

CERTIFICATION

CCR Surface Impoundment Closure Certification Unit 003 – Secondary E Pond Limestone Electric Generating Station

NRG initiated closure of the Secondary E Pond at the Limestone Electric Generating Station (Station) in accordance with 40 CFR 257.102 of the Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule (CCR Rule). The closure was performed through removal of CCR and decontamination of affected soils in accordance with 40 CFR 257.102(c) and *Amendment 2 – CCR Surface Impoundment Closure Plan* (TRC, September 2020). All CCR materials were removed from the Secondary E Pond and disposed in the Unit 004 CCR Landfill at the Station in accordance with 40 CFR 257.102 and *Amendment 2 – CCR Surface Impoundment Closure Plan*. Pursuant to *Amendment 2 – CCR Surface Impoundment Closure Plan*, CCR removal was confirmed through visual observations of the Secondary E Pond. Per *Amendment 2 – CCR Surface Impoundment Closure Plan*, the Secondary E Pond was decontaminated through excavation of a minimum of 6 inches of the underlying pond liner material. This material was also disposed in the Unit 004 CCR Landfill.

As documented in the *2019 Annual Groundwater Monitoring and Corrective Action Report, Limestone Electric Generating Station, Jewett, Texas* (TRC, January 2020), groundwater monitoring at the Secondary E Pond has been performed as part of the Detection Monitoring Program per 40 CFR 257.94. Assessment monitoring has never been implemented at the Secondary E Pond. Groundwater protection standards have never been established pursuant to 40 CFR 257.95. Therefore, groundwater protection standards have not been exceeded at the Secondary E Pond and the Secondary E Pond meets the closure criteria provided in 40 CFR 257.102(c).

I, the undersigned Texas Professional Engineer, hereby certify that, to the best of my knowledge, information, and belief, the Secondary E Pond has been closed in accordance with 40 CFR 257.102 and the *Amendment 2 – CCR Surface Impoundment Closure Plan*. I certify that this Certification was prepared by me and that I am a registered professional engineer under the laws of the State of Texas.


For the purpose of this document, “certify” and “certification” shall be interpreted and construed to be a “statement of professional opinion”. The certification is understood and intended to be an expression of my professional opinion as a Texas Licensed Professional Engineer, based upon knowledge, information, and belief. The statement(s) of professional opinion are not and shall not be interpreted or construed to be a guarantee or a warranty of the analysis herein.

Richard D. Varnell

Printed Name of Professional Engineer

135525

Texas License Number



Signature of Professional Engineer

9/29/2020

Date



FIRM #3775