

**Notice of Closure Completion
Plant Gadsden Ash Pond
Alabama Power Company**

As required by 40 CFR §257.102(h) and ADEM Admin. Code r. 335-13-15-.07(3)(h), within 30 days of completion of closure of the CCR unit, the owner or operator must prepare a notification of closure of a CCR unit. The notification must contain a certification by a qualified professional engineer verifying that closure has been completed in accordance with the closure plan and other requirements of the rules.

Based on review of earthwork and cover system installation records, the Contractor's quality control records, documentation, construction inspections and observations and review of the Brantley Engineering Construction Certification Report, I hereby certify that pursuant to 40 C.F.R. § 257.102(f)(3) and ADEM Admin. Code r. 335-13-15-.07(3)(f)3. that the closure of the Alabama Power Company Plant Gadsden Ash Pond was constructed in accordance with the project design drawings, technical specifications, and the written closure plan, in addition to the requirements of 40 C.F.R. Part 257.102(d), and ADEM Admin. Code r. 335-13-15-.07(3)(d).

James C. Pegues, P.E., D. G. E.
Alabama License No. 16516





Southern Company Services

3535 Colonnade Parkway
BIN S-530-EC
Birmingham, Alabama 35243

April 6, 2020

Mr. Mike Godfrey
General Manager, Environmental Affairs
Alabama Power Company
600 18th Street N
Birmingham, AL 35203-2206

Dear Mr. Godfrey:

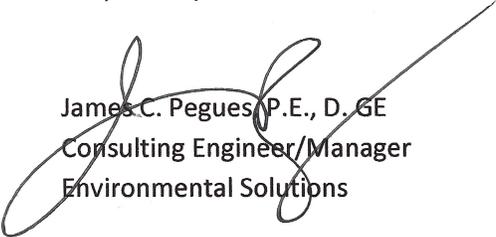
The Environmental Solutions Department of SCS Technical & Project Solutions (T&PS) is pleased to submit to you this Construction Certification Report for the Plant Gadsden Ash Pond Closure project. The construction activities associated with the project were substantially completed in August 2018. However, in that final grades of the closed facility required variances to conform State CCR obligations to the Federal CCR Rule, final certification was held pending receipt of approval from the Alabama Department of Environmental Management (ADEM) for the requested variances. ADEM issued formal, written approval in a letter from Mr. Scott Story, Chief of the Solid Waste Branch, on February 25, 2020. A copy of the referenced letter is attached.

Design of the closure was performed by SCS T&PS (formerly known as E&CS). Brantley Engineering, LLC provided 4th Party Quality Assurance services for SCS during construction. Brantley prepared a formal certification report shortly after the completion of construction activities. A copy of their report is attached for reference.

In addition to certifications provided by Brantley Engineering, a certification statement from SCS can be found on Page 2 of this letter.

If you have any questions or need additional information, please do not hesitate to contact us.

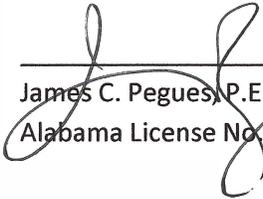
Respectfully submitted,



James C. Pegues, P.E., D. GE
Consulting Engineer/Manager
Environmental Solutions

CERTIFICATION

Based on review of earthwork and cover system installation records, the Contractor's quality control records, documentation, construction inspections and observations and review of the Brantley Engineering Construction Certification Report, I hereby certify that pursuant to 40 C.F.R. § 257.102(f)(3) and ADEM Admin. Code r. 335-13-15-.07(3)(f)3. that the closure of the Alabama Power Company Plant Gadsden Ash Pond was constructed in accordance with the project design drawings, technical specifications, and the written closure plan, in addition to the requirements of 40 C.F.R. Part 257.102(d), and ADEM Admin. Code r. 335-13-15-.07(3)(d).


James C. Pegues, P.E., D.G.
Alabama License No. 16516



Attachments

- ADEM Variance Approval Letter, February 25, 2020
- Brantley Engineering, LLC Construction Certification Report



Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

February 25, 2020

Mr. Mike Godfrey
General Manager, Environmental Affairs
Alabama Power Company
P.O. Box 2641
Birmingham, AL 35291

Re: Request for Variances to Conform State CCR Obligations to the Federal Rule
Gadsden Electric Generating Plant

Dear Mr. Godfrey:

On February 7, 2020, Alabama Power Company submitted a letter to the Department, petitioning for two variances in accordance with ADEM Admin. Code r. 335-13-15-.15 for the Gadsden Electric Generating Plant. The variances being requested are from ADEM Admin. Code r. 335-13-15-.07(3)(d)3.(i)(III) & (IV), requiring that the final grade of the cover system be a minimum of 5 percent and maximum of 25 percent.

Alabama Power Company has presented adequate proof that granting the variances from these provisions will not threaten the public health or unreasonably create environmental pollution. Therefore, the Department grants the variances to allow the minimum and maximum final grade of the final cover system to be less than 5 percent and greater than 25 percent.

If you have any questions on this matter, please contact Mr. Devin M. Jenkins of the Solid Waste Branch at (334) 270-5605.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Scott Story".

S. Scott Story, Chief
Solid Waste Branch

SSS/jdk/dmj

Cc: James Douglas (via E-mail)



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BRANTLEY
ENGINEERING, LLC



October 4, 2018

Mr. Jim Pegues, PE
Southern Company Services
Engineering and Construction Services
42 Inverness Center Pkwy.
Birmingham, Alabama 35242

**Subject: Plant Gadsden Ash Pond
Closure Construction
Certification Report
Gadsden, Etowah County, Alabama**

Dear Mr. Pegues:

Brantley Engineering, LLC is writing to provide Construction Certification for the Plant Gadsden Ash Pond Closure Construction for the Alabama Power Plant Gadsden facility located in Gadsden, Etowah County, Alabama.

Based on a review of the Contractor's quality control records, documentation, construction inspections and observations, and review of the drawings referenced herein, I hereby certify that the Plant Gadsden Ash Pond Closure was constructed in accordance with the project Technical Specifications and Design Drawings and Section 257.100 of 40 CFR Part 257 Subpart D. Due to the vacatur of Section 257.100 by EPA, closure was performed in accordance with the requirements of Section 257.102. During "Closure by Removal" construction of Area C Pond, SCS personnel witnessed the ash material removal.

This closure certification report summarizes the 3rd Party Construction Quality Control (CQC) field documentation for this project. While Brantley Engineering, LLC oversaw this project from a 4th Party standpoint, the 3rd Party Construction Quality Control (CQC) testing and field documentation was provided by the Contractor, Saiia, and their Subcontractor, ATC Group Services, LLC (ATC).

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BRANTLEY ENGINEERING, LLC

13933 Tree Loft Road
Milton, Georgia 30004
Phone: 678-427-2533
Fax: 415-598-2533
abrantley@brantleyeng.com

If you have any questions or need additional information regarding this certification, please contact me at (678)-427-2533.

Sincerely,
Brantley Engineering, LLC



Salman Nejad, Alabama PE#29503
Vice President

Cc: Wesley Wright – SCS
Stacey Simpson – SCS
Allan Brantley – Brantley



1 CONSTRUCTION CERTIFICATION

Based on a review of the Contractor's quality control records, documentation, construction inspections and observations by myself and the on-site quality assurance inspector under my supervision, and review of the drawings referenced herein, I hereby certify that the Plant Gadsden Ash Pond Closure was constructed in accordance with the project Technical Specifications and Design Drawings and Section 257.100 of 40 CFR Part 257 Subpart D. Due to the vacatur of Section 257.100 by EPA, closure was performed in accordance with the requirements of Section 257.102. During "Closure by Removal" construction of Area C, SCS personnel witnessed the ash material removal. The associated construction activities were documented with photographs and surveys to ensure conformance with the project requirements.



Salman (Sam) Nejad, Alabama P.E. #29503
Certifying Engineer-of-Record