



NRG Texas Power LLC  
W. A. Parish Station, Units 5, 6, 7, & 8

## Annual Inspection of CCR Landfill Cells

Prepared by



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S&L Project No. 12661-054  
Rev. 0  
Issue Date: January 3, 2017  
Issue Purpose: Use

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**CERTIFICATION PAGE**

**ANNUAL INSPECTION OF CCR LANDFILL CELLS**

**AT THE  
W. A. PARISH STATION**

**NRG TEXAS POWER LLC**

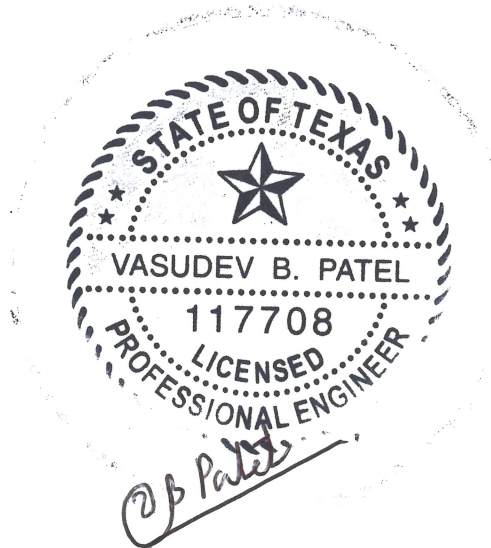
I certify that this Report was prepared by me or under my supervision and that I am a registered professional engineer under the laws of the State of Texas.

This Report is released for use under the authority of Vasudev Patel, Texas PE # 117708 on January 3, 2017. Sargent & Lundy LLC Texas Registered Engineering Firm # F-2202.

Certified by: \_\_\_\_\_

Date: 1/3/2017

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## 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 cells at NRG Texas Power LLC's (NRG) W. A. Parish Station. The following existing CCR landfill cells were visually inspected on November 16, 2016, 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):

- Cell 1C,
- Cell 2A,
- Cell 2B, and
- Cell 3.

## 2 INSPECTION OF EXISTING CCR LANDFILLS

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

This annual inspection included:

- 1) Review of previously generated information regarding the status and condition of the CCR landfill cells, 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 each CCR landfill and accessible portions of known associated appurtenant structures to identify any signs of distress or malfunction.

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

### 2.1 CHANGES IN GEOMETRY

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

The visual inspection of each CCR Landfill revealed several areas where the geometry has changed since the previous annual inspection in the fall of 2015. All of the observed geometry changes were a result of additional CCR deposited within the landfill limits and 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, the cumulative amount of CCR material deposited in each CCR landfill cell is estimated as follows:

- Cell 1C: Approximately 296 thousand cubic yards,
- Cell 2A: Approximately 0 cubic yards,
- Cell 2B: Approximately 352 thousand cubic yards, and
- Cell 3: Approximately 370 thousand cubic yards.

## **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 CCR landfill cells 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 CCR landfill cells.

## **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 cells since the previous annual inspection.

## **3 CONCLUSION**

This annual inspection confirmed that the design, construction, operation, and maintenance of the existing CCR landfill cells at NRG's W. A. Parish Station are consistent with recognized and generally accepted good engineering standards.