



**Mike Godfrey**  
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 Environmental Affairs

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October 30, 2020

VIA U.S. MAIL

Mrs. Peggy Salter  
 615 Hummingbird Lane  
 Quinton, AL 35130

Re: Alabama Power Plant Gorgas Ash Pond Closure and Groundwater Investigations

Dear Mrs. Salter,

Alabama Power Company (APC) is in the process of closing all our ash ponds in Alabama, including the ash pond located at Plant Gorgas.<sup>1</sup> As part of the closure and groundwater monitoring process, APC has installed approximately 300 groundwater monitoring wells statewide, including more than 50 at Plant Gorgas.

APC is in the process of characterizing the groundwater at Plant Gorgas pursuant to state and federal regulations.<sup>2</sup> As part of that process, with your permission, we installed one groundwater monitoring well (GS-AP-MW-44HO) on your property. APC has completed installation, sampling, and laboratory analysis of the well and the results indicate that the concentration of lithium is above the current groundwater protection standard (GWPS), which is set by state and federal regulations at 0.04 milligrams per liter (mg/L).<sup>3</sup> The GWPSs at Plant Gorgas are set by state and federal regulations.<sup>4</sup> Enclosed is a copy of all the data collected from the monitoring well to date.

The table below shows the concentrations observed at the monitoring wells located on your property.

Well	Sample Date	Analyte	Result	Current GWPS	Proposed GWPS
GS-AP-MW-44HO	08-27-2020	Lithium (mg/L)	0.0411	0.04	0.0809

<sup>1</sup> <https://www.alabamapower.com/our-company/how-we-operate/ccr-rule-compliance-data-and-information.html>

<sup>2</sup> ADEM Admin. Code r. 335-13-15-.06(6)(g)2. and 40 C.F.R. § 257.95(g)(1).

<sup>3</sup> 40 C.F.R. § 257.96(h)(2). APC received approval from the Alabama Department of Environmental Management in April 2019 to use the federal CCR Rule GWPS for lithium for purpose of complying with the State CCR rule.

<sup>4</sup> 40 C.F.R. § 257.95(h)(2). APC received approval from the Alabama Department of Environmental Management in April 2019 to use the federal CCR Rule GWPS for cobalt and lithium for purpose of complying with the State CCR rule.

State and federal regulations provide an opportunity to investigate whether a regulated constituent that is detected above the GWPS is naturally occurring.<sup>5</sup> If investigations reveal that a constituent occurs naturally at concentrations that exceed the GWPS, the regulations allow for a site-specific GWPS that takes into account naturally occurring (or background) conditions at a particular location.

APC has multiple background monitoring wells located in the same geologic formation as the well installed on your property. Background wells are sited in areas that are not influenced by the ash pond, which allows us to determine what levels are naturally occurring. The data APC has received from the background monitoring wells provide substantial evidence that lithium naturally occurs at concentrations that exceed the federally established GWPS for lithium. APC has proposed a site-specific GWPS for lithium of 0.0809mg/L and expect to receive approval from the Alabama Department of Environmental Management (ADEM). We will keep you updated on this process as events warrant.

APC is in the process of safely and permanently closing the ash pond at Plant Gorgas. We will be removing and treating all water, excavating and reducing the footprint, and installing an impermeable barrier over the material. Studies conducted by a third-party expert have shown no risk to any source of drinking water in the area.

Please know that we are committed to ensuring that our operations and ash pond closure is done safely and meet all regulations. We value your input and would be happy to have any additional discussions to address any questions or concerns you may have. Please feel free to contact James Douglas at (205) 257-6782 or [jdouglas@southernco.com](mailto:jdouglas@southernco.com).

Sincerely,

A handwritten signature in black ink that reads "Mike Godfrey". The signature is written in a cursive, flowing style.

Mike Godfrey  
General Manager  
Environmental Affairs

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<sup>5</sup> ADEM Admin. Code r. 335-13-15-.06(6)(h)3. and 40 C.F.R. § 257.95(h)(3).