

**NOTIFICATION OF INTENT TO INITIATE CLOSURE  
PLANT MILLER ASH POND  
ALABAMA POWER COMPANY  
JEFFERSON COUNTY, ALABAMA**

Alabama Power Company (APC) intends to close the CCR surface impoundment known as the Plant Miller Ash Pond located in west Jefferson County, approximately 20 miles northwest of Birmingham, Alabama. The surface impoundment is closing under the requirements of 40 C.F.R. 257.101(a)(1) and the State of Alabama's ADEM Admin. Code Chapter 335-13-15-.07(2)(a)1. Closure of the surface impoundment will be conducted under §257.102(d) and ADEM Admin. Code r. 335-13-15-.07(3)(d), *closure performance standard when leaving CCR in place*. The surface impoundment will be closed in a manner that will control, minimize or eliminate, to the maximum extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate, or contaminated runoff to the ground or surface waters or to the atmosphere. Closure will also preclude the probability of future impoundment of water, sediment or slurry. Measures will be taken during design and construction of the closure system that provide for major slope stability to prevent the sloughing or movement of the final cover system. Closure will also minimize the need for further maintenance of the CCR unit.

Prior to installation of the final cover system, free liquids will be eliminated from the surface impoundment by removing liquid wastes. Free liquids within the surface impoundment will be routed through an on-site water treatment system before being directed to the facility's National Pollution Discharge Elimination System (NPDES) permitted outfall. The outfall is monitored in compliance with the facility's NPDES permit.

Ash will be consolidated to form a reduced closure in place footprint. CCR will be hydraulically dredged and/or mechanically excavated and placed on the consolidated footprint. CCR within the closure in place footprint will be stabilized, as needed, to support construction of and performance of the final cover system. The area will be graded to facilitate positive site drainage. A final cover system will be installed that is designed to minimize infiltration and erosion. The cover system will meet or exceed the requirements of §257.102(d)(3)(ii) as well as ADEM Admin. Code r. 335-13-15-.07(3)(d)3.(ii) and will include a geomembrane component such that the permeability of the final cover system will be less than or equal to the permeability of the natural subsoils present beneath the surface impoundment. The integrity of the final cover system will be supported by a design that minimizes settling and subsidence, in addition to providing protection from wind or water erosion.

By signature below, certification is made that the final cover system will meet the requirements of §257.102(d)(3)(ii) of 40 CFR Part 257 as well as ADEM Admin. Code r. 335-13-15-.07(3)(d)3.(ii).

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