

January 13, 2025
Project No. 16224089.00

Mr. Charles Brown
Industrial and Hazardous Waste Permits Section, MC-130
Coal Combustion Residuals Program
Texas Commission on Environmental Quality
P. O. Box 13087
Austin, Texas 78711-3087

Re: Sandy Creek Energy Station Coal Combustion Residual Waste Management Facility
TCEQ Registration No. CCR107
CN604335455/RN105905657
2024 Annual Inspection Report Notification

Dear Mr. Brown:

On the behalf Sandy Creek Services, LLC (Owner and Operator), SCS Engineers is providing this letter of the availability of the 2024 Annual Inspection Report per 40 CFR §257.84(b)(2) for the Sandy Creek Energy Station (Plant) Coal Combustion Residual (CCR) Waste Management Facility (Landfill), TCEQ Registration No. CCR107. This letter is being provided in accordance with 40 CFR §257.106(g)(7) (30 TAC §352.1311) to the Texas Commission on Environmental Quality (TCEQ). In accordance with 40 CFR §257.105(g)(9) and §257.107(g)(9) this report has been placed in the Site Operating Record and placed on the Landfill's publicly accessible website (<http://www.sandycreekpower.net>). This letter is being provided to TCEQ within 30 days of placing the annual inspection in the Site Operating Record.

If you have any questions related to the above described information, please feel free to contact Mr. Brett DeVries, Ph.D., P.E. at 817-571-2288.

Sincerely,



Xiaoxuan Wang, Ph.D., E.I.T.
Staff Professional
SCS ENGINEERS



Brett DeVries, Ph.D, P.E.
Senior Project Manager
SCS ENGINEERS
TBPE No. F-340

cc: Luke Johnson – Sandy Creek Energy Station

January 13, 2025
SCS Project No. 16224089.00

Mr. Luke Johnson
Compliance Manager
NAES Corporation
2161 Rattlesnake Road
Riesel, Texas 76682

Sent via email

Subject: Sandy Creek Energy Station
Coal Combustion Residual Waste Management Facility
TCEQ Registration No. CCR107
2024 Annual Inspection Report per 40 CFR §257.84(b)(2) (30 TAC §352.841)

Dear Mr. Johnson:

SCS Engineers (SCS) is pleased to provide this 2024 annual inspection report for compliance with Title 40, Code of Federal Regulation (CFR) §257.84(b)(2) (30 Texas Administrative Code (TAC) §352.841) related to the annual inspection of a coal combustion residual (CCR) Landfill by a qualified engineer.

The Sandy Creek Energy Station (Plant) CCR Waste Management Facility (Landfill) is located at 2161 Rattlesnake Road, Riesel, Texas 76682, and is currently registered with the Texas Commission on Environmental Quality (TCEQ) under TCEQ Registration No. CCR107.

BACKGROUND

The Landfill is currently comprised of three CCR disposal cells, inclusive of Cell 1, Cell 2, and a portion of Cell 3 (inclusive of Subcells 3A through 3D). Cells 1 and 2 are classified as an existing Landfill as defined under §257.53 since they were constructed and commenced operation in 2010 and 2014, respectively (prior to October 14, 2015). Cell 3, including the portion which was constructed in 2021, is considered a lateral expansion. The approximate areas of the currently constructed cells are 10.0 (Cell 1), 14.3 (Cell 2) and 10.3 (Cell 3) acres.

The primary waste disposed in the Landfill are fly ash and bottom ash generated during the coal combustion process at the Plant. Additionally, other Class 2 and Class 3 nonhazardous industrial waste generated at the Plant are disposed of at the Landfill consistent with the Registration Application.

ANNUAL INSPECTION [§257.84(B)(1)]

An annual inspection of the Landfill was performed on December 13, 2024, by Brett DeVries, Ph.D., P.E., a Professional Engineer registered in the State of Texas. An annual inspection checklist was prepared during the inspection, and is attached to this report. At the time of the inspection, the Landfill was operational.

Although the items described below and on the attached checklist were observed during the inspection, there were no existing conditions or changes from the previous annual inspection that

appeared to have the potential to disrupt the operation, safety, or stability of the landfill [§257.84(b)(2)(iv)]. Additionally, during the inspection, no appearance of actual or potential structural weakness was observed [§257.84(b)(2)(ii)].

During the inspection, as noted in the attached checklist:

- Vegetation growth was observed in the Cell 3 protective cover (no waste within this cell at the time). Based on the size of this vegetation, it does not appear that they have or have the potential to cause damage to the liner system. However, based on discussion with operation and site personnel, the vegetation will be removed in the near future. Additionally site personnel will continue to inspect the landfill (including Cell 3) for tree growth and remove trees when observed.
- Sediment and vegetation were covering the leachate evaporation pond underdrain outlet; however, the sediment and vegetation was removed following the inspection.
- Excessive dust emissions were not observed during the inspection. Additionally, it was evident that operation personnel have repaired minor erosion rills and animal burrows and maintained vegetation (e.g., tree growth removal and mowed) throughout the year when observed and as site conditions allowed.

During the inspection, SCS also reviewed the weekly inspection reports prepared by a qualified person in accordance with §257.84(a). All required weekly and monthly inspections have been completed for the calendar year 2024. Consistent with §257.84(b)(i), SCS reviewed the 2024 weekly inspections and the prior 2023 annual inspection. Items noted during the 2024 weekly inspections were similar to the items noted in the 2023 annual inspection, which were primarily related to ongoing challenges with erosion and vegetation establishment. In addition, items observed during the 2024 annual inspection will be corrected by operation personnel in the near future (weather permitting). Based on a review of these inspections, operation personnel have routinely corrected or maintained the landfill, as weather allowed, for items identified in the inspections and during landfill operation. Additionally, no deficiencies were observed during the weekly or annual inspections that could result in harm to human health, the environment, or had resulted in a release.

Lastly, during the inspection, consistent with §257.84(b)(i), SCS also reviewed all other documents in the site operation record. All documents required to be in the Site Operating Record in accordance with §257.105 and §352.1301 were present during the inspection.

In summary, based on the above-described inspection and improvement plans (previously noted) and consistent with the previous annual inspection (dated 1/13/2024), in our opinion, the design, construction, operation, and maintenance of the landfill (inclusive of the items inspected in the attached checklist) is being performed consistent with recognized and generally accepted good engineering standards.

VOLUME OF IN-PLACE WASTE [§257.84(B)(2)(ii)]

The approximate volume of CCR contained in the Landfill at the time of the inspection was estimated in accordance with §257.84(b)(2)(ii). The Landfill has been operational since early 2013.

Surveys of the Landfill have been conducted since April 2013, with the most recent two surveys being performed on September 26, 2024 and December 18, 2024. The estimated airspace consumed between the two surveys is 35,450 cubic yards (CY) for a period of 83 days (provided by facility personnel). Therefore, the airspace consumed was converted to an average daily volume of approximately 427.1 cy/day. Based on a comparison of the as-built top of liner grades and existing grades at the time of the surveys, the Landfill has approximately 1,523,417 cubic yards of CCR waste as of December 18, 2024 (provided by facility personnel). In addition, based on the average daily volume of 427.1 cy/day, it is estimated that 2,136 cy of CCR waste was disposed of in the Landfill between December 13, 2024 and December 18, 2024. **Therefore, as of the date of the annual inspection (December 13, 2024), it is estimated that the Landfill contained approximately 1,521,281 cy of CCR waste.**

CLOSING

SCS appreciates the opportunity to perform the 2024 annual inspection of Sandy Creek Energy Station (Plant) Coal Combustion Residual (CCR) Waste Management Facility (Landfill). Should you have any questions or require additional information on this inspection, please feel free to contact Brett DeVries, Ph.D., P.E. at 817-571-2288.

Sincerely,

Xiaoxuan Wang

Xiaoxuan Wang, Ph.D., E.I.T.
Staff Professional
SCS ENGINEERS



Brett DeVries, Ph.D., P.E.
Senior Project Manager
SCS ENGINEERS
TBPE Registration No. F-3407

Attachment: Coal Combustion Residual Landfill Annual Inspection Checklist

Sandy Creek Energy Station

Coal Combustion Residual Waste Management Facility Annual Inspection Checklist

40 CFR §257.84(b) - Requires inspections on an annual basis by a Qualified Professional Engineer

Date and Time of Inspection: December 13, 2024 at 9:00 a.m.

Professional Engineer's Name: Brett DeVries, Ph.D., P.E.

Weather Summary at time of Inspection: Mist/Overcast

Precipitation for the previous 7 days: 0.49 inch

1. Landfill Structure and Slope

Sloughing, Slumping, Sliding		Surface Cracking		Excessive Slope		Toe of Slope Moving		Inadequate Compaction	
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
	X		X		X		X		X

Inappropriate Vegetative Growth		Animal Burrows		Erosion Damage		Vehicle Damage	
Yes	No	Yes	No	Yes	No	Yes	No
	X		X		X		X

Additional Observations: _____

2. Landfill Cover

Qualifier	Intermediate Soil Cover		Final Soil Cover		Bottom Ash Cover		Alternative Cover	
	Yes	No	Yes	No	Yes	No	Yes	No
Installed	X		N/A		N/A		N/A	
Erosion		X	N/A		N/A		N/A	
Location								

Additional Observations: _____

3A. Run-on and Run-off Control System

Uncontaminated Surface Water Management System

Qualifier	Diversion Berms		Downchutes		Perimeter Drainage Channels		Culverts		Detention Basins	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Inspection	X		N/A		X		X		X	
Damage		X	N/A			X		X		X
Type										
Location										

Additional Observations: _____

3B. Run-on and Run-off Control System

Contact Water Management System

Qualifier	Diversion Berms		Drainage at Perimeter Berm		Drainage at Separation Berm		Culvert		Ponding of Contact Water		Release of Contact Water			
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No		
Inspection	X		X		N/A		X		X		X			
Damage		X		X				X			X		X	
Type														
Location														

Additional Observations: _____

4. Exposed Liner and Leachate Collection and Removal System

Qualifier	Intercell Berm Sacrificial Plastic		LCRS Riser Pipes		Leachate Sump Pump/Controls		Leachate Evaporation Pond		
	Yes	No	Yes	No	Yes	No	Yes	No	Freeboard (ft)
Inspection	X		X		X		X		6.5
Damage		X		X		X		X	N/A
Type									N/A
Location									N/A

Qualifier	LCRS Ball Valve		Protective Cover		Exposed Geosynthetics	
	Yes	No	Yes	No	Yes	No
Inspection	X		X		X	
Damage		X		X		X
Type			See Note 1			
Location			Cell 3			

Additional Observations: 1. Vegetation observed on the protective cover in Cell 3

5. Fugitive Dust

Landfill		Haul Trucks		Ash Silo	
Yes	No	Yes	No	Yes	No
	X		X		X

Additional Observations: _____

6. Leachate Evaporation Pond Underdrain System

Sediment		Vegetation		Debris		Water Flow	
Yes	No	Yes	No	Yes	No	Yes	No
X ¹		X			X	X	

Additional Observations: 1. Sediment and vegetation was covering the leachate evaporation pond underdrain outlet. The sediment and vegetation was removed following the inspection.

7. Groundwater Monitoring System

Damage		Excess Vegetation		Lock Working		Housing Lid Functional		Insects in Housing		Housing Paint Peeling		Label Adequate	
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
	X		X	X		X			X		X	X	

Additional Observations: _____

8. Document Review

Description	Yes	No
Weekly Inspection Checklists Reviewed:	X	
All Weekly Inspections Completed:	X	
Site Operating Record Reviewed:	X	
All necessary documents maintained in Site Operating Record: (see attached Site Operating Record Checklist)	X	

Additional Observations: _____

Additional Comments/Observations/Recommendations: _____



Brett DeVries 1/13/25

Professional Engineer's Signature and Seal

1/13/2025

Date

**SANDY CREEK ENERGY STATION
CCR WASTE MANAGEMENT FACILITY**

ANNUAL SITE OPERATING RECORD REVIEW

Primary Citation	Description	Deadline	Date Completed	Maintained in Operating Record		
				Yes	No	NA
§257.60(a) and §352.601	Documentation of compliance with location restrictions: aquifer	No later than date of initial receipt of CCR in any lateral expansion (e.g. Cell 3)	6/7/21 (Cell 3)	X		
§257.61(a) and §352.611	Documentation of compliance with location restrictions: wetland	No later than date of initial receipt of CCR in any lateral expansion (e.g. Cell 3)	6/7/21 (Cell 3)	X		
§256.63(a) and §352.631	Documentation of compliance with location restrictions: damage seismic impact zone	No later than date of initial receipt of CCR in any lateral expansion (e.g. Cell 3)	6/7/21 (Cell 3)	X		
§256.62(a) and §352.621	Documentation of compliance with location restrictions: damage zone near fault lines	No later than date of initial receipt of CCR in any lateral expansion (e.g. Cell 3)	6/7/21 (Cell 3)	X		
§257.64(a) and §352.641	Documentation of compliance with location restrictions: unstable areas	10/17/2018	10/1/2018 (Cells 1 & 2), 6/7/21 (Cell 3)	X		
§257.70(e) and §352.701	Liner Design Certification	60 days prior to construction of any lateral expansion (e.g. Cell 3)	6/7/21 (Cell 3)	X		
§257.70(f) and §352.701	Liner Construction Certification	No later than date of initial receipt of waste in any new waste unit	12/1/22 (Cell 3)	X		
§257.80(b) and §352.801	Fugitive Dust Control Plan	10/19/2015	10/18/2015, rev. 5/6/22	X		
§257.80(c) and §352.801	Fugitive Dust Control Plan Annual Report	1 year after previous report completion	12/16/16, 11/30/17, 12/18/18, 12/19, 12/20, 12/21, 12/22, 12/23, 12/24	X		
§257.81(c) and §352.811	Initial and Periodic run-on and run-off control system plan	10/17/2016, and every 5 years after initial plan	10/14/2016, rev. 10/14/21 (Rev. 5/6/22)	X		
§257.84(a) and §352.841	Weekly Inspection Reports	Weekly in 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, and 2024	Weekly in 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, and 2024	X		
§257.84(b) and §352.841	Annual Inspections Report	Due 1/19/2016 and 1 year after previous report completion	1/13/16, 1/13/17, 1/13/18, 1/13/19, 1/13/21, 1/13/22, 1/13/23, 1/13/24	X		
§257.84(b)(5) and §352.841(b)	Documentation of corrective measures for deficiency or release (based on annual report)	As soon as feasible	NA			X
§257.90(e) and §352.901	Annual groundwater monitoring and corrective action report	1/31/2018, and Annual Report due 1 year after previous report completion	1/30/18, 1/30/19, 1/30/20 and 1/29/21, 3/4/2022, 2/1/2023, 2/14/2024	X		
§257.91(e)(1) and §352.911	Documentation of design, installation, development, and decommissioning of GW Wells	10/17/2017	3/11/2016	X		
§257.91(f) and §352.911	Groundwater Monitoring System certification	10/17/2017	3/11/2016	X		
§257.93(f) and §352.931	Certification of selected statistical method for evaluating GW monitoring data	10/17/2017	3/2/2016, rev. 10/6/22 (Rev. 10/2/23)	X		
§257.94(e)(3) and §352.941	GW Assessment Monitoring Program establishment notification	30 days after plan establishment	NA			X
§257.95(d)(1) and §352.951	GW Assessment monitoring program sampling and results	90 days after results, and on at least semiannual basis thereafter	NA			X
§257.95(g) and §352.951(e)	Notification of GW constituent(s) being above protection standards	30 days after detection	NA			X

**SANDY CREEK ENERGY STATION
CCR WASTE MANAGEMENT FACILITY**

ANNUAL SITE OPERATING RECORD REVIEW

Primary Citation	Description	Deadline	Date Completed	Maintained in Operating Record		
				Yes	No	NA
§257.96(d) and §352.961	Assessment of GW corrective measures	90 days after detection	NA			X
§257.96(e) and §352.961(c)	Documentation recording public meeting for GW corrective measures assessment	After meeting	NA			X
§257.97(a) and §352.971	Progress reports (Semiannually) for selecting and design remedy for GW corrective action	6 months after selection and design completion	NA			X
§257.98(e) and §352.981	Notification and certification of GW remedy completion	After 30 days of completion	NA			X
§257.102(b) and §352.1221	Closure Plan	10/17/2016	10/14/2016, rev 10/6/22	X		
§257.102(f)(2) and §352.1221	Closure time extension certification	After 30 days of certification	NA			X
§257.102(g) and §352.1221	Initial of closure notification	After 30 days of notification	NA			X
§257.102(h) and §352.1221	Closure completion notification	After 30 days of notification	NA			X
§257.102(i) and §352.1221	Closure notation on the deed	After 30 days of completion	NA			X
§257.104(d) and §352.1241	Post-Closure Plan	Initial Registration and any subsequent modification	10/14/2016, rev 10/6/22	X		
§257.104(e) and §352.1241	Post-closure care completion notification	After 30 days of notification	NA			X
§335.9(a)	Records of waste disposed onsite or sent offsite	Texas waste code will be recorded prior to disposal in the Landfill, volume of waste disposed in the Landfill will be conducted during the annual inspection in accordance with Section 3 of the SOP, and information for waste sent offsite will be recorded following removal from site.	Texas waste code: 1/19/22 (Initial TCEQ Registration), Volume of waste: 1/13/16, 1/13/17, 1/13/18, 1/13/19, 1/13/21, 1/13/22, 1/13/23, 1/13/24. Waste sent offsite: Ongoing	X		
§257.105(h) and §352.1301(b)	Groundwater monitoring and associated groundwater surface elevations	30 days after of completion	1/30/18, 1/30/19, 1/30/20, 1/29/21, 3/4/2022, 2/1/2023, 2/14/2024, and 8/21/2024	X		
§352.1321(c)	Post issued effective registration; all applications and revisions; registration public notice(s); TCEQ draft registration; TCEQ compliance summary; other documents regarding and/or summarizing the TCEQ's review of or initial decision on the Registration Application on publicly accessible website	Initial Registration and any subsequent modification	1/19/22 (Initial TCEQ Registration), 5/6/22 (NOD1 Response), 10/20/22 (NOD2 Response), 10/5/23 (NOD3 Response), and 3/12/24 (Supplemental Information)	X		