Coal Ash Disposal Landfill Annual Site Inspection

NELSON POWER GENERATING STATION

Prepared For:

ENTERGY LOUISIANA, LLC – NELSON POWER GENERATING STATION 3500 HOUSTON RIVER ROAD, WESTLAKE, LA 70669

Prepared By:

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January 2016

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Figure 1 Site Location Map

Figure 2 Coal Ash Disposal Landfill Site Inspection Photo Location Map

Attachments

Attachment 1 Weekly Inspection Reports

Attachment 2 Photo Log

1.0 Introduction

In accordance with 40 CFR 257.84, the Unit 6 Coal Ash Disposal Landfill (CADL) at the Nelson Coal Generating Station (Nelson Plant) is required to perform weekly and annual inspections for actual or apparent structural weakness and other conditions which are disrupting or have the potential to disrupt the operation or safety of the Coal Combustion Residuals (CCR) landfill. The site is located as shown on Figure 1.

Pivotal Engineering LLC (Pivotal) was retained by Entergy Louisiana, LLC (Entergy) to assist in developing the weekly inspection criteria and conduct the annual inspection of the CADL. The weekly inspections are conducted by trained on-site personnel. Pivotal conducted the annual inspection on December 10, 2015.

2.0 Review of Available Information

Pivotal reviewed all weekly inspection reports up to the current date beginning with the CCR rule effective date October 19, 2015. Additionally, Pivotal visited the landfill operator's office, conducted interviews and reviewed records. The weekly inspection reports are included in Attachment 1. The weekly inspection reports did not note any of the following concerns:

- Signs of sliding or sloughing of the soil layer or waste material that might indicate a slope failure,
- Signs of tension or other types of cracks or separation at the surface or slopes,
- Signs of erosion from storm water runoff or damage to stormwater control facilities, and
- Signs of burrowing or tunneling mammals that could lead to stability issues.

Additionally, Pivotal's discussion with the landfill operator did not indicate that there were issues regarding the stability of the landfill or the stockpiles of coal ash.

3.0 Visual Inspection

On December 10, 2015, Pivotal made a visual inspection of the CADL. Pivotal engineers walked the entire perimeter of the landfill and inspected internal stockpiles for the following inspection requirements:

- Any changes in geometry of the structure since the previous annual inspection;
- The approximate volume of the CCR contained in the unit at the time of the inspection;
- Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit; and

• Any other changes which may have affected the stability or operation of the CCR unit since the previous annual inspection.

The photographs are included in Attachment 2. The locations of the photographs are shown on Figure 2.

Since the CCR rule became effective on October 19, 2015, this was first annual inspection. Prior to the rule's effective date, Pivotal made an initial inspection on June 30, 2015. During this initial inspection, Pivotal noted areas to improve levee stability. The landfill operator made these improvements prior to October 19, 2015. During Pivotal's December 10, 2015 inspection, no issues were noted that would affect the stability or operation of the CCR unit.

Minor changes to the geometry of the internal stockpiles at the CADL were noted but there were no changes to the perimeter levees. The minor changes to the internal stockpiles do not affect the stability of the CCR unit.

The approximate volume of the CADL is 330,000 cubic yards based on topographic surveys conducted during May and October 2015. The volume of the CADL at the time of the inspection was estimated to be approximately this amount.

4.0 Summary

On December 10, 2015, Pivotal conducted the first required annual inspection of the CADL required under 40 CFR 257.84. The CADL was inspected to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted engineering standards.

Pivotal did not note any issues affecting the stability of the CCR landfill or conditions that are disrupting or could have the potential to disrupt the operation of the CADL.

5.0 Certification

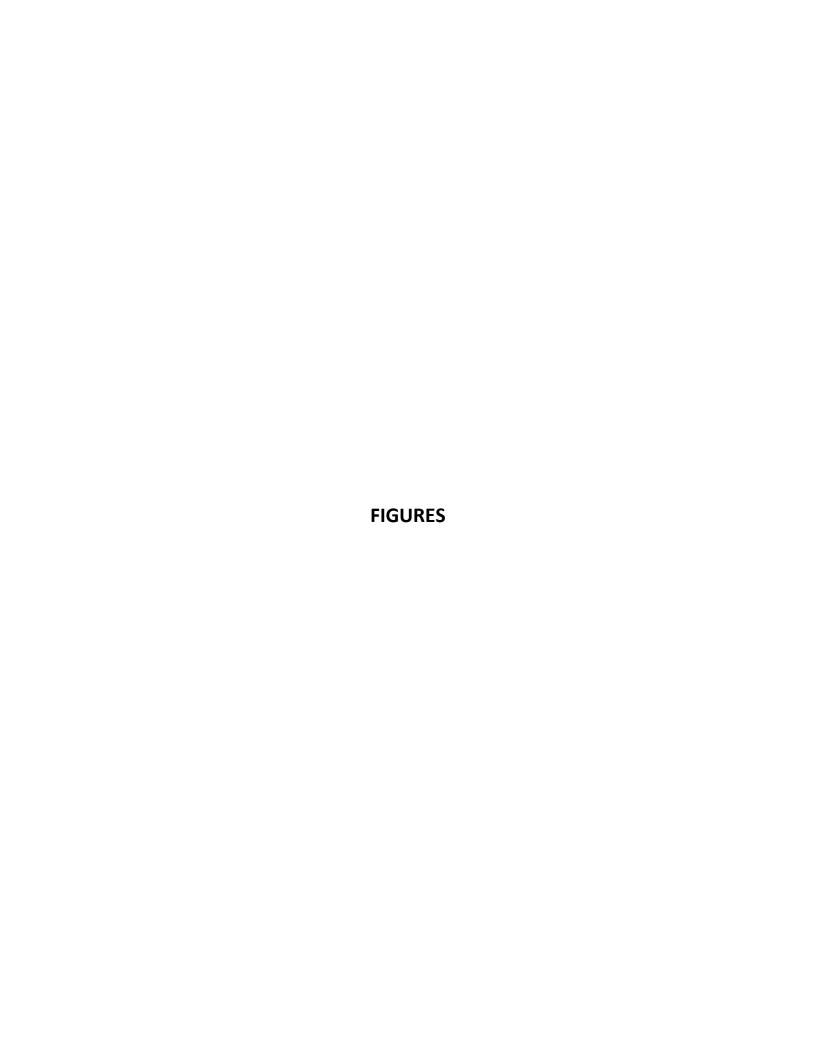
I hereby certify that I have inspected the facility and being familiar with the provisions of 40 CFR, Part 257.84.

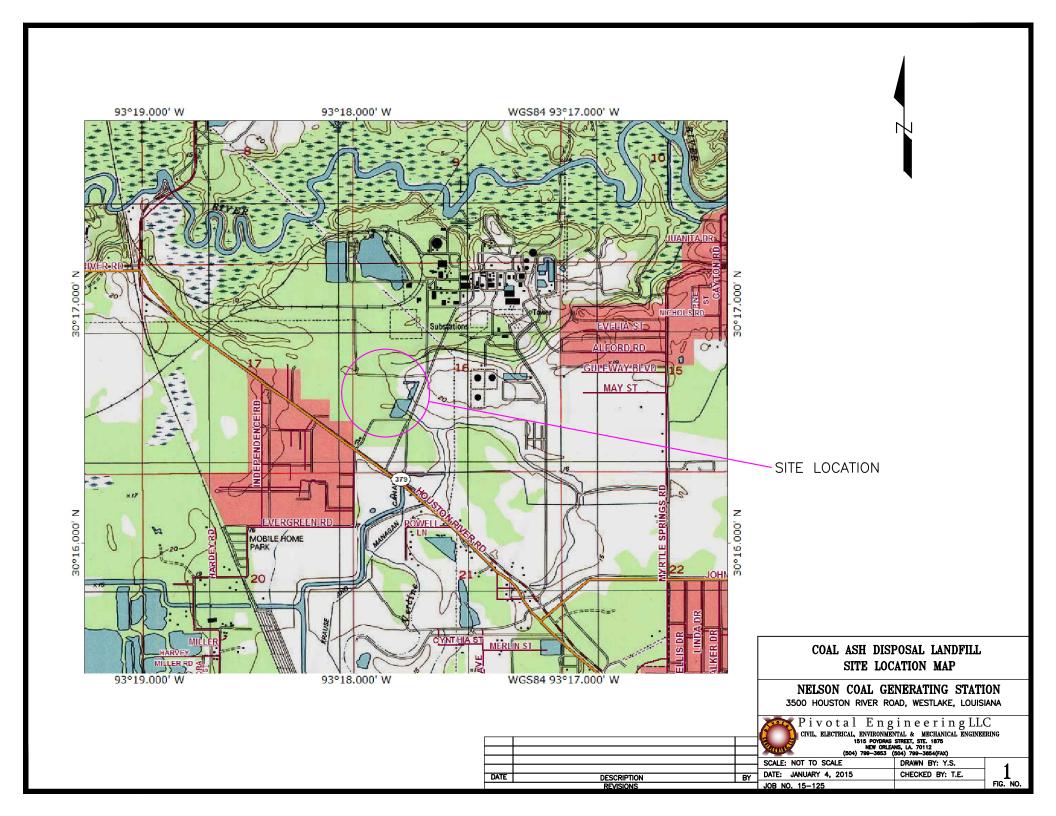
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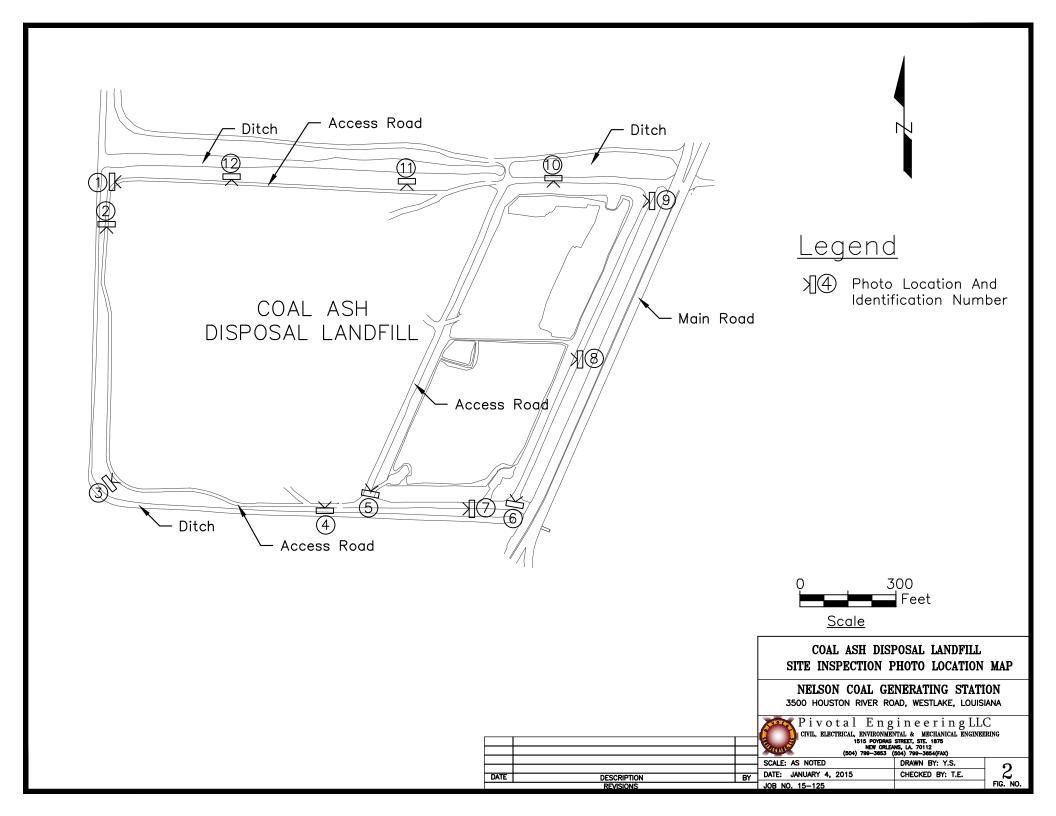
State: Louisiana

Date:









ATTACHMENT 1 WEEKLY INSPECTION REPORTS

- Inspection applies to CCR Rule affected CCR units or cells only
- Provide detailed description of location, site sketches, and pictures of any noted deficiencies or issues
- Use additional sheets as necessary
- Following inspection, send electronic copy of Inspection Form and any attachments to Entergy facility Environmental Analyst and Entergy State Lead

Inspected by:	[Must be performed by a qualified person per 257.84(a)(1)]
Inspection Dat	e:
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	Recommended Corrective Action/Responsible Party:
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b.	Any signs of tension or other types of cracks or separation at the surface or slopes? No Yes (if yes, make photographs, describe and recommend a corrective action) Location/Comments:

Entergy Facility:	Nelson Unit 6 Coal Ash Landfill Westlake, LA. Inspection Date: 10/20/15 [Inspection interval must not exceed 7 days per 257.84(a)(1)(i)]
	Recommended Corrective Action and Responsible Party:
	Engineer Approval of Corrective Action (if required):
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Location/Comments:

X No

ntergy Facility	Nelson Unit 6 Coal Ash Landfill Westlake, LA. Inspection Date: 12/8/15 [Inspection interval must not exceed 7 days per 257.84(a)(1)(i)]
	Engineer Approval of Corrective Action (if required):
	Corrective Action Completed:[Sign and Date]
	ere there any issues or recommended corrective actions from the previous weekly inspection ft to address?
	Yes (if yes, follow-up on any corrective actions taken)
Co	omments:
-	
_	

- Inspection applies to CCR Rule affected CCR units or cells only
- Provide detailed description of location, site sketches, and pictures of any noted deficiencies or issues
- Use additional sheets as necessary
- Following inspection, send electronic copy of inspection Form and any attachments to Entergy facility Environmental Analyst and Entergy State Lead

[Must be performed by a qualified person per 257.84(a)(1)]
e: 12/i5/i5 [Inspection Interval must not exceed 7 days per 257.84(a)(1)(i)]
pearances of an actual or potential structural weakness of the CCR unit, in addition to any g conditions that are disrupting or have the potential to disrupt the operation and safety CCR unit? [Inspection criteria per 257.84(a)(1)(i)] Any signs of sliding or sloughing of the soil layer or waste material that might indicate a slope failure? No Yes (if yes, make photographs, describe and recommend a corrective action)
Location/Comments:
Recommended Corrective Action/Responsible Party:
Engineer Approval of Corrective Action (if required):
[Sign and Date] Corrective Action Completed:
(Sign and Date)
Any signs of tension or other types of cracks or separation at the surface or slopes? No
☐ Yes (if yes, make photographs, describe and recommend a corrective action) Location/Comments:

1	Engineer Approval of Corrective Action (if required):	
	Corrective Action Completed:	
	[Sign and Date]	
	Any signs of erosion from storm water runoff or damage to stormwater contro (e.g. ditches, culverts, berms, and letdowns)?) facili
	☐ Yes (if yes, make photographs, describe and recommend a corrective action Location/Comments:	n)
l	Recommended Corrective Action and Responsible Party:	
	Engineer Approval of Corrective Action (if required):	
	(Sign and Date)	
	Corrective Action Completed: [Sign and Date]	
	Any signs of burrowing or tunneling mammals that could lead to stability issue: No	s?
	Yes (if yes, make photographs, describe and recommend a corrective action Location/Comments:	n)
F	Recommended Corrective Action and Responsible Party:	
•		

Entergy Facility:			12/15/15 nust not exceed 7 days per 257.84(a)(1)(i)]
	Engineer Approval of Corrective Act	tion (if requir	ed):
	Corrective Action Completed:		(Sign and Date)
			[Sign and Date]
left ☑	ere there any issues or recommended coreto address? No Yes (if yes, follow-up on any corrective imments:	actions takeı	n)

- Inspection applies to CCR Rule affected CCR units or cells only
- Provide detailed description of location, site sketches, and pictures of any noted deficiencies or issues
- Use additional sheets as necessary
- Following inspection, send electronic copy of Inspection Form and any attachments to Entergy facility Environmental Analyst and

Enterg	y Sta	te Lead
		[Must be performed by a qualified person per 257.84(a)(1)]
Inspection D	ate:	[Inspection interval must not exceed 7 days per 257.84(a)(1)(i)]
exist of th	ting ne C	conditions that are disrupting or have the potential to disrupt the operation and safety CR unit? [Inspection criteria per 257.84(a)(1)(i)] Any signs of sliding or sloughing of the soil layer or waste material that might indicate a slope failure? No Yes (if yes, make photographs, describe and recommend a corrective action) Location/Comments:
		Recommended Corrective Action/Responsible Party:
		Engineer Approval of Corrective Action (if required): [Sign and Date] Corrective Action Completed: [Sign and Date]
	b.	Any signs of tension or other types of cracks or separation at the surface or slopes? No Yes (if yes, make photographs, describe and recommend a corrective action) Location/Comments:

[Inspection interval must not exceed 7 days per 257.84(a)(1)(i)]

mandado publico	
Eng	gineer Approval of Corrective Action (if required):
0-	[Sign and Date]
LOI	rective Action Completed:
(e.g	signs of erosion from storm water runoff or damage to stormwater control facil ditches, culverts, berms, and letdowns)?
	Yes (if yes, make photographs, describe and recommend a corrective action) cation/Comments:
-	
Da	Commanded Coursetive Action and December 111
Re	commended Corrective Action and Responsible Party:
Re	commended Corrective Action and Responsible Party:
Re	commended Corrective Action and Responsible Party:
Re	commended Corrective Action and Responsible Party:
En	gineer Approval of Corrective Action (if required): [Sign and Date]
En	gineer Approval of Corrective Action (if required):
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En(gineer Approval of Corrective Action (if required): [Sign and Date] rective Action Completed: [Sign and Date] y signs of burrowing or tunneling mammals that could lead to stability issues?
En(gineer Approval of Corrective Action (if required): [Sign and Date] rective Action Completed: [Sign and Date] y signs of burrowing or tunneling mammals that could lead to stability issues? No Yes (if yes, make photographs, describe and recommend a corrective action)
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	Inspection Date: 12/22/15 [Inspection interval must not exceed 7 days per 257.84(a)(1)(i)]
Engineer Approval of Correctiv	e Action (if required):
	[Sign and Date]
Corrective Action Completed: _	
	[Sign and Date]
e there any issues or recommende to address? No Yes (if yes, follow-up on any correc	d corrective actions from the previous weekly inspection

WEEKLY LANDFILL INSPECTION

Instructions:

- Inspection applies to CCR Rule affected CCR units or cells only
- Provide detailed description of location, site sketches, and pictures of any noted deficiencies or issues

•	Use addition Following in Entergy Stat	nal sheets as necessary Ispection, send electronic copy of Inspection Form and any attachments to Entergy facility Environmental Analyst and te Lead
Inspect	ed by:	[Must be performed by a qualified person per 257.84(a)(1)]
Inspect	tion Date:	[Inspection interval must not exceed 7 days per 257.84(a)(1)(i)]
1.	existing of the C	conditions that are disrupting or have the potential to disrupt the operation and safety CCR unit? [Inspection criteria per 257.84(a)(1)(i)]
	а.	Any signs of sliding or sloughing of the soil layer or waste material that might indicate a slope failure? No
		Yes (if yes, make photographs, describe and recommend a corrective action) Location/Comments:
		Recommended Corrective Action/Responsible Party:
		Engineer Approval of Corrective Action (if required):
		[Sign and Date]
		Corrective Action Completed:[Sign and Date]
	b.	Any signs of tension or other types of cracks or separation at the surface or slopes? No Yes (if yes, make photographs, describe and recommend a corrective action)
		Location/Comments:

Entergy Facility: Nelson Unit 6 Coal Ash Landfill Westlake, LA.

Inspection Date:	12/29/15	
[Inspection interv	al must not exceed 7 days per 257.84(a)(1)(i)]	

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_	
-	Engineer Approval of Corrective Action (if required):
	[Sign and Date] Corrective Action Completed:
-	[Sign and Date]
	Any signs of erosion from storm water runoff or damage to stormwater control facilities (e.g. ditches, culverts, berms, and letdowns)?
	☐ Yes (if yes, make photographs, describe and recommend a corrective action)
	Location/Comments:
	Recommended Corrective Action and Responsible Party:
	Recommended Corrective Action and Responsible Party:
	Recommended Corrective Action and Responsible Party:
	Recommended Corrective Action and Responsible Party: Engineer Approval of Corrective Action (if required): [Sign and Date]
	Engineer Approval of Corrective Action (if required): [Sign and Date] Corrective Action Completed:
	Engineer Approval of Corrective Action (if required): [Sign and Date]
	Engineer Approval of Corrective Action (if required): [Sign and Date] Corrective Action Completed: [Sign and Date] Any signs of burrowing or tunneling mammals that could lead to stability issues?
	Engineer Approval of Corrective Action (if required): [Sign and Date] Corrective Action Completed: [Sign and Date] Any signs of burrowing or tunneling mammals that could lead to stability issues? No Yes (if yes, make photographs, describe and recommend a corrective action)
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	Engineer Approval of Corrective Action (if required): [Sign and Date] Corrective Action Completed: [Sign and Date] Any signs of burrowing or tunneling mammals that could lead to stability issues? No Yes (if yes, make photographs, describe and recommend a corrective action)

Engineer Approval of Corrective	e Action (if required):
	[Sign and Date]
Corrective Action Completed: _	
	[Sign and Date]
No Yes (if yes, follow-up on any corre omments:	
	Corrective Action Completed: Vere there any issues or recommende If to address? No Yes (if yes, follow-up on any corre

ATTACHMENT 2

PHOTO LOG



Photo 1, Northwest corner, looking east.



Photo 2 Northwest side, looking east.



Photo 3, Southwest corner, looking northeast.



Photo 4, Southside, looking north.



Photo 5, Southside, looking north.



Photo 6, Southeast corner, looking north.



Photo 7, Southwest corner, looking west.



Photo 8, East side, looking west.



Photo 9, Northeast corner, looking southwest.



Photo 10, Northeast side, looking south



Photo 11, North side, looking south



Photo 12, Northwest side, looking south