



June 19, 2019

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

RE: Quarterly Inspection conducted on June 11, 2019
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. At the time of the inspection, no allegations of noncompliance were observed at your facility. A copy of the inspection report is attached.

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 cursive script that reads "Darrell Norton".

Darrell Norton
Solid Waste Inspector
Office of Land Resources

Enclosure

cc: Jarrod Zweifel P.G., Associate Director, 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 | 32-00042 |
| Facility Address | 555 Point Ferry , Newark, AR 72562 | Phone Number | 870-799-8761 Entergy 870-799-3565 HW | Permit Number | 0200-S3N-R2 |
| Permittee Address | 555 Point Ferry , Newark, AR 72562 | E-Mail Address | krichmond@headwaters.com | | PDS # 108214 |
| Date | 6/11/2019 | Entry Time | 1045 | Exit Time | 1200 |

Regulation 22 – Operational Standards

Category 1

| Regulation | Item Description | Comments |
|----------------|--|----------|
| 510(i) | 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 | |
| 529 | Leachate collection system | Leachate high level alarms were activated and pumps were operational at the time of the inspection. Maintenance to be scheduled for the leachate panels and alarm system. |
| 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 | 10/25/2018 Rec'd 1/31/2019 | 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 | 28460.72 (report attached) | Tons for 1 st qtr.2019 | 618259 Bottom ash , 19491.25 Fly Ash, 270.16 Economizer Ash, 2516.72 Other |
| 527 | Surface water DMR records current? <input type="checkbox"/> Yes/No <input checked="" type="checkbox"/> | | | |

| | | | |
|-------------------------------|-----------------------|------------------------|---|
| Operator Name & Number | Anthony Wilson 001442 | Signature of Inspector |  |
| Exit Interview Conducted with | Anthony Wilson | Method | On-site |
| | | Date | 6/11/2019 |
| | | Time | 1151 |

Arkansas Department of Environmental Quality (ADEQ) Official Photograph Sheet

| | | | | | | | | |
|---------------------|---|-----------|-----------|----------------|-----------------------------------|-------------|-------------|------|
| Location | Entergy-Independence Plant | | | Permit | 0200-S3N-R2 | AFIN | 32-00042 | |
| Photographer | Darrell Norton , ADEQ Solid Waste Inspector | | <i>DN</i> | Witness | Anthony Wilson, Facility Operator | | | |
| Photo # | 1 | Of | 4 | Date | 6/11/2019 | | Time | 1115 |
| Description | A view of the bulking area. | | | | | | | |



| | | | | | | | | |
|---------------------|---|-----------|-----------|----------------|-----------------------------------|-------------|-------------|------|
| Location | Entergy-Independence Plant | | | Permit | 0200-S3N-R2 | AFIN | 32-00042 | |
| Photographer | Darrell Norton, ADEQ Solid Waste Inspector | | <i>DN</i> | Witness | Anthony Wilson, Facility Operator | | | |
| Photo # | 2 | Of | 4 | Date | 6/11/2019 | | Time | 1121 |
| Description | A view of the leachate basin constructed for Cell 15. | | | | | | | |



Arkansas Department of Environmental Quality (ADEQ) Official Photograph Sheet

| | | | | | | | | |
|---------------------|--|-----------|-----------|----------------|-----------------------------------|-------------|-------------|------|
| Location | Entergy-Independence Plant | | | Permit | 0200-S3N-R2 | AFIN | 32-00042 | |
| Photographer | Darrell Norton , ADEQ Solid Waste Inspector | | <i>DN</i> | Witness | Anthony Wilson, Facility Operator | | | |
| Photo # | 3 | Of | 4 | Date | 6/11/2019 | | Time | 1138 |
| Description | A view of the east slopes of Cells 12, 11, 8, and 2. | | | | | | | |



| | | | | | | | | |
|---------------------|--|-----------|-----------|----------------|-----------------------------------|-------------|-------------|------|
| Location | Entergy-Independence Plant | | | Permit | 0200-S3N-R2 | AFIN | 32-00042 | |
| Photographer | Darrell Norton, ADEQ Solid Waste Inspector | | <i>DN</i> | Witness | Anthony Wilson, Facility Operator | | | |
| Photo # | 4 | Of | 4 | Date | 6/11/2019 | | Time | 1141 |
| Description | A view of Cells 14 and 15. | | | | | | | |



BORAL RESOURCES INDEPENDENCE
2019 QUARTERLY DISPOSAL 1ST QUARTER

BOTTOM ASH DISPOSAL

| | | | | | | | | |
|-----------|------------|--------|------|--------|--------|--------|--------|--------|
| 1/3/2019 | 92,012,758 | N0028 | 0.00 | 205.50 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/3/2019 | 92,012,755 | N0100 | 0.00 | 298.46 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/5/2019 | 92,012,769 | K0028 | 0.00 | 338.10 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/5/2019 | 92,012,770 | BN0100 | 0.00 | 532.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/11/2019 | 92,012,862 | N0100 | 0.00 | 453.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/11/2019 | 92,012,863 | N0028 | 0.00 | 246.60 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/17/2019 | 92,012,960 | N0028 | 0.00 | 261.48 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/17/2019 | 92,012,961 | N0100 | 0.00 | 390.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/23/2019 | 92,012,977 | N0100 | 0.00 | 587.68 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/28/2019 | 92,012,987 | N0100 | 0.00 | 556.64 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/28/2019 | 92,012,988 | N0028 | 0.00 | 355.60 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 2/1/2019 | 92,012,998 | N0100 | 0.00 | 531.16 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 2/1/2019 | 92,012,999 | N0028 | 0.00 | 397.60 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 2/12/2019 | 92,013,047 | N0100 | 0.00 | 359.60 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 2/12/2019 | 92,013,048 | N0028 | 0.00 | 340.73 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 2/15/2019 | 92,013,049 | N0028 | 0.00 | 100.68 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 2/15/2019 | 92,013,050 | N0100 | 0.00 | 227.76 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |

6,182.59

BOTTOM ASH DISPOSAL TONS: 6182.59

ECONOMIZER ASH DISPOSAL

| | | | | | | | | |
|-----------|------------|------|------|-------|--------|--------|--------|--------|
| 1/2/2019 | 92,012,729 | 1018 | 0.00 | 37.44 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/10/2019 | 92,012,834 | 1018 | 0.00 | 32.05 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/17/2019 | 92,012,955 | 1018 | 0.00 | 42.07 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/24/2019 | 92,012,979 | 1018 | 0.00 | 65.52 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/28/2019 | 92,012,986 | 1018 | 0.00 | 55.28 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 3/28/2019 | 92,013,874 | 1018 | 0.00 | 37.80 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |

270.16

ECONOMIZER ASH DISPOSAL TONS: 270.16**FLY ASH DISPOSAL**

| | | | | | | | | |
|-----------|------------|-------|------|--------|--------|--------|--------|--------|
| 1/2/2019 | 92,012,738 | 0020 | 0.00 | 362.88 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/2/2019 | 92,012,739 | 9900 | 0.00 | 529.92 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/3/2019 | 92,012,753 | 0020 | 0.00 | 286.50 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/3/2019 | 92,012,754 | 9900 | 0.00 | 268.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/4/2019 | 92,012,767 | 9900 | 0.00 | 532.80 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/4/2019 | 92,012,768 | 0200 | 0.00 | 544.50 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/7/2019 | 92,012,789 | 9900 | 0.00 | 569.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/7/2019 | 92,012,790 | 0020 | 0.00 | 600.60 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/8/2019 | 92,012,812 | 9900 | 0.00 | 407.82 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/8/2019 | 92,012,811 | 0200 | 0.00 | 601.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/9/2019 | 92,012,836 | 9900 | 0.00 | 258.66 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/9/2019 | 92,012,837 | 0020 | 0.00 | 591.60 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/10/2019 | 92,012,861 | 9900 | 0.00 | 549.36 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/11/2019 | 92,012,869 | 0020 | 0.00 | 177.48 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/14/2019 | 92,012,889 | 0020 | 0.00 | 250.32 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/14/2019 | 92,012,888 | 9900 | 0.00 | 342.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/15/2019 | 92,012,914 | 9900 | 0.00 | 334.80 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/15/2019 | 92,012,915 | 9900 | 0.00 | 223.20 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/15/2019 | 92,012,916 | 0020 | 0.00 | 242.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/15/2019 | 92,012,917 | 0020 | 0.00 | 302.50 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/16/2019 | 92,012,945 | 0020 | 0.00 | 60.50 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/16/2019 | 92,012,944 | 9900 | 0.00 | 295.20 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/18/2019 | 92,012,969 | A9900 | 0.00 | 545.76 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/21/2019 | 92,012,972 | A9900 | 0.00 | 268.90 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/21/2019 | 92,012,970 | A0020 | 0.00 | 829.92 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/21/2019 | 92,012,971 | N0100 | 0.00 | 757.35 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |

| | | | | | | | | |
|-----------|------------|-------|------|--------|--------|--------|--------|--------|
| 1/22/2019 | 92,012,973 | 0020 | 0.00 | 545.58 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/22/2019 | 92,012,974 | 9900 | 0.00 | 218.32 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/22/2019 | 92,012,975 | 9900 | 0.00 | 272.90 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/23/2019 | 92,012,978 | A9900 | 0.00 | 442.05 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/23/2019 | 92,012,976 | N0028 | 0.00 | 409.50 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/24/2019 | 92,012,980 | 00200 | 0.00 | 158.95 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/24/2019 | 92,012,981 | 9900 | 0.00 | 336.84 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/25/2019 | 92,012,982 | 0200 | 0.00 | 675.18 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/25/2019 | 92,012,983 | 9900 | 0.00 | 737.88 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/26/2019 | 92,012,984 | 9900 | 0.00 | 706.56 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/26/2019 | 92,012,985 | 0020 | 0.00 | 725.04 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/28/2019 | 92,012,989 | 0020 | 0.00 | 377.40 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/29/2019 | 92,012,990 | 9900 | 0.00 | 422.38 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/29/2019 | 92,012,991 | A0020 | 0.00 | 380.30 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/31/2019 | 92,012,992 | 0020 | 0.00 | 316.40 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/31/2019 | 92,012,993 | 9900 | 0.00 | 534.66 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 2/5/2019 | 92,013,042 | 9900 | 0.00 | 354.36 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 2/6/2019 | 92,013,044 | 9900 | 0.00 | 181.32 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 2/6/2019 | 92,013,043 | 0020 | 0.00 | 491.70 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 2/8/2019 | 92,013,046 | 9900 | 0.00 | 471.36 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |

19,491.25

FLY ASH DISPOSAL TONS: 19491.25

RANDOM DISPOSAL

| | | | | | | | | |
|-----------|------------|-------------|------|--------|--------|--------|--------|--------|
| 1/9/2019 | 92,012,835 | REDVOLVO | 0.00 | 90.72 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/10/2019 | 92,012,859 | RED TRUCK | 0.00 | 233.28 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/10/2019 | 92,012,860 | WHITE TRUCK | 0.00 | 240.32 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/11/2019 | 92,012,864 | WHITE TRK | 0.00 | 110.32 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/11/2019 | 92,012,865 | RED TRK | 0.00 | 69.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/14/2019 | 92,012,890 | WHITE | 0.00 | 266.10 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/14/2019 | 92,012,891 | 'RED | 0.00 | 204.75 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/15/2019 | 92,012,912 | WHITE | 0.00 | 280.06 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1/15/2019 | 92,012,913 | 'RED | 0.00 | 241.08 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 3/26/2019 | 92,013,871 | CIMCO | 0.00 | 244.53 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |

| | | | | | | | | |
|-----------|------------|------------|------|--------|--------|--------|--------|--------|
| 3/27/2019 | 92,013,873 | CIMCOWHITE | 0.00 | 285.04 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 3/27/2019 | 92,013,872 | CIMCORED | 0.00 | 206.72 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 3/28/2019 | 92,013,875 | CIMCORED | 0.00 | 44.80 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |

2,516.72

RANDOM DISPOSAL TONS: 2516.72

\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00



\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00



\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00

\$0.00

\$0.00

\$0.00

