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October 15, 2016

Rushton, Stakely, Johnston & Garrett, P.A.  
184 Commerce Street  
Montgomery, Alabama 36104

Attention: Mr. J. Theodore Jackson, Jr.

Reference: **Unit #2/#3 Bottom Ash Pond - Lining Certification Statement  
Coal Combustion Residuals Impoundment  
Charles R. Lowman Power Plant  
Leroy, Alabama**

This letter is intended to address the requirements as set forth in the CCR Rule section 257.71(a) (1)(i) through (iii) regarding lining determination for the Unit 2/3 Bottom Ash Pond at the Charles R. Lowman Power Plant in Leroy, Alabama.

In reaching a determination CDG relied on documentation provided by PowerSouth, knowledge of native soils and local geologic conditions, subsurface information contained in other work authorizations, and where possible, visual confirmation of the soil liner within each impoundment.

Based on a review of the plan entitled Tombigee Generating Plant Unit 2 & 3, created by Burns and McDonnell, circa 1975, the Unit 2/3 Bottom Ash Pond floor and embankment appear to have been constructed with two feet of Type "A" Embankment material which was excavated from within the impoundment floor. These soils are described in more detail in the Unit 2/3 Bottom Ash Pond History of Construction Report.

There have been no additional studies conducted within the impoundment to evaluate the hydraulic conductivity of the Type "A" embankment material to determine if the compacted soil meets the performance criteria specified in 257.71(a) (1)(i) through (iii) of the CCR rule.

Based on our review CDG recommends that the Unit #2/#3 Bottom Ash Pond be classified as an existing unlined CCR surface impoundment until further studies are conducted.

We appreciate the opportunity to work with you on this project. Please call if you have any questions or need additional information.

Respectfully Submitted,

**CDG Engineers & Associates, Inc.**

R. Daniel Wells, PE  
Sr. Project Manager

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