
SEMI-ANNUAL REMEDY SELECTION AND DESIGN PROGRESS REPORT: ASH PONDS AND EQUALIZATION POND

San Miguel Electric Cooperative, Inc.
Christine, Atascosa County, Texas



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Prepared for: San Miguel Electric Cooperative, Inc.



GSI Environmental Inc.

9600 Great Hills Trail, Suite 350E, Austin, Texas 78759-6387 ■ P: 512.346.4474 ■ www.gsi-net.com

1.0 Introduction

On behalf of San Miguel Electric Cooperative, Inc. (San Miguel), GSI Environmental Inc. (GSI) has prepared this Coal Combustion Residuals (CCR) Semi-Annual Remedy Selection and Design Progress Report for the San Miguel Electric Plant (the Plant) located near Christine, Atascosa County, Texas. This report, in accordance with requirements specified in 40 Code of Federal Regulations (CFR) § 257.97(a), documents activities conducted during the period of 11 September 2019 to 11 March 2020 toward selecting and designing a remedy that addresses groundwater impacts originating from two CCR units at the Plant: Ash Water Transport Ponds A and B (Ash Ponds) and the Equalization Pond.

2.0 Status Of Remedy Selection

The Ash Ponds and Equalization Pond (see Figure 1) have been in assessment monitoring since January 2018; the third CCR Unit at the Plant (Ash Pile) is currently in detection monitoring. An Assessment of Corrective Measures (ACM) was initiated for the Ash Ponds and the Equalization Pond based on a detection of constituents listed in Appendix IV at a statistically significant level exceeding respective Groundwater Protection Standards (GWPSs). A notice of initiation of Assessment of Corrective Measures was issued in May 2019 in accordance with 40 CFR § 257.95(g)(5). Details of the status of the groundwater monitoring and corrective action program including the groundwater results are provided in the 2019 Annual Groundwater Monitoring Report (GSI, 2020). An ACM Report for the Ash Ponds and Equalization Pond was issued on 11 September 2019 in accordance with the requirements of 40 CFR § 257.96.

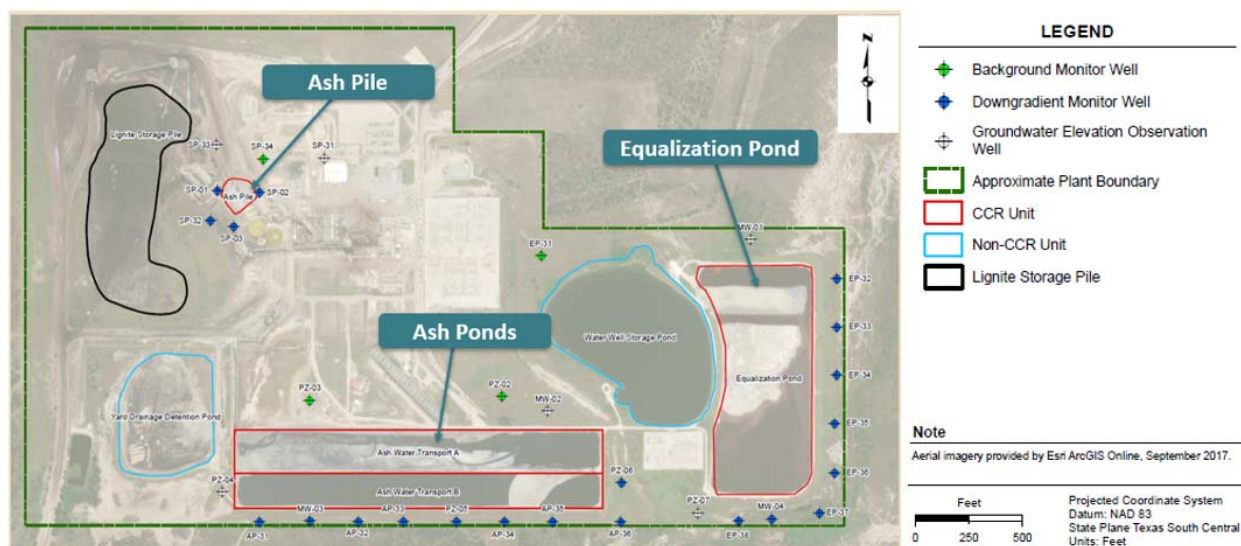


Figure 1: Site Map

The following section describes the actions completed during the semi-annual remedy selection period.

2.1 Summary of Key Actions Completed

Key actions related to groundwater monitoring and remedy selection for the Ash Ponds and Equalization Pond completed during this reporting period included:

- Completion of the CCR Assessment of Corrective Measures Report issued 11 September 2019 by GSI (GSI, 2019), in accordance with 40 CFR § 257.96.
- A public meeting to present the results of the ACM was held on 18 December 2019 in Christine, Texas, pursuant to 40 CFR § 257.96(e). Comments were received from the public meeting and are being considered during the remedy selection process.
- 2019 Annual Groundwater Report issued 31 January 2020 by GSI (GSI, 2020), as required by 40 CFR § 257.90(e).
- The first semi-annual groundwater monitoring event was conducted in February 2020, as required by 40 CFR § 257.94 (Ash Pile) and 40 CFR § 257.95 (Ash Ponds and Equalization Pond).
- Continued characterization of the nature and extent of the release and evaluation of corrective measures associated with the Ash Ponds and Equalization Pond, as required by 40 CFR § 257.95(g)(1). Characterization activities included: slug testing; continuing assessment beyond the Plant boundaries through installation of additional Unit 22 monitoring wells, and the evaluation of analytical results that are being used in the selection of corrective measures to meet the standards specified in 40 CFR § 257.97(b).

2.2 Projected Key Activities

Projected activities for the upcoming six months include the following:

- Evaluation of results from the first 2020 semi-annual sampling event pursuant to 40 CFR § 257.94(e) for the Ash Pile and 40 CFR § 257.95(e) – (g) for the Ash Ponds and Equalization Ponds.
- Review of groundwater analytical data in the context of remedy selection.
- Selection of a remedy and completion of a final remedy selection report, as required by 40 CFR § 257.97.
- Performance of the second semi-annual groundwater monitoring in August 2020.

3.0 References

GSI, 2019. Assessment of Corrective Measures Report, San Miguel Electric Cooperative, Inc.; Issued 11 September 2019.

GSI, 2020. 2019 Annual Groundwater Report, San Miguel Electric Cooperative, Inc.; Issued 31 January 2020.