



# Waste Management and Minimization

## EHS-ENV-4.1.3.1

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## 1. PURPOSE

This document defines Entergy’s position and requirements regarding waste management and support at all levels of the organization in minimizing waste, while managing waste streams from generation to disposal. Effective implementation of this standard will support Entergy’s sustainability efforts by minimizing waste, maximizing the efficient reuse of valuable resources, reducing risks of regulatory non-compliances and adverse impacts on the environment and to our stakeholders.

*Note: This standard references other standards as part of the Entergy Environmental, Health, and Safety Management System (EHSMS). Any standards issued at a later effective date do not preclude nor inhibit the requirements of this standard.*

## 2. APPLICABILITY

This document applies to all Entergy Business Functions, facilities and locations owned or operated by Entergy. All company personnel must comply with the intent and requirements of this standard applicable to their responsibilities and locations. The Business Function shall be responsible for determining the applicability of the requirements of this standard compared to the full scope of its operations.


## 3. ROLES AND RESPONSIBILITIES

### 3.1 Senior Leadership shall:

- Be ultimately accountable for waste management and minimization programs;
- Allocate adequate resources and demonstrate leadership to ensure effective waste management and minimization;
- Hold responsible individuals accountable for implementation of this standard;
- Engage with Sustainability & Environmental Policy (SEP) and others as appropriate to support waste management and minimization initiatives;
- Cascade responsibilities down through all levels of line and functional leadership, including to first line managers; and
- Review the effectiveness of waste management and minimization as part of the management review process.

### 3.2 VP of Sustainability & Environmental Policy shall:

- Own and maintain this standard and overall program management;
- Provide subject matter expertise to leadership and Business Function Environmental on the effective implementation of this standard;
- Manage the Approved Waste Disposal Vendors process and maintain an “approved waste vendor list” that is accessible to the facilities;
- Collaborate with Business Function leadership, Functional Environmental and Legal to approve waste vendor exceptions; and

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- Monitor and evaluate emerging technology/waste recycling and management techniques or practices that could be deployed throughout the enterprise to eliminate or reduce waste.

**3.3 Functional Environmental Directors / Sr. Managers / Managers shall:**

- Hire and oversee qualified vendors to assist with waste management;
- Develop and maintain function-specific waste management and minimization programs;
- Work with local procurement to establish contracts with waste vendors and ensure signed copies accessible to the sites; and
- Ensure employees complete applicable waste management and minimization training and document as appropriate.

**3.4 Functional Environmental Personnel shall:**

- Maintain an accurate documented waste inventory;
- Coordinate waste disposal and recycling and maintain applicable records;
- Work with SEP to ensure waste vendors are approved consistently following established procedures and complete the exceptions process as needed;
- Work with local leaders to identify, address and document training needs;
- Work with other site functional areas to minimize waste generation; and
- Work with local procurement to establish contracts with waste vendors and make signed copies accessible to the sites.

**3.5 Employees and Contract Partners shall:**

- Understand and be familiar with waste management and minimization requirements;
- Carry out waste management and minimization measures as requested; and
- Complete and document required training.

**4. REQUIREMENTS**

**4.1 General**

Entergy is committed to excellence and leadership in protecting the environment. As part of this commitment, our objective is to manage solid and hazardous waste properly, while also working to eliminate or reduce wastes (i.e., prevention, source reduction), when practicable. We strive to minimize adverse impacts through appropriate waste management and minimization. By reducing waste generation, the company can achieve cost savings, increase operational efficiencies, maintain a safe and healthy workplace for our stakeholders, and protect the environment. To meet this commitment each Business Function shall have processes to:

- Identify and implement appropriate engineering and administrative controls throughout the waste lifecycle (i.e., generation, transportation, and disposal) to meet applicable compliance obligations as a minimum level of performance (refer to the Enterprise standard Compliance Management EHS-GOV-5.2.1 for requirements to identify applicable compliance obligations).

- Develop and maintain documented programs to reduce waste generation volume where possible, focusing on source reduction, material reuse (internally), investment recovery, recycling and, as a last resort, disposal.
- Consider waste characteristics and generation as part of the management of change process in accordance with the Enterprise standard Management of Change EHS-GOV-4.2.1.
- Monitor waste management performance and report to relevant leadership in accordance with the Enterprise standard EHS Metrics EHS-GOV-5.1.1.

**4.2 Waste Minimization**

Each Business Function shall develop and implement a waste minimization plans that are designed to eliminate or reduce waste (i.e., prevention, source reduction) where possible. The plan shall minimize waste according to the following preferences, in order of priority (refer to Figure 1):

- Source reduction, eliminate/prevent the waste stream at the point of generation.
- Convert or substitute to a less hazardous form that reduces or eliminates the hazards of the waste.
- Recycle and reuse offsite using an approved vendor. Material sent for beneficial use, reuse or repurposing shall be managed in accordance with the Investment Recovery Policy and the Charitable Contributions Policy.
- Waste treatment, incineration or other treatment method, to reduce waste toxicity or volume.
- Disposal of wastes or treatment residuals in secure and government-approved landfills that results in long-term storage and potential bacterial degradation.

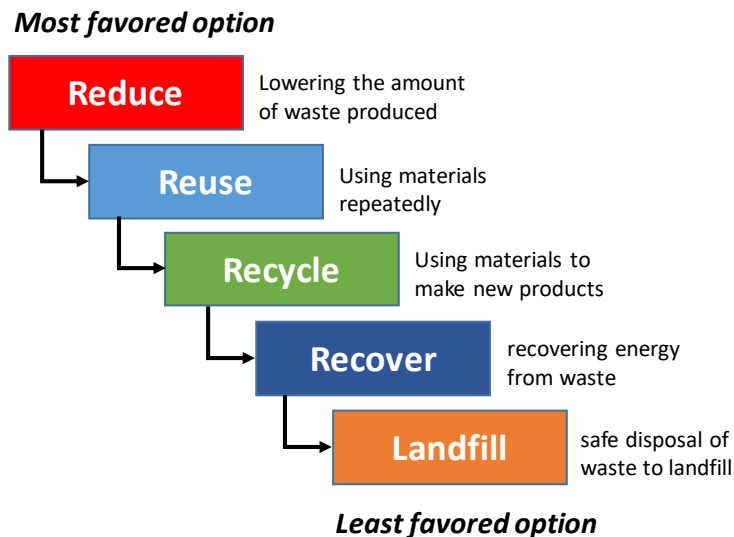


Figure 1.

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The Business Functions shall have a process to evaluate waste streams and work with Functional Environmental and other resources to identify continual improvement opportunities. When these opportunities are identified, documented actions plans shall be developed and tracked.

#### 4.3 Waste Inventory and Characterization

To maintain an awareness of hazardous waste generator status, each Business Function is responsible for developing and maintaining, on a monthly basis, function-specific documented waste inventories. The waste inventory must include the following information for each type of waste generated:

- Description of the material, including characteristics and regulatory classification;
- Quantity generated and explanation of major changes from previous inventories (i.e., since the previous month's inventory);
- Sources of the waste; and
- Details on off-site treatment and/or disposal, including name and location of all vendors used (e.g., chain of custody until final waste disposition) and methods used in management chain.

To ensure proper waste management, the Business Functions shall periodically evaluate each waste stream to determine the waste characteristics. Unless otherwise specified by regulation, waste characterization methods may include:


- Laboratory analysis
- Knowledge of the specific waste or generating process, as long as the method is sufficient to characterize the waste composition and attributes (e.g., product specifications, safety data sheets, prior or similar analysis)

The Business Functions shall review and update the waste inventory annually and as changes occur, such as:

- Addition, elimination or reclassification of a regulated waste stream.
- Changes in the underlying waste-generation process that may affect the waste stream.
- Changes to a waste-related vendor, disposal site or method of disposition for a waste stream.

#### 4.4 Waste Management Program

Each Business Function shall implement a documented waste management program in line with applicable compliance obligations (e.g., rules, regulations, permits, and internal enterprise requirements), including hazardous waste generator status. The written program shall cover waste types generated (e.g., hazardous, nonhazardous, special, PCBs, used oil, universal, medical, electronic, etc.) regardless of disposition method (e.g., disposal, reclamation, reuse, sale, transfer or treatment). Typical elements include:

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- Description of the waste and source, including regulatory waste code;
- Site plan illustrating storage location;
- Type of containers used for storage and shipping;
- Container labeling requirements, including type of label and proper method of completion;
- Onsite accumulation duration limits;
- Storage area requirements, including, but not limited to: signage, segregation of incompatibles, spacing of containers, personal protective equipment requirements, emergency eyewash/shower locations, spill response instructions and location of spill cleanup materials;
- Emergency response contact information;
- Waste accumulation area requirements;
- Scope, method and frequency of documented inspections;
- Applicable operational controls, including handling instructions;
- Training requirements, including scope and frequency of training for both affected employees and general plant personnel (refer to the Enterprise standard EHS Training EHS-GOV-3.2.1 for requirements);
- Identification of applicable regulatory requirements, including permits, licenses, applications, recordkeeping and reporting;
- Off-site disposition program, including the listing of vendors and shipping requirements (e.g., placards, shipping papers/manifests, and manner of completion of shipping papers/manifests); and
- Record retention and reporting requirements.

Business Functions shall apply relevant waste management requirements to the management of byproducts/off-spec materials/residual materials and define when material changes status (i.e., reuse, reintroduction to the process, managed as waste, etc.).

Inspections of waste management programs shall occur in accordance with the Enterprise standards EHS Assessments and Audits EHS-GOV-5.2.2 and Management Review and Continuous Improvement EHS-GOV-6.3.1. The inspection process shall assess the facility's compliance to the waste management program requirements and applicable compliance obligations.

Adequate emergency response equipment and materials shall be accessible for responding to potential emergencies involving any type of waste generated at the facility (refer to the Enterprise standard Emergency Preparedness and Response EHS-GOV-4.4.1 for requirements).

The Waste Management Program shall be reviewed by Functional Environmental personnel at least annually, or more frequently if there are significant changes, such as:

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- Regulatory changes;
- Personnel changes;
- Changes to site management practices;
- The addition or reclassification of a major waste stream; or
- Changes to waste-related vendors, disposal sites or methods of disposition for major waste streams.

#### **4.5 Prohibited Waste Management Practices**

Business Function Leadership shall determine and communicate waste management practices that are explicitly prohibited. At a minimum, the following practices are prohibited:

- Disposal of wastes to non-approved vendors;
- Transport of waste offsite by anyone other than an approved vendor;
- Commingling, defined as blending, mixing or combining, of Entergy’s waste with any other waste/material prior to disposal. Commingling does not refer to individual and independent containers and/or drums grouped with other individual and independent containers and/or drums from other generators for transportation purposes. Notably, the scope of some disposal contracts may determine the approved regulatory requirements for transport and disposal (i.e. parts washer solvents; used oil, etc.);
- Disposal of unpunctured aerosol cans as municipal solid waste;
- Disposal of wastes to site wastewater collection and treatment systems, unless each of the following conditions are met and documented:
  - The facility wastewater permit and associated application provide clear authorization,
  - There is documentation demonstrating that the system was designed for and has sufficient capacity to treat such wastes and
  - Disposal of the waste to the treatment system would not cause the facility to exceed any regulatory limit. Once these conditions are documented, written approval shall be obtained on a one-time, case-by-case basis from the Facility Manager and functional Environmental leadership.
- Unauthorized onsite land disposal of wastes and construction debris;
- Shipment of waste to any Entergy locations, unless explicitly allowed by regulation (ex. Generator Improvement Rule) to more appropriately manage wastes. All wastes shipped from one Entergy location to another Entergy location must be appropriately manifested and documented from point of generation to ultimate shipment from the receiving location to primary disposal;
- Abandoning in place, unless allowed by regulation;

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- Mixing of waste streams with incompatible hazard characteristics;
- Burning of waste on site;
- Dilution of waste to change the waste classification or hazard;
- Donation, sale or transfer of materials to employees, the public or others who do not have the proper permits or capabilities to handle the material;
- Acceptance of waste generated off-site from employees, contractors or other parties. Only waste produced by activities within the scope of employment or the applicable contract may be brought on site and managed in Entergy waste containers;
- Speculative accumulation of materials onsite for longer than one year maximum unless regulatory limits are more restrictive;
- Disposal of used computers, florescent bulbs (except for low-mercury containing bulbs) , and spent non-alkaline batteries (i.e., universal waste) in facility dumpsters not labeled for electronic wastes, regardless of volume, chemical composition or regulatory classification;
- Disposal of waste at locations intended for non-industrial customers (e.g., Home Depot, hardware stores etc.);
- Landfilling liquid waste; and
- Deep well injection of waste material in Class I, III, IV, and/or V wells, except where required by state or local regulation.

Business Functions may implement an Exception Process that authorizes one-time exceptions to these prohibitions. This process must include appropriate collaboration with SEP and Environmental Legal with records of the exception maintained per the applicable waste management record retention requirements.

#### **4.6 Off-Site Waste Disposal**

Business Functions must establish a process to ensure:

- SEP-approved waste disposal companies are used for any regulated wastes. All waste vendors must be evaluated and approved prior to use. Any exceptions must be approved by SEP. To reduce Entergy’s waste disposal footprint and long-term risk, limit new waste vendors to a practical minimum
- Documentation is retained, in an accessible location, that vendors used for off-site disposition of wastes have:
  - All permits necessary to perform the intended work, as required by governmental regulations.
  - Appropriate insurance coverage as reviewed and approved by procurement.
  - Received wastes shipped to disposal facility.



- Facilities work with Procurement and Environmental Legal to ensure a signed contract is in place and a signed copy retained covering the intended work of vendors being utilized for off-site disposition of wastes. Utilize an Entergy standard contract developed by the Environmental Legal Department. Attain approval by the Environmental Legal Department for any modifications or substitutions to the standard contract.
- Waste Vendors are reviewed every three years, or as changes occur, to ensure minimum requirements outlined in this standard are met.

## 5. TRAINING

Business Functions shall deliver and document waste management and minimization training to those employees who play a role in meeting the requirements of this standard. At a minimum, the training shall cover:

- Waste management and minimization objectives;
- Requirement for using approved waste vendors; and
- Prohibited practices.

The Business Functions shall ensure that all training it developed, delivered, and managed per the requirements of the Enterprise standard EHS Training EHS-GOV-3.2.1.

## 6. DOCUMENTATION AND RECORDKEEPING

Each Business Function shall establish processes for maintaining the records identified in the table below in accordance with the Entergy policy Records Management and Retention. The Business Functions shall ensure all records and documents are managed in alignment with the Enterprise standard EHS Records Management and Document Control EHS-GOV-3.4.1.

Document/Record
Waste Management Programs
Waste Minimization Plan
Waste Inventory
Waste Characterizations
Inspections
Exceptions
Waste Disposal Vendor Information

## 7. PROGRAM REVIEW AND EVALUATION

To assess the overall health of the program and meet the commitment for continual improvement, the Business Functions shall include a formal review of their Waste Management and Minimization programs as part of the management review process described in the Enterprise standards EHS Assessments and Audits EHS-GOV-5.2.2 and Management Review and Continuous Improvement EHS-GOV-6.3.1 and implement improvement actions as needed.

Enterprise EHS shall review and update this standard per requirements of the Enterprise standard EHS Record Management and Document Control EHS-GOV-3.4.1, and no less than every three years.


## 8. DEFINITIONS

	Term	Definitions
1	Business Functions	<p>Business Functions Group of operators together under one leadership team and structure (Nuclear, Power Generation, etc.).</p> <p>OR</p> <p>The organization, department, or work group responsible for meeting a specific business need (e.g. Capital Projects, Corporate, Nuclear, Power Generation, Transmission, and Utility).</p>
2	Compliance obligations	<p>Legal requirements than an organization has to comply with and other requirements that an organization has to or chooses to comply with. Compliance obligations can arise from mandatory requirements, such as applicable laws and regulations, or voluntary commitments, such as organizational and industry standards, contractual relationships, codes of practice and agreement with community groups or non-governmental organizations.</p>
3	Generator	<p>Any person who produces a hazardous waste as listed or characterized in part 261 of title 40 of the Code of Federal Regulations.</p>
4	Generator status	<p>(1) Very Small Quantity Generators (VSQGs) generate 100 kilograms or less per month of hazardous waste or one kilogram or less per month of acutely hazardous waste.</p> <p>(2) Small Quantity Generators (SQGs) generate more than 100 kilograms, but less than 1,000 kilograms of hazardous waste per month.</p> <p>(3) Large Quantity Generators (LQGs) generate 1,000 kilograms per month or more of hazardous waste or</p>

	<b>Term</b>	<b>Definitions</b>
		more than one kilogram per month of acutely hazardous waste.
5	Hazardous waste	<p>A subset of solid wastes that pose substantial or potential threats to public health or the environment and meet any of the following criteria: (1) is specifically listed as a hazardous waste by EPA; (2) exhibits one or more of the characteristics of hazardous wastes (ignitability, corrosiveness, reactivity, and/or toxicity); (3) is generated by the treatment of hazardous waste; or is contained in a hazardous waste.</p> <p>By-products of society that can pose a substantial or potential hazard to human health or the environment when improperly managed. Possesses at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity), or appears on special EPA lists.</p>
6	Personnel	Personnel Individuals employed or contracted to perform work at an Entergy facility or work location. The term personnel shall be used to include both employees and contractors.
7	Solid waste	Any garbage or refuse, sludge from a wastewater treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, resulting from industrial, commercial, mining, and agricultural operations, and from community activities
8	Waste management	The activities and actions required to manage waste from its inception to its final disposal.
9	Waste minimization	Waste minimization is a set of processes and practices intended to reduce the amount of waste produced. By reducing or eliminating the generation of harmful and persistent wastes, waste minimization supports efforts to promote a more sustainable society.
10	Waste treatment	Waste treatment refers to the activities required to ensure that waste has the least practicable impact on the environment. In many countries various forms of waste treatment are required by law.

## 9. REFERENCES

Document Number	Title
EHS-GOV-5.2.1	Compliance Management
EHS-GOV-4.2.1	Management of Change
EHS-GOV-5.1.1	EHS Metrics
EHS-GOV-6.2.1	Corrective Actions
EHS-GOV-4.4.1	Emergency Preparedness and Response
EHS-GOV-5.2.2	EHS Assessments and Audits
EHS-GOV-6.3.1	Management Review and Continuous Improvement
EHS-GOV-3.2.1	EHS Training
EHS-GOV-3.4.1	EHS Record Management and Document Control
	Investment Recovery Policy
	Charitable Contributions Policy
	Records Management and Retention Policy

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**APPENDIX A: WASTE DISPOSAL VENDOR PROGRAM**

**I. Purpose and Scope**

The purpose and scope of the Waste Disposal Vendor Program (“the Program”) is to ensure that all wastes and recyclable materials which originate at Entergy facilities or operations, unless specifically exempted in this standard, are managed and reused, recycled, treated, or disposed of in accordance with internal policies and applicable federal, state, and local laws and regulations. The intent of the Program is to provide a process for auditing, reviewing, and approving vendors that recycle, treat, dispose or otherwise manage Entergy’s waste streams, specifically the site or physical location where the primary and any relevant secondary, and tertiary waste streams, are recycled, treated, disposed or managed.

**II. Program Management**

Management of the Program resides in Sustainability and Environmental Policy (SEP) to ensure the waste disposal vendor audit/review and waste vendor approval processes are independent of the functions and have sufficient authority to conduct objective assessments free of any conflicts of interest.

Vice-President, Sustainability and Environmental Policy

- Ensures adequate resources are available to administer the Program and to ensure an effective waste vendor audit/review process and waste vendor approval process.

Sustainability and Environmental Policy Department

- Administers the Program, providing leadership and management support;
- Provides interpretation and guidance on this Policy and expectations of the Program;
- Manages the approved vendor process to include site and physical location additions and deletions;
- Review CHWMEG reports, or other equivalent information, and approve vendors;
- Establishes the scope and criteria of the Program; and
- Facilitates the resolution of conflict.

Core - Environmental Leadership Team (C-ELT)

- Reviews and provides feedback on modifications to the Program; and
- Advocates the purpose, scope, and intent of the Program.

Environmental Support Organizations

- Determine and document whether a material is a waste;
- Determine the disposal option for each waste;
- Determine whether a vendor(s) is approved to recycle, treat, dispose or transport of each waste;

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- Review CHWMEG reports, or other equivalent information, and approve vendors;
- Seek commercial and environmental legal counsel as required; and,
- Request for addition or deletion of disposal vendor site and physical location.

Supply Chain

- Develops and maintains vendor relationships;
- Requests and negotiates pricing;
- Develops and executes contractual agreements;
- Review CHWMEG reports, or other equivalent information, and approve vendors;
- Manages dispute resolution to include billing performance;
- Coordinates business reviews; and
- Provides details of market trends within the waste disposal industry

Legal

- Provides legal guidance and interpretation on waste matters, such as waste determination, reuse and recycling options, and disposal methods, to be consistent with the intent of this Policy and all applicable environmental laws and regulations.

Project Managers and Employees

- Actively consult with applicable Environmental Support Organizations to ensure waste disposal and recycling are included and properly managed in the scope of the project or any other Entergy activities;
- Only use approved vendors unless specifically exempted from this standard; and
- Seek guidance from SEP and/or Legal when requirements, disposal options, exemptions, etc. are unclear.

**III. Waste Vendor Audit/Review and Approval Process**

**A. DESCRIPTION**

Entergy generates wastes which can be categorized as mixed waste (contains both hazardous and radioactive waste components), hazardous waste, non-hazardous waste, and recyclables. Typically, Entergy audits vendors such as solid and hazardous waste treatment, storage and disposal facilities (TSDF) and various recyclers through its CHWMEG membership. Although not required by law, conducting waste vendor audits and reviews are in the best interest of Entergy. Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Resource Conservation and Recovery Act (RCRA), financial liability for hazardous substance contamination can be assessed to facility owners and operators, past facility owners and operators, any party who arranged for treatment/disposal or arranged with transporters for transport for treatment/disposal, any person who accepts for transport for treatment/disposal, and generators who use such facilities for

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treatment/disposal. Financial liability extends to the costs associated with potential response, removal and remedial actions, and damage to natural resources.

- The following wastes and the vendors that dispose of the wastes are excluded from the program:
- Low level and radioactive wastes;
- Scrap metal for recycle that poses no potential environmental hazards or has been properly decontaminated;
- Non-hazardous wastewaters managed at a publicly owned treatment works (POTW);
- Batteries and tires that are swapped out for recycle when new ones are delivered or purchased;
- Properly drained oil filters;
- Sewage treatment sludge;
- Infectious or medical wastes when managed at a State Health Department Approved Facility; and
- Regular municipal trash and inert, essentially insoluble material disposed of at a municipal disposal facility.

All companies or individuals utilized to transport wastes covered by the Program, along with all transfer stations, must have all required permits, licenses, and training for all waste streams transported.

#### B. VENDORS

Vendors working for the company for purposes other than waste disposal (such as a construction or environmental services contractor) are not required to go through the waste vendor approval process, but any waste generated by those vendors is subject to this Policy regarding both minimization efforts and proper management and disposal.

Only Approved Vendors reviewed and approved by the Waste Vendor Review Committee are eligible to store, treat, dispose, or recycle wastes that originate at Entergy facilities or from company operations, except in emergency situations (See Figure 1). An Approved Vendor's site that is placed on the Approved Waste Disposal Vendor List (AWDVL) is approved for disposal of all waste streams allowed by their permits unless exceptions are identified on AWDVL.

Approved Vendors that are acquired by or merged with other vendors will remain on the AWDVL as long as the physical site/location of disposal remains the same. In the event the acquisition or merger results in a change of the physical site/location of disposal, then the new site/location must go through the approval process described in Figure 1.

Any intercompany transfers of waste to another site for disposal must be conducted in accordance with federal, state and local regulations and be approved by an Entergy representative, and the site receiving the waste must also go through the approval process described in Figure 1.

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When Entergy acquires a new facility, any existing vendors utilized by the new facility will be included on the approved list, unless specifically rejected from use by Entergy, and then be nominated for an audit/review and evaluated for continued use.

In an emergency situation when an Approved Vendor cannot be used, the Function shall select an alternative provider that is qualified for one-time use (See Figure 2). Documentation must be provided to support the decision for using an alternative provider. Additionally, documentation stating that the vendor was approved for one-time use shall be affixed to the shipping paper or manifest for internal auditing purposes.

The AWDVL can be found on the SEP SharePoint site:

<https://myentergy.entergy.com/sites/Environmental/SitePages/Audit%20Program.aspx>.

Each facility has the option to choose the best Approved Vendor to support its location.

#### C. WASTE VENDOR AUDIT/REVIEW PROCESS

The waste vendor audit/review may include some or all of the following components:

- Visual inspection of the facility;
- Interviews with facility personnel;
- Historical site use inquiry;
- Review of facility Standard Operating Procedures (SOPs) for management of waste materials or safety processes;
- Identification of facility conditions, processes, materials, or wastes that may pose an environmental and/or safety hazard;
- Review of permits, licenses, consent agreements, etc.;
- Review of previous safety, health, and environmental (SH&E) audit reports, inspections, and voluntary protection program (VPP) annual assessments, where applicable;
- Review of soil surveys, topographic maps, flood plain maps, aerial photographs, etc.;
- Identification of properties immediately adjacent to the facility which may have a potentially adverse environmental effect on the facility's property;
- Evaluation of insurance and financial records as they relate to the facility's ability to pay for an environmental liability;
- Review of the regulatory agency records relating to the facility's and surrounding facilities' compliance history and OSHA recordkeeping requirements.
- Review of geological, ground water, and surface water conditions of the site.



- Identification of third-party waste management firms that receive wastes from the facilities.
- Review of vendor audits conducted or contracted out by a waste broker being considered to manage Entergy materials.

**D. VENDOR SELECTION AND AUDIT/REVIEW FREQUENCY**

The goal for waste vendor audit frequency is three years across all vendor types. In the event a more detailed methodology is needed to establish audit frequency based on the perceived risk of the provider, the following factors should be considered to evaluate risk:

- Safety performance;
- Service reliability to users (i.e., scheduled and emergency pick-ups);
- Quantity of material sent to the vendor facility;
- Type of material sent (hazardous, non-hazardous, etc.);
- Types of material that the vendor receives from other customers;
- The vendor treatment, disposal, or recycling processes (landfill, incinerator, etc.);
- Changes in waste/recyclable management practices;
- Size and financial strength of the vendor;
- Vendor location;
- Previous audits of the vendor facility;
- Vendor SH&E compliance history/reputation;
- Potential for operations to contaminate groundwater;
- Recent sale or acquisition of assets; and
- Change in compliance status.

The goal for audit frequency is set as shown in the following table:

Vendor/Site Type	Perceived Risk	Minimum Audit Frequency
Transformer Services	High	Every 2 years
PCB Disposal/Handling		
Used Oil Recyclers	Moderate	Every 3 years
Hazardous Waste Disposal		
Universal Waste Disposal	Low	Every 4 years

Vendor/Site Type	Perceived Risk	Minimum Audit Frequency
Solid Waste Disposal (non-haz)		

**E. AUDIT PROCESS**

On an annual basis, SEP will review the list of approved vendors and develop an audit schedule. SEP will then acquire audits/reviews of these vendors (and their disposal facilities) through CHWMEG, Inc., or another acceptable alternative. Entergy is a member of [CHWMEG, Inc.](#), which is a non-profit consortium of waste generators that pool resources to provide third-party reviews of waste disposal sites. Vendor site nominations are submitted to CHWMEG once per year and are either accepted into the overall program or can be “sole-sourced” through CHWMEG. An audit for a specific vendor or site can also be conducted outside of the CHWMEG process by a consulting firm or internal personnel.

A vendor audit schedule is maintained on the SEP SharePoint site and is based on the current AWDVL. SEP maintains the membership and interaction with CHWMEG.

SEP shall schedule an appropriate number of audits to insure that all vendors on the approval list are evaluated according to the schedule presented in Section E.

In order to limit Entergy’s liability associated with waste disposal and to minimize the cost of the audit program, new vendors and new disposal sites should be kept to a minimum. The submittal and approval of a business case to the Waste Vendor Review Committee is required for the addition of a new vendor site. The business case must demonstrate the operational need offsets the potential liability incurred.

**F. ROLES AND RESPONSIBILITIES**

Entergy’s Waste Disposal Vendor Audit Program is administered by SEP. The Entergy Waste Peer Group, Waste Vendor Review Committee, and Function Waste Leads support the audit process. Overall program management is described in Section II – Program Management. Specific roles for the waste disposal vendor audit process are described as follows:

Sustainability & Environmental Policy

- Review and approve recommendations for process changes;
- Provide oversight and administer the process;
- Nominate facilities for inclusion in the CHWMEG review process on an annual basis;
- Facilitate the Waste Disposal Vendor Audit Review Committee process to approve or reject new vendors or continue Entergy’s relationship with existing vendors; and
- Maintain budget responsibility for the process.

Waste Peer Group

- Share function vendor experiences and audit/review results; and

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- Coordinate with SEP to determine when changes in waste management methods are needed.

Waste Vendor Review Committee

- Members consist of SEP, Environmental Support Organizations, and Supply Chain to participate as needed in meetings to determine the acceptability of new and/or existing waste vendors based on CHWMEG’s reviews and other pertinent information.

Functional Waste Leads

- Communicate any information to the Waste Peer Group and SEP that impacts vendors currently used or under review for use.

**G. AUDIT REPORT AND RECOMMENDATION**

The final audit report summarizes the findings of the audit and presents the facts and risks associated with the use of a facility or disposal site. The reports will be distributed to the Waste Vendor Review Committee via electronic notification from CHWMEG. This committee is expected to examine the audit/review report (and any other pertinent information) in a timely manner in order to render an opinion to (1) accept or reject a new vendor and/or (2) determine if Entergy should continue to use the existing vendor. Voting committee members shall represent Operations (Power Generation, Nuclear, and Utility Operations), Supply Chain, and ESP. In the event of a tie, the Vice-President of SEP will cast the deciding vote, in consultation with Legal. Non-voting members should include Legal, Facilities/Real Estate, Safety, and Insurance & Risk Management.

Figure 1 illustrates the routine process that must be followed to approve a new vendor. A maximum of 90 days is required to complete this process. Should a vendor be accepted to provide services for Entergy, the function requesting the service will be required to complete the New Vendor Risk Matrix found on the SEP SharePoint site, submit the matrix to the Waste Review Committee for approval, and pay for vendor audits if required.

**Figure 1**

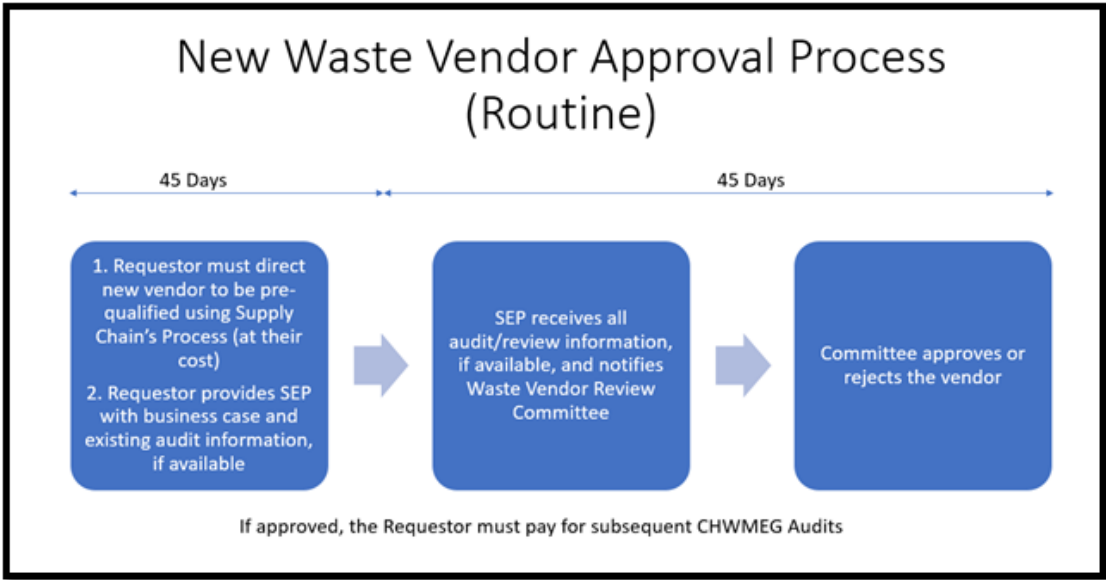
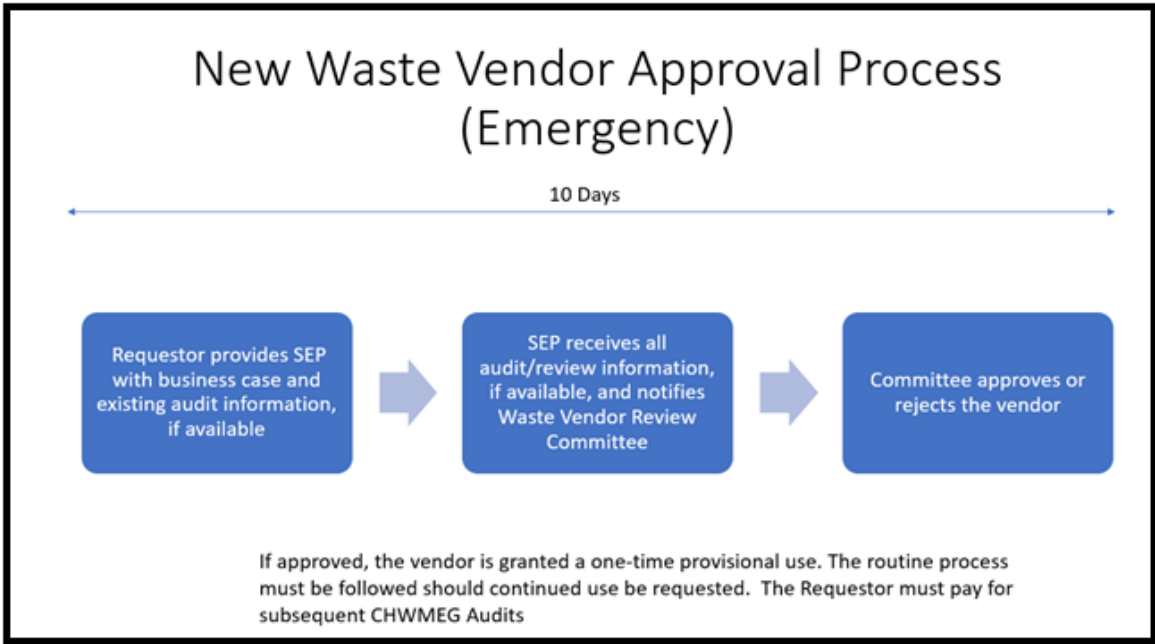


Figure 2 illustrates the emergency process that must be followed to approve a new vendor. Up to ten business days are required to complete this process. Should a catastrophic event occur that prevents the emergency process from being followed, the function should manage the material as needed to protect human health and the environment. The respective functional or regional Vice President associated with the generating facility should be notified of this emergency situation and a copy of this notification should be placed on the shipping documentation for the material maintained by Entergy.

**Figure 2**



The review committee should reach a consensus regarding its opinion to approve or reject a potential vendor. If a consensus cannot be reached, then the Vice-President, SEP will make the final decision in consultation with Legal.

The review committee’s decision should identify any restrictions placed upon usage of the vendor and any contractual verbiage that may be required to enforce these restrictions. The committee’s decision will be noted in the AWDVL. This list, along with copies of the audit reports and the audit schedule, will be maintained on the SEP SharePoint site.

All waste vendor audit reports will be retained by SEP according to Entergy’s Record Retention Policy.