



NRG Energy, Inc.  
910 Louisiana St.  
Houston, TX 77002

**BY EMAIL AND CERTIFIED MAIL -- RETURN RECEIPT REQUESTED**

October 13, 2021

Mr. Toby Baker  
Executive Director  
Texas Commission on Environmental Quality, MC 109  
P.O. Box 13087  
Austin TX 78711-3087

**Subject: Limestone Electric Generating Station  
USEPA's Final Steam Electric Reconsideration Rule  
Initial Notification of Planned Participation  
TPDES Permit No. WQ0002430000  
TCEQ Customer Reference No. CN603207218  
TCEQ Regulated Entity No. RN100542927**

Dear Mr. Baker:

NRG Texas Power LLC ("NRG Texas") plans to comply with the discharge of bottom ash transport water to surface waters of the state in accordance with USEPA's Final Steam Electric Reconsideration Rule (ELG Rule), effective December 14, 2020, at the Limestone Electric Generating Station (Limestone) located in Limestone County, Texas.<sup>1</sup> The ELG rule provides multiple compliance pathways listed in 40 CFR 423.13, including an ELG-compliant bottom ash system with up to 10% purge (§423.13(k)(2)(i)), permanent cessation of coal burning activities due to retirement or repowering (§423.13(k)(2)(ii)), or low utilization electric generating units (§423.13(k)(2)(iii)).

In its application, NRG Texas has requested a December 31, 2025 TCEQ-determined compliance date for Part 423 and a 10% bottom ash purge water allowance and is working diligently on that compliance path. However, if conditions change prior to the compliance date (for example, if there are market disruptions or substantial changes in regulatory backdrops) and cessation of coal combustion is warranted, NRG Texas intends that it would cease coal combustion at Limestone no later than December 31, 2028. NRG Texas will provide annual updates on its compliance path, and if that path changes to cessation of coal combustion, will include updates on the related schedule and milestones in its annual update. In addition, NRG Texas would file for any necessary changes to its permit to reflect this compliance path.

If you have any questions, do not hesitate to contact me at (713) 537-2776 or by email at [craig.eckberg@nrg.com](mailto:craig.eckberg@nrg.com).

Sincerely,

Craig Eckberg  
Sr. Director, Environmental Services  
NRG Energy, Inc.

cc: Mr. Matthew Udenenwu, Water Permits Division Director, TCEQ, Austin

<sup>1</sup> Limestone does not discharge FGD wastewater.