



November 20, 2018

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

RE: **Quarterly Inspection conducted on November 13, 2018**  
**AFIN 32-00042**  
**Permit Number 0200-S3N-R2**

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.

You should immediately initiate all actions necessary to resolve and correct the alleged violations cited in the attached report. Written notification of the corrective actions taken, or to be taken, for the alleged violations must be submitted within thirty (30) calendar days from the date of this letter to the attention of Darrell Norton. This written notification could include, but not be limited to, photographs, receipts, or analytical results, documenting correction of violations. If you have any questions, please do not hesitate to contact me at (501) 837-6909 or [norton@adeq.state.ar.us](mailto:norton@adeq.state.ar.us).

Sincerely,

A handwritten signature in black ink that reads "Darrell Norton".

Darrell Norton  
Solid Waste Inspector  
Office of Land Resources

Attachment

cc: Charles M. Johnson, Senior Manager, Regulated Waste Operations, Office of Land Resources



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



<b>Site Name</b>	Entergy- Independence Plant	<b>County</b>	Independence	<b>AFIN</b>	32-00042
<b>Facility Address</b>	555 Point Ferry , Newark, AR 72562	<b>Phone Number</b>	870-799-8761 Entergy 870-799-3565 HW	<b>Permit Number</b>	0200-S3N-R2
<b>Permittee Address</b>	555 Point Ferry , Newark, AR 72562	<b>E-Mail Address</b>	krichmond@headwaters.com		<b>PDS #</b>   105520
<b>Date</b>	11/13/2018	<b>Entry Time</b>	1025	<b>Exit Time</b>	<b>1130</b>

**Regulation 22 – Operational Standards**

**Category 1**

	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
	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**

	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
X	510(a)	Operations in accordance with permit documents	The GWMR was not submitted within 90 days of the last recorded sampling event as required by Reg. 22.1203(k).
	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	
529	Leachate collection system	Leachate high level alarms were activated and pumps were operational at the time of the inspection.
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)	Overflow/off lined area	

**Regulation 22 - Records**

520(a)(8), 204(b)	Date of last groundwater monitoring report	10/18/2018	Site Conditions	wet
522	Date of last engineering report	6/1/2018	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 checked="" type="checkbox"/>	Third part CQA on-site during construction	<input type="checkbox"/> Yes/No <input checked="" 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 checked="" type="checkbox"/>
701, 520(a)(2)	Date of last special waste received	N/A	Disposal location	
520(c)	Previous quarter waste received	83,604.93	Tons for 3 rd. 2018	16363.28 Bottom ash 20827.78 Fly Ash 46385 sludge 28.87 coal
527	Surface water DMR records current? <input type="checkbox"/> Yes/No <input checked="" type="checkbox"/>			

Operator Name & Number	Charlie Reynolds 002532 Anthony Wilson 001442 Phillip Fick 001893	Signature of Inspector	
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Exit Interview Conducted with	Andy Wilson	Method	phone	Date	11/19/2018	Time	0930
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## Arkansas Department of Environmental Quality (ADEQ) Official Photograph Sheet

<b>Location</b>	Entergy-Independence Plant			<b>Permit</b>	0200-S3N-R2	<b>AFIN</b>	32-00042
<b>Photographer</b>	Darrell Norton , ADEQ Solid Waste Inspector		<i>DN</i>	<b>Witness</b>	Charlie Reynolds, Licensed Operator		
<b>Photo #</b>	1	<b>Of</b>	4	<b>Date</b>	11/13/2018		<b>Time</b> 1042
<b>Description</b>	A view of ongoing slope stabilization occurring on the west slope of Cell 14.						



<b>Location</b>	Entergy-Independence Plant			<b>Permit</b>	0200-S3N-R2	<b>AFIN</b>	32-00042
<b>Photographer</b>	Darrell Norton, ADEQ Solid Waste Inspector		<i>DN</i>	<b>Witness</b>	Charlie Reynolds, Licensed Operator		
<b>Photo #</b>	2	<b>Of</b>	4	<b>Date</b>	11/13/2018		<b>Time</b> 1042
<b>Description</b>	Groundwater monitoring well 704S, with storm water ditch and adjacent cell slope visible.						



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

<b>Location</b>	Entergy-Independence Plant			<b>Permit</b>	0200-S3N-R2	<b>AFIN</b>	32-00042
<b>Photographer</b>	Darrell Norton , ADEQ Solid Waste Inspector		<i>DN</i>	<b>Witness</b>	Charlie Reynolds, Licensed Operator		
<b>Photo #</b>	3	<b>Of</b>	4	<b>Date</b>	11/13/2018	<b>Time</b>	1055
<b>Description</b>	A view of the working face.						



<b>Location</b>	Entergy-Independence Plant			<b>Permit</b>	0200-S3N-R2	<b>AFIN</b>	32-00042
<b>Photographer</b>	Darrell Norton, ADEQ Solid Waste Inspector		<i>DN</i>	<b>Witness</b>	Charlie Reynolds, Licensed Operator		
<b>Photo #</b>	4	<b>Of</b>	4	<b>Date</b>	11/13/2018	<b>Time</b>	1058
<b>Description</b>	A view of the east slopes of Cells 11,8, and 2.						



Date Range 7/1/2018 to 9/30/2018  
 Material Range 104ROCKCV to ZINCOMING  
 Customer Range C148LAN01 to WZULUAG01  
 Weights Reported in Tons  
 Directions: Both

## Independence Disposal Material Usage

11/13/2018  
 10:37:58 AM

Date	Number	Truck ID	Quantity	Net
Incoming				
<b>SLUDGEDISPOSAL - Sludge Disposal</b>				
CENTERG01 - ENTERGY-INDEPENDENCE				
7/2/2018	92,011,365	CAT2	0.00	840.00
7/2/2018	92,011,364	CAT1	0.00	840.00
7/3/2018	92,011,377	CAT1	0.00	756.00
7/3/2018	92,011,378	CAT2	0.00	756.00
7/5/2018	92,011,381	CAT2	0.00	756.00
7/5/2018	92,011,380	CAT1	0.00	756.00
7/6/2018	92,011,384	CAT1	0.00	380.00
7/6/2018	92,011,385	CAT2	0.00	380.00
7/7/2018	92,011,386	CAT1	0.00	588.00
7/7/2018	92,011,387	CAT2	0.00	560.00
7/9/2018	92,011,388	CAT1	0.00	784.00
7/9/2018	92,011,389	CAT2	0.00	784.00
7/10/2018	92,011,412	CAT2	0.00	100.00
7/10/2018	92,011,411	CAT1	0.00	100.00
7/10/2018	92,011,410	CAT2	0.00	756.00
7/10/2018	92,011,409	CAT1	0.00	784.00
7/11/2018	92,011,448	CAT1	0.00	700.00
7/11/2018	92,011,451	CAT2	0.00	180.00
7/11/2018	92,011,450	CAT1	0.00	200.00
7/11/2018	92,011,449	CAT2	0.00	672.00
7/12/2018	92,011,457	CAT2	0.00	672.00
7/12/2018	92,011,456	CAT1	0.00	672.00
7/13/2018	92,011,460	CAT2	0.00	784.00
7/13/2018	92,011,459	CAT1	0.00	812.00
7/16/2018	92,011,463	CAT2	0.00	868.00
7/16/2018	92,011,462	CAT1	0.00	896.00
7/17/2018	92,011,466	CAT1	0.00	700.00
7/17/2018	92,011,467	CAT2	0.00	700.00
7/18/2018	92,011,483	CAT1	0.00	560.00
				Page 1



Date	Number	Truck ID	Quantity	Net
8/2/2018	92,011,645	CAT1	0.00	200.00
8/3/2018	92,011,661	CAT2	0.00	360.00
8/3/2018	92,011,657	CAT2	0.00	840.00
8/3/2018	92,011,656	CAT1	0.00	868.00
8/3/2018	92,011,660	CAT1	0.00	400.00
8/4/2018	92,011,664	CAT1	0.00	200.00
8/4/2018	92,011,663	CAT2	0.00	840.00
8/4/2018	92,011,665	CAT2	0.00	160.00
8/4/2018	92,011,662	CAT1	0.00	868.00
<b>CENTERG01 - ENTERGY-INDEPENDENCE Totals</b>			<b>0.00</b>	<b>46,835.00</b>
<b>SLUDGEDISPOSAL - Sludge Disposal Totals</b>			<b>0.00</b>	<b>46,835.00</b>
<b>Total Tickets: 74</b>				
<b>Incoming Totals</b>		<b>Total Tickets: 74</b>		<b>46,835.00</b>

<b>BOTTOMASHDISP - Bottom Ash Disposal</b>				
<b>CENTERG01 - ENTERGY-INDEPENDENCE</b>				
7/3/2018	92,011,379	N0100	0.00	483.60
7/9/2018	92,011,390	K0028	0.00	332.41
7/10/2018	92,011,415	N0100	0.00	346.90
7/10/2018	92,011,414	K0028	0.00	240.10
7/13/2018	92,011,461	N0100	0.00	416.40
7/16/2018	92,011,465	N0100	0.00	453.12
7/17/2018	92,011,469	50028	0.00	201.52
7/17/2018	92,011,470	N0100	0.00	301.44
7/20/2018	92,011,509	K0028	0.00	269.00
7/20/2018	92,011,510	N0100	0.00	464.66
7/23/2018	92,011,518	N0100	0.00	303.60
7/26/2018	92,011,581	K0028	0.00	291.24
7/26/2018	92,011,582	N0100	0.00	395.52
7/30/2018	92,011,594	N0100	0.00	530.14
7/30/2018	92,011,595	K0028	0.00	284.88
7/31/2018	92,011,611	N0100	0.00	429.36
7/31/2018	92,011,610	K0028	0.00	286.08
8/3/2018	92,011,658	K0028	0.00	419.36
8/3/2018	92,011,659	N0100	0.00	366.40
8/7/2018	92,011,678	K0028	0.00	575.52

Date	Number	Truck ID	Quantity	Net
8/10/2018	92,011,707	K0028	0.00	598.69
8/15/2018	92,011,716	K0028	0.00	315.30
8/15/2018	92,011,715	N0100	0.00	391.05
8/16/2018	92,011,717	K0028	0.00	295.08
8/16/2018	92,011,718	N0100	0.00	452.52
8/20/2018	92,011,752	N0100	0.00	411.00
8/20/2018	92,011,753	K0028	0.00	239.30
8/28/2018	92,011,832	K0028	0.00	305.52
8/28/2018	92,011,833	N0100	0.00	399.72
8/31/2018	92,011,869	K0028	0.00	629.52
9/4/2018	92,011,870	N00100	0.00	519.89
9/4/2018	92,011,871	K0028	0.00	180.80
9/7/2018	92,011,933	N0100	0.00	474.06
9/7/2018	92,011,932	K0028	0.00	316.32
9/11/2018	92,011,951	N0100	0.00	290.10
9/11/2018	92,011,952	K0028	0.00	243.50
9/14/2018	92,012,014	K0028	0.00	328.68
9/20/2018	92,012,074	N0028	0.00	325.60
9/20/2018	92,012,073	N0028	0.00	358.16
9/21/2018	92,012,088	N0100	0.00	358.60
9/24/2018	92,012,092	K0028	0.00	186.55
9/24/2018	92,012,091	N0100	0.00	251.02
9/25/2018	92,012,094	N0100	0.00	559.46
9/26/2018	92,012,122	K0028	0.00	290.57
9/26/2018	92,012,121	N0100	0.00	251.02
<b>CENTERG01 - ENTERGY-INDEPENDENCE Totals</b>			<b>0.00</b>	<b>16,363.28</b>
<b>BOTTOMASHDISP - Bottom Ash Disposal Totals</b>			<b>0.00</b>	<b>16,363.28</b>
<b>Total Tickets: 45</b>				

<b>COAL - Coal WASTE</b>				
CENTERG01 - ENTERGY-INDEPENDENCE				
9/24/2018	92,012,093	82	0.00	14.47
9/26/2018	92,012,135	17	0.00	14.40
<b>CENTERG01 - ENTERGY-INDEPENDENCE Totals</b>			<b>0.00</b>	<b>28.87</b>
<b>COAL - Coal Totals</b>			<b>0.00</b>	<b>28.87</b>
<b>Total Tickets: 2</b>				



9/13/2018	92,011,989	9753						0.00	446.25	
9/13/2018	92,011,990	0020						0.00	478.80	
9/17/2018	92,012,017	0020						0.00	476.10	
9/17/2018	92,012,018	9900						0.00	448.95	
9/18/2018	92,012,029	00200						0.00	391.95	
9/21/2018	92,012,090	9900						0.00	326.26	
9/21/2018	92,012,089	A0020						0.00	378.24	
9/26/2018	92,012,120	00200						0.00	658.60	
9/28/2018	92,012,141	9900						0.00	483.75	
<b>CENTERG01 - ENTERGY-INDEPENDENCE Totals</b>								<b>0.00</b>	<b>20,827.78</b>	
<b>FLYASHDISP - Fly Ash Disposal Totals</b>								<b>0.00</b>	<b>20,827.78</b>	
<b>Total Tickets: 41</b>										



Arkansas Environmental Support  
425 West Capitol Avenue  
A-TCBY-22D  
Little Rock, AR 72203  
Tel 501-377-4030  
David Triplett, PE, Manager  
Arkansas Environmental Support

AR-18-060

AFIN: 32-00042  
PMT#: 0200-S3N-R2

December 12, 2018

DEC 13 2018

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

DOC ID#: 75105  
TO: RH > FILE < KMB

RE: Entergy's Response to Quarterly Inspection Conducted on November 13, 2018  
Entergy Independence Plant Class 3N Landfill  
Permit No. 0200-S3N-R2 AFIN: 32-00042

Dear Mr. Norton:

As requested in your letter dated November 20, 2018 regarding the quarterly inspection of the Independence Plant's solid waste landfill, Entergy acknowledges the late submittal of the First Half 2018 Groundwater Monitoring Report.

As follow-up to the inspection finding, Entergy has reviewed the report submittal tracking process with our consultant. We have implemented a revised process for tracking of the due date for future submittals that includes improved notification of the last sampling date at the site and tracking of the due date by both our consultant and Entergy Arkansas Environmental Support. This dual tracking process should ensure future reports are submitted as required.

If you have any questions or require additional information, please contact Trip Gentry or me at 501-377-4032 or 501-377-4030, respectively.

Sincerely,

David C. Triplett, PE  
Manager, Arkansas Environmental Support

cc: Dana Derrington, PE, PG – FTN  
Andy Wilson, Entergy Independence Plant

8413.10/RS2163