

**CCR Surface Impoundment Closure Amended Certification
Water Recycle Ponds – East and West**

Independence Steam Electric Station

Entergy Arkansas, LLC (Entergy) initiated closure of both Water Recycle Ponds – East and West at the Independence Steam Electric Station (Station) pursuant to 40 CFR 257.102 of the Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule (CCR Rule). Closure was performed through removal of coal combustion residuals (CCR) and decontamination of affected soils (beyond visible CCR) in accordance with 40 CFR 257.102(c) of the CCR Rule and Amendment No. 1 - Closure Plan for Water Recycle Ponds (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 Station's National Pollutant Discharge Elimination System (NPDES) Permit Number AR0037451.

All CCR was removed from both Water Recycle Ponds – East and West and disposed in the on-site CCR Landfill (Cells 12 through 15) at the Station in accordance with 40 CFR 257.102 of the CCR Rule and Amendment No. 1 - Closure Plan for Water Recycle Ponds. The on-site CCR landfill is permitted under Arkansas Energy and Environment Department, Division of Environmental Quality (DEQ) Permit No. 0200-S3N-R2. Pursuant to Amendment No. 1 - Closure Plan for Water Recycle Ponds, CCR removal was confirmed through visual observations of both Water Recycle Ponds – East and West.

Per Amendment No. 1 - Closure Plan for Water Recycle Ponds, both Water Recycle Ponds – East and West were decontaminated through excavation of a minimum of 6 inches of the underlying pond liner material (beyond visible CCR) to ensure removal of potential CCR-affected materials. This material was also disposed in the on-site CCR Landfill (Cells 12 through 15). Pursuant to Amendment No. 1 - Closure Plan for Water Recycle Ponds, CCR decontamination was confirmed through visual observations of both Water Recycle Ponds – East and West after excavation.

As documented in the 2022 Annual Groundwater Monitoring and Corrective Action Report, Independence Steam Electric Station, Recycle Ponds (TRC, January 2023), groundwater monitoring at both Water Recycle Ponds – East and West has been performed as part of the Detection Monitoring Program per 40 CFR 257.94 of the CCR Rule. Assessment monitoring has never been implemented for the Water Recycle Ponds – East and West; therefore, groundwater protection standards (GWPS) were not established pursuant to 40 CFR 257.95 of the CCR Rule.

Accordingly, notification of closure of the Water Recycle Ponds - East and West was prepared as required by 40 CFR 257.102(h) and the notification of closure was certified by a Registered Arkansas Professional Engineer and a Registered Arkansas Professional Geologist on October 2, 2023 as required by 40 CFR 257.102(f)(3). The certified notification of closure was placed into the facility's operating record as required by 40 CFR 257.105(i)(8) and was posted to the facility's publicly accessible CCR internet site as required by 40 CFR 257.107(i)(8).

This amendment to the October 2023 closure certification documents that groundwater monitoring for the constituents listed in Appendix IV of the CCR Rule was performed during the second and third quarters of 2024 for the groundwater monitoring network for the Water Recycle Ponds – East and West. For purposes of this amended certification, groundwater protection standards were

This amendment to the October 2023 closure certification documents that groundwater monitoring for the constituents listed in Appendix IV of the CCR Rule was performed during the second and third quarters 2024 for the groundwater monitoring network for the Water Recycle Ponds – A and B. The groundwater monitoring results show that no constituents listed in Appendix IV of the CCR Rule were detected at statistically significant levels above the groundwater protection standards developed for these two consecutive monitoring events. Therefore, the monitoring confirms that the Water Recycle Ponds – A and B have been closed in accordance with 40 CFR 257.102 of the CCR Rule.

I, the undersigned Registered Arkansas Professional Engineer, and the undersigned Registered Arkansas Professional Geologist, hereby certify that, to the best of our knowledge, information, and belief, the Water Recycle Ponds – A and B have been closed in accordance with 40 CFR 257.102 and Closure Plan for Water Recycle Ponds and in accordance with the Station’s NPDES Permit Number AR000930. I certify that this Certification was prepared by a Registered Professional Engineer and a Registered Professional Geologist under the laws of the State of Arkansas.

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 our professional opinion as a Registered Arkansas Professional Engineer and a Registered Arkansas Professional Geologist, 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 analysis herein.

Nakia Addison, P.E.

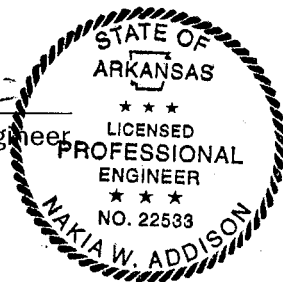
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Printed Name of Professional Engineer

Arkansas License Number



Signature of Professional Engineer



11/7/2024

Date

Trent McDaniel, P.G.

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Printed Name of Professional Geologist

Arkansas License Number

Trent McDaniel
Signature of Professional Geologist

11/7/24
Date

