



December 18, 2020

Mr. Jeff Pittman, P.E.
Cooperative Energy
P.O. Box 15849
Hattiesburg, MS 39402

Re: Annual CCR Fugitive Dust Control Report
R.D. Morrow, Sr. Power Generating Plant
Purvis, Lamar County, Mississippi

Dear Mr. Pittman:

Cooperative Energy (formerly South Mississippi Electric Power Association) retained Environmental Management Services, Inc. (EMS) to prepare an Annual Dust Control Report for the R.D. Morrow Sr. Generating Station located in Purvis, Mississippi. The purpose of this report is to comply with the air criteria in the federal Coal Combustion Residual Rule (CCR Rule) 40 CFR 257.80(c) requiring an Annual CCR Fugitive Dust Control Report, and 40 CFR 257.80(d) regarding notification and posting of the information.

The CCR Rule includes the following provisions regarding Annual CCR fugitive dust control reports:

(c) Annual CCR fugitive dust control report. The owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken. The initial annual report must be completed no later than 14 months after placing the initial CCR fugitive dust control plan in the facility's operating record. The deadline for completing a subsequent report is one year after the date of completing the previous report. For purposes of this paragraph (c), the owner or operator has completed the annual CCR fugitive dust control report when the plan has been placed in the facility's operating record as required by § 257.105(g)(2).

(d) The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in § 257.105(g), the notification requirements specified in § 257.106(g), and the internet requirements specified in § 257.107(g).

In accordance with the notification requirements, the Mississippi Department of Environmental Quality (MDEQ) shall be notified about the completion of the annual CCR Fugitive Dust Control Report, and the final report shall be placed on Cooperative Energy's publicly accessible website in accordance with the CCR rule.

Actions Taken To Control Fugitive Dust

On November 25, 2020, the facility was inspected to confirm compliance with the Dust Control Plan and was found to be in compliance. The plant is currently undergoing a re-power conversion to natural gas fuel. As a result, the coal handling portions of the plant have been dismantled resulting in a reduction in potential sources of dust. To control fugitive dust, Cooperative Energy has continued to implement the dust control measures described in the Dust Control Plan, described as follows

- Surface Impoundment. All CCR has been removed from the Impoundment Unit in the process of closure by removal. All CCR in the impoundments was entrained in water in the impoundments and thus did not generate any appreciable dust, even during the closure process.
- Landfill. As part of this conversion, the CCR Landfill Unit is preparing for closure, which entails regrading slopes to allow application of a geosynthetic and synthetic turf membrane. During this activity, additional dust control measures are being implemented including water application by water truck to control dust emissions.

Citizen Complaints

Since the Annual Fugitive Dust Control Report dated December 20, 2019 (2019 Dust Control Report), no citizen complaints have been received concerning dust control at the facility.

Corrective Action

Based on the inspection, no additional dust control corrective measures are needed, nor did Cooperative Energy find it necessary to undertake any corrective measures since the 2019 Dust Control Report.

Conclusion

The facility's established control measures remain effective in minimizing potential fugitive dust emissions. Therefore, no corrective action was undertaken during the past year.

Sincerely,

Environmental Management Services, Inc.



Christopher T. Johnson, P.E.
Engineering Manager

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