#### **MEMORANDUM**

August 4, 2020

Subject: Notification of Intent to Initiate Closure of West Recycle Pond

Independence Steam Electric Station (Independence Plant)

Newark, Independence County, Arkansas

Entergy Arkansas, LLC (Entergy) provides this notification in accordance with 40 C.F.R. § 257.102(g) that it is initiating closure of the West Recycle Pond at its Independence Plant in Newark, Arkansas (the Plant). The West Recycle Pond is the western of the two recycle ponds at the Facility.

Entergy intends to complete closure of the West Recycle Pond in accordance with the Closure Plan for Recycling Ponds, dated October, 2018, ("Closure Plan") and any conditions or other amendments approved by the Arkansas Energy and Environment Department, Division of Environmental Quality (DEQ) in accordance with the facility's National Pollutant Discharge Elimination System (NPDES) Permit Number AR0037451.

# **Proposed Closure Process Description**

Entergy has ceased placement of all coal combustion residual (CCR) and non-CCR wastestreams to the West Recycle Pond. The West Recycle Pond will be closed in accordance with 40 C.F.R. § 257.102(c) through the removal of CCR such that no residual materials remain visible and will also include over-excavation of approximately six inches of subsoils and confirmatory groundwater monitoring.

The closure process is detailed more fully in the Closure Plan.

### **Anticipated Closure Schedule**

Closure of Recycle Pond A will be completed within five years of this commencement of closure as required by 40 C.F.R. § 257.102(f)(1)(ii). The anticipated schedule is as follows (a more detailed schedule is available in the Closure Plan):

Commence Closure	August 4, 2020
Construction Completion (estimated)	August 2025

## **Professional Engineer Certification Not Required**

Because Entergy is closing the West Recycle Pond by removing all CCR from the pond, it is not required to install a final cover system or provide a professional engineer certification related to a final cover system with this notice. See 40 C.F.R. §§ 257.102(d)(3), 257.102(g).

### **Notification of Intent to Close**

On behalf of Entergy, this document serves as notification of intent to close the West Recycle Pond at its Independence Plant, as required by 40 C.F.R. § 257.102(g).