



November 30, 2020

RE: Green Surface Impoundment (AI#4196) at the R.D. Green Coal-Fired Generating Station. First Annual Progress Report as required by 40 CFR § 257.103(c)(2) of the Coal Combustion Residual Rule (April 17, 2015).

In accordance with the final Coal Combustion Residual (CCR) rule published in the Federal Register on April 17, 2015 ("2015 CCR Rule"), a notification of intent to close the Green Surface Impoundment under the alternative closure requirements found at 40 CFR § 257.103(a)(1) was posted on the Big Rivers Electric Corp. (BREC) CCR compliance website on October 31, 2019. Pursuant to this notification, BREC planned to continue to manage CCR material in the Green Surface Impoundment due to an absence of available alternative disposal capacity, as allowed under 40 C.F.R. § 257.103(a)(1) of the 2015 CCR Rule, while the facility made plans to convert to a dry bottom ash handling system.

Since the October 31, 2019 notification was posted, the United States Environmental Protection Agency ("EPA") amended the alternative closure regulations at 40 CFR § 257.103. In addition, BREC has decided to cease coal-fired operations at R.D. Green Station rather than convert to a dry bottom ash handling system. BREC filed a Closure Extension Demonstration with the EPA on November 25, 2020. This demonstration requested approval to complete closure of the Green Surface Impoundment under the conditions of 40 CFR § 257.103(f)(2) (*Permanent cessation of a coal-fired boiler(s) by a certain date)* as allowed by the Part A CCR Rule that was published in the Federal Register on August 28, 2020.

The Green Station Closure Extension Demonstration was posted on the BREC CCR compliance website on November 25, 2020. The original § 257.103 notification (October 31, 2019) was moved to the archive folder on the BREC website since it is no longer applicable to the plans at this facility.