



Water and Wastewater Management

EHS-ENV-4.1.3.3

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1. PURPOSE

The purpose of this standard is to support all levels of the organization in managing stormwater and wastewater generated by the company’s operations. Effective implementation of this standard will support Entergy’s sustainability efforts and help ensure compliance with water quality regulations.

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, including but not limited to, Power Generation, Nuclear Operations, Power Delivery, Supply Chain, Utility Operations and all Entergy-owned and operated offices and facilities. From here on, the term personnel shall be used to include both employees and contract partners. The Business Function shall be responsible for determining the applicability of the requirements of this standard compared to the full scope of its operations. No Business Function shall be allowed to develop a separate Water and Wastewater Management Standard without authorization of Vice President of Enterprise Environmental.

3. ROLES AND RESPONSIBILITIES

3.1 Senior Leadership shall:

- Be ultimately accountable for water and wastewater management programs.
- Allocate adequate resources to implement this standard.
- Hold responsible individuals accountable for implementation of this standard.
- Consider water and wastewater issues (permitting, compliance, risk) when planning physical changes to a facility, including capital projects, non-capital projects and operational changes;
- Engage with Enterprise Environmental Services (EES) and others as appropriate to support water and wastewater management initiatives;
- Cascade responsibilities down through all levels of line and functional leadership, including first line managers; and
- Review the effectiveness of water and wastewater management program as part of the management review process.

3.2 Sustainability & Environmental Policy Personnel shall:

- Manage Entergy’s EHSMS audit program;
- Coordinate with EES and other business functions as appropriate on proposed legislative or regulatory changes with potential impacts on Entergy’s operations or sustainability efforts;

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- Coordinate, review and, where appropriate, develop comments for proposed federal environmental regulations or policies with potential impacts on Entergy’s operations or sustainability efforts;
- Lead engagement and advocacy with federal regulatory agencies for proposed environmental regulations or policies with impacts on Entergy’s operations;
- Represent Entergy’s positions with national environmental trade associations in which Entergy is a member, including the development of association comments on proposed federal regulations and policies; and
- Assist EES personnel with subject-matter expertise on applicable regulatory requirements.

3.3 VP Enterprise Environmental shall:

- Review and maintain this enterprise standard in line with document control requirements;
- Provide leadership, working with functional managers, environmental and other individuals to ensure effective compliance and management of risk; and,
- Work with Senior Leadership, engineering and others as appropriate to proactively incorporate water, stormwater and water treatment considerations into capital projects.

3.4 Functional Environmental Directors / Sr. Managers / Managers shall:

- Maintain an understanding of applicable regulatory requirements with support from Sustainability and Environmental Policy;
- Provide water and wastewater permitting and compliance technical support as needed;
- Monitor potential and actual changes to federal, state and local water and wastewater laws and regulations and communicate changes and operational implications to affected personnel;
- Provide training and development to ensure teams are competent to fulfill all water and wastewater management responsibilities; and,
- Identify and communicate program- or performance-improvement opportunities to site management and Enterprise Environmental.

3.5 Functional Environmental Personnel shall:

- Maintain an understanding of applicable water, stormwater and wastewater regulatory requirements with support from Sustainability and Environmental Policy;
- Support facility leadership in obtaining necessary water, wastewater and stormwater permits, and renewing and updating them as required;
- Work with facility leaders to establish programs and processes to meet all compliance obligations (including regulations, permits and the requirements of this standard) and effectively manage risks associated with water, stormwater and wastewater;
- Act as point of contact for audits and inspections;
- Work with responsible project, operations and maintenance managers to maintain water and wastewater compliance, impacts and risks associated with local capital projects and ensure operational changes are proactively considered and addressed;

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- Work with facility leaders to define and achieve water usage and wastewater reduction targets, as appropriate;
- Conduct or coordinate periodic water or wastewater compliance monitoring and data analysis;
- Control and maintain applicable records per regulatory and corporate requirements;
- Work with facility leaders to define and achieve water and wastewater performance targets, as appropriate;
- Promote awareness of compliance and performance among facility staff;
- Report water and wastewater events/incidents and routine performance to appropriate stakeholders; and
- Work with functional leadership to identify training needs and manage training to meet requirements.

3.6 Employees and Contract Partners shall:

- Complete training as required;
- Maintain certifications to complete work activities as required;
- Comply with site environmental permits, policies and operational procedures; and,
- Contact Supervisor or Enterprise Environmental for all water and wastewater related inquiries or concerns.

4. REQUIREMENTS

4.1 General

This standard sets forth requirements for managing water and wastewater programs to minimize adverse environmental impacts and, where appropriate, ensure a sufficient compliance margin to mitigate the risk of noncompliance.

Each Business Function is responsible for identifying the environmental aspects and applicable compliance obligations associated with its operations. The results of this planning exercise are the identification and implementation of appropriate engineering and administrative controls to maintain compliance with applicable obligations as a minimum level of performance. Senior Leadership shall provide adequate resources and support to maintain effective controls and fulfill the water and wastewater management requirements outlined in this standard.

As changes occur, and in conformance with the Enterprise standard Management of Change EHS-GOV-4.2.1, the Business Functions shall ensure water and wastewater aspects, including new or revised permitting and regulatory requirements, are explicitly considered in the Management of Change (MOC) process, including new construction, capital projects, process changes, and other operations and maintenance changes (e.g., equipment service change, change in water flow or new chemical usage).

To meet the commitment to continual improvement and transparency with stakeholders, each Business Function shall document communications from employees, contractors, regulators, neighbors, and the community pertaining to complaints or concerns related to water and

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wastewater discharges. As appropriate, coordinate the responses with Enterprise Environmental, Environmental Legal and other internal stakeholders.

Unplanned and unpermitted water or wastewater events above a permit limit or the reportable quantity established by an applicable regulatory agency shall be reported and recorded in a timely manner with applicable compliance obligations by Functional Environmental Personnel. Refer to the Enterprise standard Incident Management and Event Reporting EHS-GOV-6.1.1. The corrective action process, as defined in the Enterprise standard Corrective Actions EHS-GOV-6.2.1, shall be followed to determine appropriate responses.

Each Business Function is responsible for assessing water supply risks and taking appropriate risk mitigation actions, including satisfaction of all regulatory permit requirements (e.g., Water conservation plans, strategy for obtaining water from other sources, etc.).

4.2 Regulatory Evaluation and Management

To guide the Business Functions in implementing programs to ensure compliance with applicable regulatory obligations, each Business Function shall determine and document applicable water quality regulations (e.g., permits, licenses and registration) to associated operational systems and equipment; document regulatory exemptions where appropriate; define and track completion of key water and wastewater compliance actions and performance monitoring, documenting specific actions to be taken, the responsible individual and corresponding timelines and due dates. Refer to the Enterprise standard Compliance Management EHS-GOV-5.2.1 for requirements.

Each Business Function, in conjunction with Enterprise Environmental, shall ensure that they maintain adequate policies, procedures, and controls to ensure proper permitting, as appropriate, of any new equipment or chemical(s) proposed to be replaced or installed at an Entergy site that holds water and wastewater permits.

Each Business Function shall perform periodic self-assessments and audits of compliance with water and wastewater regulations and permit requirements. Refer to the Enterprise standard EHS Assessments & Audits EHS-GOV-5.2.2 for requirements.

Identified instances of noncompliance must be documented and reported, if required, with corrective actions developed and implemented.

4.3 Identification and Characterization

Each Business Function shall be responsible for understanding its water and wastewater systems, controls and the potential impact on the environment. This will be accomplished by meeting the following requirements (where there is a regulatory requirement to do so):

- Document the locations of all permitted water and wastewater systems (e.g., Facility map, database or other methods to identify sources);
- Develop and maintain a chemical inventory used in water and wastewater systems;

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- Characterize the type and quantity of water consumption and wastewater discharges to allow the organization to understand how regulatory requirements may apply and to establish appropriate key performance indicators (KPIs) and objectives.
 - Consider routine and non-routine operations, including start-up and shut-down situations, outages/turnarounds, and upset conditions, as required.

4.4 Water and Wastewater Program Management

With consideration to compliance obligations and water and wastewater sources, the Business Function shall develop, implement and maintain documentation necessary to ensure compliance and effectively manage water and wastewater activities and associated impacts and risk. Documentation shall include non-routine procedures (i.e., alternate operating scenarios within permit), excursions and emergency scenarios. These water and wastewater procedures may be included as part of other procedures and plans, with appropriate consideration of applicable water and wastewater requirements.

4.4.1 Process Control Equipment

The Business Function shall design, install and operate water and wastewater process equipment to manage discharges in accordance with applicable permits and regulations. The equipment shall be included in the preventive maintenance program to ensure the equipment operates to manufacturer specifications and is maintained consistent with good industry practice, applicable regulatory requirements, manufacturer recommendations and/or internal asset integrity requirements.

4.4.2 Monitoring and Measurement

To anticipate and address water and wastewater issues prior to exceeding applicable regulatory or safety thresholds, each Business Function shall define and track operational performance measures. Performance targets shall be established in coordination with key internal stakeholders and Enterprise Environmental. To track and report progress in achieving defined targets, refer to Enterprise standard EH&S Metrics EHS-GOV-5.1.1 for applicable requirements.

5. TRAINING

The Business Functions shall ensure those with responsibilities related to managing water and wastewater program activities, including those with project management, engineering, operational change and regulatory responsibilities are competent based upon training, education and experience. These employees shall be aware of:

- Water and wastewater program management objectives;
- Key water and wastewater sources and process equipment; and
- Monitoring requirements.

All training shall be 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, as applicable, 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
Permits, authorizations, and exclusions
Site equipment diagrams and maps
Chemical inventories
Monitoring and measurement data
Calibration checks
Operational checks
Equipment inspection and preventative maintenance (PM) records
Employee training records
Communications with external stakeholders around complaints and company responses
Self-assessments and audit reports
Reporting and recordkeeping

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 water and wastewater management programs as part of the management review process described in the Enterprise standard 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 Environmental shall review and update this standard per requirements of the Enterprise standard EHS Record Management and Document Control EHS-GOV-3.4.1, and it shall be updated 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 (e.g., laws and regulations) and other requirements (e.g., voluntary commitments, such as organizational or industry standards, contractual relationships, codes of practice and agreement with community groups or non-governmental organizations) that an organization has to comply with or chooses to comply with.</p>
3	Corrective Action	<p>Actions taken to correct a deficient or degraded Condition, preclude its repetition, or prevent recurrence. This acronym is inclusive of other actions such as enhancement, extent of condition, reportability review, self-report, etc.</p>
4	Personnel	<p>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.</p>
5	Wastewater treatment system	<p>A system designed and operated to treat wastewater to meet a permit or a standard limitation prior to discharge. Wastewater may include industrial wastewater, storm water, or sanitary wastewater.</p>

9. REFERENCES

Document Number	Title
EHS-GOV-2.1.1	EHS Risk Management
EHS-GOV-3.2.1	EHS Training
EHS-GOV-3.4.1	EHS Records Management/Document Control
EHS-GOV-4.2.1	Management of Change
EHS-GOV-5.1.1	EHS Metrics
EHS-GOV-5.2.1	Compliance Management
EHS-GOV-5.2.2	EHS Assessments and Audits
EHS-GOV-6.1.1	Incident Management/ Event Reporting
EHS-GOV-6.2.1	Corrective Action Process (CAP)
EHS-GOV-6.3.1	Management Review and Continuous Improvement