

PERIODIC HAZARD POTENTIAL ASSESSMENT
PLANT MILLER ASH POND
ALABAMA POWER COMPANY

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257, Subpart D) and the State of Alabama's ADEM Admin. Code Chapter 335-13-15 require the owner or operator of an existing CCR surface impoundment to conduct periodic hazard potential classification assessments. Per §257.73(a)(2) and ADEM Admin. Code r. 335-13-15-.04(4)(a)2., the owner or operator must document the hazard potential of each surface impoundment as a high hazard potential CCR unit, a significant hazard potential CCR unit or a low hazard potential CCR unit. In addition, §257.73(f)(3) and ADEM Admin. Code r. 335-13-15-.04(4)(f)3. require a subsequent assessment be performed within 5 years of the previous assessment.

The CCR surface impoundment located at Alabama Power Company's Plant Miller, also referred to as the Plant Miller Ash Pond, is located near West Jefferson, Alabama. The CCR surface impoundment is formed by an engineered cross-valley embankment located on the west-southwest side of the impoundment. There is also an engineered embankment (saddle dike) located on the north side of the impoundment. The remainder of the area is impounded by natural soils. The CCR unit is bounded on most sides by undeveloped property. To the north, County Road 45 is present beyond an area of undeveloped property. The Locust Fork of the Black Warrior River is located to the south-southwest of the impoundment. In the unlikely event of an embankment failure, water and CCR could potentially impact the Black Warrior River to the south.

Based on the potential impacts in the unlikely event of an embankment failure, a hazard potential classification of Significant Hazard Potential was initially assigned to the Plant Miller Ash Pond, in that failure or mis-operation of the CCR unit would result in no probable loss of human life but could potentially result in economic loss and/or environmental damage. A review of current conditions in and around the Plant Miller Ash Pond indicates that a Significant Hazard Potential classification is still appropriate.

I hereby certify that the hazard potential classification was conducted in accordance with 40 C.F.R.
§257.73 (a)(2) and ADEM Admin. Code r. 335-13-15-.04(4)(a)2.

