

Post Closure Plan for Water Recycle Ponds

Entergy Arkansas, Inc.
Independence Steam Electric Station
Newark, Independence County, Arkansas

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Prepared For Entergy Arkansas, Inc.

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TRC Environmental Corporation | Entergy Arkansas, Inc. Post Closure Plan for Water Recycle Ponds Entergy Independence Steam Electric Station, Newark, Independence County, Arkansas

Table of Contents

1.	Introduction		1
	1.1	Site Information	1
2.	Post-Closure Activities		
	2.1	Post-Closure Period	
	2.2	Notifications	
	2.3	Amendment of the Post-Closure Plan	3
3.	Cert	tification	4
List	of Figu	ures	
Figure 1		Site Location Map	2

Section 1 Introduction

Entergy Arkansas, Inc. (Entergy) operates the Entergy Independence Steam Electric Station (Plant), located at 555 Point Ferry Road, Newark, AR 72562. This Plant operates two Water Recycle Ponds: East and West (Ponds), as part of its bottom ash transport water system. Pursuant to United States Environmental Protection Agency (USEPA) Disposal of Coal Combustion Residuals (CCR) From Electric Utilities Final Rule (CCR Rule) Section 40 Code of Federal Regulations (CFR) § 257.104, this Post-Closure Plan (Plan) describes the post-closure care requirements for the Ponds. Section 40 CFR § 257.104(d) identifies the content of written post-closure plans, which at a minimum must include the following information:

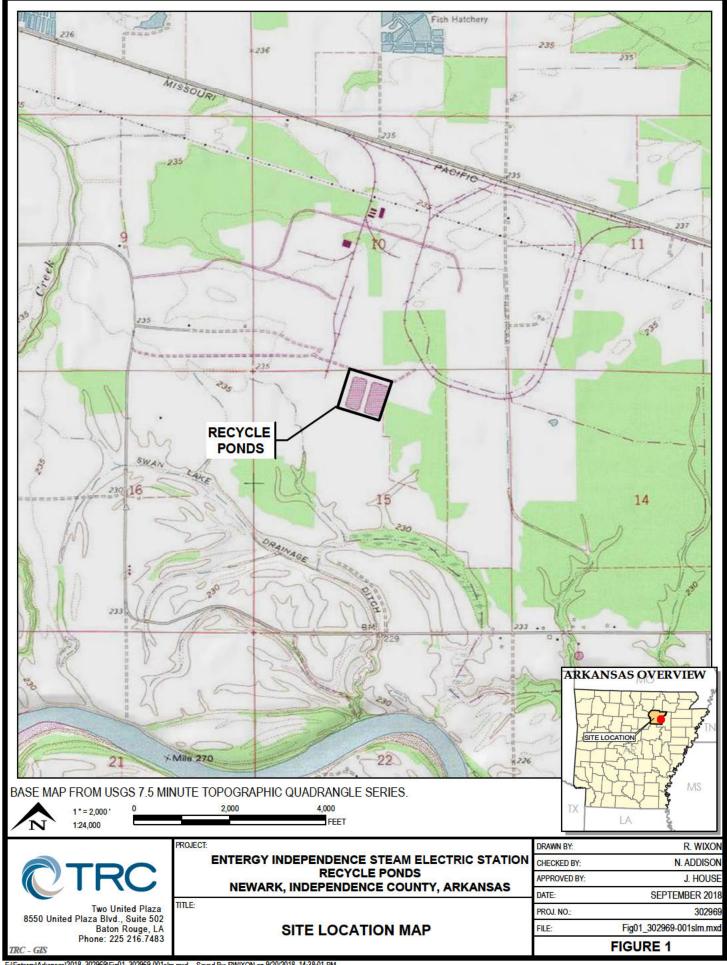
- A description of the monitoring and maintenance activities to be performed in accordance with 40 CFR § 257.104(b) and the frequency of their performance;
- Contact information for the individual at the facility to be contacted regarding the postclosure care; and
- A description of the planned uses of the property during the post-closure period.

The Ponds will be closed by removal of CCR, in accordance with 40 CFR § 257.102(c), such that no residual materials remain visible and decontamination of the area by over-excavation of approximately 6-inches of subsoils. An Arkansas Registered Professional Engineer will provide a sealed and signed certification of closure. As such, no post-closure care requirements apply to these ponds under § 257.104 (see Section 2.1).

1.1 Site Information

The Plant is located near Newark, Independence County, Arkansas (Figure 1). The Plant is located at approximate latitude 35°40′39″ N, longitude 91°24′42″ W (front gate). The area surrounding the Ponds is approximately 19 acres.

1



2.1 Post-Closure Period

Entergy intends to undertake closure of the Independence water recycle ponds by removing CCR consistent with 40 C.F.R. § 257.102(c), as described more fully in the Closure Plan for those ponds. Section 257.104(a)(2) provides that "[a]n owner or operator of a CCR unit that elects to close a CCR unit by removing CCR as provided by 257.102(c) is not subject to the post-closure care criteria under this section [§ 257.104 (Post-closure care requirements)]." Therefore, no post-closure care requirements apply to these ponds under § 257.104.

2.2 Notifications

In accordance with 40 CFR § 257.104(e) and § 257.105(i), Entergy will post to the Plant's Facility Operating Record (FOR) the Post-Closure Plan and, if required, a Notification of Completion of Post Closure Care. The Notification of Completion of Post Closure Care, if required, will be posted within 60 days following the completion of the post-closure care period. The notification will include the certification by a qualified professional engineer verifying that post-closure care has been completed in accordance with the appropriate plans. In addition, the Director of the Arkansas Department of Environmental Quality (ADEQ) will be notified when documents are placed into the FOR as per 40 CFR § 257.106(i).

2.3 Amendment of the Post-Closure Plan

In accordance with 40 CFR § 257.102(d)(3), Entergy may amend this post-closure plan at any time. Specifically, Entergy will amend the written post-closure plan whenever there is a change in the operation of the CCR unit that would substantially affect the written post-closure plan in effect or after post-closure activities have commenced. Recordkeeping, Notification and Posting requirements of 40 CFR § 257.105, 257.106 and 257.107 will be followed.

3

Section 3 Certification

I, the undersigned Arkansas Professional Engineer, hereby certify that I am familiar with the technical requirements of 40 CFR § 257.104. I also certify that it is my professional opinion that, to the best of my knowledge, information, and belief, that the activities outlined in this post-closure plan are in accordance with current good and accepted engineering practice(s) and standard(s) appropriate to the nature of the project and the technical requirements of 40 CFR § 257.104(d).

For the purpose of this document, "certify" and "certification" shall be interpreted and construed to be a "statement of professional opinion". The certification is understood and intended to be an expression of my professional opinion as an Arkansas Licensed Professional Engineer, based upon knowledge, information, and belief. The statement(s) of professional opinion are not and shall not be interpreted or construed to be a guarantee or a warranty of the

post-closure activities.

R. Kent Nilsson

Printed Name of Professional Engineer

Signature of Professional Engineer

9136

State of Arkansas License Number

REGISTERED ROFESSIONAL

10/24/18

Date