



June 12, 2017

Gaylan Hayes
Plant Manager
Entergy Independence SES
555 Point Ferry Road
Newark, AR 72562

RE: Quarterly Inspection conducted on June 8, 2017
AFIN 32-00042
Permit Number 0200-S3N-R1

Dear Mr. Hayes:

The Arkansas Department of Environmental Quality – Office of Land Resources (ADEQ) conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Act (Arkansas Code, Annotated, § 8-6-201 *et seq.*), of 1971, as amended, the Arkansas Pollution Control & Ecology Commission Regulation 22 (Solid Waste Management), and the above-referenced permit. The inspection identified conditions at your facility which the ADEQ alleges constitute violations of APC&EC Regulation No. 22. A copy of the inspection report is attached.

Please refer to the attached inspection report to note the specific allegations. A written response for the noted allegations, describing the corrective action taken or to be taken must be submitted within thirty (30) calendar days from the date of this letter to the attention of Darrell Norton. Failure to submit the written response shall be construed as an admission of any allegations. Any items noted that are neglected or persistent may warrant formal enforcement action.

If I can be of any further assistance, please do not hesitate to contact me at (501) 837-6909 or norton@adeq.state.ar.us.

Sincerely,

A handwritten signature in black ink that reads "Darrell Norton". The signature is written in a cursive style and is enclosed in a rectangular box.

Solid Waste Inspector
Office of Land Resources

Attachment

cc: Tammie J. Hynum, Acting Sr. Operations Manager, Office of Land Resources



**Arkansas Department of Environmental Quality
Office Of Land Resources-Solid Waste Management
Class 3 Landfill Inspection**



Site Name	Entergy- Independence Plant	County	Independence	AFIN	32-0042
Facility Address	555 Point Ferry , Newark, AR 72562	Phone Number	870-799-8761 Entergy 870-799-3565 HW	Permit Number	0200-S3N-R1
Permittee Address	555 Point Ferry , Newark, AR 72562	E-Mail Address	krichmond@headwaters.com		PDS # 097504
Date	6/8/2017	Entry Time	9:20 AM	Exit Time	11:05 AM

Regulation 22 – Operational Standards

Category 1

Regulation	Item Description	Comments
510(l)	Adequate employee facilities	
520(a)(b)	Record keeping meets requirements specified by regulations	
516	Access requirements	
510(j)	Adequate provisions for backup equipment	
520(c)	Waste receipt records, ticket system maintained	
510(k)	Telephone system & written emergency response plan on site	
522(a)	Annual compliance inspection by register professional engineer	
521	Facility implements operating plan and narrative	
520(a)(4)	Leachate disposal/recirculation records	
701, 520(a)(2)	Special waste disposal and procedures records	

Category 2

Regulation	Item Description	Comments
510(a)	Operations in accordance with permit documents	
516(c)	Adequate all weather operational roads	
510(c)	Smallest practical area, unloading supervised, single working face	
510(e)	Salvage operations meet approved conditions	
510(f)(l)	Scavenging of waste prohibited	
510(o)	Proper wet weather repairs	
510(b)	Operations by licensed on-site personnel at all times	
510(d)	Waste spread and compacted as unloaded	
510(g)	Litter control provisions maintained	
513(a)	Disease vectors controlled	

Category 2 (continued)


	Regulation	Item Description	Comments
	518	Surface water controls	
	510(h)(l)	Contouring prevents surface water flowing into or through waste	
	517(a)(b)	Run-on/off control system present and adequate	
	510(h)(2)	Surface water control prevents off-site sediment accumulation	
	510(h)(i)	Adequate maintenance of intermediate/final cover vegetation	
	514	Gas monitoring program	
	510(n)	Leachate leaks or evidence of leachate seepage	
	526	Survey controls	
X	529	Leachate collection system	Leachate pump and control panel for cell 15 were not functional. Read-outs for leachate head level and alarms not available due to lack of power to control panel. (see photos 3 and 4)
	519	Liquid restrictions	

Category 3

	Regulation	Item Description	Comments
	511	Implementation of hazardous/unauthorized waste exclusion plan	
	512(a)(c)	Satisfactory daily/alternative cover	
	512(b)	Satisfactory intermediate cover	
	515(b), 510(f)(4)	Open burning prohibited	
	518	Cause discharge/leachate discharge leaving landfill	
	510(f)(3), 518(a)(4)	Depositing waste in standing water prohibited	
	510(n)	Erosion or other cover defects resulting in exposed refuse	
	309(c)	Overfill/off lined area	

Regulation 22 - Records

520(a)(8), 204(b)	Date of last groundwater monitoring report	1/9/17	Site Conditions	Wet
522	Date of last engineering report	6/17/16	Weather Conditions	Sunny
528	Liner construction in progress <input type="checkbox"/> Yes/No <input checked="" type="checkbox"/> no	Notice of liner construction <input type="checkbox"/> Yes/No <input type="checkbox"/>	Third part CQA on-site during construction <input type="checkbox"/> Yes/No <input type="checkbox"/>	
511	Date of last random inspection for unauthorized waste	N/A	Total # for month	
514, 520(a)(3)	Date of last quarterly methane monitoring	N/A	Detection level	514 Explosive gas records current? <input type="checkbox"/> Yes/No <input type="checkbox"/>
701, 520(a)(2)	Date of last special waste received	N/A	Disposal location	
520(c)	Previous quarter waste received	35284.36	Tons for 1st Qtr.	Bottom ash 8927.62 Fly Ash 25471.2 other 885.54
527	Surface water DMR records current? <input type="checkbox"/> Yes/No <input type="checkbox"/>	Yes		

Operator Name & Number	Jeremy L. Stauffer 003545	Signature of Inspector	
Exit Interview Conducted with	Jeremy L. Stauffer	Method	On-Site
		Date	6/8/2017
		Time	10:55 am

**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**

Location	Entergy-Independence Plant			Permit	0200-S3N-R1	AFIN	32-00042
Photographer	Darrell Norton		<i>DN</i>	Witness	none		
Photo #	1	Of	4	Date	6/8/2017	Time	9:40 AM
Description	Slope repairs underway on cell 15 (heavy rains on 6/5/2017)						



Location	Entergy-Independence Plant			Permit	0200-S3N-R1	AFIN	32-00042
Photographer	Darrell Norton		<i>DN</i>	Witness	none		
Photo #	2	Of	4	Date	6/8/2017	Time	9:47 AM
Description	View of working face of Cell 15						



Arkansas Department of Environmental Quality (ADEQ) Official Photograph Sheet

Location	Entergy-Independence Plant			Permit	0200-S3N-R1	AFIN	32-00042
Photographer	Darrell Norton		<i>DN</i>	Witness	none		
Photo #	3	Of	4	Date	6/8/2017	Time	10:25 AM
Description	View of control panel for leachate pump/head level on cell 15 (non-operational at time of inspection)						



Location	Entergy-Independence Plant			Permit	0200-S3N-R1	AFIN	32-00042
Photographer	Darrell Norton		<i>DN</i>	Witness	none		
Photo #	4	Of	4	Date	6/8/2017	Time	10:26 AM
Description	View of leachate basin for cell 15 NOTE: Heavy rains experienced at site on 6/5/2017						





Arkansas Environmental Support
425 West Capitol Avenue
A-TCBY-22D
Little Rock, AR 72203
Tel 501-377-4033
Fax 281-297-6128
G. Tracy Johnson, Manager
Arkansas Environmental Support

AR-17-050

June 26, 2017

Mr. Darrell Norton
Solid Waste Inspector
Office of Land Programs
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

AFIN: 32-00042
PMT#: 0200-S3N-R2 REC'D SCAN

JUN 27 2017

DOC ID#: 72056
TO: HL>FILE <KMB SWMD

RE: Response to Quarterly Inspection Finding
Entergy Arkansas, Inc. – Independence Plant
Permit No.: 0200-S3N-R2, AFIN: 32-00042

Dear Mr. Norton:

Entergy appreciates the opportunity to provide you with this response to your quarterly inspection finding of non-compliance at our Class 3N landfill at our Independence Plant. The Class 3 Landfill Inspection Report dated June 12, 2017 (DIN: 097504) documents non-compliance with the requirements of APC&EC Regulation 22.529 Leachate Collection System Design and Construction, stating that the leachate pump and control panel for cell 15 were not functional and that the read-outs for leachate head level and alarms were not available due to lack of power to the control panel.

Entergy had been experiencing problems with clogging of the leachate collection pump for cell 15 that ultimately led the pump to fail on June 13, 2016. The pump was immediately replaced and on June 20, 2016 Entergy vacuumed the leachate sump to remove particulates that were causing the pump issues (clogging and over-cycling). The pump was still experiencing clogging and over-cycling issues, so on October 11, 2016 Entergy utilized PMI of Little Rock, Arkansas to replace the gravel and filter fabric in the leachate sump. The replacement pump operated with cycling issues until April 3, 2017 when it ultimately failed. Entergy contracted Advance Fluid Technologies of Sherwood, Arkansas to replace and maintain the pump system. Entergy experienced additional pump issues and failures on May 12, 2017 and final failure on May 17, 2017. On May 23, 2017 the old pump was removed and a new trash pump system was tested. Based upon the test, the decision was made to install a different style pump. Since the pumping system was inoperable, Entergy's safety protocols required the electrical system/panel to be locked and tagged out following Entergy's lock-out/tag-out procedure.

On May 25, 2017, an AMT cast iron sewage pump Model 393A-95 providing 15 to 20 feet of suction head was ordered. The AMT pump was delivered June 14, 2017 and replaced by Advanced Fluid Technologies on June 19, 2017. As of the date of this letter, the replacement pump is installed and operating effectively. Attached are a specification sheet and a photograph of the newly installed pump.

Response to Quarterly Inspection Finding

Entergy Arkansas, Inc. - Independence Plant

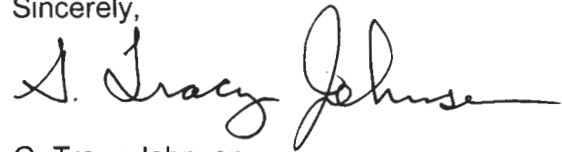
Permit No.: 0200-S3N-R2

AFIN: 32-00042

Attachment

We appreciate the opportunity to provide this additional information to ADEQ. If you have any questions regarding this submittal, please contact me at (501) 377-4033 or Trip Gentry at (501) 377-4032.

Sincerely,

A handwritten signature in black ink that reads "G. Tracy Johnson". The signature is written in a cursive style with a long horizontal flourish at the end.

G. Tracy Johnson
Manager, Arkansas Environmental Support

GTJ/rlg
Attachment

cc: Gaylan Haynes – Entergy
Andy Wilson – Entergy

File: 8413.4/RS 1859

Response to Quarterly Inspection Finding
Entergy Arkansas, Inc. - Independence Plant
Permit No.: 0200-S3N-R2
AFIN: 32-00042
Attachment



Entergy Arkansas, Inc. - Independence Plant
Permit No.: 0200-S3N-R2
AFIN: 32-00042
Cell 15 – Installed leachate collection sump pump
View to the west
6/22/2017

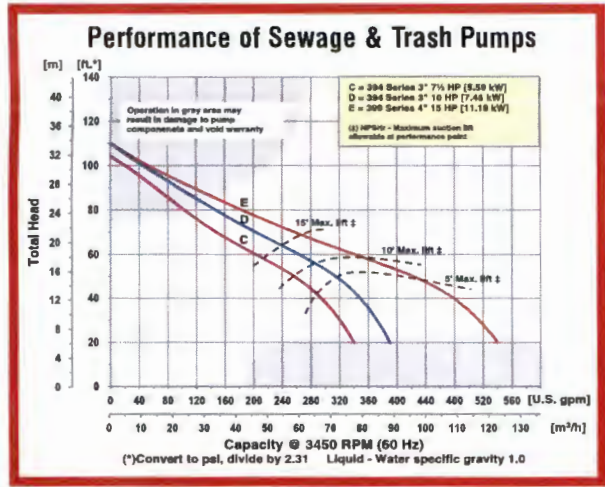
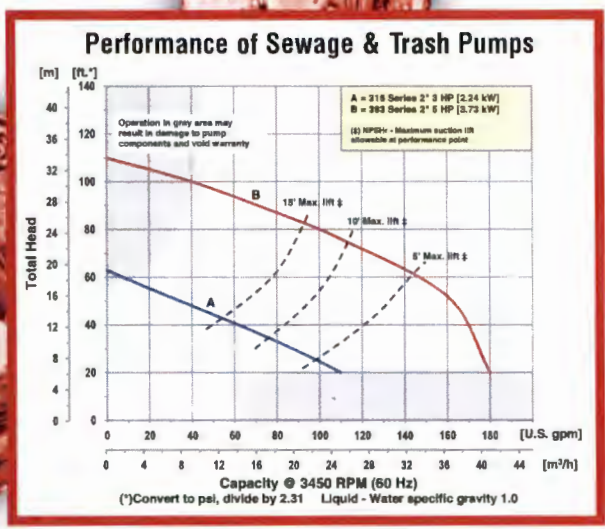
Cast Iron Sewage & Trash Pumps



Model 316A-95

Model 394A-95

- **Cast Iron Construction**
- **Silicon Carbide/Viton® Mechanical Seal**
- **2", 3" & 4" NPT Ports Sizes**
- **Maximum Temperature 180° F**
- **Self-Priming to 20 Ft.**
- **Stainless Steel Semi-Open, Clog Resistant Impeller**
- **Buna-N Check Valve and O-Ring**
- **Removable Cast Iron Volute/Wearplate**
- **Easy Cleanout Design**
- **3" & 4" Models Feature Front Cleanout**
- **Pull-from-Rear Design**
- **Available with 3 to 15 HP Totally Enclosed Fan Cooled (TEFC) Electric Motors**



AMT Cast Iron Sewage/Trash pumps are designed for trouble free and economical handling of solids laden liquids and slurries. Pumps are available in three NPT port sizes: 2", 3" or 4". Cast iron construction with two vane stainless steel self-cleaning impellers, silicon carbide mechanical seals for abrasion resistance and Buna-N O-rings and check valves. Built-in check valve allows pump to reprime automatically in an open system without the foot valve. The solids handling capabilities of the pumps make them ideally suited for a variety of industrial applications including: sewage treatment, canneries, chemical processing, wineries, tanneries, meat packing, breweries, pulp, wood chips, process water, sludge and slime, waste water, white water and other applications. These sewage/trash pumps will easily handle liquids containing sewage, stones, sticks, mud and other solids. Minimum liquid requirement must be above 85% – maximum 15% solids. **Failure to do so may damage pump and void warranty.**



400 Spring Street • Royersford, PA 19468 USA
www.amtpump.com • 888-amt-pump (268-7867)

For use with nonflammable liquids compatible with pump component materials. Viton® and Teflon® are registered trademarks of E. I. DuPont.



Self-Priming Sewage/Trash Pumps

Pump Dimensional & Specification Data

Model	HP	SUC*	DIS*	A**	B	C**	D	E	F	G	J**	K	L**	W**	H	Ship Wt. (Lbs.)
316B-95	3	2	2	2.5 [6.3]	2.1 [5.3]	3.8 [9.6]	4.0 [10.1]	4.8 [12.2]	3.1 [7.8]	6.1 [15.4]	11.1 [28.2]	2.4 [6.1]	20.3 [51.5]	9.3 [23.6]	8.8 [22.3]	94
316A-95	3	2	2	2.5 [6.3]	2.1 [5.3]	3.8 [9.6]	4.0 [10.1]	4.8 [12.2]	3.1 [7.8]	6.1 [15.4]	11.1 [28.2]	2.4 [6.1]	19.9 [50.5]	9.3 [23.6]	8.8 [22.3]	87
393B-95	5	2	2	3.8 [9.6]	2.1 [5.3]	5.5 [13.9]	5.2 [13.2]	4.8 [12.2]	3.1 [7.8]	6.9 [17.5]	14.8 [27.6]	4.4 [11.1]	27.4 [69.6]	13.4 [34.0]	10.0 [25.4]	189
393A-95	5	2	2	3.8 [9.6]	2.1 [5.3]	5.5 [13.9]	5.2 [13.2]	4.8 [12.2]	3.1 [7.8]	6.9 [17.5]	14.8 [27.6]	4.4 [11.1]	24.9 [63.2]	12.3 [31.2]	10.0 [25.4]	173
394B-95	7½	3	3	4.3 [10.9]	3.5 [8.8]	5.5 [13.9]	6.0 [15.2]	6.5 [16.5]	5.0 [12.7]	9.3 [23.6]	16.4 [41.6]	3.7 [9.4]	31.1 [79.0]	15.5 [39.4]	12.5 [31.7]	248
394A-95	7½	3	3	3.8 [9.6]	3.5 [8.8]	5.5 [13.9]	6.0 [15.2]	6.5 [16.5]	5.0 [12.7]	9.3 [23.6]	15.7 [39.7]	3.7 [9.4]	26.6 [67.5]	13.5 [34.3]	12.5 [31.7]	226
394F-95	10	3	3	4.3 [10.9]	3.5 [8.8]	7.0 [17.7]	6.1 [15.4]	9.0 [22.8]	8.8 [22.3]	12.5 [31.7]	19.7 [50.0]	3.7 [9.4]	34.3 [87.1]	15.5 [39.4]	15.1 [38.3]	450
394E-95	10	3	3	4.3 [10.9]	3.5 [8.8]	7.0 [17.7]	6.1 [15.4]	9.0 [22.8]	8.8 [22.3]	12.5 [31.7]	19.7 [50.0]	3.7 [9.4]	33.4 [84.8]	14.3 [36.3]	15.1 [38.3]	330
399C-95	15	4	4	4.3 [10.9]	3.5 [8.8]	7.0 [17.7]	6.1 [15.4]	9.0 [22.8]	8.8 [22.3]	12.5 [31.7]	19.7 [50.0]	3.7 [9.4]	33.4 [84.8]	14.3 [36.3]	15.1 [38.3]	350

(*) Standard NPT (Female) pipe thread.

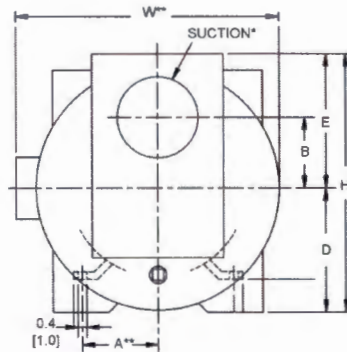
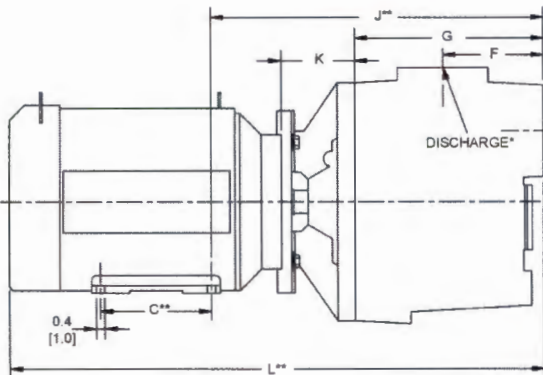
(**) This dimension may vary due to motor manufacturer's specifications.

NOTE: Dimensions are in inches (centimeters) and have a tolerance of ±1/4".

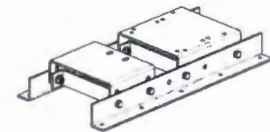
Model	Curve	HP	PH	ENC	Frame	Voltage @ 60 Hz +	Full Load Amps	Max Solids
316B-95	A	3	1	TEFC	56J	230	16	1"
316A-95	A	3	3	TEFC	56J	230/460	8/4	1"
393B-95	B	5	1	TEFC	184JM	230	20	1"
393A-95	B	5	3	TEFC	184JM	230/460	17/9	1"
394B-95	C	7½	1	TEFC	215JM	230	31	1½"
394A-95	C	7½	3	TEFC	184JM	230/460	22/11	1½"
394F-95	D	10	1	TEFC	215JM	230	40	1½"
394E-95	D	10	3	TEFC	215JM	230/460	26/13	1½"
399C-95	E	15	3	TEFC	215JM	230/460	47/24	2"

(+) 3-Phase models can also operate on 50 Hz (This will change full load amps and service factor, RPM and priming capabilities).

NOTE: Electric supply for ALL motors must be within ±10% of nameplate voltage rating (e.g. 230V ±10%= 207 to 253).



Optional Mounting Base Model A200-90



Standard Features

- Cast Iron Construction for Abrasive Resistance and Durability
- Silicon Carbide/Viton® Mechanical Seal
- Built-in Buna-N Check Valve
- Buna-N O-ring Casing Seal Reusable After Clean Out Maintenance
- Self-Cleaning Stainless Steel Impeller Resists Clogging and Wear
- Pull-from-Rear Design Permits Clean Out and Repair Without Removing Piping
- 3" & 4" Models Feature Front Cleanout
- Replaceable Cast Iron Volute/Wearplate Designed for Solids Handling
- Motor Includes Stainless Steel Shaft or Stainless Steel Shaft Sleeve
- Available with 3 to 15 HP Totally Enclosed Fan Cooled (TEFC) Electric Motors
- Single or Three Phase, 3450 RPM Motors
- Optional Mounting Base Available for 184/215 JM Frames
- Maximum Working Pressure 150 PSI
- Seal Flush Port Provided on 5 HP and Larger
- Optional Mounting Base Available
- QSP – Quick Ship Pump for Many Models

Hazardous Duty/Explosion Proof motors available from stock ranging from 1 to 10 HP; CALL FOR QUOTATION & LEAD TIME!



Manufacturer of AMT & IPT Pumps

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