COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY FOR CERTIFICATES)	
OF PUBLIC CONVENIENCE AND NECESSITY)	
AND APPROVAL OF ITS 2016 COMPLIANCE)	CASE NO. 2016-00027
PLAN FOR RECOVERY BY ENVIRONMENTAL)	
SURCHARGE)	

LOUISVILLE GAS AND ELECTRIC COMPANY

RESPONSE TO THE ATTORNEY GENERAL'S (AG) SUPPLEMENTAL DATA REQUESTS

DATED APRIL 8, 2016

FILED: APRIL 20, 2016

VERIFICATION

COMMONWEALTH OF KENTUCKY)) SS: COUNTY OF JEFFERSON)

The undersigned, **Charles R. Schram**, being duly sworn, deposes and says that he is Director – Energy Planning, Analysis and Forecasting for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Church Poly

Charles R. Schram

Subscribed and sworn to before me, a Notary Public in and before said County and State, this <u>All</u> day of <u>Apple</u> 2016.

<u>Undurfe hoster</u> Notary Public (SEAL)

My Commission Expires: JUDY SCHOOLER Notary Public, State at Large, KY My commission expires July 11, 2018 Notary ID # 512743

VERIFICATION

COMMONWEALTH OF KENTUCKY)) SS: COUNTY OF JEFFERSON)

The undersigned, **R. Scott Straight**, being duly sworn, deposes and says that he is the Director of Project Engineering for Louisville Gas and Electric Company and Kentucky Utilities Company and an employee of LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

R. Scott Straight

Subscribed and sworn to before me, a Notary Public in and before said County and State,

this <u>JOH</u> day of <u>April</u> 2016.

Heldy Schoolen (SEAL)

My Commission Expires: JUDY SCHOOLER Notary Public, State at Large, KY My commission expires July 11, 2018 Notary ID # 512743

VERIFICATION

COMMONWEALTH OF KENTUCKY)) SS: COUNTY OF JEFFERSON)

The undersigned, John N. Voyles, Jr., being duly sworn, deposes and says that he is the Vice President, Transmission and Generation Services for Louisville Gas and Electric Company and Kentucky Utilities Company and an employee of LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

John N. Voyles, Jr.

Subscribed and sworn to before me, a Notary Public in and before said County and State,

this <u>ADM</u> day of <u>April</u> 2016.

<u>Audy Scherter</u> (SEAL) Notary Public

My Commission Expires:

JUDY SCHOOLER Notary Public, State at Large, KY My commission expires July 11, 2018 Notary ID # 512743

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Attorney General's Supplemental Data Requests Dated April 8, 2016

Case No. 2016-00027

Question No. 1

Witness: Charles R. Schram / R. Scott Straight

- Q-1. Regarding Project 28 as discussed in Exhibit CRS-2 please provide a detailed explanation of the following statement found on p. 4 of 11: "The option to use PAC or coal and FGD additives will enable the Companies' [sic] to have greater control over where mercury is captured either in the unit's fly ash or gypsum."
- A-1. The option to use (a) PAC or (b) coal and FGD additives will enable the Companies to have greater control over where mercury is captured either in the unit's fly ash or gypsum. If PAC is used for mercury control, mercury will primarily be captured in the unit's baghouse and removed with the fly ash. If coal and FGD additives are used, mercury will primarily be captured in the unit's wet scrubber and removed with the gypsum. The ability to control where mercury is captured will support LG&E's beneficial use initiatives for coal combustion residuals.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Attorney General's Supplemental Data Requests Dated April 8, 2016

Case No. 2016-00027

Question No. 2

Witness: R. Scott Straight

- Q-2. Regarding the response to PSC first data request question 11 and the proposed use of organo-sulfide and halogenated liquid chemicals at Mill Creek:
 - a. What hazards does the use of these chemicals add to the plant?
 - b. Are these chemicals toxic
 - c. Do these chemicals represent additional safety concerns and if so what are they?
 - d. Are these chemicals hazardous and do they require special spill and disposal procedures?
- A-2. a. Organo-Sulfide: See attached. This chemical must not come into contact with any of the chemicals included in the 8034 Plus Safety Data Sheet (SDS) Section 10. Harmful gasses may be released. However, no storage, piping, or injection locations will be near any of the chemicals listed.

Halogenated Liquid: If injected in large quantities, the halogenated liquid could react and condense into hydrogen bromide which can be corrosive. However, the injection rates at all locations will be very low and it is not anticipated that any corrosion of downstream equipment will result from injection.

b. Organo-Sulfide: See the attachment provided in part a. Acute oral and dermal toxicity are included in the SDS Section 11. In the event of ingestion or inhalation, medical attention should be sought if symptoms occur. The note to physician is to treat symptoms.

Halogenated Liquid: See attached. Acute oral and dermal toxicity are included in the 7895 SDS Section 11. In the event of ingestion or inhalation, medical attention should be sought if symptoms occur. The note to physician is to treat symptoms.

c. Organo-Sulfide: This chemical can cause eye irritation. Proper use of Personal Protective Equipment (PPE) is required when handling the injection equipment. All locations that have the potential for the chemical to come into contact with eyes will

have eyewash or safety shower stations. See the attachment provided in part a. for more detailed information and precautionary information.

Halogenated Liquid: This chemical can cause skin irritation and serious eye irritation. Proper use of PPE is required when handling the injection equipment. All locations that have the potential for close contact with the chemical will have eyewash and safety shower stations. See the attachment provided in part b. for more detailed information and precautionary information

d. Organo-Sulfide: See the attachment provided in part a. This chemical could meet the criteria of a hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA) 40 SCR 261. Spill procedures are included in the SDS Section 6. Disposal procedures are included in the attached SDS Section 13. All bulk storage tanks at Mill Creek will be double-walled to prevent leaks and spills. All other bulk storage tanks will be placed in secondary spill containment.

Halogenated Liquid: See the attachment provided in part b. This chemical is not a hazardous waste as defined by the RCRA 40 SCR 261. Spill procedures are included in the attached SDS Section 6. Disposal procedures are included in the SDS Section 13. All bulk storage tanks at Mill Creek will be double-walled to prevent leaks and spills. All other bulk storage tanks will be placed in secondary spill containment.



MERCONTROL® 8034 PLUS

Section: 1. PRODUCT AND COMPANY IDENTIFICATION

Product name	:	MERCONTROL® 8034 PLUS
Other means of identification	:	Not applicable.
Restrictions on use	:	Refer to available product literature or ask your local Sales Representative for restrictions on use and dose limits.
Company	•	Nalco Company 1601 W. Diehl Road Naperville, Illinois 60563-1198 USA TEL: (630)305-1000
Emergency telephone number	:	(800) 424-9300 (24 Hours) CHEMTREC
Issuing date	:	12/12/2014

Section: 2. HAZARDS IDENTIFICATION

GHS Classification Eye irritation	: Category 2B
GHS Label element	
Signal Word	: Warning
Hazard Statements	: Causes eye irritation.
Precautionary Statements	 Prevention: Wash skin thoroughly after handling. Response: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/ attention.
Other hazards	: None known.
Section: 3. COMPOSITION/I	NFORMATION ON INGREDIENTS
Pure substance/mixture	: Mixture
Chemical Name	CAS-No. Concentration: (%)
Sodium Sulphide	1313-82-2 0.1 - 1
Section: 4. FIRST AID MEAS	URES
In case of eye contact	: Rinse with plenty of water. Get medical attention if symptoms occur.
In case of skin contact	: Wash off with soap and plenty of water. Get medical attention if symptoms occur.

If swallowed	:	Rinse mouth. Get medical attention if symptoms occur.
If inhaled	:	Get medical attention if symptoms occur.
Protection of first-aiders	:	In event of emergency assess the danger before taking action. Do not put yourself at risk of injury. If in doubt, contact emergency responders.Use personal protective equipment as required.
Notes to physician	:	Treat symptomatically.
Most important symptoms and effects, both acute and delayed	:	See Section 11 for more detailed information on health effects and symptoms.

Section: 5. FIREFIGHTING MEASURES

Suitable extinguishing media	:	Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.
Unsuitable extinguishing media	:	None known.
Specific hazards during firefighting	:	Not flammable or combustible.
Hazardous combustion products	:	Decomposition products may include the following materials: Carbon oxides nitrogen oxides (NOx) Sulphur oxides Oxides of phosphorus
Special protective equipment for firefighters	:	Use personal protective equipment.
Specific extinguishing methods	:	Fire residues and contaminated fire extinguishing water must be disposed of in accordance with local regulations. In the event of fire and/or explosion do not breathe fumes.

Section: 6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures	:	Refer to protective measures listed in sections 7 and 8.
Environmental precautions	:	Do not allow contact with soil, surface or ground water.
Methods and materials for containment and cleaning up	:	Stop leak if safe to do so. Contain spillage, and then collect with non-combustible absorbent material, (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations (see section 13). For large spills, dike spilled material or otherwise contain material to ensure runoff does not reach a waterway. Flush away traces with water.

Section: 7. HANDLING AND	STORAGE
Advice on safe handling	: Wash hands thoroughly after handling. Use only with adequate ventilation.
Conditions for safe storage	: Do not store near acids. Keep out of reach of children. Keep container tightly closed. Store in suitable labeled containers. The

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	original condition of the product is recovered upon thawing. If product freezes, thaw and mix before using.	
Suitable material	: The following compatibility data is suggested based on similar product data and/or industry experience: Compatibility with Plastic Materials can vary; we therefore recommend that compatibility is tested prior to use.	
Unsuitable material	: not determinednot determined	

Section: 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Contains no substances with occupational exposure limit values.

Engineering measures	:	Good general ventilation should be sufficient to control worker exposure to airborne contaminants.
Personal protective equipmer	nt	
Eye protection	:	Safety glasses
Hand protection	:	Wear protective gloves. Gloves should be discarded and replaced if there is any indication of degradation or chemical breakthrough.
Skin protection	:	Wear suitable protective clothing.
Respiratory protection	:	No personal respiratory protective equipment normally required.
Hygiene measures	:	Handle in accordance with good industrial hygiene and safety practice. Remove and wash contaminated clothing before re-use. Wash face, hands and any exposed skin thoroughly after handling.

Section: 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	:	Liquid
Colour	:	clear
Odour	:	Sulfurous
Flash point	:	> 93.3 °C
рН	:	12.0 - 13.2, 100 %
Odour Threshold	:	no data available
Melting point/freezing point	:	FREEZING POINT: -10 °C
Initial boiling point and boiling range	:	no data available
Evaporation rate	:	no data available
Flammability (solid, gas)	:	no data available
Upper explosion limit	:	no data available
Lower explosion limit	:	no data available

Vapour pressure	: no data available
Relative vapour density	: no data available
Relative density	: 1.145 - 1.175 (25.0 °C)
Density	: 9.5 - 9.8 lb/gal
Water solubility	: completely soluble
Solubility in other solvents	: no data available
Partition coefficient: n- octanol/water	: no data available
Auto-ignition temperature	: no data available
Thermal decomposition temperature	: no data available
Viscosity, dynamic	: no data available
Viscosity, kinematic	: no data available
VOC	: no data available

Section: 10. STABILITY AND REACTIVITY

Chemical stability	:	Stable under normal conditions.
Possibility of hazardous reactions	:	No dangerous reaction known under conditions of normal use.
Conditions to avoid	:	Extremes of temperature
Incompatible materials	:	Contact with strong oxidizers (e.g. chlorine, peroxides, chromates, nitric acid, perchlorate, concentrated oxygen, permanganate) may generate heat, fires, explosions and/or toxic vapors. Contact with strong acids (e.g. sulfuric, phosphoric, nitric, hydrochloric, chromic, sulfonic) may generate heat, splattering or boiling and toxic vapors. May release CS2 or hydrogen sulfide on contact with acids.
Hazardous decomposition products	:	Decomposition products may include the following materials: Carbon oxides nitrogen oxides (NOx) Sulphur oxides Oxides of phosphorus

Section: 11. TOXICOLOGICAL INFORMATION

Information on likely routes of	:	Inhalation, Eye contact, Skin contact
exposure		

Potential Health Effects

Eyes	: Causes eye irritation.
Skin	: Health injuries are not known or expected under normal use.
Ingestion	: Health injuries are not known or expected under normal use.
Inhalation	: Health injuries are not known or expected under normal use.
Chronic Exposure	: Health injuries are not known or expected under normal use.

Experience with human exposure

:	Redness, Irritation
:	No symptoms known or expected.
:	No symptoms known or expected.
:	No symptoms known or expected.
:	LD50 rat: > 2,000 mg/kg Test substance: Product
:	no data available
:	Acute toxicity estimate : > 5,000 mg/kg
:	Result: No skin irritation Test substance:Product
:	Species: rabbit Result: Mild eye irritation Method: OECD Test Guideline 405 GLP: yes Test substance: Product
:	no data available
:	no data available
:	no data available
:	Not mutagenic in Ames Test.
:	no data available

Section: 12. ECOLOGICAL INFORMATION

Ecotoxicity

Environmental Effects	: Harmful to aquatic life.	
Product		
Toxicity to fish	: LC50 Cyprinodon variegatus (sheepshead minnow): 1,824	

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	mg/l Exposure time: 96 hrs Test substance: Similar (more concentrated) Product Test Type: Static
	LC50 Inland Silverside: 3,122 mg/l Exposure time: 96 h Test substance: Product Test Type: Static
	NOEC Inland Silverside: 1,250 mg/l Exposure time: 96 h Test substance: Product Test Type: Static
	LC50 Oncorhynchus mykiss (rainbow trout): 211 mg/l Exposure time: 96 h Test substance: Product Test Type: Static
	NOEC Oncorhynchus mykiss (rainbow trout): 125 mg/l Exposure time: 96 h Test substance: Product Test Type: Static
	LC50 Pimephales promelas (fathead minnow): 636 mg/l Exposure time: 96 h Test substance: Product Test Type: Static
	NOEC Pimephales promelas (fathead minnow): 375 mg/l Exposure time: 96 h Test substance: Product Test Type: Static
Toxicity to daphnia and other : aquatic invertebrates	LC50 Ceriodaphnia dubia: 328 mg/l Exposure time: 48 h Test substance: Product Test Type: Static
	NOEC Ceriodaphnia dubia: 188 mg/l Exposure time: 48 h Test substance: Product Test Type: Static
	LC50 Mysid Shrimp (Mysidopsis bahia): 174 mg/l Exposure time: 96 h Test substance: Product Test Type: Static
	NOEC Mysid Shrimp (Mysidopsis bahia): 125 mg/l Exposure time: 96 h Test substance: Product Test Type: Static
Toxicity to algae :	EC50 Green Algae (Pseudokirchneriella subcapitata, previously Selenastrum capricornutum): 10.2 mg/l Exposure time: 96 h Test substance: Product Tested in Soft Water

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Straight

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	IC50 Green Algae (Pseudokirchneriella subcapitata, previously Selenastrum capricornutum): 9.7 mg/l Exposure time: 96 h Test substance: Product Tested in Soft Water
	NOEC Green Algae (Pseudokirchneriella subcapitata, previously Selenastrum capricornutum): 5 mg/l Exposure time: 96 h Test substance: Product Tested in Soft Water
Toxicity to fish (Chronic toxicity)	: LOEC: > 200 mg/l Exposure time: 7 d Species: Fathead Minnow Test substance: Product
	NOEC: 200 mg/l Exposure time: 7 d Species: Fathead Minnow Test substance: Product
	LOEC: 100 mg/l Exposure time: 7 d Species: Fathead Minnow Test substance: Product
	NOEC: 50 mg/l Exposure time: 7 d Species: Fathead Minnow Test substance: Product
	EC25 / IC25: 81.2 mg/l Exposure time: 7 d Species: Fathead Minnow Test substance: Product
Toxicity to daphnia and other aquatic invertebrates (Chronic toxicity)	: NOEC: 25 mg/l Exposure time: 7 d Species: Ceriodaphnia dubia Test substance: Product
	LOEC: > 25 mg/l Exposure time: 7 d Species: Ceriodaphnia dubia Test substance: Product
	NOEC: 6.3 mg/l Exposure time: 7 d Species: Ceriodaphnia dubia Test substance: Product
	LOEC: 13 mg/l Exposure time: 7 d Species: Ceriodaphnia dubia Test substance: Product
	EC25 / IC25: 5.2 mg/l Exposure time: 7 d Species: Ceriodaphnia dubia Test substance: Product

Persistence and degradability

Total Organic Carbon (TOC): 82,000 mg/l

Chemical Oxygen Demand (COD): 530,000 mg/l

Biochemical Oxygen Demand (BOD): Incubation Period Value 5 d 1,690 mg/l

Test Descriptor Product

Mobility

The environmental fate was estimated using a level III fugacity model embedded in the EPI (estimation program interface) Suite TM, provided by the US EPA. The model assumes a steady state condition between the total input and output. The level III model does not require equilibrium between the defined media. The information provided is intended to give the user a general estimate of the environmental fate of this product under the defined conditions of the models. If released into the environment this material is expected to distribute to the air, water and soil/sediment in the approximate respective percentages;

Air	:	<5%
Water	:	10 - 30%
Soil	:	70 - 90%

The portion in water is expected to be soluble or dispersible.

Bioaccumulative potential

This preparation or material is not expected to bioaccumulate.

Other information

no data available

Section: 13. DISPOSAL CONSIDERATIONS

If this product becomes a waste, it could meet the criteria of a hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA) 40 CFR 261. Before disposal, it should be determined if the waste meets the criteria of a hazardous waste.

Hazardous Waste:	:	D002
Disposal methods	:	The product should not be allowed to enter drains, water courses or the soil. Where possible recycling is preferred to disposal or incineration. If recycling is not practicable, dispose of in compliance with local regulations. Dispose of wastes in an approved waste disposal facility.
Disposal considerations	:	Dispose of as unused product. Empty containers should be taken to an approved waste handling site for recycling or disposal. Do not re-use empty containers.

Section: 14. TRANSPORT INFORMATION

The shipper/consignor/sender is responsible to ensure that the packaging, labeling, and markings are in compliance with the selected mode of transport.

Land transport (DOT)

Proper shipping name	: PRODUCT IS NOT REGULATED DURING TRANSPORTATION
Air transport (IATA)	
Proper shipping name	: PRODUCT IS NOT REGULATED DURING TRANSPORTATION
Sea transport (IMDG/IMO)	
Proper shipping name	: PRODUCT IS NOT REGULATED DURING TRANSPORTATION

Section: 15. REGULATORY INFORMATION

EPCRA - Emergency Planning and Community Right-to-Know Act

CERCLA Reportable Quantity

This material does not contain any components with a CERCLA RQ.

SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 311/312 Hazards	:	Acute Health Hazard
SARA 302	:	No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302.
SARA 313	:	This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

California Prop 65

This product does not contain any chemicals known to State of California to cause cancer, birth defects, or any other reproductive harm.

INTERNATIONAL CHEMICAL CONTROL LAWS :

TOXIC SUBSTANCES CONTROL ACT (TSCA) The substances in this preparation are included on or exempted from the TSCA 8(b) Inventory (40

CFR 710)

CANADIAN ENVIRONMENTAL PROTECTION ACT (CEPA)

This product contains substance(s) which are not listed on the Domestic Substances List (DSL) or the Non-Domestic Substances List (NDSL).

AUSTRALIA

This product contains substance(s) which are not in compliance with the National Industrial Chemicals Notification & Assessment Scheme (NICNAS) and may require additional review.

CHINA

All substances in this product comply with the Provisions on the Environmental Administration of New Chemical Substances and are listed on or exempt from the Inventory of Existing Chemical Substances China (IECSC).

EUROPE

The substances in this preparation have been reviewed for compliance with the EINECS or ELINCS inventories.

JAPAN

This product contains substance(s) which are not in compliance with the Law Regulating the Manufacture and Importation Of Chemical Substances and are not listed on the Existing and New Chemical Substances list (ENCS).

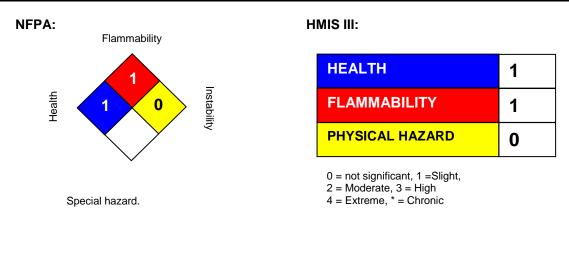
KOREA

All substances in this product comply with the Toxic Chemical Control Law (TCCL) and are listed on the Existing Chemicals List (ECL)

PHILIPPINES

This product contains substance(s) which are not in compliance with the Republic Act 6969 (RA 6969) and may require additional review.

Section: 16. OTHER INFORMATION



Revision Date	1	12/12/2014
Version Number	:	1.1
Prepared By	:	Regulatory Affairs

REVISED INFORMATION: Significant changes to regulatory or health information for this revision is indicated by a bar in the left-hand margin of the SDS.

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

For additional copies of an MSDS visit www.nalco.com and request access.



MERCONTROL® 7895

Section: 1. PRODUCT AND COMPANY IDENTIFICATION

Product name	:	MERCONTROL® 7895
Other means of identification	:	Not applicable.
Recommended use	:	Mercury Control
Restrictions on use	:	Refer to available product literature or ask your local Sales Representative for restrictions on use and dose limits.
Company	:	Nalco Company 1601 W. Diehl Road Naperville, Illinois 60563-1198 USA TEL: (630)305-1000
Emergency telephone number	:	(800) 424-9300 (24 Hours) CHEMTREC
Issuing date	:	11/18/2014

Section: 2. HAZARDS IDENTIFICATION

GHS Classification

Skin irritation Eye irritation	:	Category 2 Category 2A
GHS Label element Hazard pictograms	:	
Signal Word	:	Warning
Hazard Statements	:	Causes skin irritation. Causes serious eye irritation.
Precautionary Statements	:	 Prevention: Wash skin thoroughly after handling. Wear eye protection/face protection. Wear protective gloves. Response: IF ON SKIN: Wash with plenty of soap and water. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If skin irritation occurs: Get medical advice/attention. If eye irritation persists: Get medical advice/ attention. Take off contaminated clothing and wash before reuse.
Other hazards	:	None known.

Section: 3. COMPOSITION/INFORMATION ON INGREDIENTS

MERCONTROL® 789	95
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Pure substance/mixture	: Mixtur	e	
Chemical Name Calcium Bromide		CAS-No. 7789-41-5	Concentration: (%) 30 - 60
Section: 4. FIRST AID MEAS	SURES		
In case of eye contact	Remov		vater, also under the eyelids. and easy to do. Continue rinsing. occur.
In case of skin contact		off immediately with plenty on the second seco	of water. Use a mild soap if irritation develops and persists.
If swallowed	: Rinse r	mouth. Get medical attentio	n if symptoms occur.
If inhaled	: Get me	edical attention if symptoms	occur.
Protection of first-aiders	not put		danger before taking action. Do n doubt, contact emergency e equipment as required.
Notes to physician	: Treat s	ymptomatically.	
Most important symptoms and effects, both acute and delayed	: See Se sympto		nformation on health effects and

Section: 5. FIREFIGHTING MEASURES

Suitable extinguishing media	:	Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.
Unsuitable extinguishing media	:	None known.
Specific hazards during firefighting	:	Not flammable or combustible.
Hazardous combustion products	:	Carbon oxides
Special protective equipment for firefighters	:	Use personal protective equipment.
Specific extinguishing methods	:	Fire residues and contaminated fire extinguishing water must be disposed of in accordance with local regulations. In the event of fire and/or explosion do not breathe fumes.

Section: 6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures	:	Ensure clean-up is conducted by trained personnel only. Refer to protective measures listed in sections 7 and 8.
Environmental precautions	:	Do not allow contact with soil, surface or ground water.

MERCONTROL® 7895	
Methods and materials for containment and cleaning up	: Stop leak if safe to do so. Contain spillage, and then collect with non-combustible absorbent material, (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations (see section 13). For large spills, dike spilled material or otherwise contain material to ensure runoff does not reach a waterway. Flush away traces with water.
Section: 7. HANDLING AND S	STORAGE
Advice on safe handling	: Avoid contact with skin and eyes. Wash hands thoroughly after handling. Use only with adequate ventilation.
Conditions for safe storage	: Keep out of reach of children. Keep container tightly closed. Store in suitable labeled containers.
Suitable material	: The following compatibility data is suggested based on similar product data and/or industry experience: Shipping and long term storage compatibility with construction materials can vary; we therefore recommend that compatibility is tested prior to use.
Unsuitable material	: not determined
Section: 8. EXPOSURE CONT	ROLS/PERSONAL PROTECTION

Components with workplace control parameters

Contains no substances with occupational exposure limit values.

Engineering measures	:	Good general ventilation should be sufficient to control worker exposure to airborne contaminants.
Personal protective equipmer	nt	
Eye protection	:	Safety glasses with side-shields
Hand protection	:	Wear the following personal protective equipment: Standard glove type. Gloves should be discarded and replaced if there is any indication of degradation or chemical breakthrough.
Skin protection	:	Wear suitable protective clothing.
Respiratory protection	:	No personal respiratory protective equipment normally required.
Hygiene measures	:	Handle in accordance with good industrial hygiene and safety practice. Remove and wash contaminated clothing before re-use. Wash face, hands and any exposed skin thoroughly after handling.

Section: 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	:	Liquid
Colour	:	Light yellow Amber
Odour	:	no data available
Flash point	:	does not flash
рН	:	7.5

MERCONTROL® 7895

Odour Threshold	:	no data available
Melting point/freezing point	:	no data available
Initial boiling point and boiling range	:	127.7 °C
Evaporation rate	:	no data available
Flammability (solid, gas)	:	no data available
Upper explosion limit	:	no data available
Lower explosion limit	:	no data available
Vapour pressure	:	Not applicable.
Relative vapour density	:	no data available
Relative density	:	1.69
Density	:	14 lb/gal
Water solubility	:	completely soluble
Solubility in other solvents	:	no data available
Partition coefficient: n- octanol/water	:	no data available
Auto-ignition temperature	:	no data available
Thermal decomposition temperature	:	no data available
Viscosity, dynamic	:	no data available
Viscosity, kinematic	:	no data available
VOC	:	no data available

Section: 10. STABILITY AND REACTIVITY

Chemical stability	: Stable under normal conditions.	
Possibility of hazardous reactions	: No dangerous reaction known under conditions of normal use.	
Conditions to avoid	: None known.	
Incompatible materials	: Strong acids Strong oxidizing agents	
Hazardous decomposition products	: Hydrogen bromide Bromine	

Section: 11. TOXICOLOGICAL INFORMATION

Information on likely routes of	:	Inhalation, Eye contact, Skin contact
exposure		

Potential Health Effects

Eyes	:	Causes serious eye irritation.
Skin	:	Causes skin irritation.
Ingestion	:	Health injuries are not known or expected under normal use.

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Inhalation	:	Health injuries are not known or expected under normal use.	
Chronic Exposure	:	Health injuries are not known or expected under normal use.	
Experience with human exposure			
Eye contact	:	Redness, Pain, Irritation	
Skin contact	:	Redness, Irritation	
Ingestion	:	No symptoms known or expected.	
Inhalation	:	No symptoms known or expected.	
Toxicity			
Product			
Acute oral toxicity	:	rat: 2,210 mg/kg Test substance: Active Substance	
Acute inhalation toxicity	:	no data available	
Acute dermal toxicity	:	no data available	
Skin corrosion/irritation	:	Result: Skin irritation	
Serious eye damage/eye irritation	:	Result: Eye irritation	
Respiratory or skin sensitization	:	no data available	
Carcinogenicity	:	no data available	
Reproductive effects	:	no data available	
Germ cell mutagenicity	:	no data available	
Teratogenicity	:	no data available	
STOT - single exposure	:	no data available	
STOT - repeated exposure	:	no data available	
Aspiration toxicity	:	no data available	

Section: 12. ECOLOGICAL INFORMATION

Ecotoxicity

Environmental Effects	:	This product has no known ecotoxicological effects.
Product		
Toxicity to fish		LC50 Guppy: 538 mg/l Exposure time: 96 hrs

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	Test substance: Similar Product
	LC50 Rainbow Trout: > 1,000 mg/l Exposure time: 96 hrs Test substance: Similar Product
	LC50 Fathead Minnow: > 1,000 mg/l Exposure time: 96 hrs Test substance: Similar Product
	LC50 Inland Silverside: > 5,000.000 mg/l Exposure time: 96 hrs Test substance: Similar Product
Product	
Toxicity to daphnia and other : aquatic invertebrates	LC50 Daphnia magna: > 1,000 mg/l Exposure time: 48 hrs Test substance: Similar Product
	LC50 Mysid Shrimp (Mysidopsis bahia): 1.827.000 mg/l

LC50 Mysid Shrimp (Mysidopsis bahia): 1,827.000 mg/l Exposure time: 96 hrs Test substance: Similar Product

Persistence and degradability

Greater than 95% of this product consists of inorganic substances for which a biodegradation value is not applicable.

Mobility

The environmental fate was estimated using a level III fugacity model embedded in the EPI (estimation program interface) Suite TM, provided by the US EPA. The model assumes a steady state condition between the total input and output. The level III model does not require equilibrium between the defined media. The information provided is intended to give the user a general estimate of the environmental fate of this product under the defined conditions of the models. If released into the environment this material is expected to distribute to the air, water and soil/sediment in the approximate respective percentages;

Air	:	<5%
Water	:	30 - 50%
Soil	:	50 - 70%

Bioaccumulative potential

This preparation or material is not expected to bioaccumulate.

Other information

no data available

Section: 13. DISPOSAL CONSIDERATIONS

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If this product becomes a waste, it is not a hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA) 40 CFR 261, since it does not have the characteristics of Subpart C, nor is it listed under Subpart D.			
•	Where possible recycling is preferred to disposal or		
	incineration. If recycling is not practicable, dispose of in		
	compliance with local regulations. Dispose of wastes in an		
	approved waste disposal facility.		
Disposal considerations	Dispose of as unused product. Empty containers should be		
	taken to an approved waste handling site for recycling or		
	disposal. Do not re-use empty containers.		

Section: 14. TRANSPORT INFORMATION

The shipper/consignor/sender is responsible to ensure that the packaging, labeling, and markings are in compliance with the selected mode of transport.

Land transport (DOT)

Proper shipping name :	PRODUCT IS NOT REGULATED DURING TRANSPORTATION
Air transport (IATA)	
Proper shipping name :	PRODUCT IS NOT REGULATED DURING TRANSPORTATION
Sea transport (IMDG/IMO)	
Proper shipping name :	PRODUCT IS NOT REGULATED DURING TRANSPORTATION

Section: 15. REGULATORY INFORMATION

EPCRA - Emergency Planning and Community Right-to-Know Act

CERCLA Reportable Quantity

This material does not contain any components with a CERCLA RQ.

SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 311/312 Hazards	:	Acute Health Hazard
SARA 302	:	No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302.
SARA 313	:	This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

California Prop 65

This product does not contain any chemicals known to State of California to cause cancer, birth defects, or any other reproductive harm.

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INTERNATIONAL CHEMICAL CONTROL LAWS :

TOXIC SUBSTANCES CONTROL ACT (TSCA)

The substances in this preparation are included on or exempted from the TSCA 8(b) Inventory (40 CFR 710)

CANADIAN ENVIRONMENTAL PROTECTION ACT (CEPA)

The substances in this preparation are listed on the Domestic Substances List (DSL), are exempt, or have been reported in accordance with the New Substances Notification Regulations.

AUSTRALIA

All substances in this product comply with the National Industrial Chemicals Notification & Assessment Scheme (NICNAS).

CHINA

All substances in this product comply with the Provisions on the Environmental Administration of New Chemical Substances and are listed on or exempt from the Inventory of Existing Chemical Substances China (IECSC).

EUROPE

The substances in this preparation have been reviewed for compliance with the EINECS or ELINCS inventories.

JAPAN

All substances in this product comply with the Law Regulating the Manufacture and Importation Of Chemical Substances and are listed on the Existing and New Chemical Substances list (ENCS).

KOREA

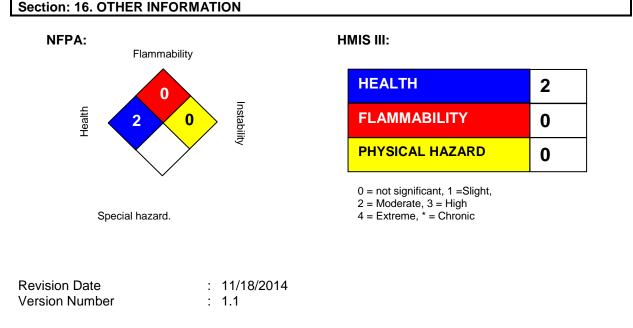
All substances in this product comply with the Toxic Chemical Control Law (TCCL) and are listed on the Existing Chemicals List (ECL)

NEW ZEALAND

All substances in this product comply with the Hazardous Substances and New Organisms (HSNO) Act 1996, and are listed on or are exempt from the New Zealand Inventory of Chemicals.

PHILIPPINES

All substances in this product comply with the Republic Act 6969 (RA 6969) and are listed on the Philippines Inventory of Chemicals & Chemical Substances (PICCS).



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Prepared By : Regulatory Affairs

REVISED INFORMATION: Significant changes to regulatory or health information for this revision is indicated by a bar in the left-hand margin of the SDS.

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

For additional copies of an MSDS visit www.nalco.com and request access.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Attorney General's Supplemental Data Requests Dated April 8, 2016

Case No. 2016-00027

Question No. 3

Witness: John N. Voyles, Jr.

- Q-3. Referring to the statement on Page 3 of 38 of Exhibit JNV-4, during the discussion of the BAP and Gypsum Storage Pond at the Trimble County Generation Station the following statement was made: "… This accumulated water will need to be removed in order to close this ponds [sic]. Costs associated with development of this approach and implementation of the approach are not included in this project or cost estimate. …"
 - a. What does this statement mean?
 - b. What costs are not considered or estimated?
- A-3. a-b. Dewatering of the impoundment is included as a line item in the costs estimates for the BAP and Gypsum Storage Pond (see pages 2 and 5 in Attachment 2 of Exhibit JNV-4). As discussed further in Section 2.2 of that attachment, costs have been included to dewater the pond but the cost of treatment has not been included. Currently, discharge of water from the BAP is prohibited by the 1982 ELG Regulations as incorporated into the Trimble County KPDES permit as a zero discharge impoundment. LG&E is currently working with regulators to determine if the excess water can be discharged via conventional methods though a permit modification. At the same time, LG&E is evaluating changes to the station's operations to minimize the process-water flows to the BAP. If water treatment, thermal evaporation, packages systems, or extraordinary means are required, the costs are currently unknown due to the variability of the system(s) required to treat process-water volumes of up to 1 million gallons per day. In the event treatment is required, LG&E will update the Commission on the scope and cost of this activity.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Attorney General's Supplemental Data Requests Dated April 8, 2016

Case No. 2016-00027

Question No. 4

Witness: John N. Voyles, Jr.

- Q-4. Georgia Power Company ("GPC") recently announced¹ that it will be closing 29 ash ponds in the next ten years at an approximate cost of \$1 billion. Given that the total number of LG&E's impoundments are significantly fewer than GPC's, does LG&E still maintain that its proposals as outlined in the application are still least-cost?
- A-4. Yes. GPC indicated that closing 29 impoundments at 11 coal-fired facilities will cost more than \$1 billion. Based on the referenced article, LG&E is unable to determine key estimating factors such as the size, location, current remaining storage capacity, complexity of closure, etc. of the 29 impoundments. As indicated by GPC, ash pond closures are "site-specific and involve complex processes," so it is not possible to compare the two compliance programs without knowing all the details of GPC's plan.² In addition, GPC indicated it would close a dozen impoundments within two years, which is significantly faster than LG&E's proposed closure plan, and likely affects costs.

It is important to also note that it is unclear whether GPC's costs in the cited article include new process-water systems related costs. When looking at LG&E's combined surface impoundment closure total cost of \$311.0 million, \$143.5 million is for closure of surface impoundments and \$167.5 million is for constructing new process-water systems.

¹ <u>http://www.utilitydive.com/news/georgia-power-to-close-half-of-its-coal-ash-ponds-in-2-years/416598/</u>

² http://www.prnewswire.com/news-releases/closure-preparation-activities-underway-at-all-29-georgia-power-ash-ponds-300242708.html.