

**NOTIFICATION OF INTENT TO INITIATE CLOSURE
PLANT JACK WATSON INACTIVE SURFACE IMPOUNDMENT
MISSISSIPPI POWER COMPANY
GULFPORT, MISSISSIPPI**

Mississippi Power Company (MPC) intends to close the inactive surface impoundment located at Plant Jack Watson in Gulfport, Mississippi under the requirements of 40 CFR §257.100. The Plant Watson surface impoundment is an inactive surface impoundment, as defined in §257.53, and did not receive CCR on or after October 19, 2015, but did contain both CCR and liquids on that date.

Closure of the surface impoundment will be conducted under §257.100(b)(1), closure by leaving CCR in place. The surface impoundment will be closed in a manner that will control, minimize or eliminate, to the 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 design and construction of the closure system that provide for major slope stability to prevent the sloughing or movement of the final cover system. Closure will also minimize the need for further maintenance of the CCR unit.

Prior to installation of the final cover system, free liquids will be eliminated from the surface impoundment by removing liquid wastes. A plan for removal of free water has been submitted to and approved by the Mississippi Department of Environmental Quality (MDEQ). Removal of free water will initially be completed by gravity flow through the existing surface impoundment permitted discharge structure via the incremental removal of stoplogs, thereby lowering the free water surface to the elevation of the top of the existing concrete weir that is servicing the impoundment. Removal of free water below the top of the weir will be accomplished by mechanical means. Pumps will be installed in the clear pool area of the surface impoundment, utilizing a series of filtering rock berms and pads to control water quality. The water will be monitored during removal of liquid for compliance with the facility's NPDES permit prior to discharging.

Remaining surficial and near-surface wastes will be stabilized to support construction of and performance of the final cover system. Stabilization will be accomplished by the removal of water from the near surface materials through gravity flow, the use of geosynthetic reinforcement, and/or the use of earthen materials to establish a stabilized subgrade for the support of construction equipment and final cover materials.

A final cover system will be installed that is designed to minimize infiltration and erosion. The cover system will meet or exceed the requirements of §257.100(b)(3)(i) of 40 CFR Part 257, or the requirements of an alternative final cover system meeting the requirements of §257.100(b)(3)(ii). The permeability of the final cover system will be less than or equal to the permeability of the natural subsoils present beneath the surface impoundment, or a permeability

no greater than 1×10^{-5} cm/sec. The disruption of the integrity of the final cover system will be minimized through a design that accommodates settling and subsidence. The cover system will provide protection from wind or water erosion.

Tentative schedule for closure is as follows:

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| • Design | Ongoing |
| • Award of Closure Construction Contract | Q1 2016 |
| • Removal of Free Liquids | Q1-Q2 2016 |
| • Contractor Mobilization | Q2 2016 |
| • Stabilization of Surficial CCR & Grading | Q2 2016 to Q3 2017 |
| • Construction of Final Cover | Q2 2017 to Q1 2018 |
| • Certification of Closure | Q1 2018 |

By signature below, certification is made that

- The final cover system will meet the requirements of §257.100(b)(3)(i) or §257.100(b)(3)(ii) of 40 CFR Part 257, and
- It is technically feasible to complete closure of the surface impoundment under the requirements of §257.100 by April 17, 2018.

 12/7/15
James C. Pegues, P.E., D.GE
Mississippi Licensed Professional Engineer No. 18942

