CERTIFIED MAIL May 18, 2009

Mr. Richard Kinch
United States 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)
W.A. Parish 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 W.A. Parish Electric Generating Station ("W.A. Parish Station"). The W.A. Parish 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 W.A. Parish 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,

Robert A. Osco, General Manager
W.A. Parish Electric Generating Station

Attachment:

ATTACHMENT A
Flue Gas Desulfurization Emergency Pond (E-Pond)
W.A. Parish 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 concrete basin, and therefore has no rating because it does not meet the applicability criteria of the Texas Commission on Environmental (TCEQ) Dam Safety Program (the "Dam Safety Program") in 30 TAC §299.1. This unit is used on a temporary basis to store FGD blowdown during emergency conditions. The sludge that accumulates at the bottom of the pond is non-hazardous and is periodically removed from the unit and disposed of in the onsite landfill. The E-Pond is regulated by the Texas Commission on Environmental Quality (TCEQ) as part of the facility's Notice of Registration.

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

The E-Pond was constructed as part of the original plant construction for Unit No. 8 during 1980-1982 and subsequently modified by the addition of the concrete liner in 1993.

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 on a temporary basis 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, as well as subsequent modifications, was designed by a Professional Engineer (PE) as denoted on original construction and modification plans. The construction of the E-Pond and subsequent modifications 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 E-Pond unit 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, 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 and resolution sought. 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 W.A. Parish facility has no record of any State or Federal structural integrity assessments made to the E-Pond unit, as it would not be subject to the provisions of the TCEQ Dam Safety Program. The TCEQ Region 12 office in Houston has conducted solid waste Compliance Evaluation Investigations (CEI) of the W.A. Parish facility. These activities have focused primarily on a review of the solid waste related facility records, not on the safety of the unit. NRG Texas 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 12 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	0.05	2.0	650	Below grade

The volume of FGD sludge currently stored in the unit is based on estimated volume measurement survey conducted on 5-1-09.

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 B

Air Preheater Pond System and associated Units 5/6 Bottom Ash Overflow Basins/Sumps, Units 7/8 Bottom Ash Overflow Basins/Sumps, Ash Dewatering Bin Sump, and Coal Pile Run Off Pond
W.A. Parish 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 four bottom ash overflow collection sumps/basins for Units 5, 6 and 7 and 8 respectively are below grade concrete basins and the air preheater and coal pile run off ponds are below grade clay-lined surface impoundments, and therefore, do not have ratings because none of these impoundments meet the applicability criteria of the TCEQ Dam Safety Program in 30 TAC §299. The air preheater wash pond and the coal pile run off pond are regulated by the TCEQ as part of the State Texas Pollutant Discharge Elimination System ("TPDES").

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

The units were commissioned in 1978. 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 air preheater pond receives two types of coal combustion waste streams. Effluent from air preheater wash or boiler cleaning wash (consisting of fly ash or economizer ash particles and water) is conveyed to unit specific concrete basins (bottom ash overflow basins/sumps), then pumped to the air preheater wash pond which overflows to the coal pile runoff pond after suspended solids have settled out. Additionally, bottom ash fines that over time collect in plant bottom ash settling tanks are blown-down/pumped from plant dewatering bin sumps or portable vats to the air preheater wash pond, where suspended solids are allowed to settle out prior to overflow to the coal pile runoff pond. These processes are performed to facilitate settling of suspended solids so that the solids can ultimately be transported to the landfill. The primary

function of coal pile runoff pond is to collect rainfall/wash-down runoff originating in the coal/fuel handling area. Runoff in the coal pile runoff pond is managed in one of two ways. The first and preferable option consists of transfer of pond runoff to a clarifier tank for treatment prior to use as cooling tower make-up. The other option is to discharge the runoff directly offsite through an overflow spillway authorized under a plant TPDES permit. The latter option would only occur during an extreme/rare rainfall event.

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?

As a matter of company policy, all units of this type are designed by Professional Engineers ("PE") and are so denoted on original construction plans. We have confirmed this with respect to all four (4) bottom ash overflow basins/sumps, the ash dewatering bin sump, and the coal pile runoff pond. Although we believe the air preheater wash pond was designed by and constructed under the auspices of a professional engineer, we have been unable to locate the physical drawings to confirm this. As part of company policy and project requirements, construction of these types of facilities are and were conducted under the auspices of qualified company 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 specialist. Should abnormalities or substantive observation surface during routine inspections, the appropriate subject matter engineer (PE)/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 with regard to functionality/safety on a weekly basis by plant operations staff/specialist. The operations staff/specialist is trained with regard to basic inspection/observation determinations (ie leak/seepage detection, concrete spall detection, sloughing etc.). Should observations of a severe nature be made, consultation with company engineers experienced in the area of concern and/or external engineers/specialist are conducted. No significant impoundment safety issues have been observed with respect to the units during the recent inspections. Plans are to continue with the 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 12 office in Houston has conducted solid waste Compliance Evaluation Investigations (CEI) of the W.A. Parish 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 Texas 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 12 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)
U 5 BA Overflow Basin	0.027	0.35	55	Below grade
U 6 BA Overflow Basin	0.027	0.35	55	Below grade
U 7 BA Overflow Basin	0.006	0.09	15	Below grade
U 8 BA Overflow Basin	0.006	0.09	15	Below grade
U 7/8 Dewatering Bin Basin	0.006	0.08	15	Below grade
Air Preheater Pond	1.20	3.70	3,900	Below grade
Coal Pile Run Off Pond	24.40	109.90	39,000	Below grade

The units are below surface grade, therefore they do 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.