



Entergy Arkansas, LLC
White Bluff Plant
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Robert "Eugene" Knighten
General Manager

AR-24-017

October 11, 2024

Mr. Richard Healey, Branch Manager
Arkansas Department of Energy and Environment
Office of Water Quality
NPDES Enforcement Section
5301 Northshore Drive
North Little Rock, AR 72118

Reference: Annual Report and Certification Statement
Notice of Planned Participation (NOPP) Pursuant to 40 CFR. 423.19(g)
Entergy Arkansas, LLC – White Bluff Plant – AR0036331, AFIN 35-00110

Dear Mr. Healey,

Part II, Other Conditions, (Number 20) **Annual Progress Report for Permanent Cessation of Coal Combustion** of Entergy Arkansas' White Bluff Plant's modified NPDES Permit states the following requirements:

After submission of the Notice of Planned Participation for permanent cessation of coal combustion, in accordance with 40 C.F.R. § 423.19(f)(1), a progress report shall be submitted annually to the Office of Water Quality, in accordance with 40 C.F.R. § 423.19(f)(3). The report shall detail the completion of any interim milestones listed in the Notice of Planned Participation since the previous progress report, provide a narrative discussion of any completed, missed, or delayed milestones, and provide updated milestones, in accordance with 40 C.F.R. § 423.19(f)(4).

Summary of Historical Facts

On October 13, 2020, the U.S. Environmental Protection Agency (EPA) published a final rule revising the technology-based effluent limitations guidelines (ELGs) and standards for the steam electric power generating point source category (2020 Reconsideration Rule). The 2020 Reconsideration Rule prescribed certain ELGs applicable to existing point sources and provided certain limited exceptions to the new ELGs. One of these exceptions was for facilities planning on permanently ceasing coal combustion by December 31, 2028.

In correspondence dated October 12, 2021, Entergy's White Bluff plant affirmed that they met the requirements contained in 40 CFR 423.19(f) and requested qualification "as an electric generating unit that will achieve permanent cessation of combustion of coal by December 31, 2028". This original NOPP met the submittal deadlines contained in the ELG and included the following affirmations of facts along with supporting documentation.

- White Bluff operates two units, Units 1 and 2, which will achieve permanent cessation of coal combustion no later than December 31, 2028, through retirement.
- The retirement of Units 1 and 2 is approved by the Arkansas Department of Energy and Environment, Division of Environmental Quality ("DEQ") through (1) an Administrative Order, dated August 7, 2018, and (2) the 2018 Arkansas Phase II Regional Haze State Implementation Plan Revision where the Administrative Order is incorporated.
- Further, the retirement of Units 1 and 2 is approved by the EPA through its approval of Regional Haze State Implementation Plan Revision for Electric Generating Units in Arkansas.

On May 9, 2024, EPA published a supplemental revised ELG. While this new rule includes requirements not previously contained in the ELG, the compliance category for facilities ceasing coal combustion by December 31, 2028, remains.

Summary of Milestones and Current Status:

Following the original NOPP submittal, Entergy's White Bluff plant developed an NPDES permit modification application to incorporate the 2020 Reconsideration Rule along with the permanent cessation of coal combustion requirement. The application was submitted to ADEQ on August 29, 2022. The modified permit including the permit condition referenced above was issued with an effective date of June 1, 2023.

An updated milestone schedule and signed certification statement has been included as an Attachment to this Annual NOPP Progress Report. This outlines Entergy Arkansas' continuing operational plans related to the White Bluff plant.

If you have any questions concerning this information or if additional information is required, please contact Kim Fuller, Arkansas Environmental Lead, at (501) 529-3633 or by email at kfulle1@entergy.com.

Respectfully Submitted,

Robert "Eugene" Knighten

Robert "Eugene" Knighten (Oct 11, 2024 11:15 CDT)

Robert "Eugene" Knighten

General Manager, White Bluff Plant

REK:kaf

Enclosure



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ATTACHMENT
Milestones to Permanent Cessation of Coal Combustion

Planned Date	Milestone	Completion Date
October 13, 2021	Original NOPP Filed	October 12, 2021
March 2022	File NPDES Permit Modification Application	August 29, 2022
October 13, 2022	NOPP Annual Report Deadline	August 29, 2022 ¹
Prior to December 31, 2023	NPDES Permit Modification Issuance for Inclusion of Permanent Cessation of Coal Combustion Requirement	June 1, 2023
October 13, 2023	NOPP Annual Report Deadline	October 12, 2023
December 31, 2023	Current NPDES Permit Compliance Date for Zero Discharge of Bottom Ash Transport Water	N/A ²
August 2, 2024	NPDES Permit Renewal Application Submitted and Deemed Administratively Complete	August 2, 2024
October 13, 2024	NOPP Annual Report Deadline	October 11, 2024
October 13, 2025	NOPP Annual Report Deadline	
October 13, 2026	NOPP Annual Report Deadline	
October 13, 2027	NOPP Annual Report Deadline	
December 31, 2027	Official Retirement Filing	
October 13, 2028	NOPP Annual Report Deadline	
December 31, 2028	Permanent Cessation of Coal Combustion at White Bluff	

¹ Contained in NPDES Permit Modification Application.

² Previous NPDES Permit containing this requirement was Superseded with the issuance of the Modified Permit with an Effective Date of June 1, 2023.

Certification Statement:

I certify under penalty of law that this document and all attachments were prepared under my direct supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Robert "Eugene" Knighten
Robert "Eugene" Knighten (Oct 11, 2024 11:15 CDT)

Robert "Eugene" Knighten
 General Manager, White Bluff Plant

10/11/24

Date