



**CORRESPONDENCE COVER SHEET
WASTE PERMITS DIVISION
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

Date: May 5, 2022
 Facility Name: Twin Oaks Power Station CCR Landfill
 Permit or Registration No.: CCR112

Nature of Correspondence:
 Initial/New
 Response/Revision*

*If Response/Revision, please provide previous TCEQ Tracking No.: 27247279

(Previous TCEQ Tracking No. can be found in the Subject line of the TCEQ's response letter to your original submittal.)

This cover sheet should accompany all correspondences submitted to the Waste Permits Division and should be affixed to the front of your submittal as a cover page. Please check the appropriate box for the type of correspondence being submitted. For questions regarding this form, please contact the Waste Permits Division at (512) 239-2335.

Table 1 - Municipal Solid Waste

APPLICATIONS	REPORTS and RESPONSES
<input type="checkbox"/> New Notification	<input type="checkbox"/> Closure Report
<input type="checkbox"/> New Permit (including Subchapter T)	<input type="checkbox"/> Groundwater Alternate SRC Demonstration
<input type="checkbox"/> New Registration (including Subchapter T)	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Statistical Evaluation
<input type="checkbox"/> Limited Scope Major Amendment	<input type="checkbox"/> Landfill Gas Corrective Action
<input type="checkbox"/> Notice Modification	<input type="checkbox"/> Landfill Gas Monitoring
<input type="checkbox"/> Non-Notice Modification	<input type="checkbox"/> Liner Evaluation Report
<input type="checkbox"/> Transfer/Name Change Modification	<input type="checkbox"/> Soil Boring Plan
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Special Waste Request
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Other:
<input type="checkbox"/> Subchapter T Workplan	
<input type="checkbox"/> Other:	

Table 2 - Industrial & Hazardous Waste

APPLICATIONS	REPORTS and RESPONSES
<input checked="" type="checkbox"/> New	<input type="checkbox"/> Annual/Biennial Site Activity Report
<input type="checkbox"/> Renewal	<input type="checkbox"/> CfPT Plan/Result
<input type="checkbox"/> Post-Closure Order	<input type="checkbox"/> Closure Certification/Report
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Construction Certification/Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> Class 3 Modification	<input type="checkbox"/> Extension Request
<input type="checkbox"/> Class 2 Modification	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Class 1 ED Modification	<input type="checkbox"/> Interim Status Change
<input type="checkbox"/> Class 1 Modification	<input type="checkbox"/> Interim Status Closure Plan
<input type="checkbox"/> Endorsement	<input type="checkbox"/> Soil Core Monitoring Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Treatability Study
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Trial Burn Plan/Result
<input type="checkbox"/> 335.6 Notification	<input type="checkbox"/> Unsaturated Zone Monitoring Report
<input type="checkbox"/> Other:	<input type="checkbox"/> Waste Minimization Report
	<input type="checkbox"/> Other:



Eddy Young
Environmental Manager

P.O. Box 37
13065 Plant Rd.
Bremond, TX 76629
Tel: (254)342-3664
Eddy.young@mesquitegen.com

May 5, 2022

MC-130
Mr. Chris Shaw, Project Manager
Industrial and Hazardous Waste Permits Section
Waste Permits Division
Texas Commission on Environmental Quality
P. O. Box 13087
Austin, Texas 78711-3087

**RE: Response to TCEQ Technical NOD 1 Correspondence Dated April 21, 2022
Twin Oaks Power Station Coal Combustion Residuals Landfill
Major Oak Power, LLC
Bremond (Robertson County), Texas
CCR Registration No. CCR112
TCEQ SWR No. 37677; EPA ID No. TXD987997988
Tracking No. 27247279; RN100226570/CN604670034**

Dear Mr. Shaw:

The following information is provided on behalf of Twin Oaks Power Station Coal Combustion Residuals (CCR) Landfill (the facility), as a response to the above-referenced April 21, 2022 correspondence letter. For your convenience, comments from the TCEQ correspondence regarding the *Registration Application for Coal Combustion Residuals Waste Management*, dated January 12, 2022, are presented below (*in italics*) followed by the prepared response.

TCEQ Deficiency ID #1:

This application has been assigned the registration identification number CCR112. This ID number must be used when referencing this application in future correspondence.

Response:

Registration identification number CCR112 will be referenced in future correspondences.

TCEQ Deficiency ID #2:

Post the registration application, any registration application revisions, and any other information required to be posted.

Response:

The *Registration Application for Coal Combustion Residuals Waste Management* and subsequent revisions will be posted to the facility's website (<https://twinoakscrr.com/>).

TCEQ Deficiency ID #3:

Provide the correct EPA ID.

Response:

Scrivener/typographical errors occurred on the *Registration Application for Coal Combustion Residuals Waste Management*. It is noted that the final digit from the EPA ID sequence was removed. Note, the correct EPA ID No. is TXD987997988. We will ensure these oversights are remedied in future submittals.

TCEQ Deficiency ID #4:

Provide latitude and longitude in degrees/minutes/seconds.

Response:

The facility's latitude and longitude will be included as degrees/minutes/seconds formatting.

TCEQ Deficiency ID #5:

Revise the first column to replace the facility Solid Waste Registration No. (SWR) placed under "NOR No" with NOR No. 009. Note that the NOR No. should be 009 per Twin Oaks' Notice of Registration (NOR).

Response:

Table I.6 has been revised and is included herein.

TCEQ Deficiency ID #6:

Revise the first column (Waste Nos) of the table to assign a waste number sequentially for each waste stream to distinguish between two separate wastes (fly ash and bottom ash). Each waste stream should have a different number.

Response:

Table I.6.A has been revised and is included herein.

TCEQ Deficiency ID #7:

- a. *Revise the first column of the table, see ID # 6 above.*
- b. *Revise the third column of the table to provide the form and classification codes for each waste stream.*

Response:

Table I.6.B has been revised and is included herein.

TCEQ Deficiency ID #8:

- a. *Revise the first column of the table, see ID # 6 above.*
- b. *Provide information for Sampling Location, Sampling Method, Frequency, Parameter, Test Method, and Desired Accuracy Level.*

Response:

The facility does not sample ash as part of this registration application. Table I.6.C has been revised and is included herein.

TCEQ Deficiency ID #9:

Provide a property ownership affidavit. Although this affidavit is not specifically listed in the Registration form or instructions, it is prescribed information. We have attached for your assistance a sample affidavit for your use.

Response:

We have prepared the *Property Ownership Affidavit*. The document is attached herein.

TCEQ Deficiency ID #10:

Provide a one-page certificate of incorporation issued by the secretary of state to verify legal status, and a list of persons having over 20% ownership.

Response:

We have prepared the requested document providing verification of legal status. The document is attached herein.

TCEQ Deficiency ID #11:

Provide items 4, 5, 7, and 11 in Section II.

Response:

The Core Data Form has been revised and is included herein.

TCEQ Deficiency ID #12:

Provide item 21 in Section III.

Response:

The Core Data Form has been revised and is included herein.

TCEQ Deficiency ID #13:

Complete item 27 in Section III using degrees/minutes/seconds.

Response:

The Core Data Form has been revised and is included herein.

TCEQ Deficiency ID #14:

- a. *Provide the property ownership map to show all mineral interest ownership and mailing addresses under the facility's registration boundary.*
- b. *Provide a map showing the location of easement(s) within the facility registration boundary.*

Response:

The property ownership map provided in the January 12, 2022 package indicates the only property owner within the ¼ mile buffer is Major Oaks Power LLC. In addition, facility property documents are being reviewed to determine both easements and mineral interest ownership within the registration boundary and will be submitted once completed.

TCEQ Deficiency ID #15:

Provide supporting documentation for verification signed, sealed, and dated by an appropriate qualified professional (see Comment ID #16, below).

Response:

Supporting documentation for Application Subsection Item No. 25 (40 CFR §257.70 and 30 TAC 352, Subchapter F) as it pertains to the existing CCR landfill are provided on CCR Registration No. CCR112 Application page 7 (Landfill Criteria) and Tables IV.A, IV.B and IV.C (Attachment No. 1).

The existing landfill does not have a leachate collection or removal system. Further, the Run-on and Run-off Controls Plan (Item No. 25E) and Inspection for Landfills (Item No. 25F) are provided in the registration application.

There are no CCR impoundments at this site.

TCEQ Deficiency ID #16:

Provide for all engineering and geoscientific information submitted to be prepared by, or under the supervision of a licensed professional engineer or licensed professional geoscientist, and signed, sealed, and dated by qualified professionals as required by the Texas Engineering Practice Act and the Texas Geoscience Practice Act, and the licensing and registration boards under these acts.

Response:

All prepared documents requiring a licensed professional engineer or geoscientist have been signed, sealed, and dated by a qualified professional, as appropriate.

TCEQ Deficiency ID #17:

- a. *Provide control measures to minimize CCR waste from becoming airborne during transport to on-site disposal.*
- b. *Provide the source for the water used for dust suppression.*

Response:

a. Existing control measures to minimize fugitive dust during transport for fly ash includes moisture conditioning of the fly ash (processed moisture contents ranging from 25 to 30 percent) prior to loading and transport. Moisture conditioning of by-product coupled with reduced haul road speeds prevent wind dispersal during transport and unloading into the landfill.

Upon discharge from the submersible scraper conveyor, the bottom ash has inherently high moisture content preventing fugitive dust during transport and disposal processes.

b. The source water used to condition ash by-product includes collected stormwater runoff and cooling tower blow-down water. The use of process wastewater for plant dust suppression including moisture conditioning of ash by-product are authorized in TPDES Permit No. WQ0002877000 (Other Requirements 10 – 12).

TCEQ Deficiency ID #18:

Specify the curing time for the ash by-product disposed of in the CCR landfill and indicate the control measures that are taken such that the ash by-product does not become airborne during this curing time.

Response:

Moisture conditioning of ash by-products results in the hydration of and subsequent cementation of the material. Landfilled by-products are spread in thin lifts and compacted using a smooth drum roller. Additional water is applied during and after placement to minimize fugitive dust.

Curing times vary dependent on by-product and ambient conditions during disposal. However, hydration (via moisture conditioning) of the by-product immediately starts the cementation process forming a stabilized mass and hardened surface crust typically within six (6) to eight (8) hours upon placement.

Included with this submittal is a ~~strikeout~~/redline copy of the revised pages indicating necessary changes, where applicable, and an unmarked copy of the revised pages suitable for insertion into the Registration Application for Coal Combustion Residuals Waste Management. We trust you will find this information sufficiently thorough and acceptable.

Should you have any questions, please feel free to contact me at (254) 342-3664 or via email at Eddy.Young@mesquitegen.com.

Sincerely,



Eddy Young
Environmental Manager

Attachments:

Attachment A	Replacement Pages Showing Changes Strikeout / <u>Redline</u>
Attachment B	Unmarked Replacement Pages

Distribution:

(E-Copy)	MC-130 Mr. Chris Shaw, Project Manager Industrial and Hazardous Waste Permits Waste Permits Division Texas Commission on Environmental Quality P. O. Box 13087 Austin, Texas 78711-3087
(1 + E-Copy)	Mr. Eddy Young Environmental Manager Twin Oaks P.O. Box 37 Bremond, Texas 76629
(E-Copy)	Mr. John J. Tayntor, P.E. Auckland Consulting, LLC P.O. Box 8155 Jacksonville, Texas 75766
(E-Copy)	Hydrex Environmental

Attachment A
Replacement Pages Showing Changes
~~Strikeout~~/Redline



Texas Commission on Environmental Quality

Registration Application for Coal Combustion Residuals (CCR) Waste Management

I. General Information

1. Reason for Submittal

Type of Registration Application

- New Major Amendment Minor Amendment
- Notice of Deficiency (NOD) Response Transfer Name Change
- Other

2. Application Fees

\$150 Application Fee

Payment Method

Check Online through ePay portal <www3.tceq.texas.gov/epay/>

If paid online, enter ePay Trace Number: 582EA000468872

3. Facility Information

Facility information must match regulated entity information on the Core Data Form.

Applicant: Owner Operator Owner/Operator

Facility TCEQ Solid Waste Registration No: 37677

Facility EPA ID: TXD987997988

Regulated Entity Reference No. (if issued): RN 100226570

Facility Name: Twin Oaks

Facility (Area Code) Telephone Number: 254-342-3664

Facility physical street address (city, state, zip code, county): 13065 Plant Road, Bremond, TX 76629

Facility mailing address (city, state, zip code, county): P.O. Box 37, Bremond, TX 76629

Latitude (Degrees, Minutes Seconds): ~~31.096425~~ 31° 5' 47.1294"

Longitude (Degrees, Minutes Seconds): ~~-94.685454~~ -94° 41' 7.6338"

Attachment B
Unmarked Replacement Pages



Texas Commission on Environmental Quality

Registration Application for Coal Combustion Residuals (CCR) Waste Management

I. General Information

1. Reason for Submittal

Type of Registration Application

- New Major Amendment Minor Amendment
 Notice of Deficiency (NOD) Response Transfer Name Change
 Other

2. Application Fees

\$150 Application Fee

Payment Method

Check Online through ePay portal <www3.tceq.texas.gov/epay/>

If paid online, enter ePay Trace Number: 582EA000468872

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Facility information must match regulated entity information on the Core Data Form.

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Facility Name: Twin Oaks

Facility (Area Code) Telephone Number: 254-342-3664

Facility physical street address (city, state, zip code, county): 13065 Plant Road, Bremond, TX 76629

Facility mailing address (city, state, zip code, county): P.O. Box 37, Bremond, TX 76629

Latitude (Degrees, Minutes Seconds): 31° 5' 47.1294"

Longitude (Degrees, Minutes Seconds): 94° 41' 7.6338"

Table I.6.C - Sampling and Analytical Methods

Waste No. ¹	Sampling Location	Sampling Method	Frequency	Parameter	Test Method	Desired Accuracy Level
0007	N/A	N/A	N/A	N/A	N/A	N/A

¹ from Table I.6.A., first column

N/A - Not applicable, the facility does not sample ash. Landfilled CCR material is from a single source.

Property Owner Affidavit

"I/We, William Lee Davis, as Chief Executive Officer

(Printed Signatory Name)

(Signatory Capacity)

As authorized signatory for Major Oak Power, LLC

(Printed Name of Property Owner of Record)

Acknowledge that the State of Texas may hold the property owner of record either jointly or severally responsible for the operation, maintenance, and closure and post-closure care of the facility. I further acknowledge that I or the operator and the State of Texas shall have access to the property during the active life and post-closure care period, if required, after closure for the purpose of inspection and maintenance."



(Property Owner's Signature)

April 30, 2022

(Date)



Office of the Secretary of State

Certificate of Fact

The undersigned, as Secretary of State of Texas, does hereby certify that the document, Application for Registration for Major Oak Power, LLC (file number 802044923), a DELAWARE, USA, Foreign Limited Liability Company (LLC), was filed in this office on August 13, 2014.

It is further certified that the entity status in Texas is in existence.

In testimony whereof, I have hereunto signed my name officially and caused to be impressed hereon the Seal of State at my office in Austin, Texas on April 28, 2022.



A handwritten signature in black ink, appearing to read "John B. Scott".

John B. Scott
Secretary of State



TCEQ Use Only

TCEQ Core Data Form

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission <i>(If other is checked please describe in space provided.)</i>		
<input checked="" type="checkbox"/> New Permit, Registration or Authorization <i>(Core Data Form should be submitted with the program application.)</i>		
<input type="checkbox"/> Renewal <i>(Core Data Form should be submitted with the renewal form)</i>	<input type="checkbox"/> Other	
2. Customer Reference Number <i>(if issued)</i>	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number <i>(if issued)</i>
CN 604670034		RN 100226570

SECTION II: Customer Information

4. General Customer Information	5. Effective Date for Customer Information Updates (mm/dd/yyyy)		5/5/2022	
<input type="checkbox"/> New Customer		<input checked="" type="checkbox"/> Update to Customer Information		<input type="checkbox"/> Change in Regulated Entity Ownership
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)				
<i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i>				
6. Customer Legal Name <i>(If an individual, print last name first: eg: Doe, John)</i>			<i>If new Customer, enter previous Customer below:</i>	
Major Oak Power, LLC				
7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits)	9. Federal Tax ID (9 digits)	10. DUNS Number <i>(if applicable)</i>	
0802044923	32054876951	47-1089604	07-951-0307	
11. Type of Customer:	<input type="checkbox"/> Corporation	<input type="checkbox"/> Individual	Partnership: <input type="checkbox"/> General <input type="checkbox"/> Limited	
Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> State <input type="checkbox"/> Other	<input type="checkbox"/> Sole Proprietorship		<input checked="" type="checkbox"/> Other: Limited Liability Company	
12. Number of Employees		13. Independently Owned and Operated?		
<input type="checkbox"/> 0-20 <input checked="" type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input type="checkbox"/> 501 and higher		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following				
<input type="checkbox"/> Owner		<input type="checkbox"/> Operator		<input checked="" type="checkbox"/> Owner & Operator
<input type="checkbox"/> Occupational Licensee		<input type="checkbox"/> Responsible Party		<input type="checkbox"/> Voluntary Cleanup Applicant <input type="checkbox"/> Other:
15. Mailing Address:	P.O. Box 37			
	City	Bremond	State	TX
	ZIP	76629	ZIP + 4	
16. Country Mailing Information <i>(if outside USA)</i>			17. E-Mail Address <i>(if applicable)</i>	
			eddy.young@mesquitegen.com	
18. Telephone Number		19. Extension or Code		20. Fax Number <i>(if applicable)</i>
(254) 342-3664				(254) 746-7159

SECTION III: Regulated Entity Information

21. General Regulated Entity Information <i>(If 'New Regulated Entity' is selected below this form should be accompanied by a permit application)</i>	
<input type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input checked="" type="checkbox"/> Update to Regulated Entity Information	
<i>The Regulated Entity Name submitted may be updated in order to meet TCEQ Agency Data Standards (removal of organizational endings such as Inc, LP, or LLC).</i>	
22. Regulated Entity Name <i>(Enter name of the site where the regulated action is taking place.)</i>	
Twin Oaks	

23. Street Address of the Regulated Entity: <i>(No PO Boxes)</i>	13065 Plant Road						
	City	Bremond	State	TX	ZIP	76629	ZIP + 4
24. County	Robertson						

Enter Physical Location Description if no street address is provided.

25. Description to Physical Location:								
26. Nearest City	Bremond				State	TX	Nearest ZIP Code	76629
27. Latitude (N) In Decimal:	31.096425			28. Longitude (W) In Decimal:	-94.685454			
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds			
31	5	47.1294	-94	41	7.6338			
29. Primary SIC Code (4 digits)	30. Secondary SIC Code (4 digits)	31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)				
4911		221121						
33. What is the Primary Business of this entity? <i>(Do not repeat the SIC or NAICS description.)</i>								
Electric Bulk Power Transmission and Control								
34. Mailing Address:	P.O. Box 37							
	City	Bremond	State	TX	ZIP	76629	ZIP + 4	
35. E-Mail Address:	eddy.young@mesquitegen.com							
36. Telephone Number	37. Extension or Code			38. Fax Number <i>(if applicable)</i>				
(254) 342-3664				(254) 746-7159				

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

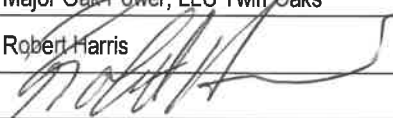
<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input type="checkbox"/> Emissions Inventory Air	<input checked="" type="checkbox"/> Industrial Hazardous Waste
				37677
<input type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> New Source Review Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Waste Water	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:

SECTION IV: Preparer Information

40. Name:	Michelle K. Transier	41. Title:	Senior Geologist
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address
(936) 568-9451		(936) 568-9527	mtransier@hydrex-inc.com

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	Major Oak Power, LLC Twin Oaks	Job Title:	General Manager
Name <i>(In Print)</i> :	Robert Harris	Phone:	(281) 541- 5995
Signature:		Date:	5/5/2022