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 Europe
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 North America
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 South America
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+ 356 21 42 30 20

+ 55 21 3095 9500

solutions@golder.com www.golder.com

Golder Associates Inc. 500 Century Plaza Drive, Suite 190 Houston, TX 77073 USA Tel: (281) 821-6868 Fax: (281) 821-6870



Project No. 12394128.002



March 11, 2014

Mr. Gary L. Spicer Luminant Power 1601 Bryan Street Dallas, Texas 75201

RE: ADDENDUM TO ASH AND SCRUBBER POND STABILITY INVESTIGATION REPORT, LUMINANT MONTICELLO POWER PLANT, TITUS COUNTY, TEXAS

Dear Gary:

This letter report serves as an addendum to "Ash and Scrubber Pond Stability Investigation Report, Luminant Monticello Power Plant, Titus County, Texas," issued by Golder Associates Inc. (Golder) in December 2012. This report includes additional slope stability analyses for exterior pond slopes.

Details of the field investigation, subsurface conditions, and soil material properties used in the stability analyses are included in the December 2012 report.

1.0 ADDITIONAL STABILITY ANALYSES

Additional stability analyses are presented for two exterior slope sections at the ash ponds. Stability analyses considered "full pond" conditions, which is the most critical loading case for the exterior slopes. A representative exterior slope for the settling pond is located on the north side and consists of an approximately 13-foot high, 3 horizontal to 1 vertical (3H:1V) slope. A representative exterior slope for the north and south ponds is located on the east side of the south pond and consists of an approximately 23-foot high, 3H:1V slope. The results of the analyses are provided in Table A-1. SLIDE output files are included as an attachment.

Case	Description	Factor of Safety
22	Settling pond; north exterior slope; full pond; short term (undrained) conditions	4.7
23	Settling pond; north exterior slope; full pond; long term (drained) conditions	5.2
24	South pond; east exterior slope; full pond; short term (undrained) conditions	3.6
25	South pond; east exterior slope; full pond; long term (drained) conditions	3.4

TABLE 1-A. SLOPE STABILITY FACTORS OF SAFETY

In addition, Cases 1-6 (presented in the December 2012 report) are representative of the settling pond's south exterior slope (i.e. same geometry and soil conditions). Cases 12-16 (presented in the December 2012 report) are representative of the south pond's east exterior slope. Cases 22 and 23 are a

p:_2012 project folders\123-94128 luminant pond slope stability/monticello\2014 report addendum\12394128002 monticello ash pond stability report addendum.docx Golder Associates Inc. 500 Century Plaza Drive, Suite 190



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conservative representation of the scrubber pond exterior slope. In summary, our analyses indicate that the exterior slopes are stable.

2.0 CLOSING

Golder appreciates the opportunity to assist Luminant with this project. If you have any questions, or require further assistance from Golder, please contact the undersigned at (281) 821-6868.

Very truly yours,

GOLDER ASSOCIATES INC. Texas Firm Registration Number: F-2578

P. Chris Marshall, P.E.

P. Chris Marshall, P.E. Senior Project Engineer

Attachments



Charles F. Rickert, P.E. Associate



2

