



Air Preheater (APH) Pond Retrofit Completion Notification

**W. A. Parish Electric Generating Station
Thompsons, Texas**

February 2021

Prepared For

NRG Texas Power LLC

NOTIFICATION OF COMPLETION

NRG Texas Power LLC manages Coal Combustion Residuals (CCR) at the W. A. Parish Electric Generating Station in the Air Preheater (APH) Pond. The APH Pond is considered a CCR surface impoundment per the Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule (effective October 19, 2015) and subsequent Final Rules, Title 40 Code of Federal Regulations (CFR) Part 257 Subpart D (§257). This notification that retrofit activities provided in 40 CFR 257.102(k) and as described in the CCR Surface Impoundments Retrofit Plan¹ dated March 2020 were completed in January 2021.

CERTIFICATION

I, the undersigned Texas Professional Engineer, hereby certify that I am familiar with the technical requirements of 40 CFR 257.102. I also certify that it is my professional opinion that, to the best of my knowledge, information, and belief, that the activities outlined in the CCR Surface Impoundments Retrofit Plan have been completed in accordance with current good and accepted construction and engineering practice(s), standard(s) appropriate to the nature of the project, and the technical requirements of 40 CFR 257.102(k). I certify that this document 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, P.E.



Signature of Professional Engineer

135525

Texas License Number

2/12/2021

Date



FIRM # 3775

¹ W.A. Parish Station, Units 5, 6, 7, and 8, CCR Surface Impoundments Retrofit Plan, W.A. Parish Electric Generating Station, Thompsons, Texas, TRC Environmental Corporation, March 2020