

October 12, 2016

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

**RE: Closure Plan - EPA Final CCR Rule (§ 257.102)  
Entergy Arkansas, Inc. Independence Plant Class 3N CCR Landfill  
ADEQ Permit No. 0200-S3N-R2  
Newark, AR**

Dear Mr. Johnson:

FTN Associates, Ltd. (FTN) has been retained by Entergy Arkansas, Inc. (Entergy) 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 Closure Plan for the CCR Landfill at Entergy's Independence Plant near Newark, Arkansas. Presented below is the project background, summary of findings, limitations, and certifications.

## **1.0 BACKGROUND**

As required by §257.102(b) of the EPA Final CCR Rule Closure Plans must be prepared for active CCR units by October 17, 2016.

In support of the above requirement, FTN has completed a Closure Plan for the CCR Landfill at the Entergy's Independence Plant in *[date to be determined]*. A complete listing of documents reviewed and utilized as part of the preparation of the Closure Plan is included in the References at the end of this letter.

## **2.0 SUMMARY OF FINDINGS**

Based upon a review of the documents listed in the References, FTN has identified that the requirements of the EPA Final Rule have been met.

The written Closure Plan includes the following information per §257.102:

1. A description of the how the CCR unit will be closed;
2. A description of the final cover system and the methods and procedures to be used to install the final cover;
3. An estimate of the maximum inventory of CCR ever onsite over the active life of the CCR unit;

4. An estimate of the largest area of the CCR unit ever requiring a final cover; and
5. A schedule for completing all activities necessary to satisfy the closure criteria in §257.102.

FTN has identified that the following closure activities must be conducted:

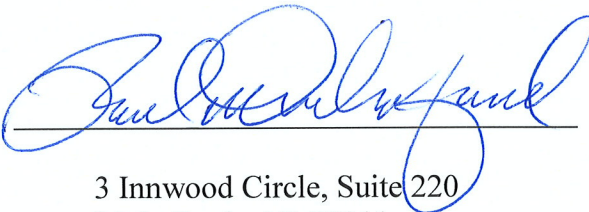
1. Installation of the final cover system in accordance with §257.102(d); and
2. Preparation of certification and filing of notification that closure of the CCR unit has been conducted in accordance with §257.102.

### 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, Paul Crawford, being an Arkansas Registered Professional Engineer, 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.

SIGNATURE:  DATE: October 12, 2016

ADDRESS: 3 Innwood Circle, Suite 220  
Little Rock, AR 72211

TELEPHONE: (501) 225-7779

References: Entergy Arkansas, Inc. Independence Plant Class 3N CCR Landfill Closure Plan,  
FTN (October 12, 2016)

