

**INITIAL CLOSURE PLAN FOR PLANT GASTON ASH POND  
40 CFR 257.102(b)**

**FACILITY INFORMATION**

**Site Name / Address**

Plant Gaston  
31972 Highway 25  
Wilsonville, AL 35186

**Owner Name / Address**

Alabama Power Company  
600 18<sup>th</sup> Street North  
Birmingham, AL 35203

**CCR Unit**

Plant Gaston Ash Pond

**Closure Method**

Close In-Place

**CLOSURE NARRATIVE**

**§ 257.102(b)(1)(i)**

The Plant Gaston Ash Pond will be closed by leaving CCR in place. The pond will be dewatered sufficiently to remove the free liquids and to an extent to provide a stable base for the construction of the final cover system. In accordance with § 257.102(b)(3), the written closure plan will be amended if there is a change in operation that would substantially affect the written closure plan in effect and/or if there are unanticipated events that necessitate a revision of the closure plan.

**FINAL COVER SYSTEM**

**§ 257.102(b)(1)(iii)**

In accordance with the requirements of § 257.102(d), the final cover will be constructed to control, minimize or eliminate, to the maximum extent feasible, post closure infiltration of liquids into the waste and potential releases of CCR from the unit. This will be accomplished providing sufficient grades and slopes to 1) preclude the probability of future impoundment of water, slurry, or sediment; 2) ensure slope and cover system stability; 3) minimize the need for further maintenance; and, 4) be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices.

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Description of Final Cover System

The final cover system will be designed to minimize infiltration and erosion. The cover system to be used is currently being evaluated and final design is not yet complete. The final cover system, at a minimum, will be designed to meet or exceed the requirements of **40 C.F.R. §257.102(d)(3)(i) or (ii)** (traditional and alternative cover system) in that 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, but no greater than  $1 \times 10^{-5}$  cm/sec. The final cover, at a minimum, will consist of an 18-in infiltration layer overlain by 6-in of soil capable of sustaining vegetative growth, or instead may consist of an alternate cover system utilizing low permeability geosynthetic materials. Final design will ensure the disruption of the integrity of the final cover system is minimized through a design that accommodates settlement and subsidence, in addition to providing an erosion layer for protection from wind or water erosion.

**§ 257.102(b)(1)(iv) – Estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit**

Plant Gaston Ash Pond currently contains approximately 23,600,000 cubic yards of material. Estimated maximum inventory of ash is approximately 29,000,000 cubic yards. Future use of the unit will not substantially affect the written closure plan in effect.

**§ 257.102(b)(1)(v) – Estimate of the largest area of the CCR unit ever requiring a final cover**

The Plant Gaston Ash Pond is approximately 269 acres in area, and will be covered. The final cover will be applied to the entire final closure footprint of the CCR unit.

**§ 257.102(b)(1)(vi) – Closure Schedule**

The milestones and the associated timeframes are initial estimates. Some of the activities associated with the milestones will overlap. Milestones reflect approximate time to implement closure instead of dates since there is no specific date to initiate closure. However, it is anticipated that closure will begin in 2019. An extension of the time required to complete closure will be needed given the size of the ash pond and the time required to dewater and stabilize the ash and then complete final cover installation.

**Milestones**

Regulatory interface – 6 months

Dewatering – 1 year

Excavation / Grading & stabilization – 3 years

Installation of final cover – 2 years

Estimate of Year in which all closure activities will be completed - 2025

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Certification Statement 40 CFR § 257.102(b)(4)

Initial Written Closure Plan for a CCR Surface Impoundment or Landfill

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**CCR Unit**

Plant Gaston Ash Pond

I hereby certify that the written closure plan was prepared in accordance with the requirements of 40 CFR § 257.102, and that the final cover system will meet the requirements of §257.102(d)(3).

  
James C. Pegues, P.E.  
Licensed State of Alabama, PE No. 16516

