

**CCR Impoundments Liner Status Certification**  
South Mississippi Electric Power Association  
R.D. Morrow, Sr. Generating Station, Purvis, Mississippi

**Regulatory Overview**

On April 17, 2015, the Environmental Protection Agency (EPA) issued the final version of the federal Coal Combustion Residual Rule (CCR Rule) to regulate the disposal of coal combustion residual (CCR) materials generated at coal-fired units at electrical generating facilities.

The South Mississippi Electric Power Association (SMEPA) R.D. Morrow, Sr. Generating Station in Purvis, Mississippi is subject to the CCR Rule and as such must document the liner construction for its two existing CCR surface impoundments in accordance with 40 CFR 257.71. The two existing CCR surface impoundments include: 1) the Emergency Scrubber Surge Pond, and 2) the Scrubber Supply Pond.

An existing surface impoundment is classified as lined if the liner was constructed with any of the following:

- A liner consisting of a minimum of two feet of compacted soil with a hydraulic conductivity of no more than  $1 \times 10^{-7}$  centimeters per second.
- A composite liner that meets the requirements of §257.70(b).
- An alternative composite liner that meets the requirements of §257.70(c).

**Impoundment Liner Construction**

The Emergency Scrubber Surge Pond and the Scrubber Supply Pond were designed and constructed in the 1970's with design and construction procedures at that time, using primarily native underlying clay soils. As-built construction documents are not available to document that the existing soils meet the requirements set forth in §257.71. Therefore, the existing CCR surface impoundments are being classified as an existing, unlined CCR surface impoundments pursuant to §257.71(a)(3)(i).

**Engineer's Certification**

I hereby certify, as a Professional Engineer in the State of Mississippi, that the information in this document was assembled under my direct supervisory control.

I hereby certify, as a Professional Engineer in the State of Mississippi that the Emergency Scrubber Surge Pond and the Scrubber Supply Pond are existing CCR surface impoundments at the R.D. Morrow, Sr. Generating Station in Purvis, Mississippi are classified as existing, unlined CCR surface impoundments as currently defined by the CCR Rule in section §257.71.

Prepared for SMEPA by:

***Environmental Management Services, Inc.***



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