DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D.
SECRETARY

Certified Mail#_____

File No.: LA0005843
AI No.: 7893
Activity No.: PER20060001

Mr. Gus M. VonBodungen
Entergy Gulf States, Inc.
Roy S. Nelson Oil & Gas Generating Plant
Post Office Box 61000, Mail Unit L-ENT-5E
New Orleans, Louisiana 70161

RE: Draft Major Modification of Louisiana Pollutant Discharge Elimination System (LPDES) permit LA0005843

Dear Mr. VonBodungen:

Your request received on May 22, 2006 regarding the modification of LPDES permit LA0005843 has been evaluated. The draft modification(s) are as follows:

1. In accordance with the settlement agreement between Entergy and LDEQ and the requirements outlined in LDEQ's July 8, 2005 letter of agreement, Outfalls 002, 005 and 007 have been changed to become effective only after circumstances outlined in Part II, Paragraph R.6 occur. The wastewater descriptions for Outfalls 002, 005 and 007 are being revised as per Entergy's modification request.

2. Outfall 002 – The effluent limitations for Outfall 002 have been revised in accordance with LDEQ stormwater guidance. The effluent limitations for TSS have been moved to Outfall 107, the monthly average limitation for oil & grease has been removed and the daily maximum limitation for oil & grease has been changed to 15 mg/l.

3. Part II, Paragraph R.6 (Stormwater Discharges) has been revised to incorporate the new Stormwater Pollution Prevention Plan requirements which were outlined in LDEQ's July 8, 2005 letter.

4. Outfall 107 is being added for the discharge of hydrostatic test waters from hydrostatic tests conducted on various pipes, tanks, vessels, and/or equipment throughout the facility. The effluent from this outfall shall discharge via final Outfalls 002 or 007.

Attached are the draft revisions to Part I of the permit (Effluent Limitations, Part I, pages 7,10, 12 and 12a of 12), the modified Part II pages, and the modified Title Page for the requested modifications. Please note that this is a DRAFT MODIFICATION only. Authorization to

ENVIRONMENTAL **SERVICES**
: PO BOX 4313, BATON ROUGE, LA 70821-4313
P:225-219-3181 F:225-219-3309
WWW.DEQ.LOUISIANA.GOV

change your discharge will be granted only upon the receipt of an approved modification from this Office. All other conditions of the permit LA0005843 shall continue unchanged and remain valid until the expiration date of the permit. In accordance with LAC 33:IX.3105.B.2, only those permit limitations and conditions pertaining to the draft modification(s) are open for public comment.

This Office will publish the enclosed public notice one time in a local newspaper of general circulation and the Office of Environmental Services Public Notice Mailing List. In accordance with LAC 33:IX.6521.A, the applicant shall receive and is responsible for paying the invoice(s) from the above mentioned newspaper. LAC 33:IX.6521.A states: "...The costs of publication shall be borne by the applicant."

Pursuant to LAC 33.IX.1309.I, LAC 33.IX.6509.A.1 and LAC 33.I.1701, you must pay any outstanding fees to the Department. Therefore, you are encouraged to verify your facility's fee status by contacting LDEQ's Office of Management and Finance, Financial Services Division at (225) 219-3863. Failure to pay in the manner and time prescribed could result in applicable enforcement actions as prescribed in the Environmental Quality Act, including, but not limited to revocation or suspension of the applicable permit, and/or assessment of a civil penalty against you.

Should you have any questions concerning any part of the draft modification(s), please feel free to contact Melanie Connor, Office of Environmental Services, at the address on the preceding page or telephone (225) 219-3088. All future correspondence regarding this permit shall use the Agency Interest (AI) number 7893 and LPDES permit number LA0005843.

Sincerely,

Jesse Chang

Jesse Chang
Environmental Scientist Manager
Industrial Water Permits

MBC

Attachment(s) including, public notice, and factsheet:

ec: Scott Guilliams
Cheryl LeJeune
Water Permits Division

Sondra McDonald (6WQ-AT)
U.S. Environmental Protection
Agency, Region VI

Permit Compliance Unit
Office of Environmental Compliance

c: Melanie Connor
Water Permits Division

IO-W File

Public Notice
Scheduled for Publication

The notice associated with the following:

Request for Public Comment on a
Draft Water Discharge Permit Modification for
Entergy Gulf States, Inc.
Roy S. Nelson Oil & Gas Generating Plant
Agency Interest (AI) No. 7893, LA0005843, PER20060001

is scheduled to publish in the following paper (s)

Newspaper(s)	**Scheduled Publication Date***
American Press, of Lake Charles, LA	Friday, March 16, 2007*

*In accordance with **LAC 33:IX.6521.A**, the applicant is responsible for payment of all costs of publication. Newspaper will bill applicant directly.*

Questions regarding publication or payment may be directed to:

DEQ Office of Environmental Services, Public Participation Group Staff:

Name: Calvin Fair

Phone: 225-219-3283

Email: ***Calvin.Fair@LA.GOV***

Comments:

***Actual date of publication is pending confirmation of publication by newspaper(s)**

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
ENTERGY GULF STATES, INC.
ROY S. NELSON OIL & GAS GENERATING PLANT
DRAFT WATER DISCHARGE PERMIT MODIFICATION

The LDEQ, Office of Environmental Services, is accepting written comments on a draft modification of a Louisiana Pollutant Discharge Elimination System (LPDES) permit prepared for Entergy Gulf States, Inc., Roy S. Nelson Oil & Gas Generating Plant, Post Office Box 61000, Mail Unit L-ENT-5E, New Orleans, Louisiana 70161. **The facility is located at 3500 Houston River Road, Westlake, Calcasieu Parish.**

The principal discharge from this existing source is made into the Houston River, waters of the state classified for primary contact recreation, secondary contact recreation, fish and wildlife propagation and agriculture. Under the SIC Code 4911, the applicant proposes to modify its LPDES permit in order to revise the stormwater requirements for Outfalls 002, 005 and 007, and the stormwater pollution prevention plan language found in Part II, Paragraph R. Further, the modification adds an outfall for the discharge of hydrostatic test waters.

During the preparation of this permit, it has been determined that the discharge will have no adverse impact on the existing uses of the receiving waterbody. As with any discharge, however, some change in existing water quality may occur.

This permit is being modified to revise the stormwater requirements for outfalls 002, 005 and 007, and the stormwater pollution prevention plan language found in Part II, Paragraph R. Further, the modification adds an outfall for the discharge of hydrostatic test waters. **In accordance with LAC 33:IX.3105.B.2, only those permit limitation and conditions pertaining to the draft modifications are open to public comment.**

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Thursday, April 19, 2007.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The modification request, draft permit modification, and fact sheet are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov**.

Inquiries or requests for additional information regarding this permit action should be directed to Melanie Connor, LDEQ, Water Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3088.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at maillistrequest@ldeq.org or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the draft permit and fact sheet can be viewed at the LDEQ permits public notice webpage at www.deq.state.la.us/news/PubNotice/ and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.state.la.us/ldbc/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 7893, Permit Number LA0005843, and Activity Number PER20060001.

Scheduled Publication Date: Friday, March 16, 2007

PERMIT NUMBER:
LA0005843
AI 7893

DEQ
LOUISIANA

OFFICE OF ENVIRONMENTAL SERVICES

Water Discharge Permit

Pursuant to the Clean Water Act, as amended (33 U.S.C. 1251 et seq.), and the Louisiana Environmental Quality Act, as amended (La. R. S. 30:2001 et seq.), rules and regulations effective or promulgated under the authority of said Acts, and in reliance on statements and representations heretofore made in the application, a Louisiana Pollutant Discharge Elimination System permit modification is issued authorizing

Entergy Gulf States, Inc.
Roy S. Nelson Oil & Gas Generating Plant
Post Office Box 61000, Mail Unit L-ENT-5E
New Orleans, Louisiana 70161

Type Facility: Steam Electric Generating Station

Location: 3500 Houston River Road in Westlake
Calcasieu Parish

Receiving Waters: Houston River

to discharge in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I and II (as applicable) attached hereto.

This permit and the authorization to discharge were effective on October 1, 2003 and shall expire five (5) years from the original effective date of the permit.

This permit has not been previously modified.

This modification shall become effective on _____

Issued on_____

DRAFT

_____
Chuck Carr Brown, Ph.D.
Assistant Secretary

GALVEZ BUILDING · 602 NORTH 5th STRET · P.O. BOX 4313 · BATON ROUGE, LA 70821-4313 · PHONE (225) 219-3181

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

During the period beginning upon exceedance of benchmark concentrations in accordance with the requirements specified by Part II, Paragraph R.6 and lasting through the expiration date the permittee is authorized to discharge from:

Outfall 002, the intermittent discharge of low contamination potential stormwater runoff from the No. 6 fuel oil storage tank farm and No. 6 fuel oil pump area, and previously monitored hydrostatic test water from Internal Outfall 107.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic		Discharge Limitations				Monitoring Requirements	
		(lbs/day, UNLESS STATED)		Other Units (mg/L, UNLESS STATED)			
	STORET Code	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	Measurement Frequency(*1)	Sample Type
Flow-MGD	50050	Report	Report	—	---	1/quarter	Estimate
TOC	00680	---	---	---	50	1/quarter	Grab
Oil and Grease	03582	---	---	---	15	1/quarter	Grab
pH Minimum/Maximum Values (Standard Units)	00400	---	---	6.0(*2) (Min)	9.0(*2) (Max)	1/quarter	Grab

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outfall 002, flow-weighted composite sample from the tank farm oil/water separator, fuel oil island oil/water separator, discharge from the northeast cell and discharge from the southeast cell. This composite involves discharge from two oil/water separators and four manual drain valves.

FOOTNOTE(S):

(*1) When discharging.

(*2) The permittee shall report on the Discharge Monitoring Report both the minimum and maximum instantaneous pH values measured.

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

During the period beginning upon exceedance of benchmark concentrations in accordance with the requirements specified by Part II, Paragraph R.6 and lasting through the expiration date the permittee is authorized to discharge from:

Outfall 005, the intermittent discharge of low contamination potential stormwater runoff from industrial and non-industrial portions of the site including but not limited to runoff from the ash haul road, the coke and limestone haul road, the gas yard, No. 2 oil fuel handling area, and the 138 KV switchyard.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic		Discharge Limitations				Monitoring Requirements	
		(lbs/day, UNLESS STATED)		Other Units (mg/L, UNLESS STATED)			
	STORET Code	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	Measurement Frequency(*1)	Sample Type
Flow-MGD	50050	Report	Report	---	---	1/quarter	Estimate
TOC	00680	---	---	---	50	1/quarter	Grab
Oil and Grease	03582	---	---	---	15	1/quarter	Grab
pH Minimum/Maximum Values (Standard Units)	00400	---	---	6.0(*2) (Min)	9.0(*2) (Max)	1/quarter	Grab

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outfall 005, at the point of discharge from the plant drainage system where the stormwater runoff crosses under the road leading from the coke storage building area.

FOOTNOTE(S):

(*1) When discharging.

(*2) The permittee shall report on the Discharge Monitoring Report both the minimum and maximum instantaneous pH values measured.

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

During the period beginning upon exceedance of benchmark concentrations in accordance with the requirements specified by Part II, Paragraph R.6 and lasting through the expiration date the permittee is authorized to discharge from:

Outfall 007, the intermittent discharge of low contamination potential stormwater runoff from the switchyard and contractor lay down yard, and previously monitored hydrostatic test water from Internal Outfall 107.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic		Discharge Limitations				Monitoring Requirements	
		(lbs/day, UNLESS STATED)		Other Units (mg/L, UNLESS STATED)			
	STORET Code	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	Measurement Frequency(*1)	Sample Type
Flow-MGD	50050	Report	Report	---	---	1/quarter	Estimate
TOC	00680	---	---	---	50	1/quarter	Grab
Oil and Grease	03582	---	---	---	15	1/quarter	Grab
pH Minimum/Maximum Values (Standard Units)	00400	---	---	6.0(*2) (Min)	9.0(*2) (Max)	1/quarter	Grab

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outfall 007, at the point of discharge from the southeast ditch exiting the contractor lay down yard.

FOOTNOTE(S):

(*1) When discharging.

(*2) The permittee shall report on the Discharge Monitoring Report both the minimum and maximum instantaneous pH values measured.

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

During the period beginning the effective date of the permit modification and lasting through the expiration date the permittee is authorized to discharge from:

Internal Outfall 107, the intermittent discharge hydrostatic test waters from hydrostatic tests conducted on various pipes, tanks, vessels, and/or equipment throughout the facility.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic		Discharge Limitations				Monitoring Requirements	
		(lbs/day, UNLESS STATED)		Other Units (mg/L, UNLESS STATED)			
	STORET Code	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	Measurement Frequency(*1)	Sample Type
Flow-MGD	50050	Report	Report	---	---	1/discharge	Estimate
TSS	00530	---	---	---	90	1/discharge	Grab
TOC	00680	---	---	---	50	1/discharge	Grab
Oil and Grease	03582	---	---	---	15	1/discharge	Grab
Benzene (*2)(*3)	34030	---	---	---	50 µg/l	1/discharge	Grab
Total BTEX (*2)(*4)	49491	---	---	---	250 µg/l	1/discharge	Grab
Total Lead (*2)	01051	---	---	---	50 µg/l	1/discharge	Grab
pH Minimum/Maximum Values (Standard Units)	00400	---	---	6.0(*5) (Min)	9.0(*5) (Max)	1/discharge	Grab

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Internal Outfall 107, at the point of discharge from the pipe, vessel or equipment tested.

FOOTNOTE(S):

(*1) When discharging.

(*2) Sampling for Total Lead, Total BTEX and Benzene is **only** required when discharging hydrostatic test waters from **existing** pipes, tanks, vessels or equipment that have been used for the storage or transportation of liquid or gaseous hydrocarbons, ie diesel tanks or natural gas lines, etc.

(*3) For Discharge Monitoring Report calculations and reporting requirements for benzene, analytical test results less than 10 µg/l may be reported as zero.

(*4) Total BTEX shall be measured as the sum of Benzene, Toluene, Ethylbenzene and Total Xylene (including ortho-, meta-, and para-xylene) as quantified by EPA methods 601, 602, and 1624.

(*5) The permittee shall report on the Discharge Monitoring Report both the minimum and maximum instantaneous pH values measured.

OTHER REQUIREMENTS (continued)

be recycled or contained for proper disposal. Spills of these materials are to be cleaned up by dry means whenever possible.

e. All storage tank installations (with a capacity greater than 660 gallons for an individual container, or 1,320 gallons for two or more containers in aggregate within a common storage area) shall be constructed so that a secondary means of containment is provided for the entire contents of the largest tank plus sufficient freeboard to allow for precipitation. Diked areas should be sufficiently impervious to contain spills.

f. All diked areas surrounding storage tanks or stormwater collection basins shall be free of residual oil or other contaminants so as to prevent the accidental discharge of these materials in the event of flooding, dike failure, or improper draining of the diked area. All drains from diked areas shall be equipped with valves which shall be kept in the closed condition except during periods of supervised discharge.

g. All check valves, tanks, drains, or other potential sources of pollutant releases shall be inspected and maintained on a regular basis to assure their proper operation and to prevent the discharge of pollutants.

h. The permittee shall assure compliance with all applicable regulations promulgated under the Louisiana Solid Waste and Resource Recovery Law and the Hazardous Waste Management Law (L.R.S. 30:2151, etc.). Management practices required under above regulations shall be referenced in the SWP3.

i. The permittee shall amend the SWP3 whenever there is a change in the facility or change in the operation of the facility which materially increases the potential for the ancillary activities to result in a discharge of significant amounts of pollutants.

j. If the SWP3 proves to be ineffective in achieving the general objectives of preventing the release of significant amounts of pollutants to water of the state, then the specific objectives and requirements of the SWP3 shall be subject to modification to incorporate revised SWP3 requirements.

6. Facility Specific SWP3 Conditions:

The permittee must conduct benchmark monitoring for all stormwater outfalls that are covered exclusively under the SWP3 (i.e. stormwater outfalls not effective in Part I of this LPDES permit), in accordance with the following requirements:

OTHER REQUIREMENTS (continued)

Parameter	Benchmark Monitoring Cutoff Concentration	Frequency
Total Recoverable Iron	1.0 mg/l	1/year
TOC	50.0 mg/l	1/year
Oil & Grease	15.0 mg/l	1/year
pH	6.0 (min) - 9.0 (max) s.u.	1/year

The effluent results shall be kept on site during the life of the permit as an attachment to the SWP3, and shall be submitted to LDEQ upon submittal of an LPDES renewal application.

If a benchmark sample exceeds the specified concentrations indicated above, the permittee shall do the following:

a. The permittee shall review and update (as necessary) its SWPPP within the first three (3) months after the benchmark sampling event where the exceedance(s) was/were noted.

b. The permittee shall re-sample the specific outfall from which the exceedance(s) occurred within three (3) months of the SWPPP review/update. If the re-sample does not exceed any of the benchmark concentrations, the permittee will proceed to item c below. However, if the re-sample does exceed any of the benchmark limits, the outfall requirements specified in Part I of the permit, with the associated limits and other requirements, will become effective starting at the first monitoring period (as specified by Part II, Paragraph S) after the exceedance(s), and shall be enforceable until renewal of the permit. Written notification shall be submitted to the Office of Environmental Compliance and the Office of Environmental Services when Part I becomes effective for each outfall.

c. If the re-sampling event taken at three (3) months from the SWPPP update (addressed in Item b above) does not exceed the benchmark concentrations, the facility will re-sample again within three (3) months of the first re-sampling event. If this second re-sample does not exceed any of the benchmark concentrations, the outfall will remain in the SWPPP only and will resume the annual benchmark sampling schedule. However, if the second re-sample does exceed any of the benchmark concentrations, the outfall requirements specified in Part I of the permit, with the associated limits and other requirements, will become effective starting at the first monitoring period (as specified by Part II, Paragraph S) after the exceedance(s), and shall be enforceable until renewal of the permit. Written notification shall be submitted to the Office of Environmental Compliance and the Office of Environmental Services when Part I becomes effective for each outfall.

d. If any benchmark sample analytical data is not valid due to analytical errors, the benchmark sampling event must be rerun at the first available storm event after the discovery of the analytical error in order to obtain a valid sample result.

OTHER REQUIREMENTS (continued)

S. DISCHARGE MONITORING REPORTS

Monitoring results must be reported on a Discharge Monitoring Report (DMR) form (EPA No. 3320-1 or an approved substitute). All monitoring reports must be retained for a period of at least three (3) years from the date of the sample measurement. The permittee shall make available to this

(continued on Part II, Page 10 of 21 from the original LPDES permit)