

October 12, 2016

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

**RE: Post-Closure Plan - EPA Final CCR Rule (§ 257.104)
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 Post-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 §257.104(d)(2) of the EPA Final CCR Rule, Post-Closure Care Plans must be prepared for active CCR units by October 17, 2016.

In support of the above requirement, FTN has completed a Post-Closure Plan for the CCR Landfill at Entergy's Independence Plant in *[date to be determined]*. A complete listing of documents reviewed and utilized as part of the preparation of the Post-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 Post- Closure Care Plan includes the following information per §257.104:

1. A description of the monitoring and maintenance activities for the CCR unit and the frequency at which these activities would be performed. This includes maintaining surface cover systems, groundwater monitoring systems, and leachate collection systems.
2. The name, address, and telephone number of the person or office to contact about the facility during the post-closure care period.
3. A description of the planned uses of the property during the post-closure care period.

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

1. Maintaining the integrity and effectiveness of the final cover system, including repairs to the final cover as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover.
2. Maintaining the integrity and effectiveness of the leachate collection and removal system and operating the leachate collection and removal system in accordance with the requirements of §257.70 if required at the time of closure due to construction of a lateral expansion (new cell after October 19, 2015).
3. Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of §§ 257.90 through 257.98.

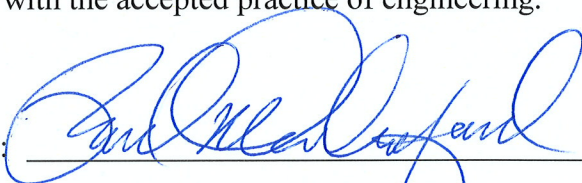
3.0 LIMITATIONS

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 a Registered Professional Engineer in accordance with the 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.

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 Post-Closure Plan, FTN (October 12, 2016)

