

UNSTABLE AREAS

CCR LANDFILL: Independence Steam Electric Station

CCR UNIT: Cell 16

Promus Engineering, LLC ("Consultant") has been retained by Entergy Arkansas, LLC (Entergy) to assess whether the above-referenced coal combustion residuals (CCR) landfill unit complies with the location restriction for unstable areas set forth in 40 C.F.R. § 257.64(a). This report presents the project background, assessment, limitations, and certification.

1.0 BACKGROUND

Pursuant to 40 C.F.R. § 257.64(a), new CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of a CCR unit must not be located in an unstable area unless the owner or operator demonstrates that recognized and generally accepted good engineering practices have been incorporated into the design of the CCR unit to ensure that the integrity of the unit's structural components will not be disrupted.

Pursuant to 40 C.F.R. § 257.64(b), the owner or operator must consider, at a minimum, the following factors in determining whether an area is unstable.

1. On-site or local soil conditions that may result in significant differential settlement;
2. On-site or local geologic or geomorphologic features; and
3. On-site or local human-made features or events, both surface and subsurface.

Pursuant to 40 C.F.R. § 257.64(c) and (d)(2), for a new CCR landfill, a new CCR surface impoundment, or any lateral expansion of a CCR unit, the owner or operator must obtain a certification from a qualified professional engineer stating that the CCR unit meets the requirements for unstable areas no later than the date of initial receipt of CCR in the unit.

In support of this assessment, Consultant performed a desktop evaluation of the location restriction for unstable areas and determined that sufficient information is available to document the required demonstration.

2.0 ASSESSMENT

Based on a review of the U.S. Geological Survey geologic mapping and USDA Natural Resources Conservation Service soil data, the Entergy Independence Landfill is located within the Mississippi Alluvial Plain, which is characterized by relatively flat terrain and unconsolidated alluvial deposits. The site does not exhibit geologic or topographic conditions typically associated with unstable areas, such as landslides, karst terrain, or other features indicative of structural instability.

The landfill has been designed to ensure stability in consideration of the fine-grained alluvial soils present at the site, including appropriate measures to address potential settlement and foundation support.

Accordingly, the site is not located in an unstable area, as that term is applied under 40 CFR §257.64(a).

CCR Unit	Unstable Areas
Cell 16	Meets the requirements of 40 C.F.R. § 257.64(a)

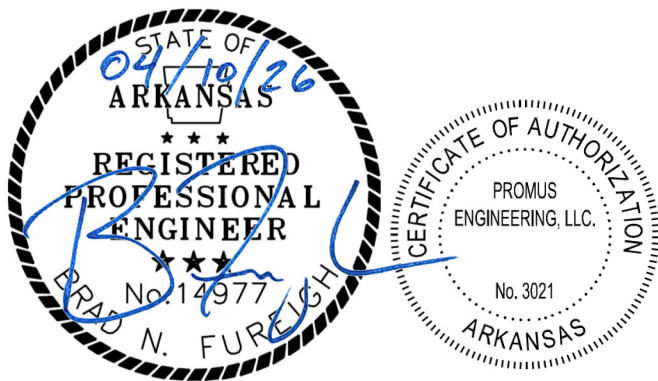


3.0 LIMITATIONS

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 location restriction requirements for unstable areas pursuant to 40 C.F.R. § 257.64(a), 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

