



**PIVOTAL ENGINEERING, LLC**

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October 3, 2016

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

**RE: Post-Closure Plan - EPA Final CCR Rule (§ 257.104)  
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 Post-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 §257.104(d)(2) of the EPA Final CCR Rule, Post-Closure Care Plans must be prepared for active CCR units by October 17, 2016.

In support of the above requirement, Pivotal has completed a Post-Closure Care 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 Post-Closure Care 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 Post- Closure Care Plan includes the following information per §257.104:

1. A description of the monitoring and maintenance activities for the CCR unit and the frequency at which these activities would be performed. This includes maintaining surface cover systems, groundwater monitoring systems, and leachate collection systems.
2. The name, address, and telephone number of the person or office to contact about the facility during the post-closure care period.

3. A description of the planned uses of the property during the post-closure care period.

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

1. Maintaining the integrity and effectiveness of the final cover system, including repairs to the final cover as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover.
2. Maintaining the integrity and effectiveness of the leachate collection and removal system and operating the leachate collection and removal system in accordance with the requirements of §257.70 if required at the time of closure due to construction of a lateral expansion (new cell after October 19, 2015).
3. Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of § 257.90 through § 257.98.

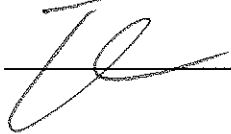
### 3.0 LIMITATIONS

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: \_\_\_\_\_

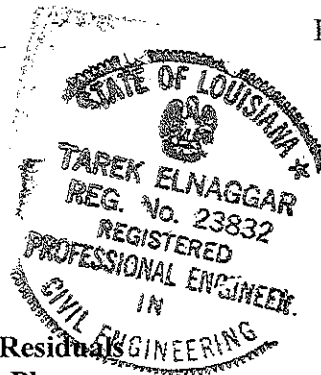


DATE

10/13/16

Address:

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REFERENCES:

**Coal Combustion Residuals  
Post-Closure Care Plan  
Entergy Louisiana LLC - Nelson Coal Ash Disposal Landfill  
October 17, 2016**

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