

US EPA ARCHIVE DOCUMENT



CERTIFIED MAIL

May 18, 2009

Mr. Richard Kinch  
US Environmental Protection Agency (5306P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

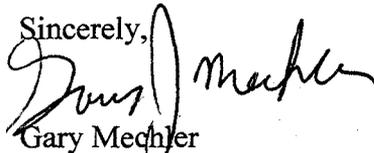
SUBJECT: Request for Information Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e)  
Limestone Electric Generating Station  
NRG Texas Power LLC

Dear Mr. Kinch:

NRG Texas Power LLC (NRG Texas) hereby provides to the United States Environmental Protection Agency ("EPA") information and documentation in response to the above-referenced Request for Information ("ROI") regarding the Limestone Generating Station ("Limestone Station"). The Limestone Station received the ROI on May 4, 2009. As requested, NRG is submitting this response to the ROI to EPA within ten (10) business days of receipt. Enclosed as an attachment to this letter are NRG's responses to the ROI regarding each of the coal combustion by-product waste management units at the Limestone Station. Each individual information request is set forth in italics followed by NRG's response.

I hereby certify that the information contained in this response to the ROI and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, and of those persons directly responsible for gathering the information, to the best of my knowledge the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

If you have questions regarding the submittal information, please contact Mr. Jeffrey Davis at (713) 795-6207.

Sincerely,  
  
Gary Mechler  
Plant Manager

Attachments

## ATTACHMENT A

### **Bottom-Ash Cooling Water Pond (K-Pond) and Stormwater Ponds A & B Limestone Electric Generating Station NRG Texas Power LLC**

*Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.*

*1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit does not have a rating, please note that fact.*

The bottom ash cooling water pond (K-Pond) and the two stormwater ponds (A&B) are below grade clay-lined surface impoundments, therefore do not have ratings and would not be subject to the provisions of the TCEQ Dam Safety Program in 30 TAC §299. NRG is including these units because the K-Pond receives minor amounts of bottom-ash that pass through the screens on the handling system and settle out in the bottom of the pond. The two stormwater ponds receive water from the K-Pond. The K-Pond is used to cool the water for the bottom ash system. Bottom ash is collected at the base of the boilers and then sluiced to the material handling area of the plant for dewatering. After dewatering, the bottom ash is removed from the above-grade hopper and is trucked to the disposal area and the water is re-circulated back to the cooling water pond. The bottom ash transport system is a closed loop system. The K-Pond and stormwater ponds are regulated by the Texas Commission on Environmental Quality.

*2. What year was each management unit commissioned and expanded?*

Commissioned 1985. These units have never been expanded.

*3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).*

The K-Pond receives minor amounts of bottom-ash that slip through the screens and settle out in the bottom of the pond. The bottom ash that accumulates in the bottom of the pond is

periodically removed and disposed of in the onsite landfill. The sluice water originates as a combination of a number of low-volume wastes, including demineralizer regenerant, boiler blowdown, and equipment washes (air pre-heater wash water). These liquid low-volume wastes are treated prior to use as sluice water.

The two stormwater ponds collect plant stormwater and low volume waste water from the Lignite Runoff Pond, K-Pond and oil water separator. The stormwater ponds are below grade clay lined surface impoundments that are used primarily for the temporary storage of stormwater runoff. Solids that settle out in the bottom of the units is removed and transferred to the facility's on-site landfill. The water collected in the stormwater ponds is treated and used back in the cooling loop.

*4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?*

The units were designed by a Professional Engineer (PE) as denoted on original construction plans. The construction of the units were conducted under the auspices of qualified company and/or external engineers ("PEs") and with a quality assurance/inspection team formed to ensure that construction was conducted in accordance with project drawings and specifications. Since commissioning, inspection and monitoring of the units are conducted by plant operations staff and/or specialist. Should abnormalities or substantive observation surface during routine inspections, the appropriate subject matter engineer/specialist is consulted for resolution.

*5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?*

The condition of the units is assessed by plant operations staff/specialist on a weekly basis with regard to functionality and safety. The operations staff/specialist is trained with regard to basic inspection/observation determinations (ie leak/seepage, concrete spall detection, sloughing etc.). Should observations of a severe nature be made, consultation with company engineers experienced in the area of concern or external engineers is conducted. No impoundment safety issues have been observed with respect to the units during the recent inspections. Plans are to continue with weekly inspections conducted by plant operations staff/specialist.

*6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.*

The Texas Commission on Environmental Quality Region 9 office in Waco has conducted solid waste Compliance Evaluation Investigations (CEI) of the Limestone facility. These activities have focused primarily on a review of the solid waste related facility records, not on the safety of the unit. NRG is not aware of any planned State or Federal inspection or evaluation in the future.

*7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.*

No evaluations or inspections with respect to dam safety or solid waste management have been conducted by State or Federal regulatory officials within the past year. The last inspection conducted by the TCEQ Region 9 Office did not uncover any safety issues associated with the management unit.

*8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s). Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.*

Management Unit	Surface Area (acres)	Total Storage Capacity (acre-ft)	Currently Stored Material (cu yds)	Height (feet)
Bottom Ash Cooling Pond	2.80	49.70	4000	Below grade
Stormwater Pond A	1.0	13.50	0	Below grade
Stormwater Pond B	1.0	13.50	0	Below grade

The units are below grade, therefore do not have a maximum height. A very nominal amount of waste solids are present in the stormwater ponds because the waste streams sent to the ponds contain minimal amounts of suspended solids.

*9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).*

There have been no known spills or unpermitted releases from the units in the last ten years.

*10. Please identify all current legal owner(s) and operator(s) at the facility.*

The legal owner and operator is NRG Texas Power LLC.

**ATTACHMENT B**  
**Flue Gas Desulfurization Emergency Pond (E-Pond)**  
**Limestone Electric Generating Station**  
**NRG Texas Power LLC**

*Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.*

*1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit does not have a rating, please note that fact.*

The flue gas desulfurization emergency pond (E-Pond) is a below grade impoundment, therefore it has no rating under the provisions of the TCEQ Dam Safety Program. This unit is a clay-lined surface impoundment that receives FGD liquids and sludge. Flue gases from the precipitator are routed to the FGD unit, where the gases are exposed to a limestone slurry. The slurry reacts with sulfur compounds, which binds them into solution, producing FGD sludge. The emergency pond is used to store FGD sludge during emergency conditions. The sludge that accumulates at the bottom of the pond is non-hazardous. It is periodically removed from the unit and disposed of in the onsite Solid Waste Disposal Area. The E-Pond is regulated by the Texas Commission on Environmental Quality.

*2. What year was each management unit commissioned and expanded?*

Commissioned 1985. This unit has never been expanded.

*3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).*

This unit is used for the purpose of storing FGD materials during emergency conditions.

*4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?*

The E-Pond was designed by a Professional Engineer (PE) as denoted on original construction plans. The construction of the E-Pond was conducted under the auspices of qualified company and/or external engineers ("PEs") and with a quality assurance/inspection team formed to ensure that construction was conducted in accordance with project drawings and specifications. Since commissioning, inspection and monitoring of the units are conducted by plant operations staff and/or specialist. Should abnormalities or substantive observation surface during routine inspections, the appropriate subject matter engineer/specialist is consulted for resolution.

5. *When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?*

The condition of the E-Pond unit is assessed by plant operations staff/specialist on a weekly basis with regard to functionality/safety. The operations staff/specialist is trained with regard to basic inspection/observation determinations (ie leak/seepage detection, embankment sloughing etc.). Should observations of a severe nature be made, consultation with company engineers experienced in the area of concern or external engineers is conducted in order to reach a resolution. No impoundment safety issues have been observed with respect to the E-Pond during the recent inspections. Plans are to continue with weekly inspections conducted by plant operations staff/specialist.

6. *When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.*

The Texas Commission on Environmental Quality Region 9 office in Waco has conducted solid waste Compliance Evaluation Investigations (CEI) of the Limestone facility. These activities have focused primarily on a review of the solid waste related facility records, not on the safety of the unit. NRG is not aware of any planned State or Federal inspection or evaluation in the future.

7. *Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.*

No evaluations or inspections with respect to dam safety or solid waste management have been conducted by State or Federal regulatory officials within the past year. The last inspection conducted by the TCEQ Region 9 Office did not uncover any safety issues associated with the management unit.

8. *What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s). Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.*

Management Unit	Surface Area (acres)	Total Storage Capacity (acre-ft)	Currently Stored Material (cu yds)	Height (feet)
E-Pond	1.10	30.70	10,000	Below grade

The volume of FGD sludge currently stored in the unit is based on volume measurement survey conducted on 5-12-09

9. *Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).*

There have been no known spills or unpermitted releases from the unit in the last ten years.

10. *Please identify all current legal owner(s) and operator(s) at the facility.*

The legal owner and operator is NRG Texas Power LLC.

**ATTACHMENT C**  
**Dewatered Sludge Disposal Area (DSDA)**  
**Limestone Electric Generating Station**  
**NRG Texas Power LLC**

*Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.*

*1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit does not have a rating, please note that fact.*

The dewatered sludge disposal area (DSDA) has no rating because it is not large enough to meet applicability criteria of the TCEQ Dam Safety Program. The Dam Safety Program provisions applies to units that have a height greater than 25 feet and a maximum storage capacity greater than or equal to 15 acre-feet. The maximum height of the DSDA is less than 25 feet.

*2. What year was each management unit commissioned and expanded?*

The DSDA was constructed in 1985, but was never used due to operational changes. As a result, on June 8, 1993, the status of the DSDA was changed on the facility's TCEQ Registration by the former owner (Houston Lighting & Power Co.) from "active" to "inactive". On November 10, 2008, NRG notified the TCEQ of our plans to begin using the DSDA for the stabilization of FGD residuals and miscellaneous non-hazardous waste sludge generated at the site.

*3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).*

The DSDA is used for stabilization of FGD residuals and miscellaneous non-hazardous sludge materials generated at the site. The miscellaneous sludge materials consist of cooling tower sludge and stormwater sludge. The stabilizing media consists of fly ash. The FGD residuals or sludge and stabilizing media are mixed together in the unit and allowed to solidify. Once solidified, the mixture is then transferred to the onsite landfill for final disposal. The materials are stored in the unit on a temporary basis.

*4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection*

*and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?*

The DSDA Pond was designed by a Professional Engineer (PE) as denoted on original construction plans. The construction of the DSDA Pond was conducted under the auspices of qualified company and/or external engineers ("PEs") and with a quality assurance/inspection team formed to ensure that construction was conducted in accordance with project drawings and specifications. Since commissioning, inspection and monitoring of the units are conducted by plant operations staff and/or engineers/specialist. Should abnormalities or substantive observation surface during routine inspections, the appropriate subject matter engineer/specialist is consulted for resolution.

*5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?*

The condition of the DSDA Pond is assessed by plant operations staff/specialist on a weekly basis with regard to functionality and safety. The operations staff/specialist is trained with regard to basic inspection/observation determinations (ie leak/seepage detection, embankment breach, embankment sloughing, etc.). Should observations of a severe nature be made, consultation with company engineers experienced in the area of concern or external engineers is conducted. No impoundment safety issues have been observed with respect to the DSDA Pond during the recent inspections. Plans are to continue with weekly inspections conducted by plant operations staff/specialist.

*6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.*

The Texas Commission on Environmental Quality Region 9 office in Waco has conducted solid waste Compliance Evaluation Investigations (CEI) of the Limestone facility. These activities have focused primarily on a review of the solid waste related facility records, not on the safety of the unit. NRG is not aware of any planned State or Federal inspection or evaluation in the future.

*7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.*

No evaluations or inspections with respect to dam safety or solid waste management have been conducted by State or Federal regulatory officials within the past year. The unit was not active during the last inspection conducted by the TCEQ Region 9 Office.

8. *What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s). Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.*

Management Unit	Surface Area (acres)	Total Storage Capacity (acre-ft)	Currently Stored Material (cu yds)	Height (feet)
DSDA	2.75	24.75	15,000	22 feet

Stabilized FGD material is currently being stored in the Unit. The volume is based on a measurement survey conducted on 5-12-09

9. *Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).*

There have been no known spills or unpermitted releases from the unit in the last ten years.

10. *Please identify all current legal owner(s) and operator(s) at the facility.*

The legal owner and operator is NRG Texas Power LLC.

## ATTACHMENT D

### ST-9 Sump Limestone Electric Generating Station NRG Texas Power LLC

*Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.*

*1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit does not have a rating, please note that fact.*

The ST-9 unit is a below grade concrete sump, therefore does not have a rating and would not be subject to the provisions of the TCEQ Dam Safety Program in 30 TAC §299. The unit is not regulated.

*2. What year was each management unit commissioned and expanded?*

Commissioned 1985. This unit has never been modified.

*3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).*

The ST-9 is a below grade concrete sump that is used to temporarily collect precipitator wash water containing flyash before being returned to the make up for the FGD system. Solids that settle out in the bottom of the unit is periodically removed and transferred to the facility's on-site landfill.

*4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?*

The ST-9 basin was designed by a Professional Engineer ("PE") as denoted on original construction plans. The construction was conducted under the auspices of qualified company or external professional engineers and with a quality assurance/inspection team formed to ensure

that construction was conducted in accordance with project drawings and specifications. Since commissioning, inspection and monitoring of the ST-9 basin are conducted by plant operations staff and specialist. Should abnormalities or substantive observation surface during routine inspections, the appropriate subject matter engineer/specialist is consulted for resolution.

*5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?*

The condition of the ST-9 basin is assessed by plant operations staff/specialist on a weekly basis with regard to functionality/safety. The operations staff/specialist is trained with regard to basic inspection/observation determinations (ie leak/seepage detection, concrete spall detection, embankment sloughing, etc.). Should observations of a severe nature be made, consultation with company engineers experienced in the area of concern or external engineers is conducted. No impoundment safety issues have been observed with respect to the ST-9 basin during the recent inspections. Plans are to continue with weekly inspections conducted by plant operations staff/specialist.

*6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.*

The Texas Commission on Environmental Quality Region 9 office in Waco has conducted solid waste Compliance Evaluation Investigations (CEI) of the Limestone facility. These activities have focused primarily on a review of the solid waste related facility records, not on the safety of the solid waste management units. NRG is not aware of any planned State or Federal inspection or evaluation in the future.

*7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.*

No evaluations or inspections with respect to dam safety or solid waste management have been conducted by State or Federal regulatory officials within the past year. The last inspection conducted by the TCEQ Region 9 Office did not uncover any safety issues associated with the management unit.

*8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s). Please*

*provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.*

Management Unit	Surface Area (acres)	Total Storage Capacity (acre-ft)	Currently Stored Material (cu yds)	Height (feet)
ST-9	0.02	0.33	25	Below grade

The ST-9 sump is a below surface grade unit, therefore it does not have a maximum height.

*9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).*

There have been no known spills or unpermitted releases from the unit in the last ten years.

*10. Please identify all current legal owner(s) and operator(s) at the facility.*

The legal owner and operator is NRG Texas Power LLC.

## ATTACHMENT E

### ST-10 Sump Limestone Electric Generating Station NRG Texas Power LLC

*Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.*

*1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit does not have a rating, please note that fact.*

The ST-10 unit is a below grade concrete sump, therefore it does not have rating and would not be subject to the provisions of the TCEQ Dam Safety Program in 30 TAC §299. The unit is not regulated.

*2. What year was each management unit commissioned and expanded?*

Commissioned 1985. These units have never been expanded.

*3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).*

The ST- 10 sump is a below grade concrete sump that is used to temporarily collect air preheater wash water containing flyash before being transferred to the bottom ash cooling water pond. The sump uses an agitator to prevent the accumulation of solid in the bottom of the sump.

*4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?*

The ST-10 basin was designed by a Professional Engineer ("PE") as denoted on original construction plans. The construction was conducted under the auspices of qualified company or external professional engineers and with a quality assurance/inspection team personnel formed to ensure that construction was conducted in accordance with project drawings and specifications.

Since commissioning, inspection and monitoring of the ST-10 basin is conducted by plant operations staff and specialist. Should abnormalities or substantive observation surface during routine inspections, the appropriate subject matter professional engineer/specialist is consulted for resolution.

*5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?*

The condition of the ST-10 basin is assessed by plant operations staff/specialist on a weekly basis with regard to functionality/safety. The operations staff/specialist is trained with regard to basic inspection/observation determinations (ie leak/seepage detection, concrete spall detection, etc.). Should observations of a severe nature be made, consultation with company engineers experienced in the area of concern or external engineers is conducted. No impoundment safety issues have been observed with respect to the ST-10 basin during the recent inspections. Plans are to continue with weekly inspections conducted by plant operations staff/specialist.

*6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.*

The Texas Commission on Environmental Quality Region 9 office in Waco has conducted solid waste Compliance Evaluation Investigations (CEI) of the Limestone facility. These activities have focused primarily on a review of the solid waste related facility records, not on the safety of the unit. NRG is not aware of any planned State or Federal inspection or evaluation in the future.

*7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.*

No evaluations or inspections with respect to dam safety or solid waste management have been conducted by State or Federal regulatory officials within the past year. The last inspection conducted by the TCEQ Region 9 Office did not uncover any safety issues associated with the management unit.

*8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s). Please provide the date that the volume measurement was taken. Please provide the maximum height of*

*the management unit(s). The basis for determining maximum height is explained later in this Enclosure.*

Management Unit	Surface Area (acres)	Total Storage Capacity (acre-ft)	Currently Stored Material (cu yds)	Height (feet)
ST-10	0.028	0.63	None	Below grade

The sump is equipped with an agitator to prevent the accumulation of flyash in the bottom the sump. The unit is below surface grade, therefore it does not have a maximum height.

*9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).*

There have been no known spills or unpermitted releases from the unit in the last ten years.

*10. Please identify all current legal owner(s) and operator(s) at the facility.*

The legal owner and operator is NRG Texas Power LLC.