

**NOTIFICATION OF INTENT TO INITIATE CLOSURE
CHARLES R. LOWMAN POWER PLANT
POWERSOUTH ENERGY COOPERATIVE
LEROY, WASHINGTON COUNTY, ALABAMA**

PowerSouth Energy Cooperative intends to close the multi-unit Coal Combustion Residuals (CCR) treatment system (CCR impoundment) at the Charles R. Lowman Power Plant located near Leroy, Washington County, Alabama. The CCR impoundment includes the Unit 1 impoundment, Unit 2/3 impoundment, and FGD impoundment. The CCR impoundment is closing in accordance with the requirements of 40 CFR 257.101(a)(1) and the Alabama Department of Environmental Management's Admin. Code Chapter 335-13-15-.07(2)(a)1. Closure of the CCR impoundment will be performed under 40 CFR 257.102(d) and ADEM Admin Code r. 335-13-15-.07(3)(d), *Closure performance standard when leaving CCR in place*. The CCR impoundment will be closed in a manner that will control, minimize, or eliminate, to the maximum extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate, or contaminated runoff to the ground or surface waters or to the atmosphere. Closure will also preclude the probability of future impoundment of water, sediment, or slurry. Measures will be taken during the closure process that will provide for major slope stability to prevent the sloughing or movement of the final cover system, as well as, minimizing the need for further maintenance of the CCR impoundment.

Prior to the installation of the impoundment cover system, free and interstitial water will be removed from the CCR impoundment. The liquids will be pumped to an on-site water treatment system before being directed to the facility's National Pollution Discharge Elimination System (NPDES) permitted outfall. The outfall will be monitored in compliance with the facility's NPDES permit.

Following the last receipt of CCR waste within the Unit 1 portion of the multi-unit CCR treatment system, PowerSouth initiated excavation of the Unit 1 impoundment. The Unit 1 impoundment CCR material was removed and placed within the Unit 2/3 and FGD impoundments to consolidate CCR waste prior to the final cap and closure operations. CCR material within the Unit 2/3 and FGD impoundments will be stabilized, as needed, to support the construction and performance of the final cover system. The entire final cover system will be graded to promote drainage into planned stormwater drainage discharge points. The final cover system will meet or exceed the performance standards presented in 40 CFR §257.102(d)(3)(ii) and ADEM Admin Code r. 335-13-15-.07(3)(d)3.ii. The final cover system will include a flexible geomembrane liner to achieve a permeability less than or equal to the regulatory requirements. The final cover system will work to minimize infiltration as well as provide protection from wind or water erosion.

By signature below, certification is made that the final cover system will meet the requirements of 40 CFR §257.102(d)(3)(ii), as well as, ADEM Admin Code r. 335-13-15-.07(3)(d)3.ii.



S. Lyle Morgan