CERTIFIED MAIL April 27, 2011

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
Correction to Information

Dear Mr. Kinch:

On May 18, 2009, NRG Texas Power LLC (NRG Texas) submitted, to the United States Environmental Protection Agency ("EPA"), responses to the above-referenced Request for Information ("RFI") regarding the Limestone Generating Station ("Limestone Station"). A review of the information previously submitted indicated that minor corrections to Attachment A and C are required, as summarized below.

Attachment A:

The original response to Question 9 indicated that there were no known spills or unpermitted releases from the ponds included in Attachment A. The correction describes a release in May, 2000 from the Bottom Ash Cooling Pond (K Pond) as a result of heavy rain event.

Attachment C:

The original response to Question 3 was modified to more accurately describe the materials stored in this unit.

The original response to Question 8 was modified to correct the surface area and height of the impoundment.

If you have questions regarding the submittal information, please contact Ted Long (713) 537-2149.

Sincerely,

Ben Carmine

Ben Carmine
Director, Environmental Operations
NRG Texas Power LLC

Attachment

ATTACHMENT A (CORRECTED)

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).

NRG previously reported that "there have been no known spills or unpermitted releases from the three units in the last ten years."

However, on May 19, 2000, approximately 5.3 inches of rain fell at the Limestone Electric Generating Station in a short period of time. This severe rainfall event upset many plant systems and resulted in an overflow and subsequent discharge from the Bottom Ash Cooling Pond (K pond). Approximately 500 gallons of water was discharged. The pH of the discharge was 8.5 su, TSS was 88 mg/l and Selenium was < 0.010 mg/l. The discharge ultimately made its way to Lynn Creek.

Notification, via facsimile, of this event was reported to the TNRCC (now TCEQ) Region 9 Office on May 22, 2000 and a written notification was provided on May 25, 2000.

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 (CORRECTED)
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 the stabilization of FGD residuals and wastewater from the emergency pond, which includes FGD wastewater and storm water containing FGD solids, bottom ash and fly ash. These materials are temporarily stored in the DSDA prior to final disposal in the onsite 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 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 this 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	3.96	20.84 normal/ 24.27 max	15,000	24 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.