

US EPA ARCHIVE DOCUMENT

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Via Electronic Mail
hoffman.stephen@epa.gov

Re: Coal Combustion Residual Site Assessment - Big Cajun II

Dear Mr. Hoffman:

Louisiana Generating LLC ("LaGen") hereby submits its response to the report and recommendations of the Environmental Protection Agency ("EPA") pertaining to the coal combustion residual ("CCR") site assessment conducted June 21, 2010, at LaGen's Big Cajun II generating facility. LaGen sets forth below each of the recommendations set forth EPA's letter of April 19, 2011, and the corresponding actions being taken by LaGen.

1.2.1 Recommendations Regarding the Structural Stability

EPA recommended that, in order to evaluate the structural stability of the CCR impoundments, a new geotechnical engineering evaluation be conducted. The new geotechnical engineering evaluation should be based on current standards, including seismic loading conditions.

LaGen has retained GeoEngineers, Inc. to perform the recommended geotechnical engineering evaluation. GeoEngineers anticipates completing the evaluation and report in the second quarter of 2011.

1.2.2 Recommendations Regarding the Hydrologic/Hydraulic Safety.

1.2.3 Recommendations Regarding the Supporting Technical Documentation.

EPA's recommendations regarding the Hydrologic/Hydraulic safety at the site were inconclusive at the time of the assessment. EPA recommends that LaGen take the following actions to document that the design and construction of the existing dike embankments meet the requirements of the current Louisiana Dam Safety Program:

- Conduct slope stability analysis of existing embankments to verify safety factors meet or exceed the minimum requirements of the dam safety program for all required loading condition.
- Conduct a hydrologic/hydraulic analysis of the existing impoundment to verify that it can store storm water from a 1 percent probability (100-year) design event without overtopping the dike. Amend and expand the Emergency Action Plan to include a dam break response.

LaGen has retained GeoEngineers, Inc. to conduct a slope stability analysis of the existing embankments and a hydrologic/hydraulic analysis of the existing impoundments. The report is expected in the second quarter of 2011. Based on the results of these analyses, LaGen will thereafter amend the Big Cajun II Emergency Action Plan to include a dam break response.

1.2.4 Recommendations Regarding the Description of the Management Unit(s).

EPA had no recommendations at this time.

1.2.5 Recommendations Regarding the Field Observations.

EPA recommended that the Bottom Ash Pond's landside southern embankment be investigated in light of observed sloughing and the wet condition to address the potential for a partial collapse.

GeoEngineers, Inc. has investigated the embankment, and will issue its analysis and recommendations in the report expected in the second quarter of 2011. Following receipt of GeoEngineer's report and recommendations, LaGen will implement any recommended corrective actions.

1.2.6 Recommendations Regarding the Maintenance and Methods of Operation.

EPA recommended that LaGen develop and implement a written Operations and Maintenance program for the dike embankments, to include regular inspection by qualified dam safety/assessment engineers.

Not later than the third quarter of 2011, LaGen will develop a written Operations and Maintenance Plan for the dike embankments, to include regular inspection by a qualified dam engineer.

1.2.7 Recommendations Regarding the Surveillance and Monitoring Program.

EPA recommended LaGen monitor any areas of local sloughing and any soft, wet spots along the downstream slope of the bottom ash cell dike to evaluate any cause thereof and appropriate corrective measures, if any, and to implement a program of regular inspections by dam safety engineers to identify changes in the performance of the embankments in a timely manner.

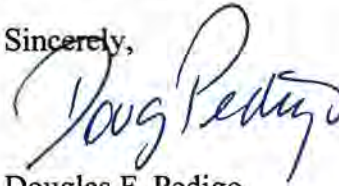
LaGen will monitor the downstream slope of the bottom ash cell, and any wet spots found during inspections, and implement appropriate corrective measures, if any. Furthermore, As suggested by EPA, LaGen has contacted the Louisiana Department of Transportation and Development ("LDOTD") regarding the LDOTD's dam safety inspection program, but LDOTD considers the Louisiana Department of Environmental Quality ("LDEQ") to be the regulatory agency charged with the duty to oversee solid waste impoundments. LaGen will retain GeoEngineers, Inc., which has qualified personnel to conduct dam inspections, to assist in implementing EPA's recommendation.

1.2.8 Recommendations Regarding Continued Safe and Reliable Operation.

EPA had no recommendations at this time.

If you have any questions regarding LaGen's steps to implement EPA's CCR impoundment recommendations, please feel free to contact me, or Mr. Gary Ellender, LaGen's Regional Environmental Manager, at 225-618-4465.

Sincerely,



Douglas F. Pedigo