

**INITIAL HAZARD POTENTIAL ASSESSMENT**  
**40 C.F.R. PART 257.73**  
**PLANT GADSDEN ASH POND**  
**ALABAMA POWER COMPANY**

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities Final Rule (40 C.F.R. Part 257 and Part 261) subsection §257.73(a)(2) requires the owner or operator of an existing CCR surface impoundment to conduct periodic hazard potential classification assessments. The owner or operator must document the hazard potential of each surface impoundment as a high hazard potential CCR unit, a significant hazard potential CCR unit or a low hazard potential CCR unit.

The Plant Gadsden Ash Pond has undergone physical closure activities and is in the process of completing the regulatory requirements of §257.102(d). It no longer impounds free water nor receives CCR. As such, the Gadsden Ash Pond no longer meets the definition of a CCR Surface Impoundment.

I hereby certify that the documentation above is accurate based on current available information.

James C. Pegues, P.E.  
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