

US EPA ARCHIVE DOCUMENT



CERTIFIED MAIL No. 7008 1300 0000 5575 4304

March 30, 2009

Mr. Richard Kinch
US Environmental Protection Agency (5306P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

SUBJECT: Request for Information Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e)
Big Cajun 2 Power Station
Louisiana Generating LLC

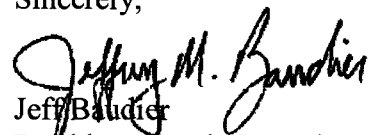
Dear Mr. Kinch:

Pursuant to your Section 104(e) of CERCLA information request letter dated March 9, 2009, Louisiana Generating LLC hereby provides information and documentation relating to this matter at the Big Cajun 2 Power Station located near New Roads, Louisiana. Your information request letter was received by Louisiana Generating LLC on March 16, 2009. We are submitting this information to EPA within ten (10) business days of receipt of your letter. Enclosed as an attachment to this letter are our responses for each of the coal combustion by-product waste management units at the subject facility. Also attached is an inspection report by the Louisiana Department of Environmental Quality as requested in question 6. Each information request is reiterated in italics followed by our response.

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

If you have questions regarding the submittal information, please contact me at (225) 618-4407.

Sincerely,


Jeff Baudier

President, South Central Region

ATTACHMENT A**Fly-Ash Unit
Big Cajun II
Louisiana Generating, LLC**

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit does not have a rating, please note that fact.

The unit has no rating. The fly ash unit is regulated by the Louisiana Department of Environmental Quality.

2. What year was each management unit commissioned and expanded?
Commissioned 1980. No expansion has occurred.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

This unit consists primarily of fly ash. The fly ash is permanently stored in the unit, some fly ash is removed from the unit for recycle/reuse. Because this management unit receives effluent from the adjacent bottom-ash unit, it may contain de-minimus amounts of bottom-ash and raw water treatment wastes (see description for the bottom-ash unit).

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

The fly ash unit was designed by a professional engineer as denoted on original construction plans. The construction of the fly ash unit was conducted under the auspices of a professional engineer as denoted in the "Control of Earthwork" section of the construction

contract/specification. Inspection and monitoring of the fly ash unit are conducted by plant specialist and/or technicians. Should abnormalities or significant observation surface during routine inspections, the appropriate subject matter specialist is consulted.

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

The condition of the fly ash unit is assessed with regard to safety on a weekly basis by plant staff. These staff individuals are trained with respect to basic embankment safety observation/assessment (ie embankment sloughing, embankment seepage, erosion, burrow holes, vegetation assessment, etc.). Should observations of a severe nature be made, consultation with company engineers experienced in this area or external geotechnical engineers is conducted. No significant embankment/impoundment safety issues have been observed with respect to the fly ash unit during recent inspections. Plans are to continue with the weekly inspection conducted by plant specialist/technicians and perform semi annual assessments by a company civil engineer.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation.

Please provide a copy of the most recent official inspection report or evaluation.

The last inspection of the fly ash management unit was in September 2006 by personnel from the Louisiana Department of Environmental Quality (LDEQ), Waste Division. As part of the LDEQ report, it was stated that the units were checked for erosion, and no problems were observed at the units. Big Cajun 2 is not aware of any planned state or federal inspection or evaluation in the future. (The 2006 DEQ inspection report is attached)

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

No evaluations or inspections have been conducted by State or Federal regulatory officials within the past year. The last inspection was by a State official with the Waste Division of the Louisiana Department of Environmental Quality in 2006. The inspection did not uncover any safety issues associated with the management unit.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s). Please provide the date that the volume measurement was taken. Please provide the maximum height of

the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

Management Unit	Surface Area (acres)	Total Storage Capacity (acre-ft)	Currently Stored Material (cu yds)	Height (feet)
Fly Ash	175	1750	1,181,203	10

Currently stored estimated through December 2008. (Currently stored based on volume measurement survey in 2001 and flyover in 2004, with addition of volumes disposed in years 2005-2008.)

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

There have been no known spills or unpermitted releases from the unit in the last ten years.

10. Please identify all current legal owner(s) and operator(s) at the facility.

The legal owners are Louisiana Generating LLC (86%) and Entergy Gulf States, Inc. (14%). The operator is Louisiana Generating LLC.

ATTACHMENT B**Bottom Ash Unit
Big Cajun II
Louisiana Generating, LLC**

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit does not have a rating, please note that fact.

The unit has no rating. The bottom ash unit is regulated by the Louisiana Department of Environmental Quality.

2. What year was each management unit commissioned and expanded?

Commissioned 1980. No expansion has occurred.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

The materials stored in this unit include consists primarily of bottom ash with minor amounts of clarifier underflow (settled solids from clarifying river water used for cooling). These materials are permanently stored in the Bottom Ash Unit, although some bottom ash is removed from the basin for recycle/reuse.

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

The bottom ash unit was designed by a professional engineer as denoted on original construction plans. The construction of the bottom ash unit was conducted under the auspices of a professional engineer as denoted in the "Control of Earthwork" section of the construction contract. Inspection and monitoring of the bottom ash unit are conducted by plant specialist and/or technicians. Should abnormalities or significant observation surface during routine inspections, the appropriate subject matter specialist is consulted.

5. *When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?*

The condition of the bottom ash unit is assessed with regard to safety on a weekly basis by plant staff. These staff individuals are trained with respect to basic embankment safety observation/assessment (ie embankment sloughing, embankment seepage, erosion, burrow holes, vegetation assessment, etc.). Should observations of a severe nature be made, consultation with company engineers experienced in this area or with external geotechnical engineers is conducted. No significant embankment/impoundment safety issues have been observed with respect to the bottom ash unit during recent inspections. Plans are to continue weekly plant staff assessments and conduct semi annual assessments by a company civil engineer.

6. *When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.*

The last inspection of the bottom ash management unit was in September 2006 by personnel from the Louisiana Department of Environmental Quality (LDEQ), Waste Division. As part of the LDEQ report, it was stated that the surface impoundments were checked for erosion, and no problems were observed at the surface impoundments. Big Cajun 2 is not aware of any planned state or federal inspection or evaluation in the future. (The 2006 DEQ inspection report is attached)

7. *Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.*

No evaluations or inspections have been conducted by State or Federal regulatory officials within the past year. The last inspection was by a State official with the Waste Division of the Louisiana Department of Environmental Quality in 2006. The inspection did not uncover any safety issues associated with the management unit.

8. *What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s). Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.*

Management Unit	Surface Area (acres)	Total Storage Capacity (acre-ft)	Currently Stored Material (cu yds)	Height (feet)
Bottom Ash	66	1,188	893,158	18
Clarifier Underflow			12,550	

Currently stored estimated through December 2008. (Currently stored based on volume measurement survey in 2001 and flyover in 2004, with addition of volumes disposed in years 2005-2008.)

9. *Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).*

There have been no known spills or unpermitted releases from the unit in the last ten years.

10. *Please identify all current legal owner(s) and operator(s) at the facility.*

The legal owners are Louisiana Generating LLC (86%) and Entergy Gulf States, Inc. (14%). The operator is Louisiana Generating LLC.

ATTACHMENT C**Water Treatment Unit
Big Cajun II
Louisiana Generating, LLC**

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit does not have a rating, please note that fact.

The unit has no rating. The water treatment units are regulated by the Louisiana Department of Environmental Quality.

2. What year was each management unit commissioned and expanded?
Commissioned 1979. No expansion has occurred.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s). Other:

This unit is an above-grade surface impoundment that contains wastewater and de-minimus amounts of solids that are removed from the wastewater. This unit consists of two bermed water settling/treatment ponds, consisting of a primary treatment basin and secondary treatment basin. The wastewater is introduced into the impoundment where the solids settle out and accumulate at the bottom of the pond leaving clear water at the surface. These basins are operated in series to facilitate the settling of solids with plant wastewaters, bottom ash sluice water, and stormwater runoff first entering the rainfall surge pond (below grade). Subsequently, these wastewaters are then pumped to the primary treatment basin, and then enter the secondary treatment basin prior to discharge to the Mississippi River.

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

The water treatment unit was designed by a professional engineer as denoted on original construction plans. The construction of the water treatment unit was conducted under the auspices of a professional engineer as denoted in the "Control of Earthwork" section of the construction contract. Inspection and monitoring of the water treatment unit are conducted by plant specialist and/or technicians. Should abnormalities or significant observation surface during routine inspections, the appropriate subject matter specialist is consulted.

5. *When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?*

The condition of the water treatment unit is assessed with regard to safety on a weekly basis by plant staff. These staff individuals are trained with respect to basic embankment safety observation/assessment (ie embankment sloughing, embankment seepage, erosion, burrow holes, vegetation assessment, etc.). Should observations of a severe nature be made, consultation with company engineers experienced in this area or with external geotechnical engineers is conducted. Plans are to continue weekly plant staff assessments and conduct quarterly to semi-annual assessments by company civil engineers. No significant embankment or impoundment safety issues have been observed with respect to the water treatment unit during recent inspections. Plans are to continue with the weekly inspection conducted by plant specialist/technicians and perform semi annual assessments by a company civil engineer.

6. *When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation.*

Please provide a copy of the most recent official inspection report or evaluation.

The last inspection of the water treatment unit was in September 2006 by personnel from the Louisiana Department of Environmental Quality (LDEQ), Waste Division. As part of the LDEQ report, it was stated that the surface impoundments were checked for erosion, and no problems were observed at the surface impoundments. Big Cajun 2 is not aware of any planned state or federal inspection or evaluation in the future. (The 2006 DEQ inspection report is attached)

7. *Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.*

No evaluations or inspections have been conducted by State or Federal regulatory officials within the past year. The last inspection was by a State official with the Waste Division of the

Louisiana Department of Environmental Quality in 2006. The inspection did not uncover any safety issues associated with the management unit.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s). Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

Management Unit	Surface Area (acres)	Total Storage Capacity (acre-ft)	Currently Stored Material (cu yds)	Height (feet)
Primary Treatment Unit	25.4	457.2		18
Secondary Treatment Unit	7.1	127.8		18

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

There have been no spills or unpermitted releases from the unit in the last ten years.

10. Please identify all current legal owner(s) and operator(s) at the facility.

The legal owners are Louisiana Generating LLC (86%) and Entergy Gulf States, Inc. (14%). The operator is Louisiana Generating LLC.