



## **PIVOTAL ENGINEERING, LLC**

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October 3, 2016

Nelson Morvant  
Entergy Services, Inc.  
639 Loyola Ave.  
New Orleans, LA 70113

**RE: Closure Plan - EPA Final CCR Rule (§ 257.102)  
Entergy Louisiana LLC. Nelson Coal Generation Station  
Nelson Coal Ash Disposal Landfill  
Westlake, LA**

Dear Mr. Morvant:

Pivotal Engineering LLC (Pivotal) has been retained by Entergy Louisiana LLC to prepare the following assessment of the EPA's requirements under the HAZARDOUS AND SOLID WASTE MANAGEMENT SYSTEM; DISPOSAL OF COAL COMBUSTION RESIDUALS FROM ELECTRIC UTILITIES [RIN-2050-AE81; FRL-9149-4] (EPA Final CCR Rule) associated with the Closure Plan for the CCR Landfill at Nelson Coal Ash Disposal facility in Westlake, Louisiana. Presented below is the project background, summary of findings, limitations, and certifications.

### **1.0 BACKGROUND**

As required by § 40 CFR 257.102 (b)(2) of the EPA Final CCR Rule, Closure Plans must be prepared for active CCR units by October 17, 2016.

In support of the above requirement, Pivotal has completed a Closure Plan for the CCR Landfill at the Nelson Coal Ash Disposal Landfill (CADL) in October 2016. A complete listing of documents reviewed and utilized as part of the preparation of the Closure Plan is included in the References at the end of this letter.

### **2.0 SUMMARY OF FINDINGS**

Based upon a review of the documents listed in the References, Pivotal has identified that the requirements of the EPA Final Rule have been met.

The written Closure Plan includes the following information per §257.102:

1. A description of the how the CCR unit will be closed;
2. A description of the final cover system and the methods and procedures to be used to install the final cover;
3. An estimate of the maximum inventory of CCR ever onsite over the active life of the CCR unit;

4. An estimate of the largest area of the CCR unit ever requiring a final cover; and
5. A schedule for completing all activities necessary to satisfy the closure criteria in §257.102.

Pivotal has identified that the following closure activities must be conducted:

1. Installation of the final cover system in accordance with §257.102(d); and
2. Preparation of certification and filing of notification that closure of the CCR unit has been conducted in accordance with §257.102.

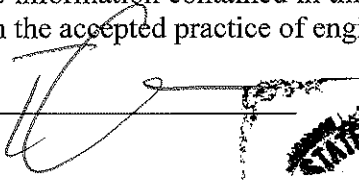
### 3.0 LIMITATIONS

The signature of Pivotal's authorized representative on this document represents that to the best of Pivotal's knowledge, information and belief in the exercise of its professional judgment, it is Pivotal's professional opinion that the aforementioned information is accurate as of the date of such signature. Any recommendation, opinion, or decisions by Pivotal are made on the basis of Pivotal's experience, qualifications and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

### 4.0 CERTIFICATION

I, Tarek Elnaggar being a Registered Professional Engineer in accordance with the Louisiana Professional Engineer's Registration do hereby certify to the best of my knowledge, information and belief, that the information contained in this report is true and correct and has been prepared in accordance with the accepted practice of engineering.

SIGNATURE: \_\_\_\_\_



DATE \_\_\_\_\_

10/17/16

Address:

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1515 Poydras St, Suite 1875  
New Orleans, LA 70112  
Telephone: (504) 799 3653



REFERENCES:

Coal Combustion Residue  
Closure Plan  
Entergy Louisiana LLC - Nelson Coal Ash Disposal Landfill  
October 17, 2016

Louisiana Solid Waste Permit GD-019-0261/P-0018