



NRG Texas Power LLC  
Limestone Generating Station, Units 1 & 2

Liner Documentation for  
Existing CCR Surface Impoundments

Prepared by



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## 1 LINER DOCUMENTATION

### Federal CCR Rule Reference: 40 CFR 257.71(a)(1)

Pursuant to 40 CFR 257.71(a)(1), NRG Texas Power LLC (NRG) is documenting that the following existing coal combustion residual (CCR) surface impoundments have been constructed with a liner consisting of a minimum of two feet of compacted soil with a hydraulic conductivity of no more than  $1 \times 10^{-7}$  cm/sec:

- Unit BACP (Bottom Ash Cooling Pond),
- Unit 019 E Pond,
- Unit 003 Secondary E Pond,
- Unit ST-18, and
- Unit 002 Storm Water Pond.

The hydraulic conductivity of the liner material was tested.

NRG has evaluated the CCR landfill stormwater run-off pond (002) and determined that the subject surface impoundment does not meet the definition of a CCR surface impoundment based on EPA guidance. This determination is based on:

1. the fact that the CCR landfill stormwater run-off pond (002) is not designed primarily to hold an accumulation of CCR and liquid
2. the primary function of the landfill stormwater run-off pond (002) is not storage or disposal of CCR.

For the aforementioned reasons, NRG will no longer manage the CCR landfill stormwater run-off pond (002) as a CCR surface impoundment after October 17, 2016.

## 2 CERTIFICATION

### Federal CCR Rule Reference: 40 CFR 257.71(b)

The documentation presented herein to meet the requirements of 40 CFR 257.71(a) is accurate.

I certify that this document was prepared by me or under my supervision and that I am a registered professional engineer under the laws of the State of Texas.

This document is released for use under the authority of James H. Staehlin, Texas PE # 87527 on October 7, 2016. Sargent & Lundy LLC Texas Registered Engineering Firm # F-2202.

Certified by: JAMES H. STAEHLIN Date: 10-7-2016

Seal:

