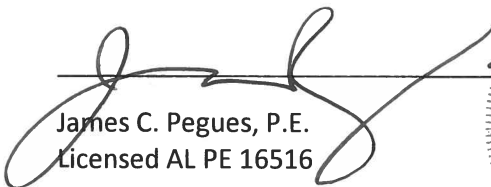


**LINER DESIGN CRITERIA
40 C.F.R. PART 257.71
PLANT GADSDEN ASH POND
ALABAMA POWER COMPANY**

Section § 257.71(a)(1) of EPA's regulations requires a demonstration as to whether or not an existing CCR surface impoundment was constructed with (i) a minimum of 2 feet of compacted soil having a hydraulic conductivity of no more than 1×10^{-7} cm/sec, (ii) a composite liner meeting the requirements of § 257.70(b), or (iii) an alternate liner meeting the requirements of §257.70(c). The CCR surface impoundment known as the Plant Gadsden Ash Pond was not constructed with a liner that meets any of these criteria.

It should be noted that 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 attest that the documentation above is accurate based on current available information.


James C. Pegues, P.E.
Licensed AL PE 16516

