

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



Registration for Industrial Solid Waste Management Facility Issued Under Provisions of Texas Health and Safety Code ANN. Chapter 361 and Chapter 5 of the Texas Water Code

CCR Registration No.: CCR107

Facility Operator: Sandy Creek Services, LLC
2157 Rattlesnake Road
Riesel, Texas, 76682

Facility Owner: Sandy Creek Services, LLC
2157 Rattlesnake Road
Riesel, Texas 76682

Facility Name: Sandy Creek Energy Station
2157 Rattlesnake Road
Riesel, Texas, 76682

Sandy Creek Services, LLC is authorized to operate, construct and expand a Coal Combustion Residuals (CCR) unit to dispose of and manage CCR generated from the combustion of coal at electric utilities and independent power producers in accordance with the limitations, requirements, and other conditions set forth herein. This registration is granted subject to the rules and Orders of the Commission and laws of the State of Texas. Nothing in this registration exempts the Registrant from compliance with other applicable rules and regulations of the Texas Commission on Environmental Quality (TCEQ). This registration will be valid until canceled, amended, or revoked by the Commission.

Approved, Issued and Effective in accordance with Title 30 Texas Administrative Code (30 TAC) Chapter 352.

Issued Date:

For the Commission

Table of Contents

I.	Facility Description	3
II.	Authorized CCR Waste Management.....	3
III.	Design, Construction, and Operation	3
IV.	Financial Assurance	4
V.	CCR Unit Closure, Retrofit and Post-Closure Care.....	4
VI.	Standard Registration Conditions	5
VII.	Incorporated Regulatory Requirements	6
VIII.	Special Provisions - Reserved.....	6

List of Tables:

Table I.6. - CCR Unit
Table I.6.A. - Waste Management Information
Table IV.A. - Landfill Characteristics
Table IV.B. - Landfill Liner System
Table IV.C. - Landfill Leachate Collection System
Table VI.A. - Groundwater Monitoring Network System
Table VI.C-1. - Groundwater Detection Monitoring Parameters
Table VII.A.1. - Unit Closure
Table VIII.A.1. - Post-Closure Cost Summary for Existing Registered Unit
Table VIII.A.2. - Post-Closure Cost Summary for Proposed Registered Unit
Table VIII.B. - Post-Closure Period

List of Attachments:

Attachment A – Registration Boundary and CCR Unit Map
Attachment B – Registration Application Revision Chronology

I. Facility Description

A. Location of Facility

The registration is issued to Sandy Creek Services, LLC (hereafter called the Registrant) to operate and/or manage a CCR unit located at 2157 Rattlesnake Road, near Riesel, McLennan County, Texas (Facility).

Coordinates:

Latitude: 31.474167° N

Longitude: 96.955000° W

Attachment A "Registration Boundary and CCR Unit Map" and supporting documents are contained in the registration application and are incorporated by reference in Section I.B. of this registration.

B. Incorporated Application Materials

This registration is based on, and the Registrant shall follow the registration application submittals chronicled in Attachment B "Registration Application Revision Chronology" of this registration. These application materials are incorporated into this registration by reference as if fully set out herein. Any and all revisions to this registration shall become conditions of the registration upon the date of approval by the Commission.

II. Authorized CCR Waste Management

A. Waste Management Units

The Registrant is authorized to manage or dispose of CCR waste in registered units listed in Table I.6. - "CCR Units". Units shall include associated structures, appurtenances, or improvements as described in the registration application.

A facility may consist of one or several CCR units as defined in Title 40 Code of Federal Regulations (CFR), Part 257, Section (§)257.53 and adopted in 30 TAC, Chapter 352, §352.3.

B. Changes, Additions, or Expansions

Any proposed CCR waste management unit change must be authorized in accordance with TCEQ rules in 30 TAC Chapter 352 (Coal Combustion Residuals Waste Management) and 30 TAC Chapter 305 (Consolidated Permits). Changes to an existing registration will be classified and processed as minor or major amendments in accordance with 30 TAC §352.131.

III. Design, Construction, and Operation

- A.** CCR waste management unit design, construction, and operation must comply with this registration, the regulations in 30 TAC Chapter 352, and the registration application and application revisions as incorporated by reference in Section I.B. of this registration.

- B. CCR waste management units shall be designed, constructed, operated, and maintained to prevent the release and migration of any waste, contaminant, or pollutant, and to prevent discharge to or inundation of the areas surrounding the units.
- C. As applicable, the Registrant shall comply with groundwater monitoring and corrective action requirements in accordance with 40 CFR §257.91 through 40 CFR §257.98 and 30 TAC Chapter 352 Subchapter H.

IV. Financial Assurance

- A. Authorization to operate the Facility is contingent upon compliance with provisions contained within this registration and maintenance of financial assurance in accordance with 30 TAC Chapter 352, Subchapter I and 30 TAC Chapter 37, Subchapters A - D.
- B. Within 90 days after the executive director's approval of the registration, a financial assurance mechanism acceptable to the executive director must be established and submitted to the executive director in current dollars in an amount not less than \$2,080,740 (2021 dollars) as shown on Table VIII.A.1 to perform post-closure care maintenance pursuant to 30 TAC §352.1101 and 30 TAC §352.1241.
- C. Whenever the current cost estimate increases to an amount greater than the amount being provided in the financial assurance mechanism, the owner and/or operator shall increase the dollar amount of the financial assurance within 60 days in accordance with 30 TAC §37.141. Continuous financial assurance coverage must be provided in accordance with 30 TAC Chapter 352, Subchapter I, until all requirements of the post-closure care have been completed, and the Facility is released from post-closure care obligations.
- D. Financial assurance for post-closure care cost, including any adjustments after registration issuance, shall be corrected for inflation during the active life of the Facility according to the methods described by 30 TAC Sections §§37.131 and 37.141.

V. CCR Unit Closure, Retrofit and Post-Closure Care

Closure, retrofit and post-closure care of CCR waste management units are required to comply with the requirements of 40 CFR Part 257, Subpart D and 30 TAC Chapter 352, as applicable.

A. CCR Unit Closure Shall Commence:

1. Upon direction of the TCEQ for violations of this registration or violations terms or violation of State or Federal regulations;
2. Upon the issuance of an emergency order to the Registrant in accordance with applicable requirements of 30 TAC 305 Subchapter B or 30 TAC §§305.21 and 305.29, and §§5.501 and 5.512 of the Texas Water Code;
3. Upon abandonment of the unit or Facility by the Registrant; or
4. Upon Registrant's notification to the TCEQ.

B. Completion Requirements:

CCR unit closure, retrofit and post-closure care activities shall be conducted and completed in accordance with the registration application submittals as incorporated by reference in Section I.B. of this registration and the applicable State and Federal regulations in 40 CFR Part 257, Subpart D and 30 TAC Chapter 352.

For any changes to closure and post-closure plans, the Registrant shall submit a written request for an amendment to authorize changes in accordance with 30 TAC §352.131. The written request shall include a copy of the amended closure and /or post-closure plan(s) for review and approval by the executive director prior to or during implementation of closure and post-closure care activities.

VI. Standard Registration Conditions

- A. This registration is based on the initial registration application submittal and subsequent revisions, amendments, corrections and changes dated as referenced in Section I.B. of this registration. These application submittals are hereby approved subject to the terms of this registration, any orders of the TCEQ, and are incorporated into this registration by reference as if fully set out herein. Any and all revisions to these elements shall become conditions of this registration upon the date of approval by the Commission. The Registrant shall comply with the registration application submittals, maintain the Application and all supporting documentation at the facility (operating record) and make them available for inspection by TCEQ personnel.
- B. Failure to comply with any registration condition may constitute a violation of the registration, the rules of the Commission, and the Texas Solid Waste Disposal Act and is grounds for an enforcement action, for registration amendment, revocation or suspension.
- C. After construction of a new or laterally expanding CCR unit, and prior to accepting waste, the Registrant is required to obtain and submit to the executive director a pre-opening certification by a qualified Texas-licensed Professional Engineer that the unit complies with the registration conditions. The Registrant shall contact the executive director and region office in writing and request a pre-opening inspection pursuant to 30 TAC §352.851.

If the executive director has inspected the amended or newly constructed facility and finds it is in compliance with the conditions of the registration; or if within fifteen (15) days of submission of the written request for a pre-opening inspection, the Registrant has not received notice from the executive director of the intent to inspect, waiving prior inspection; then the Registrant may commence operation or acceptance of waste.

- D. Entry onto the Facility by authorized TCEQ personnel for the purpose of CCR unit inspection shall be allowed.
- E. The provisions of this registration are severable. If any registration provision or the application of any registration provision to any circumstance is held invalid, the remainder of this registration shall not be affected.
- F. Regardless of the specific designs contained in the registration application or adopted by reference in Section I.B. of this registration, the Registrant shall be required to meet all performance standards in the registration, the application, or as required by local, State, and Federal laws or ordinances.

- G. If differences arise between these registration provisions and the application, these registration provisions shall prevail.
- H. A CCR registration may be issued for the unit's entire active life and post-closure care period but may be revoked or amended at any time if the owner or operator fails to meet the standards established in 30 TAC Chapter 352.
- I. As applicable, the Registrant shall comply with recordkeeping, notification and posting of information to the internet pursuant 30 TAC Chapter 352 Subchapter K.

VII. Incorporated Regulatory Requirements

- A. The Registrant shall comply with all applicable Federal, State, and local regulations and shall obtain any and all other required permits prior to the beginning of any on-Facility improvements or operations authorized by this registration.
- B. To the extent applicable to the activities authorized by this registration, the requirements of 30 TAC Chapters 37, 39, 111, 116, 305, and 352; 40 CFR Part 257, Subparts A and D; statutory obligations of the Texas Water Code are hereby made provisions and conditions of this registration.

VIII. Special Provisions - Reserved

Table I.6. – CCR Unit

CCR Registered Unit No. ¹	Unit Name	N.O.R. No. ¹	Unit Description ³	Capacity	Unit Status ²
002	Sandy Creek Energy Station CCR Waste Management Facility	002	CCR Landfill	3,870,000 Cubic Yards	Active: Cells 1 and 2 Inactive: Cell 3 (Subcells 3A, 3B, 3C and 3D) Proposed: Cell 3 (Subcells 3E, 3F, 3G)

¹ Registered Unit No. and N.O.R. No. cannot be reassigned to new units or used more than once.

² Unit Status options: Active, Closed, Inactive (built but not managing waste), Proposed (not yet built), Never Built, Transferred, Post-Closure.

³ If a unit has been transferred, the applicant should indicate which facility/permit it has been transferred to in the Unit Description column.

Table I.6.A. – CCR Waste Management Information

Waste No. ¹	Waste Type(s)	Source
1	Fly Ash	Generated during coal combustion process and collected in the SDA and Fabric Filter
2	Bottom Ash	Generated during coal combustion process
3	Filter cake from the water treatment building	Generated from the filtering of water at the treatment building
4	Spent SCR catalyst modules (catalyst and housing)	Generated from selective catalytic reduction (SCR) system used to reduce nitrogen oxide emissions
5	Class 2 spent demineralizer resin	Generated from process water treatment system
6	Cooling tower sediments and cooling water screenings	Generated from the condenser and cooling tower as a result of heat developed during the process of boiling water.
7	Spent Resin	Generated from the process water treatment system
8	Spent fabric filter bags and cages	Generated from flue gas filtration in the fabric filter baghouse used at the plant to reduce particulate matter emissions

¹ Assign waste number sequentially. Do not remove waste number of wastes which are no longer generated.

Table IV.A. – Landfill Characteristics

Registered Unit No.*	Landfill	N.O.R. No.	CCR Waste Nos. ¹	Rated Capacity	Dimensions ²	Distance from lowest liner to groundwater ³	Action Leakage Rate (if required)	Unit will manage CCR Waste and non-CCR Waste (state all that apply)
002	Sandy Creek Energy Station CCR Waste Management Facility	002	1- 8	3,870,000 cy	Approx. 1,200 ft E-W 1,500 ft N-S 138 ft depth 40.7 acres	Greater than 1.52 meters (five feet)	N/A	CCR and non CCR-waste

¹ From Table I.6.A., first column

² Dimensions should be provided as average length, width and depth, also include the surface acreage for the unit.

³ The shallowest geologic formation beneath the Landfill Registration Boundary that is capable of providing usable quantities of water is the Trinity Aquifer, located approximately 1,000 feet below the Landfill.

*from Table I.6, first column

Table IV.B. – Landfill Liner System

Registered Unit No*	Landfill	Geomembrane Liner Material	Geomembrane Liner Permeability (cm/sec)	Geomembrane Liner Thickness	Soil Liner Material	Soil Liner Permeability (cm/sec)	Soil Liner Thickness
002	Sandy Creek Energy Station CCR Waste Management Facility - Cell 1	N/A	N/A	N/A	Compacted Clay	1×10^{-7}	3ft
002	Sandy Creek Energy Station CCR Waste Management Facility - Cell 2	N/A	N/A	N/A	Compacted Clay	1×10^{-7}	3ft
002	Sandy Creek Energy Station CCR Waste Management Facility - Cell 3	HDPE - Textured on both sides	4×10^{-13}	60-mil	Compacted Clay	1×10^{-7}	2ft

* This number should match the Registered Unit No. given on Table IV.A.

Table IV.C. – Landfill Leachate Collection System

Registered Unit No.*	Landfill Name	Drainage Media	Collection Pipes (including risers)	Filter Fabric	Geofabric	Sump Material
002	Sandy Creek Energy Station CCR Waste Management Facility – Cell 1	Leachate collection trench – drainage aggregate wrapped in 6.5 oz/yd ² geotextile	4" diameter HDPE SDR 17 leachate collection pipe	6.5 oz/yd ² geotextile wrapped around drainage aggregate in leachate collection trench	N/A	N/A – gravity drain to leachate evaporation pond
002	Sandy Creek Energy Station CCR Waste Management Facility – Cell 2	Floor/sidewall 200-mil geocomposite (double-sided) Leachate collection trench – drainage aggregate wrapped in 8 oz/yd ² geotextile	6" diameter HDPE SDR 11 leachate collection pipe and 24" diameter HDPE SDR 11 sump riser pipe	8 oz/yd ² geotextile wrapped around drainage aggregate in leachate collection pipe in leachate collection trenches and sump	N/A	Drainage aggregate wrapped in 8 oz/yd ²
002	Sandy Creek Energy Station CCR Waste Management Facility – Cell 3	Floor/sidewall 270-mil geocomposite (double-sided) Leachate collection trench – drainage aggregate wrapped in 12 oz/yd ² geotextile	6" diameter HDPE SDR 9 leachate collection pipe and 18" diameter HDPE SDR 11 sump riser pipe	12 oz/yd ² geotextile wrapped around drainage aggregate in leachate collection trench and sump	N/A	Drainage aggregate wrapped in 12 oz/yd ²

*This number should match the Registered Unit No. given on Table IV.A.

Table VI.A. – Groundwater Monitoring Network System

Waste Management Unit/Area Name ¹	WMU 002 / Sandy Creek Energy Station CCR Waste Management Facility					
Well Number(s):	BW-1	MW-1	MW-2	MW-3	MW-4	MW-5
Hydrogeologic Unit Monitored	Ozan and Wolf City formations	Ozan and Wolf City formations	Ozan and Wolf City formations	Ozan and Wolf City formations	Ozan and Wolf City formations	Ozan and Wolf City formations
Type (e.g., point of compliance, background, observation, etc.)	Background	Point of compliance	Point of compliance	Point of compliance	Point of compliance	Point of compliance
Up or Down Gradient	Upgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient
Casing Diameter and Material	2" Sch. 40 PVC	2" Sch. 40 PVC	2" Sch. 40 PVC	2" Sch. 40 PVC	2" Sch. 40 PVC	2" Sch. 40 PVC
Screen Diameter and Material	2" Sch. 40 PVC	2" Sch. 40 PVC	2" Sch. 40 PVC	2" Sch. 40 PVC	2" Sch. 40 PVC	2" Sch. 40 PVC
Screen Slot Size (in.)	0.010	0.010	0.010	0.010	0.010	0.010
Top of Casing Elevation (Ft, Mean Sea Level [MSL])	485.57	465.87	442.15	430.06	436.91	454.52
Grade or Surface Elevation (Ft, MSL)	482.70	462.85	439.18	427.09	433.73	451.70
Well Depth (Ft, Below Grade Surface [BGS])	38.63	34.23	19.63	16.23	30.00	35.00
Well Depth (Ft, Below Top of Casing [BTOC])	41.50	37.25	22.60	19.20	33.66	38.29
Screen Interval From (Ft, BGS) To (Ft, BGS)	From 28.30 to 38.30	From 23.89 to 33.89	From 9.30 to 19.30	From 5.90 to 15.90	From 20.00 to 30.00	From 25.00 to 35.00
Screen Interval From (Ft, BTOC) To (Ft, BTOC)	From 31.17 to 41.17	From 26.91 to 36.91	From 12.27 to 22.27	From 8.87 to 18.87	From 23.66 to 33.66	From 28.29 to 38.29

¹ From Tables in Section I.; MSL: Mean Sea Level; BGS: Below Grade Surface; BTOC: Below Top of Casing

Table VI.C-1. – Groundwater Detection Monitoring Parameters

Name of CCR Unit	Sandy Creek Energy Station CCR Waste Management Facility			
Registered CCR Unit No.	002			
Well ³ and Parameters	Sampling Frequency	Analytical Method ¹	Practical Quantification Limit (units) ⁴	Concentration Limit ^{2,3} (units)
BW-1 (upgradient)				
Boron	Semiannual	6010B	0.100 mg/L	4.837 mg/L
Calcium	Semiannual	6010B	2.50 mg/L	738.4 mg/L
Chloride	Semiannual	9056	2.50 mg/L	1502.0 mg/L
Fluoride	Semiannual	9056	0.500 mg/L	0.94 mg/L
pH	Semiannual	9040C	0.100 pH units	6.2 to 7.9 pH units
Sulfate	Semiannual	9056	25.0 mg/L	3770.0 mg/L
Total Dissolved Solids	Semiannual	160.1	10.0 mg/L	7320.0 mg/L
MW-1 (downgradient)				
Boron	Semiannual	6010B	0.100 mg/L	1.661 mg/L
Calcium	Semiannual	6010B	2.50 mg/L	603.5 mg/L
Chloride	Semiannual	9056	2.50 mg/L	253.0 mg/L
Fluoride	Semiannual	9056	0.500 mg/L	1.2 mg/L
pH	Semiannual	9040C	0.100 pH units	6.2 to 8.3 pH units
Sulfate	Semiannual	9056	25.0 mg/L	3299.0 mg/L
Total Dissolved Solids	Semiannual	160.1	10.0 mg/L	5444.0 mg/L

MW-2 (downgradient)				
Boron	Semiannual	6010B	0.100 mg/L	3.533 mg/L
Calcium	Semiannual	6010B	2.50 mg/L	827.1 mg/L
Chloride	Semiannual	9056	2.50 mg/L	3709.0 mg/L
Fluoride	Semiannual	9056	0.500 mg/L	1.3 mg/L
pH	Semiannual	9040C	0.100 pH units	6.7 to 7.5 pH units
Sulfate	Semiannual	9056	25.0 mg/L	4671.0 mg/L
Total Dissolved Solids	Semiannual	160.1	10.0 mg/L	13374.0 mg/L
MW-3 (downgradient)				
Boron	Semiannual	6010B	0.100 mg/L	1.565 mg/L
Calcium	Semiannual	6010B	2.50 mg/L	697.5 mg/L
Chloride	Semiannual	9056	2.50 mg/L	595.7 mg/L
Fluoride	Semiannual	9056	0.500 mg/L	0.662 mg/L
pH	Semiannual	9040C	0.100 pH units	6.5 to 7.3 pH units
Sulfate	Semiannual	9056	25.0 mg/L	3926.0 mg/L
Total Dissolved Solids	Semiannual	160.1	10.0 mg/L	8507.0 mg/L
MW-4 (downgradient)				
Boron	Semiannual	6010B	0.100 mg/L	6.58 mg/L
Calcium	Semiannual	6010B	2.50 mg/L	641.8 mg/L
Chloride	Semiannual	9056	2.50 mg/L	1892.0 mg/L
Fluoride	Semiannual	9056	0.500 mg/L	0.55 mg/L
pH	Semiannual	9040C	0.100 pH units	5.7 to 9.1 pH units
Sulfate	Semiannual	9056	25.0 mg/L	3416.0 mg/L
Total Dissolved Solids	Semiannual	160.1	10.0 mg/L	7432.0 mg/L

MW-5 (downgradient)				
Boron	Semiannual	6010B	0.100 mg/L	4.5 mg/L
Calcium	Semiannual	6010B	2.50 mg/L	706.6 mg/L
Chloride	Semiannual	9056	2.50 mg/L	1986 mg/L
Fluoride	Semiannual	9056	0.500 mg/L	1.139 mg/L
pH	Semiannual	9040C	0.100 pH units	6.2 to 8.2 pH units
Sulfate	Semiannual	9056	25.0 mg/L	4154 mg/L
Total Dissolved Solids	Semiannual	160.1	10.0 mg/L	9806 mg/L

¹ other EPA-approved groundwater-matrix methods with equivalent or lower PQL may be used.

² If there is a determination of a statistically significant increase over the background value for any Appendix III constituent adopted by reference in 30 TAC §352.1421 at any monitoring well, and If the owner or operator does not make an alternative source demonstration under 30 TAC §352.941 satisfactory to the executive director, then the owner or operator shall initiate an assessment monitoring program as required in 40 CFR §257.94(e). If the owner or operator does make an alternative source demonstration under 30 TAC §352.941 that is satisfactory to the executive director, then the owner or operator may continue to monitor in accordance with the detection monitoring program established under 30 TAC §352.941.

³ The concentration limit is the basis for determining whether a release has occurred from the CCR unit/area. The concentration limits are statistical limits determined from initial background evaluation statistical analysis. These limits will be updated through and contained within subsequent Background Evaluation Reports as those reports are reviewed and accepted by TCEQ.

⁴ PQL may be substituted with NELAC approved alternate laboratory limits.

Table VII.A.1. – Unit Closure

For each unit to be registered, list the unit components to be decontaminated, the possible methods of decontamination, and the possible methods of disposal of wastes and waste residues generated during unit closure.

Equipment or CCR Unit	Possible Methods of Decontamination ¹	Possible Methods of Disposal ¹
CCR Unit No. 002	Waste left in place and installation of final cover system	N/A
Landfill equipment	Wash off excessive waste material from equipment within landfill (active face)	N/A

¹Applicants may list more than one appropriate method.

Table VIII.A.1. - Post-Closure Cost Summary for Existing Registered Unit

Unit: Sandy Creek Energy Station CCR Waste Management Facility Unit No: 002 Cells 1 and 2	Cost
1.0 Engineering:	
1.1 Site Inspection: security, signs and fencing, benchmarks and final cover	\$2,986
1.2 Correctional Plans and Specifications (engineering plans correct erosion issues every other year)	\$8,500
2.0 Site Monitoring:	
2.1 Groundwater Sampling and Analysis (6 wells X 2 sampling events/yr.)	\$21,000
2.2 Groundwater Well Plugging and Abandonment	\$233
3.0 Construction and Maintenance:	
3.1 Cap and Side slope Repairs and Revegetation	\$1,700
3.2 Mowing and Vegetation Management	\$3,400
3.3 Groundwater Monitoring System Maintenance	\$2,500
3.4 Perimeter Fence and Gates Maintenance	\$1,500
3.5 Access Roads Maintenance	\$4,500
3.6 Drainage System Cleanout/Repairs	\$3,500
4.0 Leachate Management:	
4.1 Leachate Management System Operation and Maintenance	\$5,000
4.2 Decommissioning of Existing Leachate Evaporation Pond	\$2,333
4.3 Contaminated Leachate Disposal-Profiling, Transportation and Disposal (all leachate discharged to evaporation pond)	N/A
5.0 Administration	
5.1 Annual Report Preparation and Submittal to TCEQ	\$4,500
Subtotal	\$61,652
10% Contingency	\$6,165
Third Party Administration and Project Management (2.5% of Subtotal)	\$1,541
Estimated Annual PCC Cost	\$69,358 (2021 dollars)
Total 30 Year Existing Unit Post-Closure Cost Estimate	\$2,080,740 (2021 dollars) ¹

Table VIII.A.2. - Post-Closure Cost Summary for Proposed Registered Unit

Unit: Sandy Creek Energy Station CCR Waste Management Facility Unit No: 002 Cell 3	Cost
1.0 Engineering :	
1.1 Site Inspection: security, signs and fencing, benchmarks and final cover	N/A
1.2 Correctional Plans and Specifications (engineering plans to correct erosion issues every other year	\$1,675
2.0 Site Monitoring:	
2.1 Groundwater Sampling and Analysis (6 wells X 2 sampling events/yr.)	\$3,000
2.2 Groundwater Well Plugging and Abandonment	\$33
3.0 Construction and Maintenance:	
3.1 Cap and Side slope Repairs and Revegetation	\$340
3.2 Mowing and Vegetation Management	\$670
3.3 Groundwater Monitoring System Maintenance	N/A
3.4 Perimeter Fence and Gates Maintenance	N/A
3.5 Access Roads Maintenance	N/A
3.6 Drainage System Cleanout/Repairs	N/A
4.0 Leachate Management:	
4.1 Leachate Management System Operation and Maintenance	N/A
4.2 Decommissioning of Existing Leachate Evaporation Pond	N/A
4.3 Contaminated Leachate Disposal-Profiling, Transportation and Disposal (all leachate discharged to evaporation pond)	N/A
5.0 Administration	
5.1 Annual Report Preparation and Submittal to TCEQ	N/A
Subtotal	\$5,718
10% Contingency	\$572
Third Party Administration and Project Management (2.5% of Subtotal)	\$143
Estimated Annual PCC Cost	\$6,433 (2021 dollars)
Total 30 Year Existing Unit Post-Closure Cost Estimate	\$192,990 (2021 dollars)

¹ As units are added or deleted from these tables through future registration amendments, the remaining itemized unit costs should be updated for inflation when re-calculating the revised total cost in current dollars.

Table VIII.B. – Post-Closure Period

Unit Name	Date Certified Closed	Authorized Post-Closure Period (Yrs.)	Earliest Date Post-Closure Ends ¹
Sandy Creek Energy Station CCR Waste Management Facility	TBD	30 years	TBD

¹ Post-Closure Care shall continue beyond the specified date until the Executive Director has approved the applicant's request to reduce or terminate the post-closure period, consistent with 30 TAC §352.1241 – Post-Closure Care Requirements.

DRAFT