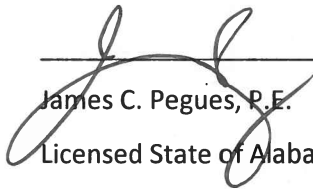


**INITIAL STRUCTURAL STABILITY ASSESSMENT  
40 C.F.R. PART 257.73  
PLANT GADSDEN ASH POND  
ALABAMA POWER COMPANY**

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities Final Rule (40 C.F.R. Part 257 and Part 261) section §257.73(d) requires the owner or operator of an existing CCR surface impoundment to conduct periodic structural stability assessments. The owner or operator must document whether the design, construction, operation and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded therein.

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.  
Licensed State of Alabama, PE No. 16516

