



# Groundwater Monitoring System Certification

## Limestone Electric Generating Station Jewett, Texas

August 2018

*Prepared For*  
*NRG Texas Power, LLC*

A handwritten signature in blue ink, appearing to read "R. Nilsson", written over a horizontal line.

R. Kent Nilsson, P.E.  
Senior Engineer

A handwritten signature in blue ink, appearing to read "Tony Dworaczyk", written over a horizontal line.

Tony Dworaczyk, P.G.  
Senior Project Manager

*TRC Environmental Corporation | NRG Texas Power, LLC*  
*Groundwater Monitoring System Certification*  
*Limestone Electric Generating Station, Jewett, Texas*

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# Section 1

## Regulatory Requirement

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Pursuant to 40 CFR 257.91(a), the Limestone Electric Generating Station has installed single unit groundwater monitoring systems around its existing Landfill Unit (Unit 004) and Secondary E Pond Unit (Unit 003) coal combustion residuals (CCR) units under 40 CFR 257. Per 40 CFR 257.91(f), the owner or operator must obtain a certification from a qualified professional engineer stating that the groundwater monitoring system has been designed and constructed to meet the requirements of 40 CFR 257.91.

# Section 2

## Certification Update

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Pursuant to 40 CFR 257.91(f), a qualified professional engineer prepared the initial certification for five single unit groundwater monitoring systems at the Limestone Electric Generating Station on October 17, 2017. The initial certification encompassed five active CCR units at the Limestone Electric Generating Station: Secondary E Pond (SWMU 003), E-Pond (SWMU 019), ST-18 (SWMU ST-18), K Pond (Bottom Ash Cooling Pond Unit [BACP]), and the Landfill (SWMU 004). The initial certification was prepared by Environmental Resource Management (ERM) on behalf of NRG Texas Power, LLC and stated that the groundwater monitoring systems had been designed and constructed to meet the requirements of 40 CFR 257.91.

Since preparation of the October 17, 2017 groundwater monitoring system certification, NRG Texas Power, LLC has reviewed its initial determination of the active CCR units at the Limestone Electric Generation Station under 40 CFR 257. Based on its review, NRG Texas Power, LLC determined that three of the four impoundments do not meet criteria provided in 40 CFR 257 for management as CCR impoundments. Therefore, NRG Texas Power, LLC has determined that the E-Pond (SWMU 019), ST-18 (SWMU ST-18), and the K Pond (BACP) should not be managed as CCR units under the CCR Rule. Only the Secondary E Pond (SWMU 003) and the Landfill (SWMU 004) should be managed as CCR units that are used to treat, store, dispose, or otherwise conduct solid waste management of CCR at the Limestone Electric Generating Station under 40 CFR 257.

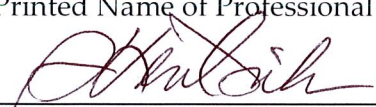
Therefore, this revised certification updates the original October 17, 2017 groundwater monitoring system certification by revising the identification of active CCR units at the Limestone Electric Generating Station that are used to treat, store, dispose, or otherwise conduct solid waste management of CCR under 40 CFR 257. The groundwater monitoring systems for the three units that do not manage CCR (E-Pond, ST-18, and the K Pond) are withdrawn from the overall CCR groundwater monitoring system at the Limestone Electric Generating Station. The groundwater monitoring systems for the Landfill and the Secondary E Pond CCR units are not revised.

# Section 3 Certification

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I, the undersigned Texas Professional Engineer, hereby certify that I am familiar with the technical requirements of 40 CFR 257.91. I also certify that it is my professional opinion that, to the best of my knowledge, information, and belief, that the groundwater monitoring systems at the Secondary E Pond (SWMU 003) and the Landfill (SWMU 004) have been designed and constructed in accordance with current good and accepted engineering practice(s) and standard(s) appropriate to the nature of the project and the technical requirements of 40 CFR 257.91.

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 groundwater monitoring system.

R. Kent Nilsson, P.E.	107021
Printed Name of Professional Engineer	State of Texas License Number
	August 13, 2018
Signature of Professional Engineer	Date

