#### MEMORANDUM

February 26, 2021

Subject: Notification of Intent to Initiate Closure of East 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 East Recycle Pond at its Independence Plant in Newark, Arkansas (the Plant). The East Recycle Pond is the eastern of the two recycle ponds at the Facility.

Entergy intends to complete closure of the East Recycle Pond in accordance with the Closure Plan for Recycling Ponds ("Closure Plan") submitted by Entergy in August 2020 as approved by the Arkansas Energy and Environment Department, Division of Environmental Quality (DEQ) on December 11, 2020, and 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 waste streams to the East Recycle Pond. The East 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 B 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	February 26, 2021
Construction Completion (estimated)	January 2026

# **Professional Engineer Certification Not Required**

Because Entergy is closing the East 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 East Recycle Pond at its Independence Plant, as required by 40 C.F.R. § 257.102(g).