CCR SURFACE IMPOUNDMENT EMERGENCY ACTION PLAN

Plant Gorgas Gypsum Pond

I hereby certify that this Emergency Action Plan has been prepared in accordance with the requirements of 40 C.F.R. Part 257.73.

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Licensed State of Alabama, P.E. No. 15516

ISSUE DATE: April 17, 2017
REVISION #: 0
In accordance with 40 C.F.R. Part 257.73, this Emergency Action Plan (EAP) must be amended whenever there is a change in conditions that would substantially affect the EAP in effect. Additionally, the EAP must be evaluated, at a minimum, every five years to ensure the information is accurate. As necessary, this EAP must be updated and a revised EAP placed in the facility’s operating record as required by 40 C.F.R. Part 257.105(f)(6).

<table>
<thead>
<tr>
<th>Revision Number</th>
<th>Date</th>
<th>Sections Affected/Reason</th>
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<td>0</td>
<td>04/17/2017</td>
<td>Creation of EAP</td>
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<th>Description</th>
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</thead>
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<tr>
<td>ADEM</td>
<td>Alabama Department of Environmental Management</td>
</tr>
<tr>
<td>AEMA</td>
<td>Alabama Emergency Management Agency</td>
</tr>
<tr>
<td>ALDOT</td>
<td>Alabama Department of Transportation</td>
</tr>
<tr>
<td>APC</td>
<td>Alabama Power Company</td>
</tr>
<tr>
<td>CCR</td>
<td>Coal Combustion Residuals</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>E&amp;CS</td>
<td>Engineering &amp; Construction Services</td>
</tr>
<tr>
<td>EAP</td>
<td>Emergency Action Plan</td>
</tr>
<tr>
<td>EMA</td>
<td>Emergency Management Agency</td>
</tr>
<tr>
<td>EPA</td>
<td>Environmental Protection Agency</td>
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<tr>
<td>FERC</td>
<td>Federal Energy Regulatory Commission</td>
</tr>
<tr>
<td>H:V</td>
<td>Horizontal:Vertical</td>
</tr>
<tr>
<td>HDPE</td>
<td>High-Density Polyethylene</td>
</tr>
<tr>
<td>ID</td>
<td>Inside Diameter</td>
</tr>
<tr>
<td>SCS</td>
<td>Southern Company Services</td>
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DEFINITIONS

Adverse Consequences. Negative impacts that may result from the failure of a dam. The primary concerns are loss of life, economic loss (including property damage), lifeline disruption and environmental impact.

Coal Combustion Residuals (CCR). Fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers.

CCR Surface Impoundment. A natural topographic depression, man-made excavation, or diked area which is designed to hold an accumulation of CCR and liquids, and the unit treats, stores, or disposes of CCR.

Dam/Dike/Embankment. An artificial barrier that has the ability to impound water, wastewater, or any liquid-borne material for the purpose of storage.

Dam Failure. Catastrophic type of failure characterized by the sudden, rapid and uncontrolled release of impounded water or the likelihood of such an uncontrolled release. It is recognized that there are lesser degrees of failure and that any malfunction or abnormality outside the design assumptions and parameters that adversely affect a dam’s primary function of impounding water is properly considered a failure. These lesser degrees of failure can progressively lead to or heighten the risk of catastrophic failure. They are, however, normally amenable to corrective action.

Imminent Failure (Condition A Emergency). Failure of a dam/dike/embankment is imminent or has occurred.

Potential Failure (Condition B Emergency). A potential failure condition of a dam/dike/embankment is a developing condition, but adequate time is available to properly evaluate the problem and implement corrective actions that may alleviate or prevent failure.

Non-Failure Condition. A condition that will not, by itself, lead to a failure, but that requires investigation and notification of internal and/or external personnel.

Emergency. A condition that develops unexpectedly, endangers the structural integrity of the dam, and requires immediate action. An emergency can lead to Adverse Consequences in the event of Imminent Failure.

Filter. One or more layers of granular material graded so as to allow seepage through or within the layers while preventing the migration of material from adjacent zones.

Inundation Map. A graphic representation of the inundation zone that shows the potential impact area due to a breach of the Gypsum Pond. The inundation maps in this procedure are based on a specific computer-modeled dam breach scenario; therefore, the boundaries depicted are estimates for that particular model. The models are considered conservative but larger floods could potentially occur. Please refer to Appendix B.
**Inundation Zone.** Area subject to flooding in the event of increased flows due to a dam/dike/embankment failure.

**Piping.** The progressive development of internal erosion of the dam/dike/embankment or foundation material by seepage.

**Probable Maximum Flood.** The flood that may be expected from the most severe combination of critical meteorologic and hydrologic conditions that are reasonably possible in the drainage basin.

**Sunny Day Failure.** A night or day failure that occurs during fair weather or when weather-related flooding is not occurring.
1.0 STATEMENT OF PURPOSE

This Emergency Action Plan (EAP) has been prepared for the Plant Gorgas Gypsum Pond to meet the requirements of 40 C.F.R. Part 257.73(a)(3). The EAP identifies potential safety emergency conditions at the Plant Gorgas Gypsum Pond and specifies actions to be followed to minimize potential loss of life and property damage if such conditions exist.

This EAP will provide responding personnel with:

- Pertinent information and description related to Plant Gorgas Gypsum Pond;
- Definition of events or circumstances that represent a safety emergency;
- Procedures that will be followed to detect a safety emergency;
- Notification procedures in the event of a safety emergency;
- Information to assist in decision making;
- A list of responsible persons and their respective responsibilities;
- Provisions for an annual face-to-face meeting with local emergency responders;
- Contact information for emergency agencies and emergency responders
- A map that delineates the downstream area that could be affected in the event of a failure.
2.0 FACILITY DESCRIPTION

Plant Gorgas is a coal-fired power plant located near Parrish, Alabama. This EAP covers emergency response procedures for the Plant Gorgas Gypsum Pond (the Gypsum Pond), which is designed to receive and store coal combustion residuals produced during the electric generating process at Plant Gorgas. An overview of Plant Gorgas and the surrounding area is shown in Appendix A – Figure 1.

The Gypsum Pond is approximately 18 acres in size at its normal pool elevation of 428 feet (Appendix A – Figure 2). It should be noted that a significant portion of this 18 acres is utilized for dry storage and contains no standing water. The Gypsum Pond has a cross valley embankment that ties into natural terrain/fill on the eastern and western sides of the pond. Approximately one half of the perimeter of the Gypsum Pond is an earthen embankment with a consistent blanket of riprap protecting the downstream slopes. The embankment is most prevalent along the southeast side of the Pond and this area was considered during the breach scenario. The top of the embankment is at an elevation of 440 feet or approximately 50 feet above the invert of the discharge pipe. The entirety of the Gypsum Pond is lined with an HDPE liner. The Gypsum Pond system also includes a sedimentation pond and two clear pools that are used to decant water back to Plant Gorgas. The discharge system of the Gypsum Pond is located in the southwest portion of the pond and consists of the following features:

1. A 48-inch HDPE riser pipe that connects to a 36-inch pipe that discharges into the sedimentation pond.

2. A 36-inch HDPE pipe that collects Stormwater runoff from the perimeter ditch that discharges into the same 36-inch pipe as mentioned above before discharging to the sedimentation pond.

3. All flows from the pond are collected in the sedimentation pond before being pumped back to the plant for reuse or to the Ash Pond at Plant Gorgas.

The Gypsum Pond is not included in the National Inventory of Dams and there is no Safe Dams Program in the State of Alabama. The Gypsum Pond and has been assigned a Significant Hazard Potential classification under 40 C.F.R. Part 257.73 of the Environmental Protection Agency’s (EPA’s) Coal Combustion Residuals (CCR) Rule. This classification, by definition, indicates that there is no probable loss of human life in the event of a dam/dike failure or misoperation of the facility. However, failure or misoperation can cause economic loss, damage to the environment, disruption of lifeline facilities, or impact other concerns. There are no structures that could be impacted by the failure of the Gypsum Pond dam/dike or mis-operation of the surface impoundment other than gravel roads on Plant Gorgas property. There are no other dams located downstream that could be impacted by the failure of the Gypsum Pond dam/dike. The Gypsum Pond is located just above the Mulberry Fork of the Black Warrior River. The limits of potential flooding in the event of failure of the Gypsum Pond dam/dike can be seen on the Inundation Maps, which are included as Appendix B. The provided inundation maps were developed based on the results of routing the breach wave downstream using the computer software, HEC-RAS. HEC-RAS is a general application one-dimensional hydraulic model that can perform unsteady flow routing through an open channel system that may also include culverts, bridges, levees, tributaries, storage areas, and other dams. Unsteady flow analyses allow for flow conditions that vary temporally and spatially such as a dam breach simulation. Breach parameters such as failure time, breach width, and breach side slopes were
selected from industry accepted empirical formulas. Water surface elevation data was extracted from the hydraulic model and plotted on best available LiDAR topographic information for the downstream areas.

Normal river/lake levels and the flow from simulated dam breaches were superimposed over topographical maps to identify areas subject to flooding. *These flood extents are provided for planning purposes only; actual flooding can vary due to actual conditions present at the time of the failure.*
3.0 DETECTION, EVALUATION, AND CLASSIFICATION PROCEDURES FOR EMERGENCIES

3.1 Inspection Schedule and Condition Detection/Evaluation

Trained personnel from Plant Gorgas inspect the Gypsum Pond dams/dike on a regular basis to pre-emptively detect conditions, in a timely manner, that could indicate a potential issue so that it can be addressed. Trained personnel from the Plant’s Compliance group perform weekly inspections; and SCS E&CS Fossil Dam Safety (Fossil Dam Safety) personnel perform semi-annual inspections.

Plant personnel conducting inspections of the dams/dikes are trained on an annual basis by engineers from Fossil Dam Safety on the appropriate surveillance and monitoring requirements.

Any issues discovered during an inspection are reported to Fossil Dam Safety as prescribed in the Safety Procedure for Dams and Dikes at Fossil Generation Plants (GEN10004). The Fossil Dam Safety Engineer(s) working with plant personnel will recommend a corrective course of action, as needed.

3.2 Condition Severity Classifications

Gypsum Pond dam/dike conditions will be classified based on the type of event, severity of the situation, and the time required to take corrective measures. This procedure covers the following severity classifications:

- **NON-FAILURE CONDITION (NFC)**
  A situation that will not, by itself, lead to a failure and is not considered an emergency. However, an NFC does require investigation and notification of Fossil Dam Safety personnel and may require corrective action in order to prevent conditions that may lead to an emergency.

- **POTENTIAL FAILURE – Condition B Emergency (B)**
  A developing situation where failure of a dam/dike may occur but implementation of pre-planned actions may alleviate or prevent failure. In general, adequate time is considered available to properly evaluate and implement corrective actions. *Should conditions worsen, an Imminent Failure emergency may be declared.*

- **IMMINENT FAILURE – Condition A Emergency (A)**
  A situation where failure of the dam/dike is imminent or has already occurred.
3.3 Guidance for Determining the Condition Severity Level

The following table details potential situations that could occur at the Gypsum Pond dam/dike. *The Condition Level indicated in the right-most column corresponds with the Condition Severity Classifications in Section 3.2 above.*

<table>
<thead>
<tr>
<th>Event</th>
<th>Situation</th>
<th>Condition Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Discharge Structure</td>
<td>Spillway flow that could result in flooding of people downstream if the</td>
<td>B</td>
</tr>
<tr>
<td>Flow</td>
<td>reservoir level continues to rise</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Spillway flow that is flooding people downstream</td>
<td>A</td>
</tr>
<tr>
<td>Embankment Overtopping</td>
<td>Reservoir level is 1 foot below the top of the dam/dike</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td>Water from the reservoir is flowing over the top of the dam/dike</td>
<td>A</td>
</tr>
<tr>
<td>Seepage</td>
<td>New seepage areas in or near the dam/dike</td>
<td>NFC</td>
</tr>
<tr>
<td></td>
<td>New seepage areas with cloudy discharge or increasing flow rate</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td>Seepage with discharge greater than 10 gallons per minute</td>
<td></td>
</tr>
<tr>
<td>Dropouts</td>
<td>Observation of new sinkhole in reservoir area or on embankment</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td>Rapidly enlarging sinkhole</td>
<td>A</td>
</tr>
<tr>
<td>Embankment Cracking</td>
<td>New cracks in the embankment greater than ¼-inch wide without seepage</td>
<td>NFC</td>
</tr>
<tr>
<td></td>
<td>Cracks in the embankment with seepage</td>
<td>B</td>
</tr>
<tr>
<td>Embankment Movement</td>
<td>Visual movement/slippage of the embankment slope</td>
<td>NFC</td>
</tr>
<tr>
<td></td>
<td>Sudden or rapidly proceeding slides of the embankment slopes</td>
<td>A</td>
</tr>
<tr>
<td>Earthquake</td>
<td>Measurable earthquake felt or reported on or within 50 miles of the</td>
<td>NFC</td>
</tr>
<tr>
<td></td>
<td>dam/dike</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Earthquake resulting in visible damage to the dam/dike or appurtenances</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td>Earthquake resulting in uncontrolled release of water from the dam/dike</td>
<td>A</td>
</tr>
<tr>
<td>Security Threat</td>
<td>Verified bomb threat that, if carried out, could result in damage to the</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td>dam/dike</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Detonated bomb that has resulted in damage to the dam/dike or appurtenances</td>
<td>A</td>
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<tr>
<td>Sabotage / Vandalism</td>
<td>Damage to dam/dike or appurtenances that could adversely impact the</td>
<td>NFC</td>
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<tr>
<td></td>
<td>functioning of the dam/dike</td>
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<tr>
<td></td>
<td>Modification to the dam/dike or appurtenances that could adversely</td>
<td>NFC</td>
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<td></td>
<td>impact the functioning of the dam/dike</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Damage to dam/dike or appurtenances that has resulted in seepage flow</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td>Damage to dam/dike or appurtenances that has resulted in uncontrolled</td>
<td>A</td>
</tr>
<tr>
<td></td>
<td>water release</td>
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</table>
4.0 INCIDENT RESPONSE

The following situations and conditions should be evaluated when performing condition severity detections and evaluations.

Overtopping. The Gypsum Pond reservoir has a drainage area of approximately 30 acres compared to a pond size of 18 acres. The Gypsum Pond receives only Stormwater runoff that falls within the local drainage area and water used to sluice the Gypsum slurry. The surface impoundment and principal spillway are designed and operated to safely manage the 1,000-year flood.

Seepage. Failures due to internal erosion and/or piping resulting from seepage would be detected in the early stages during the regular inspections conducted by plant personnel. Inspectors are trained to look for evidence of seepage. Inspection reports, including piezometer readings, are transmitted to trained dam safety engineers for evaluation. Therefore, the conditions that could lead to failures of this type would likely be discovered and corrected, making an actual failure a remote possibility.

Slope Instability. Slope instability would be demonstrated by sloughing of dam/dike slopes, which would be detected by Environmental Compliance personnel in their weekly inspections. The conditions that could potentially lead to a failure of this type would also be detected in advance and corrected making an actual failure a remote possibility.

In the event that conditions are detected that could potentially lead to a dam/dike failure, the flowcharts in Appendices C (Incident Response) and D (Response Notification) will be used to respond to the situation and alert applicable personnel and emergency agencies. In that situation, local emergency management agencies (EMAs) would respond and begin warnings and evacuations as soon as possible following the declaration of a safety emergency.

4.1 Access to the Site

Plant and emergency personnel are able to access the dam/dike from the main portion of Plant Gorgas by paved or gravel-surfaced roadways. Figures 1 and 2 in Appendix A show the location of the Gypsum Pond on Plant property.

4.2 Response during Periods of Darkness

Plant Gorgas is operational and/or manned 24 hours a day every day, and personnel and equipment are able to access the site at any time. Response times would not vary significantly from daylight conditions.

4.3 Response during Weekends and Holidays

Plant Gorgas is operational and manned 24 hours a day every day, and personnel and equipment will be able to access the site at any time. The response times of certain personnel may be affected.
4.4 Response during Adverse Weather

The dam/dike is accessed by paved and gravel-surfaced roads and is accessible during periods of adverse weather. If severe flooding causes road closures, response times may be adversely affected.
5.0 RESPONSIBLE PERSONS AND RESPONSIBILITIES

Designated personnel have been trained in the use of these response procedures and are aware of their responsibilities in making the procedures effective. The chain of command and the individual responsibilities for plant personnel, public officials, and agencies are outlined below.

5.1 Incident Commander

The Incident Commander is the 24-hour point of contact for all plant emergencies. The Primary Incident Commander is the Operations Team Leader on-shift. The Secondary Incident Commander is the Fuels Team Leader on-shift, and should be contacted if the Primary Incident Commander cannot be reached.

The Incident Commander is responsible for ensuring the following functions are addressed as required for emergency response situations:

1. Verifying that an emergency condition exists.
2. Assessing and declaring the emergency condition.
3. Consulting with Fossil Dam Safety to evaluate conditions and determine remediation actions.
4. Emergency Actions
   a. If necessary, implement actions to lower the water level in the impoundment in consultation with Fossil Dam Safety.
   b. Call-out of personnel necessary to perform the work required on plant site during the emergency.
5. Ensure the notification process as outlined in the Response Notification Flowchart (Appendix D) is completed in an expedient manner.
6. Other responsibilities include:
   a. Establishing lines of communication from the plant to the local and state EMAs.
   b. Ensuring emergency sources of power are available for the operation of essential equipment such as emergency lighting.
   c. Ensuring the availability of heavy equipment and trained operators to aid in the mitigation effort.

5.2 Dam Emergency Response Team Leader

The Incident Commander shall assign a Dam Emergency Response Team Leader as appropriate for the type of emergency incident. Duties include reporting matters relating to potential emergency action directly to the Incident Commander, accounting for his/her crew personnel and directing their actions.
5.3 Plant Security Department

The Plant Security Department is responsible for securing company property and controlling access to company facilities. The Plant Security Department will relay information to the Incident Commander. The Incident Commander will determine the appropriate people and agencies to notify. The Plant Security Department will perform emergency notifications to Plant departments as appropriate.

5.4 Plant Environmental Compliance

Environmental Compliance personnel are responsible for assessing conditions, contacting the Plant Manager, obtaining assistance from Fossil Dam Safety, and for providing technical updates to the Incident Commander. Compliance personnel can also request assistance from APC Environmental Affairs, if conditions warrant.

5.5 Alabama Control Center

The Alabama Control Center contacts the National Weather Service to inform them of conditions at the plant that may lead to potential flooding downstream.

5.6 SCS E&CS Fossil Dam Safety

Fossil Dam Safety is responsible for coordinating and providing the technical support necessary to mitigate the emergency condition and for notifying APC Corporate Communications and the Hydro General Manager (if the failure could impact a FERC regulated reservoir downstream of the surface impoundment) of the emergency condition. The SCS E&CS Manager shall notify the APC Supply Chain Management as shown on the Response Notification Flowchart (Appendix D).

5.7 APC Personnel

Environmental Affairs
APC Environmental Affairs is responsible for coordinating long-term environmental response (after the initial response) and to remediate environmental issues and provide the technical support necessary for any remediation needs. Environmental Affairs is also responsible for all communications with environmental regulatory agencies for appropriate reporting of releases to the environment and for securing variances to existing permits, if needed.

If necessary, Environmental Affairs will also help secure approved remediation contractors for the specific emergency condition that may exist. They will also provide additional support, such as emergency manpower, material, equipment, and expertise to assist in mitigation efforts, if needed.

Corporate Communications
APC Corporate Communications is responsible for coordinating the APC media response and will schedule news briefings and prepare news releases, as required. APC Corporate Communications will also work with local and State Public Information Officers to ensure that timely, accurate, and consistent information is made available to media outlets.
Corporate Security
APC Corporate Security is responsible for supporting Plant Security personnel and contracting with local law enforcement for additional security personnel as needed.

Supply Chain Management
Supply Chain Management is responsible for obtaining additional equipment and materials necessary to mitigate the emergency condition and begin the recovery process.

5.8 Emergency Agencies
Local EMAs are responsible for planning and implementing evacuation and sheltering plans as well as directing search, rescue, and recovery efforts. If additional resources are required, the local agencies can contact the Alabama Emergency Management Agency (Alabama EMA) for assistance.

The local EMAs are the point of contact between plant personnel and local jurisdictions. The EMAs are responsible for the direction and control of emergency operations at the local level and keeping local government officials informed of the status of emergency operations.

Alabama EMA generally becomes involved in an emergency situation if the local agencies are not capable of handling the situation or if assistance is requested by a local agency or by the Governor. Alabama EMA has responsibilities similar to the local EMAs but is also responsible for mobilizing state military support as well as State Disaster Center operations.

5.9 Law Enforcement
Local Law Enforcement agencies are notified by the appropriate EMA. Alabama EMA notifies the State Patrol as well as the Alabama Department of Transportation (ALDOT). Law Enforcement is responsible for traffic control and can assist with evacuation, mitigation, and rescue activities.
6.0 NOTIFICATION PROCEDURES

Communication during an emergency event will primarily be by company phone. In the event of system failure, Southern Linc radios and cell phones would be utilized as an alternate method of communication.

Local and state EMA will be notified in the event of an emergency, and these agencies will be responsible for notifying the public. In the event of an imminent failure, local and state EMA’s will be notified to immediately begin evacuation procedures. APC Corporate Communications will provide information for media outlets and will be responsible for communicating relevant information to the public.

6.1 Incident Response Flowchart for Imminent Failure and Potential Failure Emergencies

Personnel responsible for executing mitigation and/or emergency actions shall be thoroughly familiar with their responsibilities under this EAP.

A. When a Condition B or Condition A situation is detected, notify plant personnel in accordance with the Incident Response Flowchart (below and in Appendix C). Plant Environmental Compliance should contact Fossil Dam Safety immediately for technical consultation. Fossil Dam Safety will provide the evaluation of the conditions and provide a determination if there is an immediate threat to the dam/dike. If there is an immediate threat of dam/dike or dike failure, declare an Imminent Failure Emergency and proceed to Step I.

B. If no immediate threat is detected, determine if the problem detected could possibly lead to failure of the dam/dike. If there is a potential for failure but corrective measures may be taken to moderate or alleviate failure, declare a Potential Failure Emergency (Condition B) and proceed to Step C.

C. If a Potential Failure Emergency has been declared, notify personnel and agencies listed on the Response Notification Flowchart (Appendix D). Document all communications using the appropriate forms contained in Appendix E. Once outside agencies have been notified of an issue or potential problem, plant management is responsible for keeping local EMAs informed of any change in conditions.

D. Begin corrective measures to attempt to alleviate or prevent failure.

E. Evaluate the effectiveness of the corrective measures. If the corrective actions are successful, update all personnel/agencies previously contacted of the status of the improved conditions and document relevant communications using the forms provided in Appendix E. At this time, the Incident Commander will end the emergency condition. Fossil Dam Safety will be responsible for preparing the after-action report.

F. If the corrective measures are not effective, Fossil Dam Safety will determine if there is time to take additional corrective measures.
G. If there is not time to take additional corrective measures and failure is imminent, declare an **Imminent Failure Emergency (Condition A)** and proceed to Step I.

H. If there is time to implement additional corrective measures, return to Step E. Additional support can be requested from Civil Field Services or outside contractors, as needed.

I. If an **Imminent Failure Emergency** has been declared by the Incident Commander or his designee, ensure that all personnel have been moved to a safe area and perform notifications per the Response Notification Flowchart (Appendix D). Document all communications using the appropriate forms contained in Appendix E. Once outside agencies have been notified of a problem or potential problem, the Incident Commander or his designee is responsible for keeping local EMAs informed of any change in conditions. Fossil Dam Safety will be responsible for preparing the after-action report.

### 6.2 Additional Considerations

All communication shall be documented using the *Data Recording Sheet* located in Appendix E.
7.0 PROVISIONS FOR ANNUAL COORDINATION MEETING

An annual face-to-face meeting will be held with representatives of Plant Gorgas, APC, and local emergency responders. The representatives may include:

- Southern Company Services Fossil Dam Safety
- Plant Gorgas Plant Manager and Team Leaders
- Plant Gorgas Emergency Response Team
- Alabama Power Environmental Affairs
- Alabama Power Corporate Communications
- Local Emergency Responders
APPENDIX A

Plant Gorgas Location Map – Figure 1
Gypsum Pond Overview – Figure 2
FIGURE 1
PLANT GORGAS LOCATION MAP
WALKER COUNTY, ALABAMA

LEGEND
- Plant Boundary

Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Earthstar Geographics, iGeoEye, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USFS, AEX Grid, IGN, and the GIS User Community

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USFS, AEX Grid, IGN, and the GIS User Community
APPENDIX B

Inundation Maps
Notes:
1. This map depicts the maximum water surface elevation from breaching of the western side of the embankment.
2. Mapping of flooded areas and flood wave travel times are approximate and should be used as guidance for establishing evacuation zones.
3. Actual areas inundated will depend on failure mode and pre-failure hydrologic conditions and may differ significantly from information shown on these maps.

WEST SUNNY DAY BREACH SUMMARY

<table>
<thead>
<tr>
<th>Point</th>
<th>Distance from Breach (miles)</th>
<th>Arrival Time (HH:MM)</th>
<th>Time to Peak (HH:MM)</th>
<th>Ground/Water Elevation (ft-msl)</th>
<th>Breach Maximum Water Surface Elevation (ft-msl)</th>
<th>Maximum Water Depth (feet)</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AA</td>
<td>0.03</td>
<td>00:01</td>
<td>00:08</td>
<td>400.6</td>
<td>410.9</td>
<td>10.3</td>
<td>Downstream of Breach</td>
</tr>
<tr>
<td>BB</td>
<td>0.05</td>
<td>00:07</td>
<td>00:11</td>
<td>330.9</td>
<td>336.2</td>
<td>6.3</td>
<td>Access Road</td>
</tr>
<tr>
<td>CC</td>
<td>0.17</td>
<td>00:07</td>
<td>00:09</td>
<td>282.5</td>
<td>282.6</td>
<td>0.1</td>
<td>Sedimentation Pond</td>
</tr>
<tr>
<td>DD</td>
<td>0.30</td>
<td>00:08</td>
<td>00:10</td>
<td>254.4</td>
<td>263.6</td>
<td>9.2</td>
<td>Confluence with Mulberry Fork</td>
</tr>
</tbody>
</table>

PLANT GORGAS
GYPSUM POND DAM BREACH
WALKER COUNTY, AL

ISSUE DATE: 12/13/2016
PROJECTION: TRANSVERSE MERCATOR NAD 1983 ALABAMA WEST STATE PLANE
SCALE: 1" = 500 Feet

SERVICE LAYER CREDITS: SOURCES: ESRI, HERE, DELORME, USGS, INTERMAP, INCREMENT P CORP., AA

POINT IDENTIFIER
DISTANCE FROM BREACH
5 FOOT CONTOUR
WEST BREACH
FEMA ZONE A 100 YEAR FLOODPLANNING
MULBERRY FORK
PLANT GORGAS
GYPSUM POND
GOOD SUMMIT ROAD
PLANT GORGAS
GOOD SUMMIT ROAD
MULBERRY FORK
GOOD SUMMIT ROAD
MULBERRY FORK
GOOD SUMMIT ROAD
GOOD SUMMIT ROAD
APPENDIX C
Incident Response Flowchart
Incident Response Flowchart

Problem Discovered

- Notify Security Office
- Notify E&CS Dam Safety to Assist with Evaluation and Mitigation

Enviro. Compliance Evaluates

Potential Failure?

- Notify Plant Manager
- Incident Commander Declares Potential Failure

Activate EAP, Perform All Notifications, Move Personnel to Safety at Incident Commander’s Discretion

Implement Corrective Actions

- Corrective Actions Effective?
  - YES
  - Time Available to Take Corrective Actions?
    - YES
    - Time Available to Take Additional Corrective Actions?
      - YES
      - Update Personnel and Agencies per Notification Flowchart and Document Actions Taken
      - END
      - NO
      - END
    - NO
      - END
  - NO
    - END
- NO
  - END

Incident Commander Declares Imminent Failure

Activate EAP, Perform All Notifications, Move Personnel to Safety

Failure Occurs

Update Personnel and Agencies per Notification Flowchart and Document Actions Taken

END
APPENDIX D
Response Notification Flowchart
Response Notification Flowchart
Imminent Failure or Potential Failure Emergencies

1. Southern Co. Generation Senior Vice President
   → Plant Gorgas Plant Manager

2. Incident Commander Declares Imminent or Potential Failure Emergency
   → Plant Gorgas Security Office
   → Plant Gorgas Compliance C&S Manager (Dam Emergency Response Team Leader)

3. Plant Gorgas Security Office
   → Plant Gorgas Compliance C&S Manager (Dam Emergency Response Team Leader)
   → APC Enviro. Affairs

4. Alabama System Owner
   → Walker County EMA Regina Myers, Coordinator (205) 384-7233
     Alternate: Mobile, AL (251) 633-6443

National Weather Service
Birmingham, Alabama
(205) 664-3010
Alternate: Mobile, AL (251) 633-6443

APC Enviro. Affairs

SCS Fossil Dam Safety
Dam Safety Referral
(205) 992-6601

See Next Page for Notifications by Fossil Dam Safety
Emergency Responders Contact Information

If a Condition A Emergency has occurred call 911

1) Parrish Police Department – 1-205-686-9991
2) Parrish Fire and Rescue – 1-205-686-5762
3) Walker County Sheriff’s Office – 1-205-302-6464
4) Walker County Emergency Management Agency – 1-205-384-7233
5) Alabama Emergency Management Agency – 1-205-280-2200
6) National Weather Service
   a. Birmingham Office – 1-205-664-3010
   b. Mobile Office – 1-251-633-6443
APPENDIX E
Data Recording Sheet
EMERGENCY ACTION PLAN
DATA RECORDING SHEET

The Data Recording Sheet will be used to record important information relating to dam safety emergency.

Team Member(s): __________________________________________

Date of Incident: ____________________________________________

Time of Incident: ____________________________________________

Type of Emergency: __________________________________________

Emergency Coordinator: ______________________________________

Description of Events:* ______________________________________

________________________________________________________________

________________________________________________________________

________________________________________________________________

________________________________________________________________

What is Being Done:* __________________________________________

________________________________________________________________

________________________________________________________________

________________________________________________________________

________________________________________________________________

________________________________________________________________

*Attach additional pages as necessary.

For incoming questions, refer all calls to:

Media Inquiries: Alabama Power Company Corporate Communications

EMA Inquiries: Plant Manager/Incident Commander

Environmental Agency Inquiries: APC Environmental Affairs