



April 19, 2024

Gordon Criswell and Jennifer Petritz
Talen Montana
PO Box 38
Colstrip, Montana
[sent electronically]

RE: DEQ's Final Decision Document and Design Approval Process for the *Plant Site Remedy Modification to Alternative 4B* for the Colstrip Steam Electric Station (SES), Colstrip, Montana

Gordon and Jen:

The Montana Department of Environmental Quality (DEQ) has reviewed Talen's Plant Site Remedy Modification Request proposing to amend the Plant Site remedy from Alternative 4 to Alternative 4B. Under the 2012 administrative order on consent (AOC), Talen is directed to identify a preferred remedy, but ultimately DEQ has the authority to select a remedy or a modified remedy. After a thorough technical review of the alternatives presented in Talen's July 2023 remedy modification request, DEQ is selecting Alternative 4B as the modified remedy for the Plant Site area. The reasons supporting DEQ's remedy selection are set forth in the enclosed Final Decision Document.

Selection of Alternative 4B as the modified Plant Site remedy triggers the financial assurance requirement under the AOC. After review of the cost estimate provided by Talen for the implementation of Alternative 4B as the Plant Site remedy, DEQ is requiring financial assurance in the amount of \$99,588,400 (undiscounted), which is \$73,101,090 (calculated with a 3% discount rate). For the Plant Site remedy DEQ currently holds \$57,916,292. The difference between the financial assurance requested by DEQ for the Plant Site remedy modification (Alternative 4B) is \$15,184,798. Talen previously submitted a surety bond with an additional \$288,306 in January 2024 in anticipation of updated bonding requirements for the Plant Site. Therefore, the remaining \$14,896,492 in financial assurance must be provided to DEQ within 60 days of receipt of this letter. Please send updated financial assurance to the following address with Amy Steinmetz, Waste Management & Remediation Division Administrator, as the DEQ signatory, if necessary:


Sarah Seitz, DEQ Waste Management & Remediation
Colstrip Project Officer
PO Box 200901 Helena, MT 59620-0901 (US Mail/USPS)
or
Sarah Seitz, DEQ Waste Management & Remediation
Colstrip Project Officer
1225 Cedar Street, Helena, MT 59601 (FedEx or UPS).

DEQ expects a stepwise process to revise and update the RD/RA remedial component design modifications and associated work plans. DEQ is requesting that Talen submit a RD/RA Workplan addendum with a Landfill Engineering Report and associated workplan documents as the appendices to

the Landfill Engineering Report within 60 days of receipt of this Decision Document as the first step of the process. DEQ understands that Talen is working to start construction in 2024 and will work closely with Talen to establish review time periods that are in compliance with those outlined in the AOC or expedited as necessary.

If you have any questions or need clarifications, please feel free to contact me at 406-444-6797 or Sarah.Seitz@mt.gov.

Thanks,

A handwritten signature in blue ink, appearing to read 'S Seitz', is positioned above the typed name.

Sarah Seitz
Environmental Project Officer
Cleanup, Protection & Redevelopment Section
Waste Management & Remediation Division
Ph: 406.444-6797 | Sarah.Seitz@mt.gov

Enclosures:

Final Decision Document including DEQ Public Comment Responsiveness Summary

CC:

Rick Thompson – DEQ

Glenn Logan, Scott Ward – Talen Energy

Mike Nolden, David Richardson, Robert Glazier, Carrie Pendleton, Meena Viswanath, Mehdi Khalili –
Geosyntec

Al Hilty, Rich Labbe – Hydrometrics

Amelia Tallman, Angela Lucero – GSI Environmental Inc.

Nancy Atwood, John Rork – Puget Sound Energy