



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

**CERTIFIED MAIL -- RETURN RECEIPT REQUESTED**

December <sup>21</sup>~~7~~, 2023

Mr. Matthew Udenenwu  
Manager, Water Permitting Section  
Texas Commission on Environmental Quality, MC 148  
P.O. Box 13087  
Austin, TX 78711-3087

Subject: Limestone Electric Generating Station  
USEPA's Final Steam Electric Reconsideration Rule  
Planned Participation Progress Report  
TPDES Permit No. WQ0002430000

Dear Mr. Udenenwu:

NRG Texas Power LLC ("NRG Texas") plans to comply with the discharge of bottom ash transport and Flue Gas Desulfurization (FGD) 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 located in Limestone County, Texas. 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)) and FGD water effluent limits (§423.13(g)(1)), permanent cessation of coal burning activities due to retirement or repowering (§423.13(k)(2)(ii), (g)(2)(i)), or low utilization electric generating units (§423.13(k)(2)(iii), (g)(2)(iii)).

NRG Texas is working diligently on an ELG Rule compliance path for Limestone. As such, NRG Texas has yet to establish milestones concerning cessation of coal combustion. Please refer to the attachment for updates related to milestones as identified in the original Notice of Planned Participation. NRG Texas will continue to provide annual updates on its compliance path. If conditions change prior to the compliance date and cessation of coal combustion is warranted, NRG Texas 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.

## Limestone Electric Generating Station

In accordance with 40 CFR 423.19(f)(1) and TPDES Permit No. WQ0002430000, NRG Texas Power LLC (NRG Texas) is providing requested information to clarify interim milestones and projected dates of completion for the installation of an ELG-compliant bottom ash system or, in the alternative, if prompted by new circumstances, cessation of coal combustion.

1. Electric Generating Units intending to achieve permanent cessation of coal combustion:  
No changes as of December 2023  
Neither Unit 1 nor Unit 2 currently intends to cease burning coal.
2. Expected date that each electric generating unit is projected to achieve permanent cessation of coal combustion:  
No changes as of December 2023  
Neither Unit 1 nor Unit 2 currently intends to cease burning coal.
3. Whether each date represents a retirement or a fuel conversion:  
No changes as of December 2023  
Neither Unit 1 nor Unit 2 currently intends to cease burning coal.
4. Whether each retirement or fuel conversion has been approved by a regulatory body:  
No changes as of December 2023  
NRG Texas does not currently intend to cease burning coal, approval for retirement or fuel conversion has not been sought for either Unit 1 or Unit 2.
5. What the regulatory body is: No changes as of December 2023.  
Electric Reliability Council of Texas (ERCOT) and Public Utility Commission of Texas (PUCT).  
NRG Texas intends to be ELG compliant by the end of 2025; NRG Texas has not notified either the Electric Reliability Council of Texas or the Public Utility Commission of Texas.
6. The NOPP shall also include, for each such generating unit, a timeline to achieve the permanent cessation of coal combustion. Each timeline shall include interim milestones and the projected dates of completion. Note the timeline below also includes interim milestones and projected dates of completion for the installation of an ELG-compliant bottom ash system.

Action	Estimated Timeline	Interim Milestones
Further advance from preliminary engineering to the full engineering and design process for the implementation of the ELG-compliant technology	On or before January 31, 2022	Scope is being developed for maintenance to existing system and funding has been secured.
Submit an annual progress report required by 40 CFR 423.19(f)(3) and/or a status report on the engineering and design process for the	Beginning December 31, 2022	Formal engineering has started to ensure required maintenance to bottom ash system will

implementation of the ELG-compliant technology		achieve compliance with current ELG rule.
Submit an annual progress report required by 40 CFR 423.19(f)(3) and/or a status report on the engineering and design process for the implementation of the ELG-compliant technology	Beginning December 31, 2023	Engineering is in the process of identifying flow meters and installation locations to support monitoring for the 10%, 30-day rolling average for BA purge allowance. Station is budgeting for additional BA system upgrades to ensure compliance.
Submit an annual progress report required by 40 CFR 423.19(f)(3) OR documentation informing the Agency of the status to complete and operate the ELG-compliant technology	Beginning December 31, 2024	Anticipate to have completed by the listed date.
Submit an annual progress report required by 40 CFR 423.19(f)(3) OR comply with the ELG requirements with the ELG-compliant technology	Beginning December 31, 2025	Anticipate to have completed by the listed date.
Submit an annual progress report required by 40 CFR 423.19(f)(3), if applicable	December 31, 2026	To be determined
Submit an annual progress report required by 40 CFR 423.19(f)(3), if applicable, including a copy of any notice submitted to ERCOT or the PUCT, as relevant	December 31, 2027	To be determined
Cease coal-fired operations of Units 1 and 2, if applicable	No later than December 31, 2028	To be determined