WETLANDS
CCR LANDFILL: Independence Steam Electric Station
CCR UNIT: Cell 16

Promus Engineering, LLC ("Consultant") has been retained by Entergy Arkansas, LLC (Entergy) to prepare the following assessment of whether the above-referenced coal combustion residuals ("CCR") landfill unit meets the wetlands impacts requirements set out in 40 C.F.R. § 257.61(a). Presented below are the project background, summary of findings, limitations, and certification.

1.0 BACKGROUND

Pursuant to 40 C.F.R. § 257.61(a), new CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of a CCR unit must not be located in wetlands, as defined in 40 C.F.R. § 232.2, unless the owner or operator demonstrates that the CCR unit meets the requirements of paragraphs (a)(1) through (5) under 40 C.F.R. § 257.61(a).

Pursuant to 40 C.F.R. § 257.61(b) and (c)(2), for a new CCR landfill, a new CCR surface impoundment, or any lateral expansion of CCR unit, no later than the date of initial receipt of CCR in the CCR unit, the owner or operator must obtain a certification from a qualified professional engineer stating that the owner or operator has demonstrated that the CCR unit meets the requirements of 40 C.F.R. § 257.61(a).

In support of Consultant's assessment, Consultant completed a desktop evaluation of the location of the CCR unit and determined that sufficient information is available to document the required wetlands demonstration.

1.1 Site Background

Entergy owns and operates the CCR landfill in accordance with DEQ Solid Waste Permit 0200-S3N-R2. The Facility is located approximately 2.5-miles southeast of Newark in Independence County, Arkansas. The site is generally located in portions of the South 1/2 of Section 11, excluding the west 1/2, SW 1/4 and a portion of the North 1/2 of Section 14, Township 12 North, Range 4 West in Independence County, Arkansas. The permitted landfill area consists of approximately 335 acres and is located in the northeastern portion of the plant site.

The CCR Landfill was originally permitted by the Arkansas Division of Environmental Quality (DEQ) in 1982. The DEQ-permitted layout of the CCR Landfill includes a total of 22 disposal cells. Cells 1 through 15 were constructed prior to October 19, 2015, the effective date of the first federal CCR regulations. Cells 12 through 15 currently comprise the active disposal area of the CCR Landfill, having received CCR materials after October 19, 2025. Cell 16 has been constructed and prepared in accordance with 8 CAR § 60 and 40 C.F.R. Part 257, Subpart D and will begin receiving waste as soon as 2026. Cell 16 is approximately 19 acres located directly south of active Cell 15.

2.0 ASSESSMENT

Under state regulation 8 CAR § 60-504, no portion of the permitted landfill footprint may be located within a wetland. Accordingly, in June and July of 1996, Entergy hired FTN to conduct an onsite preliminary jurisdictional determination (PJD) of wetlands and other waters of the United States within the entire 335-acre permitted landfill footprint. Evaluation of soil pits at 21 sampling sites, along with review of vegetation and hydrology, determined that a 1.06-acre area in the northwest

corner of the landfill site, which is now located in Cell 14, was the only area of wetlands in the 335-acre permitted landfill area. The United States Army Corps of Engineers (USACE) agreed with this determination. USACE issued Department of the Army Permit No. 01235-3 on November 14, 2001, which authorized Entergy to fill the wetlands. An extension of time (Permit Modification No. 01235-4) for the permit was granted by USACE until December 31, 2008. This 1.06-acre area was filled and mitigated in 2006 with USACE approval.

The US Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) also reflects that the CCR Landfill is not constructed in or adjacent to wetlands. (https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/).

Based on a review of the preliminary jurisdictional determination report prepared in 1996 by FTN Associates, Ltd., in support of the 2014 Permit Modification Application (approved by DEQ as part of the 2014 Permit Modification), the individual Section 404 permit issued by the U.S. Army Corps of Engineers, and related correspondence, the Consultant concludes as follows:

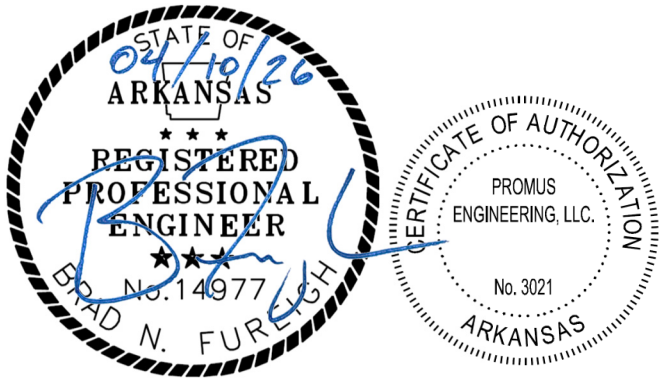
CCR Unit	Wetlands
Cell 16	Meets the requirements of 40 C.F.R. § 257.61(a)

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 requirements for wetlands impacts pursuant to 40 C.F.R. § 257.61(a), and that this report is true and correct and has been prepared in accordance with generally accepted good engineering practices.



April 10, 2026

Brad N. Fureigh, PE — Date

AR Registered Professional Engineer No.: 14977