

# CERTIFICATION

## CCR Surface Impoundment Closure Certification Water Recycle Ponds – A and B

### White Bluff Steam Electric Station

Entergy Arkansas, LLC (Entergy) initiated closure of both Water Recycle Ponds - A and B at the White Bluff 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, *Closure Plan for Water Recycle Ponds* (August 2019), and in accordance with the Station's National Pollutant Discharge Elimination System (NPDES) Permit Number AR000930.

All CCR was removed from both Water Recycle Ponds – A and B and disposed in the on-site CCR Landfill (Cells 1 through 4 at the Station in accordance with 40 CFR 257.102 of the CCR Rule and *Closure Plan for Water Recycle Ponds*. The on-site CCR landfill has Arkansas Energy and Environment Department, Division of Environmental Quality (DEQ) Permit Number 0199-S3N-R3. Pursuant to *Closure Plan for Water Recycle Ponds*, CCR removal was confirmed through visual observations of both Water Recycle Ponds – A and B.

Per *Closure Plan for Water Recycle Ponds*, both Water Recycle Ponds – A and B 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 1 through 4). Pursuant to *Closure Plan for Water Recycle Ponds*, CCR decontamination was confirmed through visual observations of both Water Recycle Ponds – A and B after excavation.

As documented in the *2022 Annual Groundwater Monitoring and Corrective Action Report, White Bluff Steam Electric Station, Recycle Ponds* (TRC, January 2023), groundwater monitoring at both Water Recycle Ponds – A and B has been performed as part of the Detection Monitoring Program per 40 CFR 257.94 of the CCR Rule. Detection monitoring results have not required a transition to assessment monitoring for the Water Recycle Ponds – A and B. No statistically significant increases (“SSIs”) were identified in groundwater monitoring conducted in 2022 pursuant to 40 CFR 257.94 of the CCR Rule. Alternate source demonstrations were successfully conducted for prior SSIs identified during detection monitoring. Therefore, groundwater protection standards (GWPS) have never been formally established pursuant to 40 CFR 257.95 of the CCR Rule and detection monitoring sampling at the CCR units has not indicated a release. However, for purposes of closure only GWPS were established following 40 CFR 257.95(h) and confirmed that as of August 15, 2023 there are no exceedances of these GWPS for Appendix IV constituents. Accordingly, the closure criteria provided in 40 CFR 257.102(c) of the CCR Rule have been met.

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.

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

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Arkansas License Number

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Signature of Professional Engineer

October 2, 2023  
Date



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

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Trent McDaniel  
Signature of Professional Geologist

10/2/2023  
Date

