

Closure Completion Notification for Closure by Removal

February 13, 2026
Closure Completion Notification
Welsh Power Plant
Bottom Ash Storage Pond

On February 13, 2026, the Welsh Power Plant, Bottom Ash Storage Pond was closed by removal in accordance with 40 CFR 257.102(c)(1) and 30 TAC §352.1221(a) and the most recent Written Closure Plan. This notification is being prepared in accordance with 40 CFR 257.102(h) and 30 TAC §352.1221(a) and placed into the operating record in accordance with 40 CFR 257.105(i)(8) and 30 TAC §352.1301(a).

This notification is being made to demonstrate compliance with 40 CFR 257.101(a)(1) and 30 TAC §352.1211(b) which required Welsh Bottom Ash Storage Pond to cease receipt of CCR and non-CCR wastestreams no later than April 11, 2021 and close the CCR unit in accordance with the requirements of 40 CFR 257.102(c)(1) and (f)(1)(ii) and 30 TAC §352.1221.

The State of Texas received partial delegation from USEPA on June 1, 2021 including 40 CFR 257.102 Criteria for Conducting the Closure and Retrofit of CCR Units. Therefore, final review and approval of closure will be determined by TCEQ.

CLOSURE CERTIFICATION BY QUALIFIED PROFESSIONAL ENGINEER

I certify that the Welsh Power Plant's Bottom Ash Storage Pond has been closed in accordance with the most recent written closure plan specified by paragraph 40 CFR §257.102(b) and 30 TAC §352.1221.



David Anthony Miller

Printed Name of Licensed Professional Engineer

David Anthony Miller

Signature

112498

License Number

Texas

Licensing State

02.13.2026

Date

Bottom Ash Storage Pond CCR Removal Certification

J. Robert Welsh Power Plant

The CCR Removal Certification for the Bottom Ash Storage Pond at the J. Robert Welsh Power Plant was prepared by Akron Consulting, LLC (TBPE Firm #14014). This Certification/Statement of Professional Opinion is limited to the information available to Akron at the time the report was written. On the basis of and subject to the foregoing, it is my professional opinion as a Professional Engineer licensed in the State of Texas, that the report has been prepared in accordance with good and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances at the same time and in the same locale. It is my professional opinion that the removal of the CCR material in the Bottom Ash Storage Pond was performed in accordance with the current requirements of 30 TAC 352.1221 and Section 4.0 of the most recent written Closure Plan.

The use of the words “certification” and/or “certify” in this document shall be interpreted and construed as a Statement of Professional Opinion, and is not and shall not be interpreted or construed as a guarantee, warranty or legal opinion. This certification in no way relieves the Owner or Operator of the facility of his/her duty to fully implement the other requirements outlined in the entire section of 30 TAC 352.

Engineer: Lane D. Roberts
Registration Number: 105135
State: Texas
Date: 01/14/2026

Firm Information: Akron Consulting, LLC
TBPELS Firm # 14014

