



NRG Texas Power LLC  
910 Louisiana St.  
Houston, TX 77002

**Via EMAIL AND CERTIFIED MAIL**

January 20, 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 not established 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 a change in compliance paths.

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. NRG Texas, if prompted by new circumstances, would like to preserve the option to cease coal combustion by 2028.

1. Electric Generating Units intending to achieve permanent cessation of coal combustion:  
No changes as of December 2022. 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 2022, Neither,  
Unit 1 nor  
Unit 2 intends to cease burning coal as each intends to be ELG compliance by the end of 2025.
3. Whether each date represents a retirement or a fuel conversion:  
No changes as of December 2022. 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 2022. NRG Texas does not currently intend to cease burning coal so 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 2022  
Electric Reliability Council of Texas (ERCOT), Public Utility Commission of Texas (PUCT)  
  
As 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 is currently being 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 implementation of the ELG-compliant technology	Beginning December 31, 2022	Formal engineering has started to ensure required maintenance to bottom ash system will 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	Anticipate to have completed by the listed date.
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	Not applicable