



December 21, 2016

Mr. Brian Hocutt
Cooperative Energy
P.O. Box 15849
Hattiesburg, MS 39402

Re: CCR Impoundments – Wetlands Certification
R.D. Morrow, Sr. Generating Station
Purvis, Lamar County, Mississippi

Dear Mr. Hocutt:

Cooperative Energy (formerly South Mississippi Electric Power Association) retained Environmental Management Services, Inc. (EMS) to evaluate Cooperative Energy's compliance with the Federal Coal Combustion Residuals Rule (CCR Rule) requirements in accordance with 40 CFR 257.61 which states:

“(a) New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located in wetlands, as defined in § 232.2 of this chapter, unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that the CCR unit meets the requirements of paragraph (a)(1) through (5) of this section.”

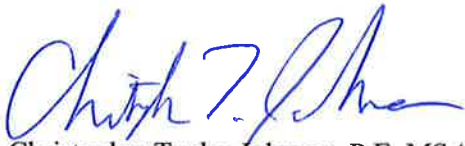
Cooperative Energy has two existing CCR surface impoundments including: 1) the Emergency Scrubber Surge Pond, and 2) the Scrubber Supply Pond. Cooperative Energy has an existing CCR landfill, but does not have a “new CCR landfill”, nor does it currently have a lateral expansion of any CCR unit. Therefore, at this time, only the two existing CCR surface impoundments are subject to 40 CFR 257.61.

§257.61 Wetlands

No part of the CCR impoundment footprint is located in a wetland, as defined in 40 CFR 232.2. See the attached wetland survey map for the entire Cooperative Energy facility. In addition, an EMS employee, Mr. Ethan E. Allen, RPG, visited the site on August 22, 2016 to confirm the accuracy of the attached wetland survey map. The results of the site visit indicated that the existing CCR surface impoundments are not located within wetlands. The impoundments discharge into other impoundments that are part of the plant NPDES-permitted wastewater treatment system, which is regulated under a State NPDES permit, therefore the impoundments do not cause any downstream impacts to water quality or wetlands. Mr. Allen is trained in wetland delineation and has over 12 years of experience in the field.

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 personal charge and that this determination was conducted in accordance with and meets the requirements of 40 CFR Part 257.61(a).



Christopher Taylor Johnson, P.E. MS #15761
Mississippi Professional Engineer

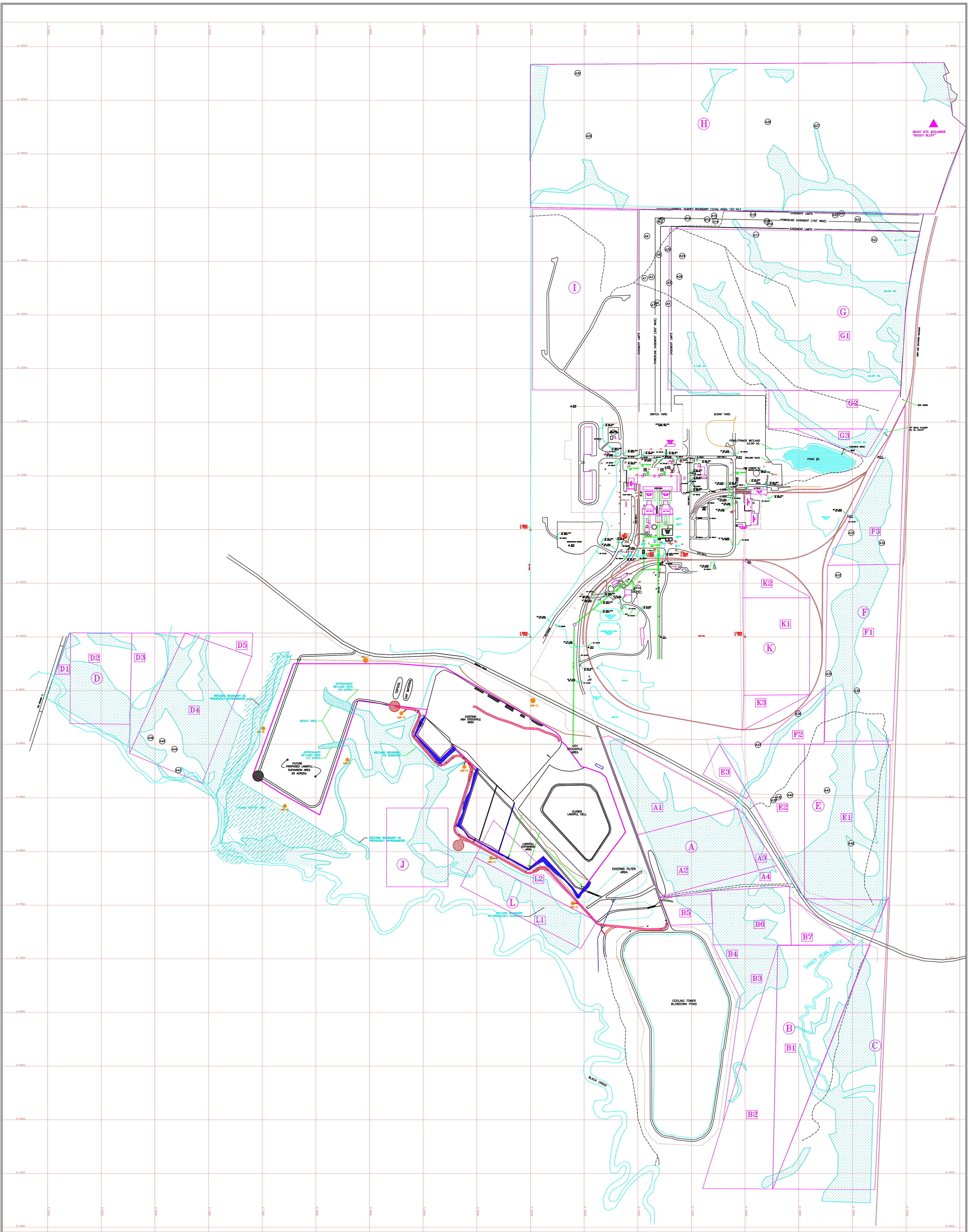
Date: 12/21/2014



Attachment -- Wetlands Map

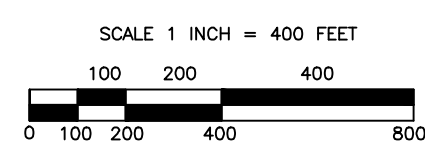
File: Wetlands

Attachment



LEGEND

- AREAS DELINEATED AS WETLANDS
- WETLANDS MITIGATION AREA
- WETLANDS IMPACT AREAS (PERMITTED)
- ACTIVE GOPHER TORTOISE BURROW
- SIGNIFICANT PREHISTORIC SITE
- SECTOR DEFINED FOR AREA REFERENCE/IDENTIFICATION
- SUBSECTOR
- GRAVEL ROADS



ZONES	TOTAL ACRES	WETLAND AREA	PERCENTAGE WETLAND
A	29.23	19.55	67.0%
B	60.70	16.40	27.0%
C	29.70	14.80	50.0%
D	39.60	22.50	57.0%
E	43.20	19.70	45.6%
F	39.80	14.40	36.3%
G*	88.30	17.30	19.6%
H**	128.60	10.80	8.4%
I	37.50	NOT SURVEYED	-
J	9.64	2.20	23.7%
K	17.80	NOT SURVEYED	-
L	14.30	6.23	43.5%
TOTAL	538.37	143.88	26.7%

* - DELINEATION PERFORMED IN SEPTEMBER, 2006
 ** - DELINEATION PERFORMED IN MARCH, 2007

PROJECT NO. 07HA010
 SHEET NO. 1
 SCALE 1" = 400'
 DATE 04-23-07
 SHEET TITLE
ENVIRONMENTAL SITE STUDIES
 2007 WETLAND DELINEATION, T&E SPECIES SURVEY, AND
 CULTURAL RESOURCES SURVEY INVENTORY
 R.D. MORROW, SR. GENERATING STATION
 PURVIS, MISSISSIPPI

No.	DATE	REVISION	BY

PREPARED FOR

SOUTH MISSISSIPPI ELECTRIC
 POWER ASSOCIATION
 P.O. BOX 15849
 HATTIESBURG, MS 39404-5849

EMS
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 ENVIRONMENTAL MANAGEMENT SERVICES, INC.
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