

**CLOSURE PLAN FOR EXISTING CCR SURFACE IMPOUNDMENT
PLANT GADSDEN ASH POND
40 CFR 257.102(b)**

SITE INFORMATION

Site Name / Address

Gadsden Steam Plant
1000 Goodyear Avenue
Gadsden, AL 35903

Owner Name / Address

Alabama Power Company
1313 6th Ave N
Birmingham, AL 35203

CCR Unit

Ash Pond

Closure Method

Close In-Place

CLOSURE PLAN DESCRIPTION

§ 257.102(b)(1)(i) – Narrative description of how the CCR unit will be closed.

Plant Gadsden Ash Pond has been closed by leaving some CCR in place, while removing some CCR from certain areas and consolidating the ash to reduce the size of the closure footprint. CCR removed from the southwestern portion of the impoundment was used to construct grades to provide drainage on top of the consolidated footprint. The procedure in the closure by removal area included removing all visible ash and over excavating into the subgrade soils. A permanent cover system was placed over the consolidated area, and a stormwater management pond is located in the closure by removal area.

§ 257.102(b)(1)(iii) –Closure of the CCR unit by leaving CCR in place

Methods and Procedures

The pond was dewatered sufficiently to remove the free liquids, to provide a stable base for the construction of an ash containment structure for the consolidated footprint, to excavate ash outside the consolidated footprint, and to construct the final cover system. In accordance with § 257.102(d), the final cover has been constructed to control, minimize or eliminate, to the maximum extent feasible, post-closure infiltration of liquids into the stacked CCR and potential releases of CCR from the unit. Construction of the final cover provides sufficient grades and slopes to 1) preclude the probability of future impoundment of water, slurry, or sediment; 2) ensure slope and cover system stability; and 3) minimize the need for further maintenance. Construction of the final cover system has been completed in the shortest amount of time possible while being consistent with recognized and generally accepted good engineering practices.

**CLOSURE PLAN FOR EXISTING CCR SURFACE IMPOUNDMENT
PLANT GADSDEN ASH POND
40 CFR 257.102(b)**

Description of Final Cover System

The final cover system was designed to minimize infiltration and erosion and to meet or exceed the requirements of **40 C.F.R. §257.102(d)(3)(ii)** in that the permeability of the final cover system is less than or equal to the permeability of the natural subsoils present beneath the surface impoundment, and not greater than 1×10^{-5} cm/sec. The final cover consists of an engineered, relatively impermeable cover system utilizing geosynthetic materials. Disruption of the integrity of the final cover system is minimized through a design that accommodates settlement and subsidence, in addition to providing synthetic turf for protection from wind and water erosion.

§ 257.102(b)(1)(iv) – Estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit

The closed footprint of the closed Gadsden Ash Pond contains approximately 1.2 million cubic yards of CCR.

§ 257.102(b)(1)(v) – Estimate of the largest area of the CCR unit ever requiring a final cover

The final cover was constructed over the consolidated footprint of the CCR unit which has an area of about 55 acres.

§ 257.102(b)(1)(vi) – Closure Schedule

CCR grading and consolidation began in June 2016, and was completed in November 2017. The primary geosynthetic component of the engineered final cover was completed in January 2018.

**CLOSURE PLAN FOR EXISTING CCR SURFACE IMPOUNDMENT
PLANT GADSDEN ASH POND
40 CFR 257.102(b)**

Certification Statement 40 CFR § 257.102(b)(4)

Initial Written Closure Plan for a CCR Surface Impoundment or Landfill

Site Name / Address

Gadsden Steam Plant
1000 Goodyear Avenue
Gadsden, AL 35903

Owner Name / Address

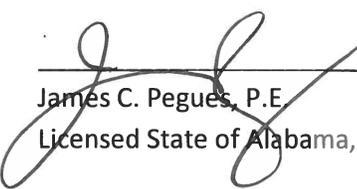
Alabama Power Company
600 North 18th Street
Birmingham, AL 35203

CCR Unit

Ash Pond

The Plant Gadsden Ash Pond has undergone closure in accordance with §257.102(d), and no longer impounds free water nor receives CCR.

I hereby certify that the written closure plan was prepared in accordance with the requirements of 40 CFR § 257.102, and that the final cover system meets the requirements of §257.102(d)(3).


James C. Pegues, P.E.
Licensed State of Alabama, PE No. 16516

