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Engineer's Certification

I hereby certify that the CCR Fugitive Dust Control Plan - 2023 Annual Report presented herein meets the requirements of Section 257.80, subset (c), of Title 40 of the Code of Federal Regulations and ADEM 335-13- 15-.05(1)(c) as amended upon the date of this certification.

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1. Introduction

The Charles R. Lowman Power Plant campus is in Leroy, AL and is owned and operated by PowerSouth Energy Cooperative (PowerSouth). Three coal fired units were decommissioned and demolished, and a combined cycle unit has been constructed and commenced commercial operation in September 2023. The facility includes infrastructure for storing coal combustion residuals (CCR) including fly ash, bottom ash, and gypsum produced from flue gas desulfurization (FGD). Each material is unique and is managed to account for site conditions and the material's characteristics.

2. CCR Fugitive Dust Control Plan Summary

The CCR Fugitive Dust Control Plan (Plan) identifies PowerSouth's control measures and practices to minimize and control CCR products from becoming airborne at the facility in compliance with Section 257.80 of the CCR regulations and ADEM 335-13-15-.05(1). The plan defines the following:

- Potential sources for CCR fugitive dust emissions;
- Procedures to control CCR fugitive dust emissions;
- Procedures to receive and log citizen complaints received by the operator;
- Outline annual reporting requirements; and
- Record keeping practices.

The Plan was placed within the operating file of the facility in October of 2015.

3. Actions Taken in 2023

Measures delineated within the Plan were continued and/or put into action within the reporting period of this report. These actions included completing regular inspections of each identified area and evaluations of the prescribed control measures to ensure that each was working as intended.

4. Record of Citizen Complaints in 2023

The facility did not receive any citizen complaints during the reporting period of 2023.

5. Corrective Actions Taken in 2023

As no citizen complaints were received and there were no prescribed control measures that indicated substandard performance at controlling fugitive dust emissions, corrective actions were not required or taken at the facility during the 2023 reporting period.

6. Record Keeping

Records of all activities related to CCR fugitive dust emission observation and management are logged and records shall be maintained in accordance with Section 257.80 of Title 40 of the Code of Federal Regulations and ADEM 335-13-15-.05(1).

