



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

Annual Inspection of Unit 004 Landfill

Prepared by



55 East Monroe Street
Chicago, IL 60603-5780 USA
312-269-2000
www.sargentlundy.com

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CERTIFICATION PAGE

ANNUAL INSPECTION OF UNIT 004 LANDFILL

**AT THE
LIMESTONE GENERATING STATION**

NRG TEXAS POWER LLC

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

This Report is released for client use under the authority of Vasudev Patel, Texas PE # 117708 on January 12, 2018. Sargent & Lundy LLC Texas Registered Engineering Firm # F-2202.

Certified by: _____

Date: 1/12/18

Seal:





TABLE OF CONTENTS

1	PURPOSE	1
2	INSPECTION OF EXISTING CCR LANDFILL	1
2.1	CHANGES IN GEOMETRY	1
2.2	APPROXIMATE VOLUME OF CCR	1
2.3	VISUAL INDICATION OF ACTUAL OR POTENTIAL STRUCTURAL WEAKNESSES	2
2.4	OTHER CHANGES	2
3	CONCLUSION	2

1 PURPOSE

Pursuant to 40 CFR 257.84(b)(2), this document provides the annual inspection report for the existing coal combustion residual (CCR) landfill at NRG Texas Power LLC's (NRG) Limestone Generating Station, Unit 004 Landfill. Unit 004 Landfill was visually inspected on November 8, 2017, by Mr. Vasudev Patel, P.E. (Licensed in TX and WI) and Mr. David Nielson, P.E. (Licensed in IN, IL, MI, NV, and WA).

2 INSPECTION OF EXISTING CCR LANDFILL

Federal CCR Rule Reference: 40 CFR 257.84(b)(1)(i), and 257.84(b)(1)(ii)

This annual inspection of the CCR landfill, Unit 004 Landfill, included:

- 1) Review of previously generated information regarding the status and condition of the CCR landfill, including, but not limited to, operating records, publically accessible Internet site entries, design and construction drawings, and other documents and reports, and
- 2) A visual inspection of the CCR landfill and accessible portions of known appurtenant structures to identify any signs of distress or malfunction.

The following sections present the CCR landfill inspection observations and findings.

2.1 CHANGES IN GEOMETRY

Federal CCR Rule Reference: 40 CFR 257.84(b)(2)(i)

The visual inspection of the CCR landfill revealed several areas where the geometry has changed since the previous annual inspection on November 15, 2016. The following changes in geometry were observed:

- Removal of some Gypsum from Area 11 for beneficial reuse;
- Clay Liner was installed in Areas 13, 14, 15, 16, 17, and 18;
- Installation of Clay Liner was ongoing in Areas 19 and 20;
- Final Cover was installed and vegetation established on a portion of the top of Area 8; and
- Ongoing construction was observed to install a new rundown channel for non-contact water from the top of Area 8 down to Lynn Creek.

These changes were intentional and controlled in nature. No noticeable unintentional geometry changes were observed.

2.2 APPROXIMATE VOLUME OF CCR

Federal CCR Rule Reference: 40 CFR 257.84(b)(2)(ii)

As of the date of this annual inspection, an estimated 29.80 million cubic yards of CCR materials have been deposited in the Unit 004 Landfill.

2.3 VISUAL INDICATION OF ACTUAL OR POTENTIAL STRUCTURAL WEAKNESSES

Federal CCR Rule Reference: 40 CFR 257.84(b)(2)(iii)

S&L observed the exposed exterior slopes, toes of slopes, and crests of slopes for the Unit 004 Landfill and did not observe any evidence of existing conditions that are disrupting or could plausibly have the potential to disrupt the operation and safety of the landfill.

2.4 OTHER CHANGES

Federal CCR Rule Reference: 40 CFR 257.84(b)(2)(iv)

No other changes were observed which may have affected the stability or operation of the landfill since the previous annual inspection.

3 CONCLUSION

This annual inspection confirmed that the design, construction, operation, and maintenance of the existing CCR landfill, Unit 004 Landfill, at NRG's Limestone Generating Station are consistent with recognized and generally accepted good engineering standards.