



June 22, 2022

Gordon Criswell
Talen Montana
PO Box 38
Colstrip, Montana
(electronically delivered)

RE: DEQ's Approval of the Colstrip Steam Electric Station (SES) Units 3 & 4 Evaporation Holding Ponds (EHP) Revised Remedy Evaluation Report, April 2022, submitted by Talen Montana

Gordon,

On February 10, 2020, the Department of Environmental Quality (DEQ) conditionally approved the technologies and methods proposed for the Alternative 4 remedy based on the August 2019 Revised Units 3 & 4 EHP Remedy Evaluation Report (RER). The conditional approval was contingent upon Talen Montana completing additional sampling and treatability studies and addressing comments and contingencies associated with the August 2019 Revised RER and subsequent comments on an April 2021 Revised RER. Talen Montana addressed pertinent comments for the April 2021 Revised RER and is working on contingency studies. DEQ received a Revised RER on April 8, 2022, that addressed the comments and contingencies from the April 2021 Revised RER. DEQ has reviewed Talen Montana's April 2022 Revised RER and the associated response to comments. DEQ approves the April 2022 Revised RER and the selection of Alternative 4 to address groundwater contamination at Units 3 & 4 EHP. If implementation of the selected remedy, Alternative 4, does not demonstrate adequate remedial performance or separation between CCR waste and groundwater, DEQ will require Talen Montana to revisit or refine the selected remedy.

DEQ is requiring Talen Montana to continue addressing previously identified remedial design data gaps and studies (Table 1 and Table 2 of the DEQ Response to comments submitted to Talen Montana in February 2022 and responded to by Talen Montana in April 2022). The identified remedial design data gaps will be addressed in a Revised Remedial Design/Remedial Action (RD/RA) Work Plan design submittal. A Revised RD/RA Work Plan with updated design details and associated pilot studies to support that remedial design will be due following field work and data evaluation.

The Revised RD/RA Work Plan needs to include responses to the comments submitted by DEQ in the Revised RER Table 2 Response to Comments (DEQ, February 9, 2022) along with the results from the following studies or pilot project design work referenced as part of additional investigations or design components in Talen's Table 1 and Table 2 Response to Comments (Talen Montana, April 15, 2022):

- MNA Pilot Study
- PRB Pilot Study
- Small-Scale Pilot Test for Flushing/Capture System
- Underdrain operational evaluations

DEQ is aware that the majority of the noted studies are being completed in 2022 and anticipates receiving a Revised RD/RA Work Plan in early 2023. The RD/RA Work Plan submittal date should be discussed with DEQ and included in the schedule provided during the Annual Planning Meeting for the Colstrip SES remediation (anticipated in September 2022).

Please feel free to contact DEQ with any questions or clarifications at sarah.seitz@mt.gov or 406.444.6797.

Sincerely,



Sarah Seitz
Environmental Project Officer – Colstrip SES Remediation
Contaminated Site Cleanup Bureau

Cc (electronic):

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