

## Colstrip Update

October 2015

### Introduction

The Montana Department of Environmental Quality (DEQ) is issuing this update to keep you informed about the investigation and remediation of groundwater impacted by the coal ash ponds at the Colstrip, Montana coal-fired power plant.

Coal ash is the waste product from coal combustion. The ash, mixed with water, is transported in pipelines to storage ponds and either stays mixed with the water or settles to the pond bottom. The ponds are located in three areas:

- Plant Site Area,
- Units 1 & 2 Area, and
- Units 3 & 4 Area.



Some of the water has seeped out of the ponds and impacted ground-water with boron, chloride, and sulfate as well as other constituents. In August 2012, DEQ and PPL Montana, subsequently renamed Talen Energy (Talen), entered into an Administrative Order on Consent (AOC) to address the pond seepage. Talen uses an extensive well network to monitor the impacts and to capture and return impacted water to the ponds.

### DEQ Public Meeting

DEQ will hold a public meeting to provide information about the status of the AOC process at 7:00 p.m. on Wednesday, November 4, 2015, at the City Council Chamber in the Colstrip City Hall located at 12 Cherry Street in Colstrip, Montana. DEQ will provide a presentation regarding the AOC process and a representative from Talen will provide information about operational changes required by a new federal rule. DEQ and Talen will answer questions regarding the presentations; however this is not a formal public hearing.

### Move of Colstrip AOC process to DEQ Remediation

In January 2015, the administration of the Colstrip AOC process was moved from the Environmental Management Bureau (EMB) of the DEQ Permitting and Compliance Division to the Hazardous Waste Cleanup Bureau of the DEQ Remediation Division. The AOC was initially developed by the Permitting and Compliance Division because the power plant was permitted under the Major Facility Siting Act administered by EMB. During the negotiation of the AOC, DEQ and PPLM crafted the investigation



and remediation process to mirror the remediation processes administered by the Remediation Division. The stages of the process include Site Characterization, Risk Assessment, Cleanup Criteria development, Remedy Evaluation, and Remediation. In 2015, DEQ recognized that the Remediation Division had the resources to best address the complex technical challenges associated with the plant to facilitate the implementation of the AOC so the oversight of the AOC process was moved to Remediation.

### Approval of Plant Site Report

The AOC specifies that a site characterization report be completed for each of the three areas where coal ash was or is being deposited. The AOC requires that certain details be included in the site characterization reports such as ash pond construction, estimates of seepage to groundwater from each pond, a groundwater model, a description of investigations performed, and identification of any data gaps.

DEQ has required Talen to greatly expand and modify the Plant Site Report into a valuable planning document for the remainder of the AOC process. DEQ has approved the Plant Site Report. The next step in the AOC process is for DEQ to review the Cleanup Criteria and Risk Assessment Work Plan for the Plant Site Area that Talen recently submitted. Talen is also using DEQ's comments on the Plant Site Report to expand and modify the other two site characterization reports. DEQ anticipates that this will expedite the remainder of the AOC process.

### **Reanalysis of background screening levels**

Currently, Talen and DEQ are working to establish background screening levels (BSLs) for the pond constituents entering the groundwater around the ponds. Preliminary BSLs were evaluated in 2007 and 2011. However, further analysis indicates that data from additional wells will more accurately characterize the groundwater in each of the water-bearing units.

Assessment of the spatial extent of the contamination is part of the Site Characterization stage and this requires valid BSLs. In the next stage, the BSLs will be used to identify which contaminants are above background levels and therefore will be the focus of the AOC process. The BSLs will also potentially be used to identify applicable cleanup criteria. In the Remedy Evaluation stage, potential remedial actions will be evaluated with respect to whether they can achieve the identified cleanup criteria.

### **Implementation of CCR Rules**

The recently approved United States Environmental Protection Agency Coal Ash Combustion Residuals from Electric Utilities Rule (CCR Rule) will affect the Colstrip plant operations, including ash pond operation. The CCR Rule is a federal regulation that is designed to be self-implementing. Talen is not required to submit reports concerning progress in completing provisions of the CCR Rule to DEQ.

The CCR Rule was finalized on April 17, 2015. The rule covers both wet and dry ash storage and disposal impoundments that receive coal ash waste from coal-fired power plants. The Colstrip power plant transports wet coal ash through pipelines to the ponds. The rule defines coal ash as a non-hazardous waste under the provisions of the federal Hazardous Waste Rules.

The rule also sets deadlines for certain actions that Talen must meet. Some of the upcoming actions and deadlines are outlined below. Talen may already be performing some of the actions but will now need to document compliance with the CCR Rule.

This month, Talen is required to establish a CCR website to communicate with the public. The plans, records, notifications, and reports generated in compliance with the CCR Rule will be added to the website. A fugitive dust control plan is also due this month. Talen must also demonstrate that it is conducting weekly inspections of the impoundments and monthly inspections of the measurement instruments.

For further information, please visit the EPA website concerning the CCR Rule:

<http://www2.epa.gov/coalash/coal-ash-rule>

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## Contact Information:

Jake Kandelin  
DEQ Project Officer  
(406) 444-6797  
[jkandelin@mt.gov](mailto:jkandelin@mt.gov)

DEQ email inbox for Colstrip comments and concerns: [deqcolstrip@mt.gov](mailto:deqcolstrip@mt.gov)

## Information is also located at:

Colstrip Public Library  
419 Willow Avenue  
Colstrip, Montana  
(406) 748-3040

DEQ Colstrip web site: <http://deq.mt.gov/mfs/ColstripSteamElectricStation/default.mcp>

## Public Meeting

**Date:** Wednesday, November 4, 2015

**Time:** 7:00 p.m.

**Location:** City Council Chamber  
Colstrip City Hall  
12 Cherry St.  
Colstrip, Montana

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P.O. Box 200901  
Helena, MT 59620-0901

Recipient Address