

Design Criteria Certification 257.70(f)
Liner and Leachate Collection System
CCR LANDFILL: Independence Steam Electric Station
CCR UNIT: Cell 16

Promus Engineering, LLC ("Consultant") has been retained by Entergy Arkansas, LLC (Entergy) to assess the construction of the composite liner and leachate collection and removal system of the above-referenced coal combustion residuals (CCR) landfill unit and determine if it meets the requirements of 40 CFR § 257.70(f). The following paragraphs present the background, assessment, limitations, and certification.

1.0 BACKGROUND

Pursuant to 40 CFR § 257.70(a)(1), new CCR landfills and any lateral expansion of a CCR landfill must be designed, constructed, operated, and maintained with either a composite liner or an alternative composite liner and a leachate collection and removal system. Pursuant to 40 C.F.R. § 257.70(f), upon completion of construction of the CCR landfill or any lateral expansion of a CCR landfill, the owner or operator must obtain a certification from a qualified professional engineer that the composite liner (or alternative composite liner) and the leachate collection and removal system meet the following requirements:

- i. A composite liner that meets the requirements of 40 CFR § 257.70(b); or
- ii. An alternative composite liner that meets the requirements of 40 CFR § 257.70(c); and
- iii. A leachate collection and removal system that meets the requirements of 40 CFR § 257.70(d).

In support of the above assessment, Consultant completed a desktop evaluation of the composite liner and leachate collection and removal system design and construction documentation.

2.0 ASSESSMENT

Based on a review of the applicable information, Consultant concludes as follows:

CCR Unit	Composite Liner System	Leachate Collection and Removal System
Cells 16	Composite Liner meets the requirements of 40 C.F.R. § 257.70(c)	Leachate Collection and Removal System meet the requirements of 40 C.F.R. § 257.70(d)

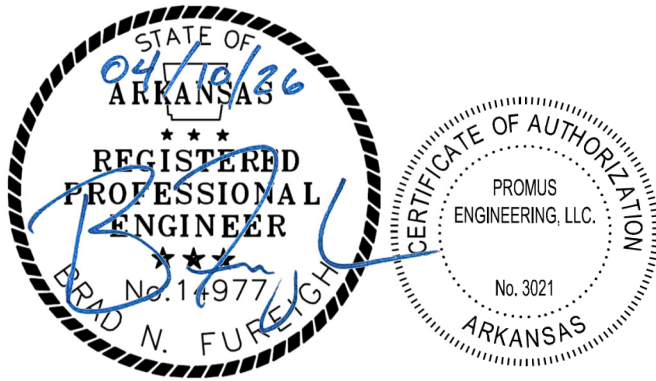
3.0 LIMITATIONS

The signature of Consultant's authorized representative on this document represents that, to the best of Consultant's knowledge, information, and belief in the exercise of its professional judgment, the information presented herein is accurate as of the date of such signature. Any opinion or decisions by Consultant are based on Consultant's experience, qualifications, and professional judgment and are not to be construed as warranties or guarantees. Opinions relating to environmental, geologic, and geotechnical conditions, or other estimates, are based on available data, and actual conditions may differ from those encountered at the times and locations where data were obtained, despite the use of due care.



4.0 CERTIFICATION

I, Brad N. Fureigh, PE, of Promus Engineering, LLC (Promus), being a Registered Professional Engineer in the State of Arkansas, do hereby certify, to the best of my knowledge, information, and belief, that the CCR unit that is the subject of this report, dated April 10, 2026, meets the requirements for the design and construction of the Composite Liner and Leachate Collection and Removal System pursuant to 40 C.F.R. § 257.70(f), and that this report is true and correct and has been prepared in accordance with generally accepted good engineering practices.



Brad N. Fureigh, PE
AR Registered Professional Engineer No.: 14977

April 10, 2026

Date

