**Context and Background:**

Jeremy Halland, Manager of Environmental Project Services at Entergy Services, LLC, provides testimony supporting Entergy Louisiana LLC's (ELL) application for environmental compliance associated with the construction and operation of three new Combined Cycle Combustion Turbine (CCCT) generating units. Two of these units will be located near Richland Parish ("Units 1 and 2") and the third at a yet-to-be-determined location in the Southeast Louisiana Planning Area ("Unit 3").

**Key Areas Covered:**

**1. Required Permits and Regulatory Oversight:**

* The CCCTs' sites will be subject to oversight by various regulatory bodies, including:
  + Louisiana Department of Environmental Quality (LDEQ)
  + Louisiana Department of Natural Resources (LDNR)
  + U.S. Environmental Protection Agency (EPA)
  + U.S. Army Corps of Engineers (USACE)
* Applicable laws include the Clean Air Act (CAA), Clean Water Act (CWA), Resource Conservation and Recovery Act, and the Louisiana Environmental Quality Act.

**2. Air Quality Permits:**

* CCCTs will be classified as major stationary sources requiring multiple air permits:
  + Prevention of Significant Deterioration (PSD) permits.
  + New Source Performance Standards (NSPS).
  + Acid Rain Program permits.
* Emission controls will include Selective Catalytic Reduction (SCR) for nitrogen oxides (NOx) and Oxidation Catalysts for carbon monoxide (CO) and volatile organic compounds (VOC).
* The EPA’s Phase 2 CO₂ emission standard effective January 1, 2032, could limit future full-capacity operations if Carbon Capture and Storage (CCS) technology isn't fully integrated.

**3. Water Quality Regulations:**

* Permitting under the Louisiana Pollutant Discharge Elimination System (LPDES) for wastewater and stormwater discharge.
* Additional construction-related stormwater discharge permits from LDEQ required.
* Potential environmental effects include impacts on surface water resources, groundwater, and stormwater discharges. Mitigation measures will comply with state water quality standards.

**4. Other Environmental Issues:**

* Evaluation of potential environmental impacts (e.g., historical and archaeological sites, endangered species).
* Land clearing required for construction primarily involves active farmland; no significant endangered species habitats or archaeological resources identified near Units 1 and 2.
* USACE's Section 404 permit required for wetland impacts associated with Units 1 and 2; mitigation credits will be procured accordingly.

**5. Visibility and Vegetation Impact Analysis:**

* Comprehensive air quality analyses (NAAQS, PSD, Additional Impact Analysis) are underway, with no Class I Areas (such as national parks or wilderness areas) within 100 kilometers of the facilities; hence minimal impact anticipated.

**6. Current Status of Permits:**

* Main permits include PSD/Title V air operating permits and Section 404 permits for wetlands impacts.
* Permit applications for Units 1 and 2 expected to be filed with LDEQ in November 2024; Unit 3 permits filed later. The Section 404 permit was filed in June 2024, with additional wetland mitigation activities anticipated.

**Conclusion:**

Halland asserts ELL's thorough evaluation of environmental and community impacts, confirming that the CCCT projects will comply fully with applicable environmental regulations and standards at federal, state, and local levels. ELL is committed to mitigating adverse impacts related to land use, water resources, and air emissions through proactive planning and regulatory adherence.