

**INITIAL POST-CLOSURE CARE PLAN**  
**40 C.F.R. PART 257.104**  
**PLANT GADSDEN ASH POND**  
**ALABAMA POWER COMPANY**

Section 257.104 of EPA's regulations for the disposal of coal combustion residuals requires the owner or operator of an existing CCR surface impoundment that is closed in place to provide for post-closure care of the unit for a period of at least 30 years. Post-closure care includes maintenance of the facility, as well as groundwater monitoring in accordance with §§ 257.90 through 257.98.

The CCR surface impoundment located at Alabama Power Company's Gadsden Steam Plant, which is also referred to as the Plant Gadsden Ash Pond, has undergone physical closure activities under the provisions of §257.102, resulting in a consolidated and covered area as well as a stormwater management pond within the original pond footprint. Maintenance will be provided on the final cover system for the required post-closure care period so that the integrity and effectiveness of the final cover system will be maintained. Maintenance activities will include, as needed, repairs to the final cover to correct any effects related to settlement, subsidence, erosion or other events, and will be performed to prevent run-on or run-off from eroding or otherwise damaging the final cover. Maintenance tasks could include, but not be limited to, repair of erosion features and/or replacement of cover turf and sand infill where applicable. Maintenance will be performed on a semi-annual schedule, or more frequently if needed.

The groundwater monitoring system required by §257.91 will be maintained throughout the required post-closure care period. Groundwater monitoring, as needed according to the requirements of §§ 257.90 through 257.98, will be performed on a semiannual basis during the required post-closure care period as well.

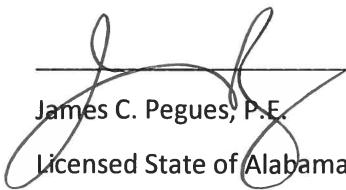
The following office(s) can be contacted about the facility during the post-closure care period.

Plant Gadsden  
Compliance and Support Manager  
1000 Goodyear Avenue., Gadsden, AL 35903 1-256-543-5194  
G2CCRPostGAD@southernco.com

At the present time, there is no planned use of the facility after closure. If current plans change, they will be noted in an amendment to this post-closure care plan required by §257.104(d)(3). Any future use of the property after closure will comply with all applicable requirements of Part 257, Subpart D.

No later than 60 days following completion of the post-closure care period of 30 years, Alabama Power Company will prepare a notification verifying completion of the post-closure care as described in §257.104(e).

I hereby certify that this post-closure care plan has been prepared in accordance with the requirements of 40 C.F.R. Part 257.104.

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

  
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