

APPENDIX L

**DOCUMENTATION FROM VISTRA ENERGY CORPORATION
FOR PROPERTY BOUNDARIES**

Rusk-Panola Attainment Demonstration State
Implementation Plan for the 2010 Sulfur Dioxide
National Ambient Air Quality Standard

Project Number 2020-057-SIP-NR
SFR-122/2020-057-SIP-NR

This page intentionally left blank

APPENDIX L-1: DOCUMENTATION OF MARTIN LAKE PROPERTY BOUNDARIES

Appendix L-1 includes the document, “Property Line Discussions, Martin Lake Steam Electric Station” that was provided to the Texas Commission on Environmental Quality (TCEQ) by Vistra Energy Corporation on April 23, 2021. The document includes photographic evidence of the measures that are currently in place to secure the property boundary of the Martin Lake Steam Electric Station from public access.

Property Line Discussions

Martin Lake Steam Electric Station

Updated April 2021



Luminant



Legend:

Blue – denotes existing fencing

Yellow – denotes existing and/or proposed signage

Martin Lake Plant – Railroad Overpass FM2658

Railroad Overpass over FM 2658 looking North (Point ML1)



Martin Lake Plant – Railroad Overpass FM2658

Railroad Overpass over FM 2658 looking North- left picture of gate on SE side of overpass #17, right picture of gate on SW side of overpass #18. (Points ML2, ML3)



Martin Lake Plant – Main Entrance

Main Entrance to Security Guard Checkpoint-View looking towards plant entrance from FM 2658 (Point ML4)



Martin Lake Plant – Main Entrance

Main Entrance Security Guard Checkpoint-View looking out from plant to entrance from FM 2658 Highway. Security Checkpoint staffed 24 hours per day, security badge required for entering and exiting security checkpoint (Point ML5)



Martin Lake Plant – Employee Park Entrance

Main Entrance to Company Park-Located between FM 2658 and Main Security Checkpoint- Normally, requires Company issued security badge for entry but closed due to COVID 19 security protocols. Family of Employees are allowed to accompany employees. (Point ML6)



Martin Lake Plant – Contractor Gate

Contractor Guard Gate Entrance off of FM 2658 (ML7)



Martin Lake Plant – Oncor Easement

Restricted access into Oncor 345KV powerline

View looking toward plant from FM 2658 Highway (Point ML8)



Martin Lake Plant – Intake Channel

Power Plant Raw Water Intake Channel and Railroad Bridge Crossing of Intake Channel
View looking from Plant toward Martin Lake (Point ML9)



Martin Lake Plant – Intake Channel

Power Plant Raw Water Intake Channel and Railroad Bridge Crossing of Intake Channel
View looking along Railroad Bridge toward FM 2658 Highway (Point ML10)



Martin Lake Plant – Peninsula

Peninsula/Island South of Power Plant-Restricts access from Lake to Power Plant Facility
View looking From Plant toward Peninsula/Island (Point ML11)



Martin Lake Plant – Discharge Canal

Buoys preventing entrance into Water Discharge Channel from Power Plant
View looking toward FM 2658 Highway (Point ML12)



Martin Lake Plant – Discharge Canal

Fence preventing water access into Water Discharge Channel from Power Plant

View looking upstream from buoys toward the Plant (Point ML13)



Martin Lake Plant – Discharge Canal

Structure preventing water access into Water Discharge Channel from Power Plant

View looking toward plant upstream from buoys and fence (Point ML14)



APPENDIX L-2: DOCUMENTATION OF LIBERTY MINE PROPERTY BOUNDARIES

Appendix L-2 includes the document, "Property Line Discussions, Liberty Mine," provided to the TCEQ by Vistra Energy Corporation on April 23, 2021. The document includes photographic evidence of the measures that are currently in place to secure the property boundary of Liberty Mine from public access.

Property Line Discussions

Liberty Mine

Updated April 2021



Luminant

Liberty Mine - North



- Legend:
- Pink – denotes property boundary
 - Blue – denotes existing fencing
 - Yellow – denotes existing and/or proposed signage

Liberty Mine - North



- Legend:
- Pink – denotes property boundary
 - Blue – denotes existing fencing
 - Yellow – denotes existing and/or proposed signage

Liberty Mine - South



- Legend:
- Pink – denotes property boundary
 - Blue – denotes existing fencing
 - Yellow – denotes existing and/or proposed signage

Liberty Mine - South



Legend:

Pink – denotes property boundary

Blue – denotes existing fencing

Yellow – denotes existing and/or proposed signage

Liberty Mine – Main Entrance

Liberty Mine Guard Gate at CR 2138 (Point LM1)



Liberty Mine – Railroad Underpass CR 2138

Railroad under CR2138 (Points LM2)



Liberty Mine – Signage along CR 2145D

Liberty Mine North permit boundary at CR 2145D (Point LM3)



Liberty Mine – Property Gate/Fencing

North permit boundary on west side of CR 2145D (Point LM4)



Liberty Mine – Property Gate/Fencing

North permit boundary at end of CR 2145D (Point LM5)



Liberty Mine – Property Gate/Fencing

Liberty Mine Gate at FM 2658 (Point LM6)



Liberty Mine – N-3 Pond

Restricted access into N-3 pond, north and south gate access

View looking toward Martin Lake from FM 2658 Hwy (Points LM7 and LM8)



Liberty Mine – N-3 Pond

Liberty Mine Perimeter Gate L7 looking north (LM7-1)



Liberty Mine – N-3 Pond

Liberty Mine Perimeter Gate L7 looking north (LM7-2)



Liberty Mine – N-3 Pond

Liberty Mine Perimeter Gate L7 from FM 2658 (LM7-3)



Liberty Mine – N-3 Pond

Liberty Mine Perimeter Gate L7 looking south (LM7-4)



Liberty Mine – N-3 Pond

Liberty Mine Perimeter Gate L7 looking south (LM7-5)



Liberty Mine – N-3 Pond

Liberty Mine Perimeter Gate L7 looking south (LM7-6)



Liberty Mine – N-3 Pond

Liberty Mine Perimeter Gate L7-L9 midpoint looking east (LM7-7)



Liberty Mine – N-3 Pond

Liberty Mine Perimeter Gate L7-L9 midpoint looking southeast (LM7-8)



Liberty Mine – N-3 Pond

Liberty Mine Perimeter Gate L9, looking north (LM7-9)



Liberty Mine – N-3 Pond

Liberty Mine Perimeter Gate L9, looking north (LM7-10)



Liberty Mine – N-3 Pond

Liberty Mine Perimeter Gate L9, looking north (LM7-11)



Liberty Mine – N-3 Pond

Liberty Mine Perimeter Gate L9 (LM7-12)



Liberty Mine – N-3 Pond

Liberty Mine Perimeter Gate L9, looking south (LM7-13)



Liberty Mine – Property Gate/Fencing

Liberty Mine Gate at FM 2658 (Point LM9)



Liberty Mine – Fencing

Restricted access showing typical perimeter fencing

View looking toward Martin Lake from FM 2658 Hwy (LM10)



Liberty Mine – Property Gate/Fencing

Liberty Mine Gate at FM 2658, entry to gas well off old FM 2658 (Point LM11)



Liberty Mine – Property Gate/Fencing

Liberty Mine looking north at west right of way fence of old FM 2658 (Point LM12)



Liberty Mine – Property Gate/Fencing

Liberty Mine looking west at west right of way fence of old FM 2658, gate was removed and wire existing from H-brace to H-brace (Point LM13)



Liberty Mine – Property Gate/Fencing

Liberty Mine looking north at north end of abandoned FM 2658, four-foot-tall berm creates barrier from accessing mine property (Point LM14)



Liberty Mine – Property Gate/Fencing

Liberty Mine Gate at FM 2658 (Point LM15)



Liberty Mine – Property Gate/Fencing

Liberty Mine Gate at FM 2658 – Lake Side of Highway (Point LM16)



Liberty Mine – Property Gate/Fencing

Liberty Mine Gate at FM 2658 (Point LM17)



Liberty Mine – Property Gate/Fencing

Gate at FM 2658 (lake side of highway)- (Point LM18)



Liberty Mine – Property Gate/Fencing

Liberty Mine Gate at FM 2658 (Point LM19)



Liberty Mine – Property Gate/Fencing

Liberty Mine Gate at FM 2658 (Point LM20)



Liberty Mine – Property Gate/Fencing

Liberty Mine Gate at FM 2658 (Point LM20.5)



Liberty Mine – Property Gate/Fencing

Liberty Mine Gate at FM 2658 (Point LM21)



Liberty Mine – Property Gate/Fencing

Liberty Mine Gate at FM 2658 (Lake side of highway) - (Point LM22)



Liberty Mine – Property Gate/Fencing

Liberty Mine Gate at FM 2658 - (Point LM22.5)



Liberty Mine – Property Gate/Fencing

Liberty Mine Gate at FM 2658 - (Point LM23)



Liberty Mine – Property Gate/Fencing

Liberty Mine Typical Fence at FM 2658 - (Point LM24 and LM25)



Liberty Mine – Property Gate/Fencing

Southernmost point of Liberty Mine, looking at west right of way fence of FM 2658 (Point LM26)



Liberty Mine – Property Gate/Fencing

Southern point of Liberty Mine, looking south at gate at abandoned section of FM 2658 (Point LM27)



Liberty Mine – Property Gate/Fencing

Southern point of Liberty Mine, looking southwest at west right of way fence of abandoned section of FM 2658 Hwy-(Point LM28)



Liberty Mine – Property Gate/Fencing

Southern point of Liberty Mine, looking southeast at east right of way fence of abandoned section of FM 2658 Hwy-(Point LM29)



Liberty Mine – Property Gate/Fencing

Gate on FM 1251 - (Point LM30)



Liberty Mine – Property Gate/Fencing

Gate on CR 392 - (Point LM32)



Liberty Mine – Property Gate/Fencing

Gate on CR 392 - (Point LM32)



Liberty Mine – Property Line

Property Line Looking East - (Point LM33)



Liberty Mine – Property Line

Property Line Looking Northwest at Corner of Property - (Point LM34)



Liberty Mine – Property Line

Property Line Looking North at Corner of Property - (Point LM35)



Liberty Mine – Property Line

Property Line Northwest at Corner of Property - (Point LM36)



APPENDIX L-3: LETTER FROM VISTRA TO THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix L-3 includes a letter and attachments from Vistra Energy Corporation (Vistra) to the United States Environmental Protection Agency (EPA) describing the planned actions to secure the property boundaries shown in Appendices L-1: *Documentation of Martin Lake Property Boundaries* and L-2: *Documentation of Liberty Mine Property Boundaries* against public access. The letter was emailed to the TCEQ and to the EPA's Region Six office from a representative of Vistra on August 9, 2021.



Luminant

Renee Collins
Sr. Director
Environmental Services
Renee.Collins@luminant.com

Luminant
6555 Sierra Drive
Irving, TX 75039

T 214.875-8338
C 214.406.2452
F 214.875-8699

August 9, 2021

Mr. Erik Snyder
EPA Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

Re: Property Boundary Request
Martin Lake Steam Electric Station
Luminant Generation Company LLC

Dear Mr. Snyder:

Luminant Generation Company LLC (Luminant) is submitting this letter and attachments to itemize for EPA Region 6 the proposed additional signage and security patrols associated with the Martin Lake Steam Electric Station (Martin Lake) and Liberty Mine. This letter provides documentation of non-ambient air surrounding the plant.

All of the fencing and signage, as well as security patrol updates, will be in place no later than the date by which the State of Texas is required to demonstrate compliance with the 2010 1-hour SO₂ NAAQS for the Rusk-Panola SO₂ Nonattainment Area.

We appreciate the guidance and feedback received to date and believe that the current practices, supplemented by the additional steps described below, satisfy the guidance for identifying non-ambient air.

Fencing and Signage.

Along with other security measures discussed below, the Martin Lake and Liberty Mine properties employ a combination of fencing and signage to limit access. Attachment 1 to this letter outlines areas that are currently fenced, as well as wooded and non-wooded areas where additional signage will be implemented.

Note that as operations progress the distinction between wooded and non-wooded areas may change. As installation of the additional signage begins, Luminant may decide to fence or repair fencing in certain areas, clear land to change the category depicted in Attachment 1, and/or place signage in areas closer to the actual property line than is depicted in Attachment 1.

The following depicts the current and/or proposed supplemental signage:

- No trespassing or private property signs are installed along the fenced areas. Additional signs will be installed such that signs will be placed at least every 1,000 feet.
- No Trespassing Signs are installed along portions of the non-wooded areas. Additional signs will be installed such that signs will be placed at least every 200 feet.
- No Trespassing Signs are installed along portions of the wooded areas. Additional signs will be installed such that signs will be placed at least every 100 feet.

Mr. Erik Snyder
August 9, 2021
Page 2

Security.

Additional internal security checks will be added along non-fenced areas. Attachment 2 outlines the existing and new internal and external security checks. These points will be visited at least twice a day to ensure that no intruders or signs of intruders are present. Logs will be kept and made available for inspection, upon request. As requested, Luminant will provide EPA with a general route of patrols as part of a follow-up package.

Please do not hesitate to contact me at (214) 875-8338 or via email at Renee.Collins@luminant.com, if you have any questions.

Sincerely,




Renee Collins

ATTACHMENT 1 - FENCING AND SIGNAGE

ATTACHMENT 1 – MARTIN LAKE PLANT



Legend:

-  Fencing
-  Wooded Area
-  Non-Wooded Area

ATTACHMENT 1 – LIBERTY MINE



Legend:

-  Fencing
-  Wooded Area
-  Non-Wooded Area

ATTACHMENT 1 – LIBERTY MINE



Legend:

-  Fencing
-  Wooded Area
-  Non-Wooded Area

ATTACHMENT 2 - SECURITY CHECKPOINTS

ATTACHMENT 2 – MARTIN LAKE PLANT



Legend:

- Internal Patrol
- External Patrol

ATTACHMENT 2 – LIBERTY MINE



Legend:

- Internal Patrol (Orange circle)
- External Patrol (Red circle)

© 2021 Google

Google

ATTACHMENT 2 – LIBERTY MINE



Legend:

- Internal Patrol
- External Patrol