



Entergy Arkansas, LLC  
White Bluff Plant  
1100 White Bluff Road  
A-WB  
Redfield, AR 72132  
Telephone: (501) 688-7330  
Email: [rknigh3@entergy.com](mailto:rknigh3@entergy.com)  
Robert "Eugene" Knighten  
General Manager

AR-22-027

December 20, 2022

Mr. Richard Healey, Branch Manager  
Arkansas Department of Energy and Environment  
Office of Water Quality  
NPDES Enforcement Section  
5301 Northshore Drive  
North Little Rock, AR 72118

Reference: **NPDES Permit Compliance Schedule  
2<sup>nd</sup> Annual Progress Report  
Entergy Arkansas, LLC – White Bluff Plant – AR0036331, AFIN 35-00110**

Dear Mr. Healey,

In accordance with Part IB, Permit Compliance Schedule, of the subject NPDES permit, this correspondence serves as the second Progress Report for Entergy's White Bluff Plant in Redfield, Arkansas.

As you know, Entergy has significant compliance obligations related to the Effluent Limitation Guidelines ("ELG") for Steam Electric Stations including the revisions to the rule. The updates to the rule promulgated in 2015, required the White Bluff Plant to implement a zero discharge of Bottom Ash Transport Water (BATW). The current NPDES permit effective on March 1, 2020, included a three (3) year compliance schedule to meet this requirement. The following are the requirements from the permit.

**Part IB. Permit Compliance Schedule**

*Compliance with the requirement for no discharge of Bottom Ash Transport Water generated on and after December 31, 2023 is required by December 31, 2023. The permittee shall submit progress reports addressing the progress towards attaining the aforementioned requirement according to the following schedule:*

<b><u>ACTIVITY</u></b>	<b><u>DUE DATE</u></b>
<i>Progress Report<sup>1, 2</sup></i>	<i>December 31, 2021</i>
<i>Progress Report<sup>1, 3</sup></i>	<i>December 31, 2022</i>
<i>Achieve Final Compliance<sup>1, 4</sup></i>	<i>December 31, 2023</i>

*All progress reports must be submitted to the Department at the following address:*

*Enforcement Branch  
Office of Water Quality  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317*

*Information can also be submitted electronically via email at [water-enforcementreport@adeq.state.ar.us](mailto:water-enforcementreport@adeq.state.ar.us).*

- <sup>1</sup> *If the permittee is already in compliance with the requirement, only documentation demonstrating compliance with the requirement will be required for the progress report.*
- <sup>2</sup> *If the permittee is not in compliance with the requirement by December 31, 2021, the initial Progress Report must detail how the permittee plans to come into compliance with the requirement within the remaining 2 years of the interim period. Options must be provided that were considered along with which option was selected.*
- <sup>3</sup> ***The second Progress Report must contain an update on the status of the chosen option from the initial Progress Report. If the facility is not meeting any of the milestones provided in the initial Progress Report, the facility must update the milestone schedule to show how the requirement will be met by the deadline.***
- <sup>4</sup> *A final Progress Report must be submitted no later than 30 days following the final compliance date and include a certification that the requirement was met on the effective date and is still being met.*

### **Summary of Modifications and Changes:**

To meet the compliance obligation for no discharge of BATW, Entergy – White Bluff Plant installed a high recycle rate wet closed loop system. The system consists of a submerged flight conveyor (SFC) which transfers the BATW generated in the power block to a continuous dewatering and recirculation (CDR) system designed to treat the water for re-use. The complete system was installed and has been in operation since October 2020.

As part of this process, the onsite Recycle Ponds were removed from service. All process water flows into the Recycle Ponds were discontinued in October 2020, and the piping to the Recycle Ponds was cut and capped in April 2021. The Recycle Ponds have now been clean closed in accordance with the previously approved Closure Plan. The levee between the two ponds was removed and an outer levee was breached to hydrologically connect the old pond area to White Bluff's Clear Water Pond.

**Current Compliance Status:**

The SFC/CDR is designed as a closed loop system. However, as acknowledged in the 2020 Reconsideration Rule, these closed loop systems cannot necessarily operate as true closed loop systems, but rather “partially closed” loops with some small discharges. Regardless, the installation of the SFC/CDR closed loop system demonstrates Entergy – White Bluff Plant’s commitment to compliance.

With the promulgation of the 2020 ELG Reconsideration Rule, EPA outlined certain limited exceptions to the BATW “zero discharge” requirement (i.e., 40 CFR 423.13(k)(2)(ii)). In the Notice of Planned Participation (NOPP) dated October 12, 2021, Entergy’s White Bluff Plant notified of our intent to “qualify as an electric generating unit that will achieve permanent cessation of combustion of coal by December 31, 2028” under 40 C.F.R § 423.19(f).

To implement the current rule in the White Bluff NPDES permit, a modification application was submitted on August 29, 2022, and deemed administratively complete on September 20, 2022.

A signed certification statement has been included as Attachment 1 to this letter report. The submitted NOPP is included as Attachment 2, and the NPDES permit modification application completeness letter is included in Attachment 3.

If you have any questions concerning this information or if additional information is required, please contact Stan Chivers, Arkansas Environmental Support Manager, at (501) 215-0024 or at [schiver@entergy.com](mailto:schiver@entergy.com).

Respectfully Submitted,

*Robert E. Knighten*

Robert E. Knighten (Dec 14, 2022 10:52 CST)

Robert “Eugene” Knighten  
General Manager, White Bluff Plant

KAF/RBM/REK

Enclosure

cc: Bryan Leamons, P.E. – ADEQ, Water Permits Section (via email)

December 20, 2022

Entergy Arkansas, LLC  
White Bluff Plant

# **ATTACHMENT 1**

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## **Certification Statement**



Entergy Arkansas, LLC  
White Bluff Plant  
1100 White Bluff Road  
A-WB  
Redfield, AR 72132  
Telephone: (501) 688-7330  
Email: [rknight3@entergy.com](mailto:rknight3@entergy.com)  
Robert "Eugene" Knighten  
General Manager

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## 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 14, 2022 10:52 CST)

Robert "Eugene" Knighten  
General Manager, White Bluff Plant

Dec 14, 2022

Date

December 20, 2022

Entergy Arkansas, LLC  
White Bluff Plant

## **ATTACHMENT 2**

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### **Notice of Planned Participation (NOPP)**



PPGMR LAW, PLLC  
201 E. MARKHAM SUITE 200 | LITTLE ROCK, AR 72201  
P.O. BOX 3446 | LITTLE ROCK, AR 72203  
TEL: (501) 603-9000 | FAX: (501) 603-0556 | PPGMRLAW.COM  
[LITTLE ROCK](#) | [EL DORADO](#) | [STUTT GART](#)

JOHN PEISERICH  
EMAIL: [JOHN@PPGMRLAW.COM](mailto:JOHN@PPGMRLAW.COM)

October 12, 2021

Arkansas Department of Energy and Environment  
Division of Environmental Quality  
Office of Water Quality  
Attn: Associate Director Alan York  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Re: Notice of Planned Participation Pursuant to 40 C.F.R. 423.19(f)  
White Bluff Steam Electric Generating Facility  
AFIN: 35-00110; Permit Number: AR0036331

Dear Mr. York:

On October 13, 2020, the U.S. Environmental Protection Agency (“EPA”) published a final rule revising the technology-based effluent limitations guidelines and standards for the steam electric power generating point source category applicable to bottom ash transport water (“2020 Reconsideration Rule”).<sup>1</sup> The 2020 Reconsideration Rule modified the EPA’s 2015 Steam Electric Power Generating Effluent Limitations Guidelines<sup>2</sup> 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”).

The 2020 Reconsideration Rule prescribes certain effluent limitations guidelines (“ELGs”) applicable to existing point sources and provides certain limited exceptions to the new ELGs. Facilities planning permanent cessation of coal combustion by December 31, 2028 may seek to qualify for such exemptions.

White Bluff “seeks to qualify as an electric generating unit that will achieve permanent cessation of combustion of coal by December 31, 2028” under Part 423 of Title 40 of the Code of Federal

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<sup>1</sup> United States, Environmental Protection Agency. “Steam Electric Reconsideration Rule.” 85 FR 64,650 (Oct. 13, 2020).

<sup>2</sup> United States, Environmental Protection Agency. “Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category.” 80 FR 67,838 (Nov. 3, 2015).

Regulations and makes that election through this Notice of Planned Participation (“NOPP”) pursuant to 40 C.F.R § 423.19(f).

**Affirmative Statement of 40 C.F.R § 423.19(f) Requirements**

- White Bluff operates two units, Units 1 and 2, which will achieve permanent cessation of coal combustion no later than December 31, 2028.
- Units 1 and 2 will achieve permanent cessation of coal combustion by December 31, 2028 through retirement.
- The retirement of Units 1 and 2 is approved by the Arkansas Department of Energy and Environment, Division of Environmental Quality (“DEQ”) through (1) an Administrative Order, dated August 7, 2018<sup>3</sup> and (2) the 2018 Arkansas Phase II Regional Haze State Implementation Plan Revision where the Administrative Order is incorporated.<sup>4</sup>
- Further, the retirement of Units 1 and 2 is approved by the EPA through its approval of Regional Haze State Implementation Plan Revision for Electric Generating Units in Arkansas.<sup>5</sup>
- A copy of EAL’s most recently filed Integrated Resource Plan (“IRP”) is attached to this Notice as Attachment C.

Milestones to be met between the date of this NOPP and the permanent cessation of coal combustion at White Bluff are described in Attachment A. Should any milestones be added or modified, they will be updated in the Annual Report required to be filed by 40 C.F.R. § 423.19(f)(3). The Annual Reports will provide a narrative discussion of any completed, missed, or delayed milestones.

Please contact me if you have any questions regarding this qualification request.

Sincerely,

John Peiserich

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<sup>3</sup> The Administrative Order is attached to this NOPP as Attachment B.

<sup>4</sup> The 2018 Arkansas Phase II Regional Haze State Implementation Plan Revision is attached to this NOPP as Attachment C.

<sup>5</sup> United States, Environmental Protection Agency. “Approval and Promulgation of Implementation Plans; Arkansas; Approval of Regional Haze State Implementation Plan Revision for Electric Generating Units in Arkansas.” 84 FR 51,033 (Sep. 27, 2019).



Attachment A

**Milestones to Permanent Cessation of Coal Combustion**

<b>Date</b>	<b>Milestone</b>
<b>October 12, 2021</b>	NOPP Filed
<b>March 2022</b>	File NPDES Permit Modification Application
<b>October 13, 2022</b>	NOPP Annual Report Deadline
<b>October 13, 2023</b>	NOPP Annual Report Deadline
<b>December 31, 2023</b>	Current NPDES Permit Compliance Date for Zero Discharge of Bottom Ash Transport Water
<b>October 13, 2024</b>	NOPP Annual Report Deadline
<b>October 13, 2025</b>	NOPP Annual Report Deadline
<b>October 13, 2026</b>	NOPP Annual Report Deadline
<b>October 13, 2027</b>	NOPP Annual Report Deadline
<b>October 13, 2028</b>	NOPP Annual Report Deadline
<b>December 31, 2028</b>	Permanent Cessation of Coal Combustion at White Bluff

December 20, 2022

Entergy Arkansas, LLC  
White Bluff Plant

## **ATTACHMENT 3**

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### **NPDES Permit Modification Application Completeness Letter**



# ARKANSAS

## ENERGY & ENVIRONMENT

September 20<sup>th</sup>, 2022

Louise Duncan, VP, Power Plant Operations - EAL  
Entergy Arkansas, LLC  
d/b/a Entergy - White Bluff Plant  
P.O. Box 551  
Little Rock, AR 72203-0551

Re: NPDES Permit Number AR0036331, AFIN 35-00110

Dear Ms. Duncan:

The application for modification of your existing NPDES permit was received on August 30, 2022. In accordance with Division policy, your application has been reviewed and determined to be administratively complete. This request will be acted upon as soon as possible in accordance with existing priorities. However, a request for a permit modification does not suspend any portion or requirement of your existing NPDES permit. Please note you are still legally obligated to meet all the NPDES permit requirements pending final disposition of your request.

Pursuant to Act 163 of 1993 and Arkansas Pollution Control and Ecology Commission (APCEC) Rule 8, Section 8.205, public notice must be given for all permit applications submitted to this Division. The enclosed public notice will be published by DEQ in a newspaper of general circulation for one (1) day only. An invoice for the cost of publishing the public notice and proof of publication will be sent to you by the advertising newspaper. The permittee must send proof of publication and payment to the address at the bottom of this letter as soon as possible but no later than 30 days from the above date. Until this Division receives proof of publication of the public notice, no further action will be taken on the modification of your discharge permit.

Additionally, a permit fee is required in accordance with Arkansas Act 817 of 1983, as amended, Arkansas Act 1254 of 1993, as amended, and APCEC Rule 9. Your fee will be calculated in accordance with the fee schedule contained in APCEC Rule 9, and an invoice will be sent to you.

Thank you for your cooperation in this matter. If there are any questions concerning this submittal, please contact Guy Lester, P.E. by email at [guy.lester@adeq.state.ar.us](mailto:guy.lester@adeq.state.ar.us) or at (501) 519-0304.

Sincerely,

A handwritten signature in cursive script that reads "Jessica Sears".

Jessica Sears, P.E.  
NPDES Engineer Supervisor  
Office of Water Quality, Division of Environmental Quality  
5301 Northshore Drive, North Little Rock, AR, 72118

Public Notice of Application  
NPDES Permit Modification AR0036331

Under the provisions of Act 163 of the 1993 Arkansas Legislature, this is to give notice the Department of Energy and Environment - Division of Environmental Quality - Office of Water Quality received an application on August 30, 2022 for a modification of NPDES Permit No. AR0036331 from the following facility:

Entergy Arkansas, LLC  
d/b/a Entergy - White Bluff Plant  
P.O. Box 551  
Little Rock, AR 72203-0551

The application has been deemed administratively complete and is undergoing technical review by the Office of Water Quality for compliance with State and Federal regulations. The facility under consideration is located as follows: 1100 White Bluff Road, Redfield, in Jefferson County, Arkansas.

Interested persons desiring to request a public hearing on the application may do so in writing. The Division shall have the discretion to decide whether to hold a public hearing, unless otherwise required by law or rule. If a hearing is scheduled, adequate public notice will be given in this newspaper. All requests shall be submitted in writing and must include the reasons for the necessity of a public hearing. All requests should be received by DEQ within 10 business days of the date of this notice and should be submitted to:

Guy Lester  
Department of Energy and Environment - Division of Environmental Quality  
Office of Water Quality, NPDES Permits Branch  
5301 Northshore Drive  
North Little Rock, AR 72118-5317  
Telephone: (501) 682-0656