PERIODIC HAZARD POTENTIAL ASSESSMENT PLANT GASTON ASH POND ALABAMA POWER COMPANY

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257, Subpart D) and the State of Alabama's ADEM Admin. Code Chapter 335-13-15 require the owner or operator of an existing CCR surface impoundment to conduct periodic hazard potential classification assessments. Per §257.73(a)(2) and ADEM Admin. Code r. 335-13-15-.04(4)(a)2., 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. In addition, §257.73(f)(3) and ADEM Admin. Code r. 335-13-15-.04(4)(f)3. require a subsequent assessment be performed within 5 years of the previous assessment.

The CCR surface impoundment located at Alabama Power Company's Plant Gaston, also referred to as the Plant Gaston Ash Pond, is located just east of Wilsonville, Alabama. The CCR surface impoundment is formed by an engineered perimeter dike. The CCR unit is bounded on the north by plant property and a railroad line, with a residential neighborhood beyond; on the east by plant property; on the south by undeveloped land and the Coosa River; and on the west by a residential neighborhood. In the unlikely event of an embankment failure, water and CCR could potentially impact the residential neighborhood to the west, and the Coosa River to the south.

Based on the potential impacts in the unlikely event of an embankment failure, a hazard potential classification of High Hazard Potential was initially assigned to the Gaston Ash Pond, in that failure or mis-operation of the CCR unit could potentially result in a loss of human life. A review of current conditions in and around the Plant Gaston Ash Pond indicates that a High Hazard Potential classification is still appropriate.

I hereby certify that the hazard potential classification was conducted in accordance with 40 C.F.R. §257.73 (a)(2) and ADEM Admin. Code r. 335-13-15-.04(4)(a)2.

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