

CERTIFICATION

CCR Surface Impoundment Closure 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 has DEQ Permit Number 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) have never been established pursuant to 40 CFR 257.95 of the CCR Rule. Thus, GWPS have not been exceeded at the Water Recycle Ponds – East and West and both Water Recycle Ponds – East and West meet the closure criteria provided in 40 CFR 257.102(c) 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 – East and West have been closed in accordance with 40 CFR 257.102 and *Amendment No. 1 - Closure Plan for Water Recycle Ponds* as approved by the DEQ on December 11, 2020, and in accordance with the Station's NPDES Permit Number AR0037451. 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.

Michael Amstadt, P.E.
Printed Name of Professional Engineer

14474
Arkansas License Number

Signature of Professional Engineer

October 2, 2023
Date



Trent McDaniel, P.G.
Printed Name of Professional Geologist

1952
Arkansas License Number

Trent McDaniel
Signature of Professional Geologist

10/2/2023
Date

