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**NOTICE OF COMPLETION OF CLOSURE BY REMOVAL
CCR SURFACE IMPOUNDMENT UNIT
R.D. MORROW, SR. PLANT
PURVIS, MISSISSIPPI
March 23, 2021**

Cooperative Energy is providing notification of the completion of closure by removal of the Coal Combustion Residuals (CCR) Surface Impoundment Unit at the R.D. Morrow, Sr. Plant in Purvis, Mississippi pursuant to 40 CFR §257.102(h) of the CCR Rule.

Attached to this notification is the Professional Engineer Certification Statement pursuant to 40 CFR §257.102(f)(3).

Notification of Completion of Closure by Removal Pursuant to 40 CFR 257.102(h)
CCR Surface Impoundment Unit
Cooperative Energy R.D. Morrow, Sr. Generating Station

Pursuant to 40 CFR 257.102(h), Cooperative Energy (formerly South Mississippi Electric Power Association) files this notification of completion of closure for the Coal Combustion Residual (CCR) Surface Impoundment Unit located at R.D. Morrow, Sr. Generating Station. Cooperative Energy is the owner of the CCR Surface Impoundment Unit that consisted of two adjacent CCR surface impoundments (the Emergency Scrubber Surge Pond and the Scrubber Supply Pond). The CCR Surface Impoundment Unit has been in the detection monitoring program pursuant to 40 CFR § 257.94 since the effective date of the CCR Rule.

Environmental Management Services, Inc. (EMS) prepared a revised Closure/Post-Closure Plan dated June 3, 2020 to provide technical information in support of Cooperative Energy's compliance with the CCR rule, specifically 40 CFR 257, Subpart D. As specified in the closure plan Cooperative Energy elected to close the CCR Surface Impoundment Unit by removal of CCR. On June 16, 2020 EMS prepared a Notice of Intent to Close the CCR Surface Impoundment Unit.

Closure by removal of CCR is described in 40 CFR 257.102(c) which states:

“An owner or operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to § 257.95(h) for constituents listed in appendix IV to this part.”

Pursuant to 40 CFR § 257.102(f)(3) the owner or operator of a CCR Unit must obtain a certification from a qualified professional engineer verifying that closure has been completed in accordance with the closure plan and the requirements of 40 CFR § 257.102. A Notification to document completion of closure must be prepared within 30 days of completion of closure of the CCR Unit and placed in the facility operating record. That Notification must contain the Certification under 40 CFR § 257.102(f)(3).

SECTION 257.102(f)(3) CERTIFICATION

It is my opinion as a Professional Engineer licensed in the State of Mississippi that the CCR materials were removed and decontamination completed, in accordance with 40 CFR § 257.102(c) and the revised Closure/Post-Closure Plan dated June 3, 2020. I have the knowledge to make this Certification because (1) I have been involved in various aspects of the closure process; and (2) I am familiar with activities associated with the CCR removal activities.

Environmental Management Services, Inc.



Christopher T. Johnson, P.E., P.S.
Engineering Manager/Vice President

Date: March 19, 2021



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