PERIODIC HAZARD POTENTIAL ASSESSMENT PLANT GREENE COUNTY 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 Greene County, also referred to as the Plant Greene County Ash Pond, is located near Forkland, Alabama. The CCR surface impoundment is formed by an engineered perimeter dike, with the formal dike structure located on all sides. The CCR unit is bounded on the north by plant facilities; on the east by a canal servicing the plant, with undeveloped land beyond; on the south by the Black Warrior River; and on the west by undeveloped agricultural land. In the unlikely event of an embankment failure, water and CCR could potentially impact the undeveloped property to the west and the Black Warrior River to the south.

Based on the potential impacts in the unlikely event of an embankment failure, a hazard potential classification of Significant Hazard Potential was initially assigned to the Plant Greene County Ash Pond, in that failure or mis-operation of the CCR unit would result in no probable loss of human life but could potentially result in economic loss and/or environmental damage. A review of current conditions in and around the Plant Greene County Ash Pond indicates that a Significant 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.

A BA ALITHIUM MALTING James C. Pegues, PE. Licensed State of AL PE No.94. 5/2021