



Entergy Arkansas, LLC
White Bluff Plant
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Robert "Eugene" Knighten
General Manager

AR-25-016

December 11, 2025

Ms. Jessica Sears, Managing Engineer
Arkansas Department of Energy and Environment
Office of Water Quality, Permits Section
5301 Northshore Drive
North Little Rock, AR 72118

Reference: Annual Report and Certification Statement
Combustion Residual Leachate (CRL) Notice of Planned Participation (NOPP)
Pursuant to 40 CFR. 423.19(h)
Entergy Arkansas, LLC – White Bluff Plant – AR0036331, AFIN 35-00110

Dear Ms. Sears,

Part II, Other Conditions, (Number 20) **Annual Progress Report for Permanent Cessation of Coal Combustion** of Entergy Arkansas' White Bluff Plant's modified NPDES Permit states the following requirements:

After submission of the Notice of Planned Participation for permanent cessation of coal combustion, in accordance with 40 C.F.R. § 423.19(f)(1), a progress report shall be submitted annually to the Office of Water Quality, in accordance with 40 C.F.R. § 423.19(f)(3). The report shall detail the completion of any interim milestones listed in the Notice of Planned Participation since the previous progress report, provide a narrative discussion of any completed, missed, or delayed milestones, and provide updated milestones, in accordance with 40 C.F.R. § 423.19(f)(4).

Summary of Historical Facts

On October 13, 2020, the U.S. Environmental Protection Agency (EPA) published a final rule revising the technology-based effluent limitations guidelines and standards (ELGs) for the steam electric power generating point source category applicable to bottom ash transport water (2020 Reconsideration Rule). The 2020 Reconsideration Rule modified the ELGs applicable to the facility owned by Entergy Arkansas, LLC located at 1100 White Bluff Road, Redfield, Arkansas 72132 in Jefferson County, Arkansas, known as the White Bluff Steam Electric Generating Station (White Bluff).

Accordingly, on October 12, 2021, pursuant to 40 C.F.R § 423.19(g), White Bluff submitted a Notice of Planned Participation (NOPP) to this Division to qualify for certain exemptions from Bottom Ash Transport Water (BATW) requirements as a facility that will achieve permanent cessation of combustion of coal (PCCC) by December 31, 2028 (the "BATW NOPP"). Under the BATW NOPP, White Bluff's BATW discharges are subject to TSS limits until April 30, 2029, when it will become subject to zero discharge limits for BATW.

Pursuant to 40 C.F.R. § 423.19(g)(3), White Bluff has filed Annual Progress Reports related to the BATW NOPP with this Department in 2022, 2023, 2024, and most recently on October 8, 2025.

On May 9, 2024, EPA published a final rule again revising the ELGs applicable to White Bluff (the "2024 Rule"). The 2024 Rule prescribes certain ELGs applicable to existing point sources and provides certain limited exceptions to the new ELGs. Facilities planning to permanently cease combusting coal by December 31, 2034 (2034 PCCC subcategory), may seek to qualify for such exemptions. Facilities falling under this category will be subject to mercury and arsenic limits for discharges of their Combustion Residual Leachate (CRL) after they permanently cease the combustion of coal.

The EPA clarified in the preamble to the 2024 Rule that facilities such as White Bluff, with an existing BATW NOPP under the 2020 Reconsideration Rule, qualify for the CRL limits under the 2034 PCCC subcategory as long as a new NOPP declaring the intent to utilize the 2034 PCCC subcategory for its CRL was submitted. In a letter dated December 16, 2024, White Bluff submitted a Notice of Planned Participation (CRL NOPP) pursuant to 40 C.F.R §423.19(h) declaring the intent "to qualify as an electric generating unit that will achieve permanent cessation of combustion of coal by December 31, 2034". This original CRL NOPP met the submittal deadlines contained in the ELG and included the following affirmations of facts along with supporting documentation.

- White Bluff operates two units, Units 1 and 2, which will achieve permanent cessation of coal combustion no later than December 31, 2028.
- This is approved by the Arkansas Department of Energy and Environment, Division of Environmental Quality ("DEQ") through (1) an Administrative Order, dated August 7, 2018, and (2) the 2018 Arkansas Phase II Regional Haze State Implementation Plan Revision where the Administrative Order is incorporated.
- Further, it is approved by the EPA through its approval of the Regional Haze State Implementation Plan Revision for Electric Generating Units in Arkansas.
- A copy of EAL's most recently filed Integrated Resource Plan (IRP) can be found at https://apps.apsc.arkansas.gov/pdf/07/07-016-U_103_1.pdf.
- Because of its existing BATW NOPP allowed under the 2020 Reconsideration Rule and incorporated by the 2024 Rule, White Bluff's applicable BATW limits are found in 40 C.F.R § 423.13(k)(2)(ii). White Bluff is currently compliant with this standard.

Summary of Milestones and Current Status:

Prior to submittal of the original CRL NOPP, Entergy's White Bluff plant developed an NPDES permit renewal application which included the request to incorporate the 2024 Rule along with the CRL requirements. The application was submitted to ADEQ in August of 2024.

An updated milestone schedule and signed certification statement has been included as an Attachment to this Annual CRL NOPP Progress Report. This outlines Entergy Arkansas' continuing operational plans related to the White Bluff plant. Pursuant to 40 C.F.R § 423.19(h)(4)(iii), Entergy Arkansas certifies that it will make the filing required in 40 C.F.R § 423.19(h)(4)(i) to the Midcontinent Independent System Operator (MISO), which is Entergy's Regional Transmission Operator (RTO). Entergy Arkansas estimates that it will make this filing on or before June 30, 2026.

If you have any questions concerning this information or if additional information is required, please contact Kim Fuller, Arkansas Environmental Manager, at (501) 529-3633 or by email at kfulle1@entergy.com.

Respectfully Submitted,

Robert E. Knighten

Robert E. Knighten (Dec 11, 2025 08:39:27 CST)

Robert "Eugene" Knighten
General Manager, White Bluff Plant

REK:kaf
Enclosure



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ATTACHMENT
Milestones to Permanent Cessation of Coal Combustion

Date	Milestone
October 13, 2021	BATW NOPP Submitted Under 2020 Reconsideration Rule
August 29, 2022	Annual BATW NOPP Certification Filed
June 1, 2023	NPDES Permit Modified to Reflect BATW NOPP
October 12, 2023	Annual BATW NOPP Certification Filed
August 2, 2024	NPDES Permit Renewal Application Filed
October 11, 2024	Annual BATW NOPP Certification Filed
December 16, 2024	CRL NOPP Submitted Under 2024 Rule
February 28, 2025	Current NPDES Permit Expiration Date
October 6, 2025	Annual BATW NOPP Certification Filed
December 16, 2025	Annual CRL NOPP Certification Deadline
June 30, 2026	Official Suspension Filed with MISO
October 13, 2026	Annual BATW NOPP Certification Deadline
December 16, 2026	Annual CRL NOPP Certification Deadline
October 13, 2027	Annual BATW NOPP Certification Deadline
December 16, 2027	Annual CRL NOPP Certification Deadline
October 13, 2028	Annual BATW NOPP Certification Deadline
December 16, 2028	Annual CRL NOPP Certification Deadline
December 31, 2028	Permanent Cessation of Coal Combustion at White Bluff
April 30, 2029	Zero Discharge Limits for BATW Becomes Effective
TBD (Date to be permitted by ADEQ)	Mercury and Arsenic Limits for CRL Become Effective

Certification Statement:

I certify under penalty of law that this document and all attachments were prepared under my direct supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Robert E. Knighten

Robert E. Knighten (Dec 11, 2025 08:59:27 CST)

Robert "Eugene" Knighten
General Manager, White Bluff Plant

12/11/2025

Date