



Mike Godfrey
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 Environmental Affairs

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August 12, 2020

VIA U.S. MAIL

Mrs. Willia D. Sewell
 C/O Mr. J.W. Sewell
 P.O. Box 9943
 Mobile, AL 36691

Re: Alabama Power Plant Greene County Ash Pond Closure and Groundwater Investigations

Dear Mrs. Sewell,

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

APC is in the process of characterizing the groundwater at Plant Greene County pursuant to state and federal regulations.² As part of that process, with your permission, we installed four groundwater monitoring wells on your property. APC has completed installation, sampling, and laboratory analysis of the four wells and the results indicate that the concentration of cobalt is above the groundwater protection standard (GWPS) in one well and the concentration of lithium is above the GWPS in two wells as shown in the table below. The GWPSs for cobalt and lithium at Plant Greene County are set by state and federal regulations at 0.0167 milligrams per liter (mg/L) and 0.04 mg/L, respectively.³

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

Well	Sample Date	Analyte	Result	GWPS
GC-AP-MW-47HO	5/28/2020	Lithium (mg/L)	0.628	0.04
GC-AP-MW-50HO	5/28/2020	Lithium (mg/L)	0.148	0.04
GC-AP-MW-59HO	5/28/2020	Cobalt (mg/L)	0.119	0.0167

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

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

³ 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.

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State and federal regulations provide an opportunity to investigate whether a regulated constituent that is detected above the GWPS is naturally occurring.⁴ 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 is conducting such an investigation and, depending on what the science shows, the site-specific GWPSs for these constituents may be updated to reflect background conditions. This determination will be made in consultation with our geology experts and with the approval of the Alabama Department of Environmental Management. 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 Greene County. We will be removing and treating all water, excavating and reducing the footprint, installing a barrier wall around the consolidated ash, 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 me at (205) 257-6131 or jgodfrey@southernco.com.

Sincerely,

A handwritten signature in cursive script that reads "Mike Godfrey".

Mike Godfrey
General Manager
Environmental Affairs

⁴ ADEM Admin. Code r. 335-13-15-.06(6)(h)3. and 40 C.F.R. § 257.95(h)(3).