

# Ponds B1, B2, and B3 Post-Closure Care, Reid Gardner Generating Station

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This technical memorandum is written to meet the requirements of §257.100(e)(6)(ii) and §257.104(d) of the U.S. Environmental Protection Agency's Coal Combustion Residuals Rule (CCR) Rule. This technical memo documents why the post-closure care requirements in the U.S. Environmental Protection Agency's Coal Combustion Residuals (CCR) Rule are not applicable for inactive CCR surface impoundments Ponds B1, B2, and B3.

## 1.0 Closure of Ponds B1, B2, and B3

Ponds B1, B2, and B3 are inactive CCR surface impoundments at the Reid Gardner Generating Station near Moapa, Nevada. As described in the Closure Plan for Ponds B1, B2, and B3, the ponds will be closed by removing CCR as allowed by §257.102(c) (Jacobs, 2018).

## 2.0 Post-Closure Care Requirements

The post-closure care section in the CCR Rule states the following: "An owner or operator of a CCR unit that elects to close a CCR unit by removing CCR as provided by §257.102(c) is not subject to the post-closure care criteria under this section." (§257.104(a)(2)).

## 3.0 Conclusion

Because Ponds B1, B2, and B3 will be closed by removing CCR, the post-closure care requirements in the CCR Rule are not applicable and post-closure will not be provided.

## 4.0 References

Jacobs. 2018. *Closure Plan; Coal Combustion Residual Surface Impoundments Ponds B1, B2, and B3; Reid Gardner Generating Station*. April 16.