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October 12, 2016

G. Tracy Johnson, Manager
Arkansas Environmental Support
Entergy Services, Inc.
425 West Capitol Avenue
TCBY-22D
Little Rock, AR 72203

RE: Run-on / Run-off Control Plan
EPA Final CCR Rule (§ 257.81)
Entergy Arkansas, Inc. - Independence Plant Class 3N CCR Landfill
Newark, AR

Dear Mr. Johnson:

FTN Associates, Ltd. has been retained by Entergy Arkansas, Inc. to prepare the following assessment of the EPA's requirements under the HAZARDOUS AND SOLID WASTE MANAGEMENT SYSTEM; DISPOSAL OF COAL COMBUSTION RESIDUALS FROM ELECTRIC UTILITIES (EPA Final CCR Rule) associated with the Stormwater Run-on and Run-off Controls for the CCR Landfill at Entergy Arkansas' Independence Plant near Newark, Arkansas. Presented below is the project background, summary of findings, limitations, and certification.

1.0 BACKGROUND

As required by §257.81 of the EPA Final CCR Rule, by October 17, 2016, documentation is required to show that the facility's stormwater run-on and run-off control systems have been designed and constructed to meet the 25-year, 24-hour design storm event.

2.0 SUMMARY OF FINDINGS

Based on the results presented in the table below, FTN has determined that the Independence Plant CCR Landfill meets the requirements of the EPA Final CCR Rule §257.81 for prevention of stormwater run-on. In addition to the perimeter berm which encompasses the landfill, the facility includes a perimeter stormwater system which routes stormwater around and away from the landfill.

Based on the results in the table below, FTN has determined that the Independence CCR Landfill meets the requirements of EPA Final CCR Rule §257.81 for run-off flows.

Table 1: Landfill Run-off Conveyance and Stormwater Channel Assessment

Channel Reach	Peak Storm Discharge, cfs (a)	Ditch Capacity, cfs (b)	Additional Ditch Capacity, cfs (b-a)
1	131.4	825.6	694.2
2	32.0	825.6	793.6
3	35.6	825.6	790.0

Table 2: Landfill Stormwater Culvert Assessment

Culvert	Peak Storm Discharge, cfs (a)	Culvert Capacity, cfs (b)	Additional Culvert Capacity, cfs (b-a)
1	131.4	231.0	99.6
2	32.0	32.5	0.5
3	35.6	36.6	1.0

The resulting combined stormwater run-off at the landfill flows to the facility Surge Pond. The Surge Pond was designed and is operated to handle all stormwater at the plant. The Surge Pond is operated under an NDPES discharge permit (Permit No. AR0037451).

3.0 LIMITATIONS

The signature of FTN's authorized representative on this document represents that to the best of his knowledge, information and belief in the exercise of its professional judgment, it is his professional opinion that the aforementioned information is accurate as of the date of such signature. Any recommendation, opinion, or decisions by him are made on the basis of his experience, qualifications and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

4.0 CERTIFICATION

I, Nick Schoggin, PE, being a Registered Professional Engineer in accordance with the State of Arkansas Professional Engineer's Registration do hereby certify to the best of my knowledge,

information and belief, that the information contained in this report is true and correct and has been prepared in accordance with the accepted practice of engineering.

We appreciate the opportunity to work with you on this project. If you have questions or comments regarding this project, please do not hesitate to call me at (479) 571-3334 or Paul Crawford, PE, PG at (501) 225-7779.

Respectfully submitted,
FTN ASSOCIATES, LTD.

Nick Schoggin, PE

NVS/kae

CC: Trip Gentry, Entergy Arkansas, Inc.

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