



Gordon Criswell • Director, Environmental & Compliance

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March 30, 2023

Sarah Seitz
Colstrip Coal Ash Pond Remediation
Environmental Project Officer
Tanks, Brownfields, & Federal Facilities Bureau
Montana Department of Environmental Quality

RE: Colstrip Units 1&2 Remediation Plan
The Coal-Fired Generating Unit Remediation Act
Annual Status Report 2021/2022

Sarah,

As you requested, this letter provides a status report for calendar years 2021 and 2022 for the Colstrip Units 1&2 Remediation Plan that was prepared in accordance with Mont. Code Ann. § 75-8-105, MCA, titled The Coal-Fired Generating Unit Remediation Act. The Colstrip Units 1&2 Remediation Plan dated August 2020 was approved by MDEQ on December 3, 2020. The initial remediation work described in the Plan was completed in 2020. This letter provides the activities related to the referenced Remediation Plan that have been conducted during calendar years 2021 and 2022.

Regarding the two previous petroleum release sites in the Units 1&2 area that were identified in the Remediation Plan (Releases 332 & 562), Petroleum Mixing Zone Closure Summary Reports were provided to MDEQ in December of 2020. These reports provide the basis for a Petroleum Mixing Zone (PMZ) site closure for both releases. During 2021 and 2022, additional discussions and information was provided to MDEQ with the understanding that site closures would be approved for these releases. On March 30, 2023, Talen Montana received draft PMZ Deed Restrictions from MDEQ for these releases and expects to have them finalized in the near future.

The Colstrip Water Feasibility Study (75-8-110 MCA) was completed in 2022 as required. The Colstrip Owners collaborated with the Stakeholders in selecting a qualified consultant to conduct the Study. DOWL was selected and performed the Study with input from the Plant providing existing water supply information and by conducting several Stakeholder meetings in Colstrip to get input as the Study progressed. The final report was submitted to MDEQ on November 1, 2022 and shared with the Stakeholders.

Groundwater remediation and process pond closures are discussed in the Remediation Plan under Section 5.2.2.1 AOC and Federal CCR Rule. Related activities for 2021 and 2022 are described below.

2021 Activities

- 1/12/2021, Colstrip 1&2 SOEP/STEP Groundwater Modeling review with MDEQ
- 8/11/2021, Colstrip 1&2 SOEP/STEP Flushing Pilot Test Workplan submitted to MDEQ
- 10/7/2021, Revised Colstrip 1&2 SOEP/STEP Flushing Pilot Test Workplan submitted to MDEQ
- 10/8/2021, Plantsite Remedy Performance Evaluation Report submitted to MDEQ
- 10/18/21, Colstrip 1&2 SOEP/STEP Wastewater AOC Settlement Agreement with MDEQ
- 10/22/2021, Annual Colstrip Wastewater AOC Annual & 5-year Plan submitted to MDEQ
- 10/26/2021, MDEQ Annual Public Meeting on Colstrip remediation activities
- 11/1/2021, Colstrip Wastewater AOC Financial Assurance Update submitted to MDEQ
- 11/18/2021, email to MDEQ describing Remediation Act contract releases meeting prevailing wage requirements as identified in (75-8-107 MCA)
- 12/17/2021, Colstrip 1&2 AOC Remediation Quarterly Review meeting with MDEQ

2022 Activities

- 1/31/2022, Colstrip 1&2 SOEP/STEP Alternative 10 RD/RA Workplan Proposal submitted to MDEQ
- 2/18/2022, Colstrip 1&2 SOEP/STEP Small-Scale Flushing Pilot Test Report submitted to MDEQ
- 3/1/2022, Colstrip 1&2 SOEP/STEP Alternative 10 Remedial Design Geotechnical Investigation Workplan submitted to MDEQ
- 3/1/2022, Colstrip 1&2 SOEP/STEP Hydrologic Investigation Workplan for Proposed Alternative 10 Landfill Remedial Design/Remedial Action submitted to MDEQ
- 3/23/2022 Colstrip 1&2 AOC Remediation Quarterly Review meeting with MDEQ
- 4/1/2022, Colstrip Wastewater Facility Amended Closure Plan Units 1&2 SOEP/STEP submitted to MDEQ

2022 Activities continued

- 5/13/2022, Revised Colstrip 1&2 SOEP/STEP Alternative 10 Remedial Design Geotechnical Investigation Workplan submitted to MDEQ
- 6/3/2022, Colstrip 1&2 STEP Dewatering Report submitted to MDEQ
- 6/15/2022, Colstrip 1&2 AOC Remediation Quarterly Review meeting with MDEQ
- 6/17/2022, Revised Colstrip 1&2 SOEP/STEP Alternative 10 RD/RA Workplan Proposal submitted to MDEQ
- 6/24/2022, Colstrip 1&2 SOEP/STEP Alt 10 Pilot Test Excavation Workplan submitted to MDEQ
- 6/28/2022, Revised Colstrip 1&2 SOEP/STEP Hydrologic Investigation Workplan for Proposed Alternative 10 Landfill Remedial Design/Remedial Action submitted to MDEQ
- 8/1/2022, Revised Colstrip 1&2 SOEP/STEP Small-Scale Flushing Pilot Test Report submitted to MDEQ
- 8/12/2022, Revised 1&2 SOEP/STEP Alt 10 Pilot Test Excavation Workplan submitted to MDEQ
- 8/16/2022, Addendum to Revised Colstrip 1&2 SOEP/STEP Alternative 10 Remedial Design Geotechnical Investigation Workplan submitted to MDEQ
- 9/12/2022, 1&2 SOEP/STEP Amended AOC Closure Plan submitted to MDEQ
- 9/15/2022, Revised/Revised Colstrip 1&2 SOEP/STEP Alternative 10 RD/RA Workplan Proposal submitted to MDEQ
- 9/29/2022, Colstrip 1&2 AOC Remediation Quarterly Review meeting with MDEQ
- 10/6/2022, MDEQ Annual Public Meeting on Colstrip remediation activities
- 10/21/2022, email to MDEQ describing Remediation Act contract releases meeting prevailing wage requirements as identified in (75-8-107 MCA)
- 10/31/2022, Colstrip Wastewater AOC Financial Assurance Update submitted to MDEQ
- 10/31/2022, Colstrip 1&2 SOEP/STEP Small-Scale Flushing System O&M Plan and Performance Monitoring Plan submitted to MDEQ
- 11/22/2022, Annual Colstrip Wastewater AOC Annual & 5-year Plan submitted to MDEQ
- 12/9/2022, Plantsite MNA Workplan submitted to MDEQ
- 12/13/2022, Colstrip 1&2 AOC Remediation Quarterly Review meeting with MDEQ
- 12/20/2022, Revised/Revised Colstrip 1&2 SOEP/STEP Small-Scale Flushing Pilot Test Report submitted to MDEQ

If you have any questions, please do not hesitate to contact me at 406-748-5002 or email me at gordon.criswell@talenergy.com.

Thank You,

A handwritten signature in blue ink that reads "Gordon Criswell". The signature is written in a cursive, flowing style.

Gordon Criswell
Director, Environmental & Compliance
Colstrip Power Plant
Talen Montana

Seitz, Sarah

From: Criswell, Gordon D <Gordon.Criswell@talenenergy.com>
Sent: Friday, October 21, 2022 6:42 AM
To: Seitz, Sarah
Cc: Petritz, Jennifer F; Criswell, Gordon D
Subject: [EXTERNAL] Remediation Act Contracts - Colstrip January 1 thru September 30, 2022 - Prevailing Wages

Sarah,

Here is a summary of contracts issued at Colstrip from January 1 – September 30 in 2022 that were issued meeting prevailing wage requirements.

For Units 1&2, we had 15 contract releases in 2022 related to remediation activities that were issued meeting prevailing wage requirements. The types of contractors hired meeting the prevailing wage requirements included ironworkers, boilermakers, carpenters, pipefitters, construction equipment operators, construction equipment mechanics, laborers, electricians, crane operators, and sheet metal workers.

For Units 3&4, we had 16 contract releases in 2022 related to remediation activities that were issued meeting prevailing wage requirements. The types of contractors hired meeting the prevailing wage requirements for these contracts included ironworkers, boilermakers, carpenters, pipefitters, construction equipment operators, construction equipment mechanics, laborers, electricians, crane operators, linemen, and sheet metal workers.

Let me know if you have any questions.

Thanks,
Gordon

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