

#### REPORT

# **Structural Stability Assessment**

San Miguel Electric Cooperative Power Plant CCR Ponds Atascosa County, Texas Submitted to:

# San Miguel Electric Cooperative, Inc. 6200 FM 3387

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Submitted by:

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# **PROFESSIONAL CERTIFICATION**

This document and all attachments were prepared by Golder Associates Inc. under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I hereby certify that the Structural Stability Assessment has been prepared in accordance with the requirements of Section 257.73(d) of the CCR Rule.



Jeffrey B. Fassett, P.E. Associate Golder Associates Inc. Firm Registration No. F-2578



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#### **1.0 INTRODUCTION**

San Miguel Electric Cooperative, Inc. (SMECI) owns and operates the San Miguel Power Plant (SMPP) located approximately 6 miles south of Christine, Texas in Atascosa County, Texas (Figure 1). The SMPP is a 440-megawatt, lignite-fired electric power plant that was placed into service in 1982. Coal Combustion Residuals (CCR) including fly ash, bottom ash and flue gas desulfurization (FGD) wastewater/solids are generated as part of SMPP operation.

From 1982 through 2020, bottom ash and FGD wastewater/solids were managed in Ash Pond A and Ash Pond B (which were collocated and referred to collectively as the Ash Ponds) and an Equalization Pond (EQ Pond). The Ash Ponds and EQ Pond are located south and southeast of the SMPP generating unit (Figure 2). In 2020, SMECI retrofitted the Ash Ponds by installing a composite liner system meeting the requirements of 40 CFR Section 257.70(b), and subdivided Ash Pond B to create a smaller Retrofitted Ash Pond B and a Retrofitted EQ Pond (See Figure 3). The previous EQ Pond (referred to herein as the Former EQ Pond) was removed from service in 2021 and is undergoing closure.

The U.S. Environmental Protection Agency promulgated 40 C.F.R. Part 257, Subpart D (the CCR Rule) to establish technical requirements for new and existing CCR landfills and surface impoundments. Retrofitted Ash Pond A, Retrofitted Ash Pond B and the Retrofitted EQ Pond have been identified as Existing CCR Surface Impoundments regulated under the CCR Rule.

Section 257.73(d) of the CCR Rule specifies that periodic structural stability assessments must be conducted for each CCR surface impoundment. In accordance with Section 257.73(g) of the CCR Rule, the initial Structural Stability Assessment for the Ash Ponds and Former EQ Pond was completed and placed in the facility operating record in October 2016 (ERM, 2016a). As specified in Section 257.73(f)(3), the structural stability assessment must be updated every five years from the completion date of the initial plan. Golder Associates Inc., member of WSP, was retained by SMECI to prepare this updated Structural Stability Assessment for Ash Pond A, Retrofitted Ash Pond B and the Retrofitted EQ Pond.

## 1.1 Description of Ash Pond A and Retrofitted Ash Pond B

From 1982 through 2020, bottom ash transport water was managed in Ash Pond A and Ash Pond B, which were constructed as part of the original SMPP construction. The Ash Transport Water Pond Complex (Ash Pond) as originally constructed contained two pond cells, Ash Pond A on the north side and Ash Pond B immediately adjacent to the south. The system was constructed as a side-hill impoundment with the northern dike at or near natural grade and includes a central "splitter dike" that separates the pond into north and south sections with a connecting weir.

The total dike perimeter of the Ash Pond is approximately 6,000 feet, and the approximate surface area is 26 acres. The maximum dike height is approximately 20 feet with side slopes ranging from 2.5 horizontal to 1 vertical (2.5H:1V) to 3.0H:1V, with an average crest width of 20 feet. The elevation of the dike crest is 315 feet with a maximum pool water surface elevation of 313.5 feet (18 inches below crest) (AECOM, 2018).

Both ash ponds were constructed with a clay soil liner consisting of 3 feet of compacted soil with a hydraulic conductivity of no more than  $1 \times 10^{-7}$  cm/sec (ERM, 2016b; Zephyr, 2017).

In 2020, SMECI retrofitted Ash Pond A and Ash Pond B as follows:

• A 60-mil HDPE geomembrane was installed in Ash Pond A over the existing clay soil liner. The HDPE

geomembrane extends across the floor of the pond and up the interior faces of the perimeter dikes and is secured in anchor trenches at the top of the dikes.

• Ash Pond B was subdivided to create a smaller Retrofitted Ash Pond B and a Retrofitted EQ Pond by constructing a divider dike across the width of Ash Pond B. A 60-mil HDPE geomembrane was installed in Retrofitted Ash Pond B over the existing clay soil liner. The HDPE geomembrane extends across the floor of the pond and up the interior faces of the perimeter dikes and is secured in anchor trenches at the top of the dikes.

The configuration of the existing perimeter dikes of the Ash Ponds was not modified as part of the Ash Pond Retrofit project. Engineering Drawings for the Ash Pond Retrofit project are reproduced in Appendix A (Newfields, 2019).

#### **1.2** Previous Structural Stability Assessment for Ash Ponds

The Initial Structural Stability Assessment concluded that the Ash Ponds were in compliance with the structural stability requirements of Section 257.73(d) of the CCR Rule.

The Initial Structural Stability Assessment referenced a 2012 Geotechnical Engineering Study performed for the Ash Ponds by Arias and Associates (Arias, 2012). The purpose of the engineering study was to investigate the subsurface soil and groundwater conditions present at the Ash Ponds and to perform global stability calculations to assess short-term, long-term, and seismic stability for the embankments and to assess the liquefaction potential of the underlying foundation soils. The engineering study concluded that the Ash Pond embankments exhibited adequate short-term, long-term and seismic stability and that liquefaction of the underlying foundation soils was unlikely.

#### 2.0 SUBSURFACE CONDITIONS

Information from previous subsurface investigations was used to characterize the subsurface site conditions. The surface impoundments were designed using information obtained during a geotechnical investigation prepared for San Miguel by NFS/National Soil Services, Inc. (NFS) in calendar year (CY) 1978.

NFS described the foundation and abutment soils of the surface impoundment as generally consisting of an upper clay stratum ranging from approximately 22 to 30 feet thick. This stratum was encountered at depths from 14 feet below the bottom of Ash Ponds. NFS described the upper clay as consisting of hard, moderately-to-highly plastic, relatively impermeable clays, sandy clays, and silty clays.

NFS described the soil underlying the upper clay stratum as a very dense, silty fine sand. The thickness of the underlying sand stratum at the Ash Ponds was not determined in the NFS geotechnical engineering report.

In 2012, Arias and Associates, Inc. (Arias, 2012) performed an investigation including seven borings along the crest and toe of the Ash Pond abutment. In addition to index testing, multistage triaxial compression testing was performed on both natural and compacted clays to characterize the shear strength of the foundation soils and the abutment fill. Based on the investigation Arias divided the subsurface soils as follows.

Stratum	Depth (ft)	Material Type	PI range	No. 200 Range	Pocket Pen. (tsf)	N range
-	0 to (3-28)	FILL: Brown to Dark Brown and Gray to Dark Gray, Fat CLAY (CH), Fat CLAY (CH) with Sand, Lean CLAY (CL), Lean CLAY (CL) with Sand, Gravelly Fat CLAY (CH), stiff to hard	23 - 59	-	1.25 - 9.0	13 - 29
II	(0 - 28) to (12 - 52)	Brown to Dark Brown and Gray, Clayey SAND (SC), Fat CLAY (CH), Sandy Fat CLAY (CH), Sandy Lean CLAY (CL), Lean CLAY (CL), Lean CLAY (CL) with Sand, stiff to hard and medium dense to very dense, some of these soils are Eocene Age deposits	12 - 92	13 to 52	0.75 – 5.75	9 - 100*
III	Below (0-52)	Gray and Brown, Silty SAND (SM), Sandy SILT (ML), Sandy Fat CLAY (CH), Sandy Lean CLAY (CL), Clayey SAND (SC), Fat CLAY (CH), very stiff to hard and loose to very dense, some alluvial soils but mostly Eocene Age deposits	1 - 66	13 to 56	-	8 – 100 <sup>+</sup>

Where: Depth

N

Depth from existing ground surface at the time of geotechnical study, feet Plasticity Index, %

PI -No. 200 -

No. 200 - Percent passing #200 sieve, % Pocket Pen - Pocket Penetrometer reading (tons/ft<sup>2</sup>)

- Standard Penetration Test (SPT) value, blows per foot

#### 3.0 SITE RECONNAISSANCE

Following a review of the structural stability assessment and past inspection reports, Golder performed a site reconnaissance on July 15, 2021 to observe conditions at the crest, downstream slopes, and areas beyond the Ash Ponds. It was not feasible to observe the conditions of the upstream slopes below the water level.

During the site visit, items of concern were noted. Table 1 provides a summary of our observations and our recommended remedies.

Area	Observed Condition	Recommendation
Crest	The grade along the northwestern portion of Pond A is low. Temporary measures have been implemented to raise the liner elevation in the area.	Since the date of the site reconnaissance, we understand that the temporary measures have been removed and permanent repairs (i.e., placing fill to raise the area and extending the geomembrane) have be installed to prevent water escaping the pond.
Downstream slopes	Woody vegetation is present along the southern embankment of the Retrofitted EQ Pond and Pond B and is suppressing grass growth.	Continue to control large vegetation and seed denuded areas.

#### Table 1: Observed Items of Concern

## 4.0 UPDATED STRUCTURAL STABILITY ASSESSMENT – SECTION 257.73(d)(1)(i)-(vii)

The CCR Rule requires periodic structural stability assessments conducted by a qualified professional engineer to document whether the design, construction, operation and maintenance is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater that can be impounded therein. The assessment must address:

- i. Stable foundations and abutments;
- *ii.* Adequate slope protection to protect against surface erosion, wave action, and adverse effects of sudden drawdown;
- *iii.* Dikes mechanically compacted to a density sufficient to withstand the range of loading conditions in the CCR unit;
- *iv.* Vegetated slopes of dikes and surrounding areas not to exceed a height of six inches above the slope of the dike, except for slopes which have an alternate form or forms of slope protection;
- v. A single spillway or a combination of spillways configured as specified in paragraph (d)(1)(v)(A) of [40 CFR Section 257.73];
- vi. Hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit that maintain structural integrity and are free of significant deterioration, deformation, distortion, bedding deficiencies, sedimentation, and debris which may negatively affect the operation of the hydraulic structure; and
- vii. For CCR units with downstream slopes which can be inundated by the pool of an adjacent water body, such as a river, stream or lake, downstream slopes that maintain structural stability during low pool of the adjacent water body or sudden drawdown of the adjacent water body.

#### 4.1 Foundations and Abutments

As noted above, the foundation soils consist of native soils and compacted fill. At the time of our site visit, the foundation soils and abutments were visibly stable. The 2012 engineering study concluded that the Ash Pond embankments exhibited adequate short-term, long-term and seismic stability and that liquefaction of the underlying foundation soils was unlikely (Arias, 2012).

#### 4.2 Slope Protection

The downstream slopes of the embankments in the surface impoundments are protected from erosion and deterioration by the establishment of a vegetative cover. The vegetative cover is inspected weekly for erosion, signs of seepage, animal burrows, sloughing, and plants that could negatively impact the embankment.

As noted above, the Ash Ponds have been retrofitted with a composite liner system comprised of a 60-mil HDPE geomembrane overlying a compacted clay liner. The presence of the geomembrane will prevent erosion of the underlying clay soil.

#### 4.3 Dikes (Embankment)

The embankments were constructed from compacted clay rich site soils at 2.5H:1V to 3H:1V slopes. No construction testing of the original embankment fill is available; however, several of the borings conducted by Arias in 2012, penetrated the fill. The borehole logs describe this material as stiff to hard fat clay, with SPT blow counts typically exceeding 20, which is consistent for a compacted clay fill.

A divider dike across the width of Ash Pond B to form the EQ Pond. The dike was constructed with compacted fill at 3H:1V slopes.

Based on this information, we believe that the embankments are sufficient to withstand the range of loading conditions that are subjected to.

### 4.4 Vegetated Slopes

The exterior slopes of the dikes around the ash ponds are vegetated to control erosion. SMECI maintains the vegetation in a manner that ensures that the weekly inspections required under the CCR Rule can be conducted; however, the height of the vegetation varies depending on the frequency of maintenance.

The US Court of Appeals for the District of Columbia Circuit issued an Order that remanded and vacated the CCR Rule requirement that vegetation on the exterior portions of dikes on CCR surface impoundments be maintained not to exceed 6 inches in height. EPA proposed to address this requirement in 2018 but it has not finalized any new requirements.

#### 4.5 Spillways

San Miguel Plant documentation shows that there a no outfalls or emergency spillways present in Ash Pond A, Ash Pond B, or the EQ Pond.

#### 4.6 Hydraulic Structures

According to drawings prepared by Tippet & Gee, Inc. (included as Appendix B) a 30-inch diameter pipe with an inlet invert elevation of approximately 305 ft, is connected to a drop inlet at the structure connecting Ash Pond A and B located near the eastern end of the interior dike. The 30-inch pipe runs along the interior dike to the ash water pump station west of the ash ponds with an outlet invert elevation of approximately 300 ft. This pipe is still present but is no longer functioning due to sediment blockage.

#### 4.7 Inundation by Adjacent Water Body

San Miguel Plant documentation shows that neither Ash Pond A, Ash Pond B, nor the EQ Pond were constructed with dike exterior sides slopes that are in contact with any adjacent to water body, such as a river, stream or lake, except during an ephemeral flood event. Consequently, the embankment will not be inundated and will maintain structural stability during low pool and will not be subjected to rapid drawdown.

#### 5.0 CONCLUSIONS

Based on our review of the information provided by SMECI and on observations made during a site visit, no structural stability deficiencies were identified in Ash Pond A, Ash Pond B, or the new EQ Pond during this assessment.

#### 6.0 **REFERENCES**

- Arias & Associates, 2012. Ash Water Transport Pond and Equalization Pond Stability Analyses, San Miguel Electric Cooperative Christine, Texas, November 19.
- AECOM, 2018. CCR Certification: Seismic Impact Zone §257.63 for the Ash Pond, Equalization Pond and Ash Pile at the San Miguel Plan, Revision 0, October 17.
- ERM, 2016a. CCR Surface Impoundment Structural Stability Assessment, San Miguel Electric Cooperative, Inc., Atascosa County, Texas, October 17.
- ERM, 2016b. Existing CCR Surface Impoundment Liner Design Criteria Ash Pond A, San Miguel Electric Cooperative, Inc., Atascosa County, Texas, October 17.
- Newfields, 2019. Engineering Drawings for Ash Disposal Pond Retrofit, San Miguel Electric Plant, Atascosa County, Texas, August.
- Tippet & Gee, Inc (T&G), 1980b. Site Plan Section No. 6, San Miguel Plant Unit No. 1, Drawing No. 1-C-35, Rev 16, April 1, 1977, revised August 6, 1980.
- Zephyr Environmental Corporation (Zephyr), 2017. Liner System Certification Report Ash Water Transport Pond 1-B, San Miguel Electric Cooperative, Inc., San Miguel Plant, Christine, Atascosa County, Texas, November 28.

# **FIGURES**



# Time:10:34:47 AM 2021 CCR Pend S 2021-09-24 Date

QUADRANGLE DATED 2019.



BASE MAP TAKEN FROM USGS.GOV, CROSS NE AND CABALLOS CREEK, TX 7.5 MIN. USGS

CLIENT SAN NIGUEL ELECTRIC COOPERATIVE, INC.

21455682

PROJECT CCR POND STRUCTURAL STABILITY ASSESSMENT UPDATE

#### TITLE SITE LOCATION MAP CONSULTANT YYYY-MM-DD 2021-09-07 DESIGNED AJD GOLDER PREPARED AJD MEMBER OF WSP REVIEWED PJB APPROVED PJB PROJECT NO. CONTROL FIGURE REV.

0

1



6	GOLDER MEMBER OF WSP		
PROJECT NO. 21455682	CONTROL		

YYYY-MM-DD	2021-09-07	
DESIGNED	AJD	
PREPARED	AJD	
REVIEWED	PJB	
APPROVED	PJB	
F	REV.	FIGURE
	0	2

# TITLE SITE PLAN

PROJECT CCR POND STRUCTURAL STABILITY ASSESSMENT UPDATE

CLIENT SAN MIGUEL ELECTRIC COOPERATIVE, INC.

REFERENCE(S) BASE MAP TAKEN FROM TNRIS.ORG, ATASCOSA CO., 2015 PHOTOGRAPHY. MONITORING WELL LOCATIONS FROM FIGURE 1 - CCR UNIT GROUNDWATER MONITORING SYSTEM, ERM, 10/16/2017.



LEGEND

APPROX. PLANT BOUNDARY

CCR IMPOUNDMENT/UNIT



NON-CCR IMPOUNDMENT



	GOLDER	PREPARED
	MEMBER OF WSP	REVIEWED
		APPROVED
PROJECT NO. 21455682		

YYYY-MM-DD 2021-09-23 DESIGNED AJD RS PJB PJB FIGURE REV. 0

# TITLE ASH POND LAYOUT

CONSULTANT

PROJECT CCR POND STRUCTURAL STABILITY ASSESSMENT UPDATE

# CLIENT SAN MIGUEL ELECTRIC COOPERATIVE, INC.

REFERENCE(S) BASE MAP TAKEN FROM TNRIS.ORG, ATASCOSA CO., 2015 PHOTOGRAPHY. MONITORING WELL LOCATIONS FROM FIGURE 1 - CCR UNIT GROUNDWATER MONITORING SYSTEM, ERM, 10/16/2017.





LEGEND



CCR IMPOUNDMENT/UNIT

NON-CCR IMPOUNDMENT

APPENDIX A

Engineering Drawings – 2020 Ash Pond Retrofit Project











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APPENDIX B

Tippet & Gee, Inc. San Miguel Plan, Unit No. 1 Drawings: I-C-I-C, 1-C-33, I-C-37, I-C-40, C-?













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