

**INITIAL SAFETY FACTOR ASSESSMENT
PLANT BARRY GYPSUM STORAGE FACILITY
ALABAMA POWER COMPANY**

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257 and Part 261), §257.73(e), requires the owner or operator of an existing CCR surface impoundment to conduct periodic safety factor assessments. The owner or operator must document that the minimum safety factors outlined in §257.73(e)(1)(i) through (iv) for the critical embankment section are achieved.

The CCR surface impoundment located at Alabama Power Company's Plant Barry also referred to as the Plant Barry Gypsum Storage Facility is located on Plant Barry property, near Bucks, Alabama. The lined CCR surface impoundment is formed by an engineered perimeter embankment. The critical section of this CCR unit has been determined to be located on the west side of the unit.

The analyses used to determine the minimum safety factor for the critical section resulted in the following minimum safety factors:

Loading Condition	Minimum Calculated Safety Factor	Minimum Required Safety Factor
Long-term Maximum Storage Pool (Static)	1.8	1.5
Maximum Surcharge Pool (Static)	1.7	1.4
Seismic	1.7	1.0

The embankments are constructed of well compacted clayey sands that are not susceptible to liquefaction. Therefore, a minimum liquefaction safety factor determination was not required.

I hereby certify that the safety factor assessment was conducted in accordance with 40 C.F.R. Part 257.73 (e)(1).

James C. Pegues, P.E.

Licensed State of Alabama, PE No. 16516





Engineering and Construction Services Calculation

Calculation Number:
TV-BA-APC387586-591-002

Project/Plant: Plant Barry Gypsum Storage Facility	Unit(s): Units 1-5	Discipline/Area: ES&FS
Title/Subject: Factor of Safety Assessment for CCR Rule		
Purpose/Objective: Analyze slope stability of Gypsum Storage Facility		
System or Equipment Tag Numbers: NA	Originator: Rajendra S. Gondhalekar	

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Total # of pages including cover sheet & attachments:		13	

Revision Record

Rev. No.	Description	Originator Initial / Date	Reviewer Initial / Date	Approver Initial / Date
0	Issued for Information	RSG/10-04-16	JAL/10-04-16	JCP/10-04-16

Notes:

Purpose of Calculation

Barry Steam Plant is owned and operated by Alabama Power Company and located 30 miles north of Mobile, Alabama, off of Hwy 43 near Bucks, Alabama. Plant Barry is a seven unit generating facility, including two natural gas fired combined cycle units and five coal fired units. Plant Barry is in the process has installed a flue gas desulfurization system (scrubber) on Unit 5. This process produces gypsum as a by-product. The FGD gypsum is sluiced to a lined facility for final storage or disposal.

The gypsum storage facility will be constructed in a four cell arrangement with construction of Cell 1 currently completed. Additional cells will be completed as capacity demands dictate. Construction of the Cell 1 involved grading of the existing ground surface and the constructing of a perimeter dike out of compacted fill. The inside of Cell 1 was be lined with a high-density polyethylene (HDPE) liner to prevent infiltration of decant water into the subsurface. A drainage system utilizing a layer of geogrid sandwiched between layers of geofabric (i.e. TexDrain) carries decant water from the bottom of the cell to collection pipes which discharge into a sediment basin. A plan view of the Cell 1 design is shown in the Attachments.

The perimeter dike has been constructed using compacted fill from a nearby borrow area. This fill consists of silty and clayey sands. The dike averages approximately 20 feet in height and will varies in top width from 16 to 32 feet. The top of the dike at the critical section is at approximately elevation EL31 based on the latest topographic map. The exterior slope of the dikes is at 3H:1V and the interior slope of dikes within Cell 1 is at 2H:1V.

During operation, gypsum slurry is sluiced into the cell and allowed to decant through the drainage system. The dry gypsum that remains is used to create perimeter dikes, allowing the sluiced gypsum to be raised in levels to a final height of approximately 77 feet. A 3H:1V exterior slope will be maintained for the gypsum, and a 16 foot set-back will be constructed between the gypsum levels. Cross-sections showing the levels of gypsum placement in Cell 1 are shown in the Attachments.

The purpose of this calculation is to evaluate the stability of Plant Barry's gypsum storage facility and dike at the critical analysis section located on the after the final level of gypsum placement in Cell 1.

Methodology

The calculation was performed using the following methods and software:

GeoStudio 2012 (Version 8.15, Build 11777), Copyright 1991-2016, GEO-SLOPE International, Ltd.

Strata (Version alpha, Revision 0.2.0), Geotechnical Engineering Center, Department of Civil, Architectural, and Environmental Engineering, University of Texas.

Morgenstern-Price analytical method was run and reported.

Criteria and Assumptions

The slope stability models were run using the following assumptions and design criteria:

- Seismic site response was determined using a one-dimensional equivalent linear site response analysis. The analysis was performed using Strata, utilizing random vibration theory. The input motion consisted of the USGS published 2008 Uniform Hazard Response Spectrum (UHRS) for Site Class B/C at a 2% Probability of Exceedance in 50 years. The UHRS was converted to a Fourier Amplitude Spectrum, and propagated through a representative one dimensional soil column using linear wave propagation with strain-dependent dynamic soil properties. The input soil properties and layer thickness were randomized based on defined statistical distributions to perform Monte Carlo simulations for 100 realizations, which were used to generate a median estimate of the surface ground motions.
- The median surface ground motions were then used to calculate a pseudostatic seismic coefficient for utilization in the stability analysis using the approach suggested by Bray and Tavasrou (2009). The procedure calculates the seismic coefficient for an allowable seismic displacement and a probability exceedance of the displacement. For this analysis, an allowable displacement of 0.5 ft, and a probability of exceedance of 16% were conservatively selected, providing a seismic coefficient of 0.008g for use as a horizontal acceleration in the stability analysis.
- The current required minimum criteria (factors of safety) were taken from the Structural Integrity Criteria for existing CCR surface impoundment from 40 CFR 257.73, published April 17, 2015.
- The soil properties of unit weight, phi angle, and cohesion were obtained from historical laboratory and in-situ test results.
- Soil stratigraphy and piezometric data was estimated from the historical boring logs.
- The properties of unit weight, phi angle, and cohesion for the gypsum were derived from laboratory test data from Plant Scholz gypsum samples including the following: sedimented – consolidation samples, cast and sedimented triaxial samples, cast gypsum samples, and in-situ tests on sedimented gypsum
- The COE EM 1110-2-1902, October 2003, allows the use of the phreatic surface established for the maximum storage condition (normal pool) in the analysis for the maximum surcharge loading condition. This is based on the short term duration of the surcharge loading relative to the permeability of the embankment and the foundation materials. This method is used in the analysis for the impoundments at this facility with surcharge loading.

The Cross-Section and materials used in this survey calculation were generally gathered from historical slope stability analyses for the gypsum storage facility. The critical section for the storage facility was identified to be located along the west side of Cell 1.

Input Data

The following soil properties were used in the analyses.

Soil Type	Unit Weight, pcf	Cohesion, psf	Phi Angle, deg
Gypsum	85	0	30
Dike Fill	122	500	26
Base Soil	110	300	20

Hydrologic Considerations

Since the analysis condition consists of the gypsum stack being at a significantly higher elevation than the perimeter dikes and drainage channels, the gypsum will not receive any runoff from the surrounding areas. For the purpose of the analyses, the hydrologic conditions in the gypsum stack were conservatively assumed to be at the operating pool elevation for the previous level for the long term maximum storage condition, and at the surface of the gypsum top deck for the maximum surcharge condition.

Load Conditions

The stability of the Plant Barry gypsum storage facility was evaluated for the load conditions indicated in the following table. When appropriate, cases were run both in the gypsum and the dike.

Summary of Conclusions

The following table lists the factors of safety for various slope stability failure conditions. All conditions are steady state except where noted. Construction cases were not considered. Based on the results of these analyses all structures are stable.

North East Main Dike		
Case	Computed Factor of Safety	Typical Minimum Factor of Safety
Long-term Maximum Storage Pool (Static)	1.8	1.5
Maximum Surcharge Pool (Static)	1.7	1.4
Seismic	1.7	1.0

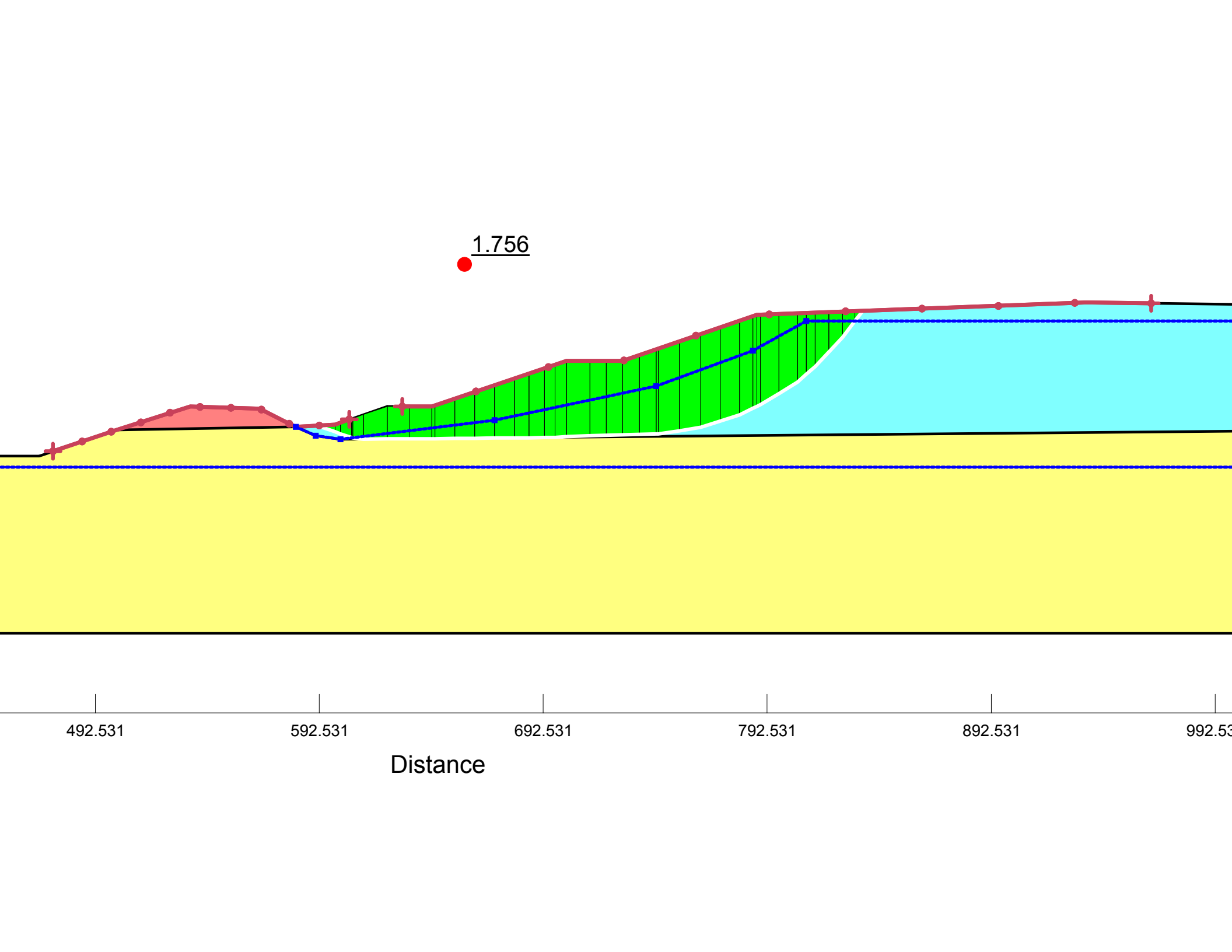
The analyses indicate that in all cases, the factors of safety are above the required minimums.

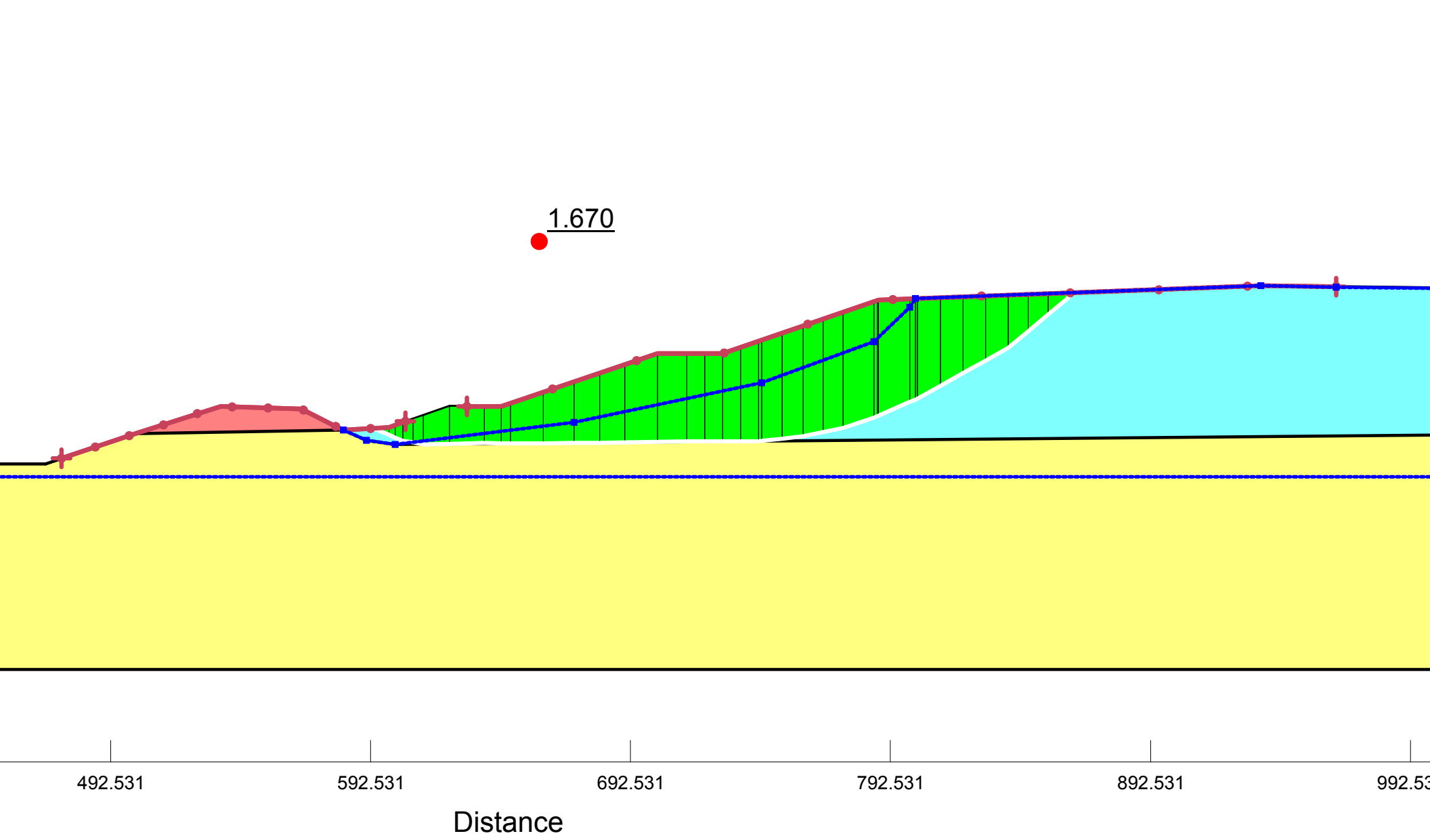
Design Inputs/References

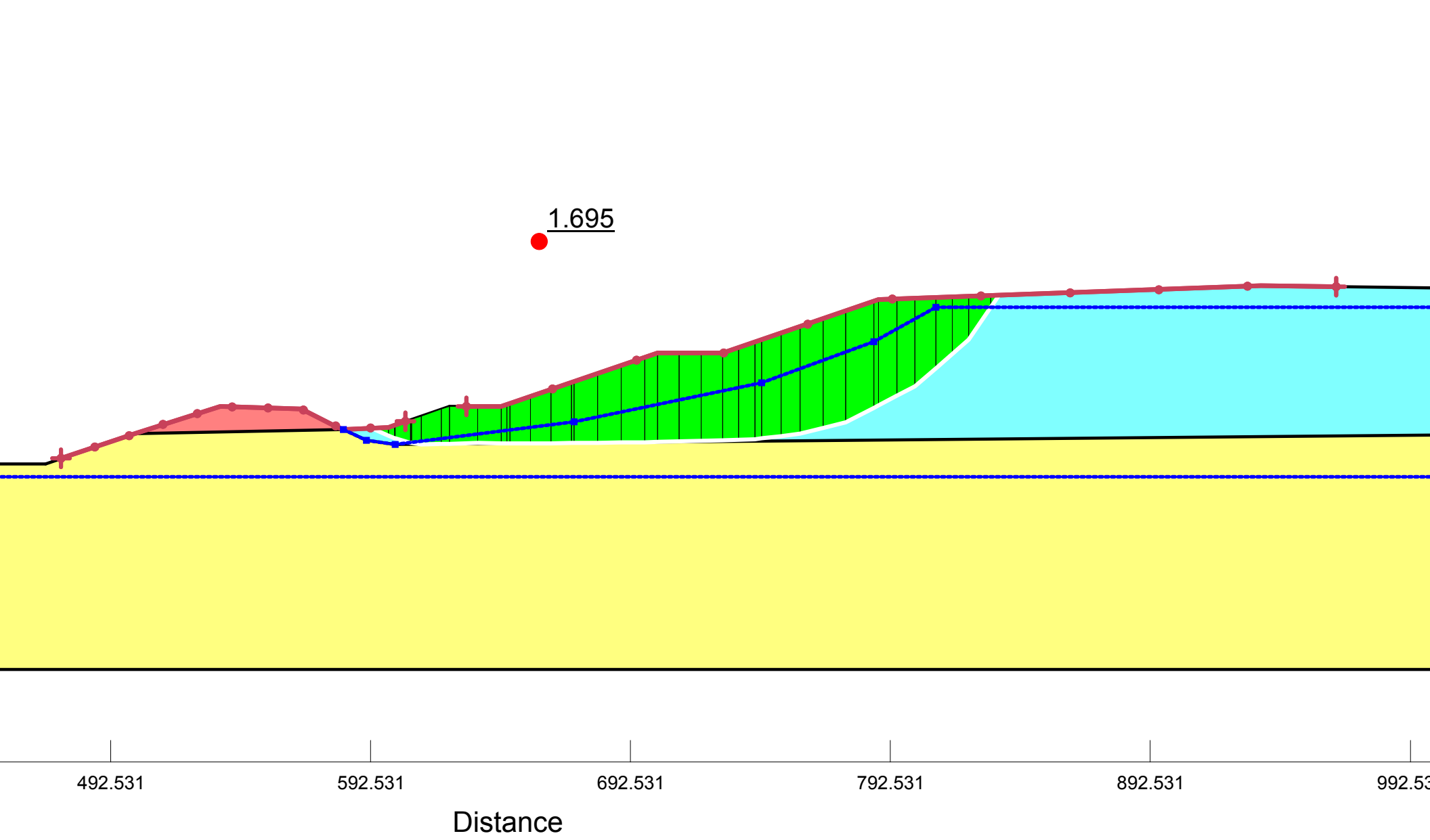
- USGS Earthquake Hazards website, <http://www.usgs.gov/hazards/earthquakes/>.
- US Corps of Engineers Manual EM 1110-2-1902, October 2003
- Bray, J. D. and Travasarou, T., *Pseudostatic Coefficient for Use in Simplified Seismic Slope Stability Evaluation*, Journal of Geotechnical and Environmental Engineering, American Society of Civil Engineers, September 2009

Body of Calculation

Calculation consists of Slope-W modeling attached.

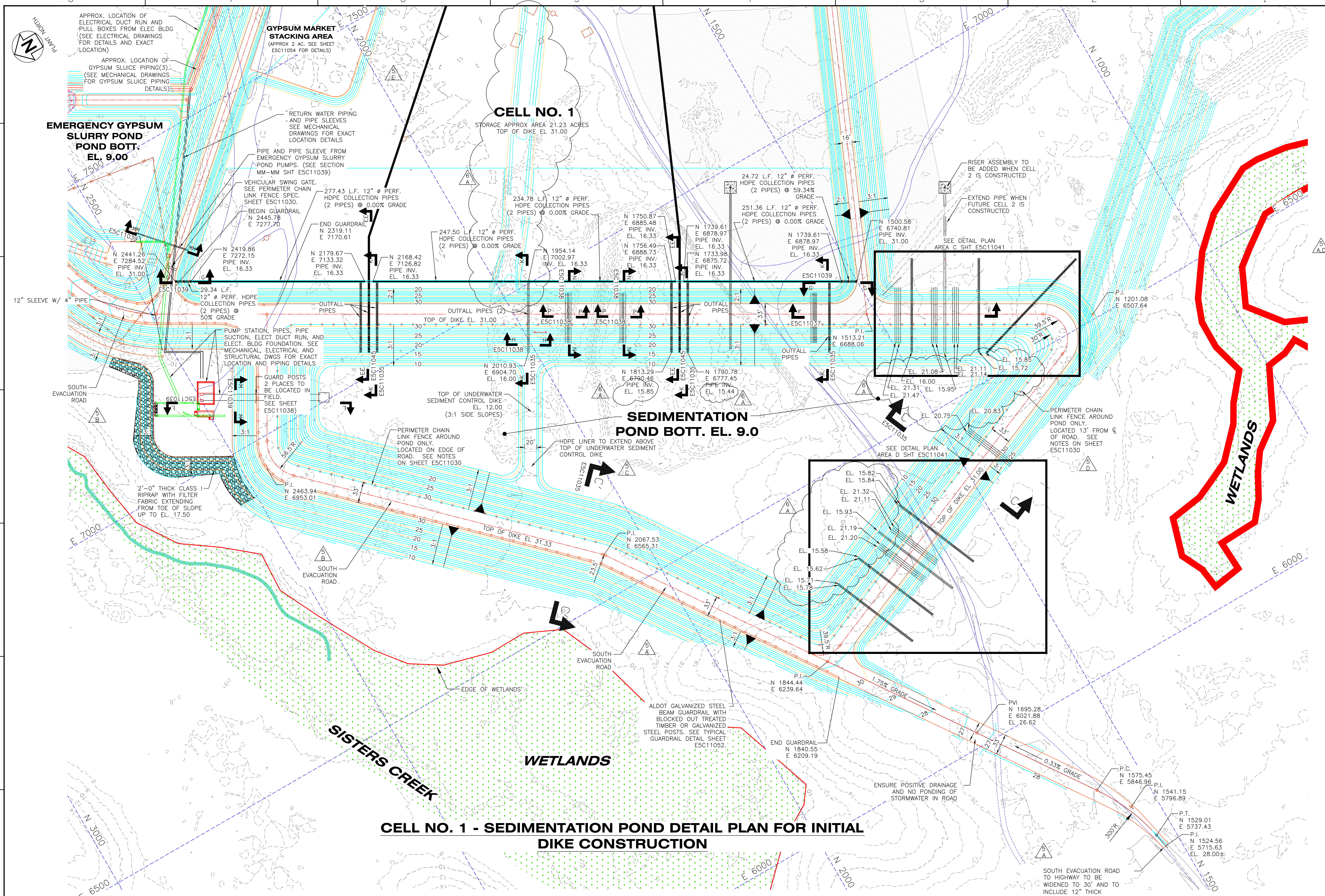






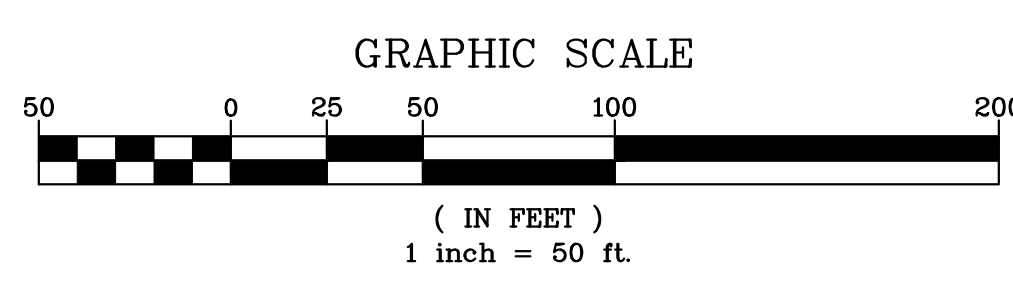
Attachment A

Figure – Cell 1 Construction Drawings

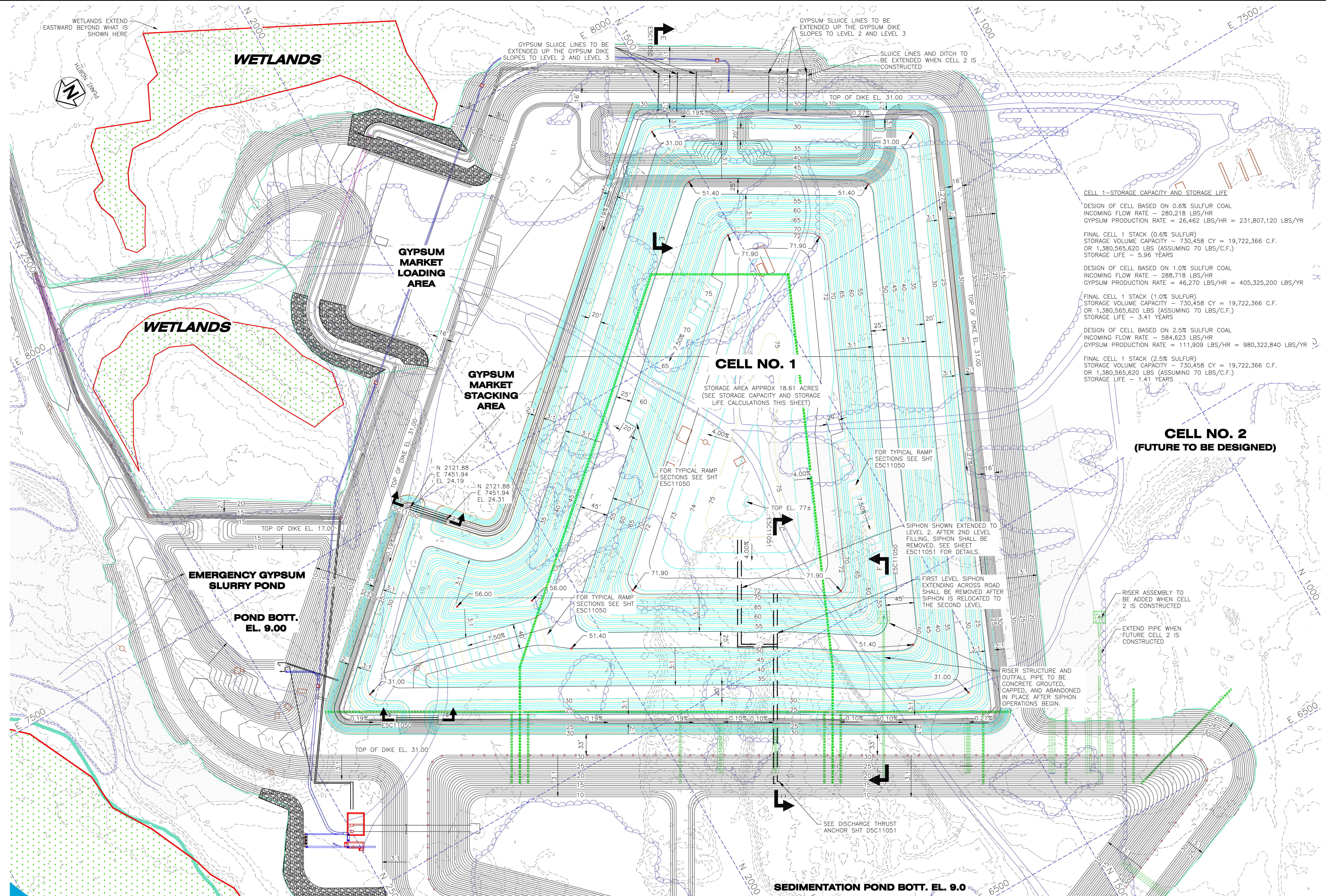


CELL NO. 1 - SEDIMENTATION POND DETAIL PLAN FOR INITIAL DIKE CONSTRUCTION

NOTES:
 1. GRIDLINES AND COORDINATES SHOWN ARE IN PLANT GRID.



REVISION	DATE	REVISION	DATE	REVISION	DATE	REVISION	DATE	REVISION	DATE	REVISION	DATE	REVISION	DATE	REVISION	DATE	REVISION	DATE																					
6	12-19-11	5	08-14-09	4	07-02-09	3	03-05-09	2	11-14-08	1	04-11-08	0	12-03-07	Southern Company Generation Engineering and Construction Services FOR Alabama Power Company PLANT BARRY UNIT 5 GYPSUM STORAGE AREA CELL NO. 1-SEDIMENTATION POND DETAIL PLAN FOR INITIAL DIKE CONSTRUCTION																								
A. ADDED AS-BUILT CONDITIONS		A. B-2 CHANGED GAB TO 12"		A. C-4, F-7 ADDED GUARDRAIL AND SWING GATE		A. G-7 ADDED PIPE SLEEVES AND PIPING		ISSUED FOR CONSTRUCTION GENERAL REVISION		ISSUED FOR CONSTRUCTION GENERAL REVISION		ISSUED FOR CONSTRUCTION																										
B. C-3, E-6, F-B, ADDED SOUTH EVACUATION NOTE.		B. C-3, E-6, F-B, ADDED SOUTH EVACUATION NOTE.		C. A-4, F-7 ADDED GUARDRAIL AND SWING GATE		B. H-7 ADDED ELECT DUCT RUN																																
C. D-5, CHANGED SECTION C-C TO C'-C'		C. D-5, CHANGED SECTION C-C TO C'-C'		C. A-4, F-7 ADDED GUARDRAIL AND SWING GATE		C. B-6 ADDED ELECT DUCT RUN																																
D. E-2, REVISED DISTANCE TO CL		D. E-2, REVISED DISTANCE TO CL		C. A-4, F-7 ADDED GUARDRAIL AND SWING GATE		D. F-7 ADDED ELECT DUCT RUN AND EDITED NOTE																																
E. H-7, ADDED GYPSUM MARKET STACKING AREA EWO 2161DE		E. H-7, ADDED GYPSUM MARKET STACKING AREA EWO 2161DE		C. A-4, F-7 ADDED GUARDRAIL AND SWING GATE		E. F-8 ADDED PIPE SLEEVE AND PIPING																																
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		CSM	DPK	JBS	JTM	KAR			PMG	BRH	JTM	KAH	TDJ	CKT			PMG	BRH	JTM	KAH	TDJ	CKT			PMG	BRH	JTM	KAH	TDJ	CKT			PMG	BRH	JTM	KAH	TDJ	CKT
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																1"=50'		E5C11034	1	FINAL	6																	



CELL 1-STORAGE CAPACITY AND STORAGE LIFE

DESIGN OF CELL BASED ON 0.6% SULFUR COAL
 INCOMING FLOW RATE = 280,218 LBS/HR
 GYPSUM PRODUCTION RATE = 26,462 LBS/HR = 231,807,120 LBS/YR

FINAL CELL 1 STACK (0.6% SULFUR)
 STORAGE VOLUME CAPACITY = 730,458 CY = 19,722,366 C.F.
 OR 1,380,565,620 LBS (ASSUMING 70 LBS/C.F.)
 STORAGE LIFE = 5.96 YEARS

DESIGN OF CELL BASED ON 1.0% SULFUR COAL
 INCOMING FLOW RATE = 288,718 LBS/HR
 GYPSUM PRODUCTION RATE = 46,270 LBS/HR = 405,325,200 LBS/YR

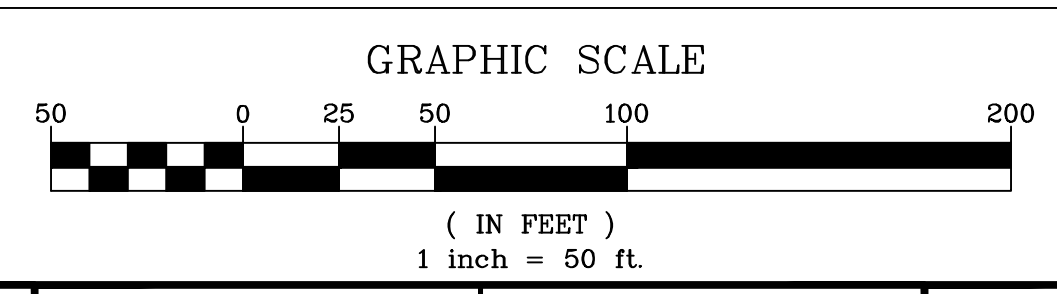
FINAL CELL 1 STACK (1.0% SULFUR)
 STORAGE VOLUME CAPACITY = 730,458 CY = 19,722,366 C.F.
 OR 1,380,565,620 LBS (ASSUMING 70 LBS/C.F.)
 STORAGE LIFE = 3.41 YEARS

DESIGN OF CELL BASED ON 2.5% SULFUR COAL
 INCOMING FLOW RATE = 584,623 LBS/HR
 GYPSUM PRODUCTION RATE = 111,909 LBS/HR = 980,322,840 LBS/YR

FINAL CELL 1 STACK (2.5% SULFUR)
 STORAGE VOLUME CAPACITY = 730,458 CY = 19,722,366 C.F.
 OR 1,380,565,620 LBS (ASSUMING 70 LBS/C.F.)
 STORAGE LIFE = 1.41 YEARS

CELL NO. 1 - OPERATIONS AND CONSTRUCTION FINAL STACKING PLAN

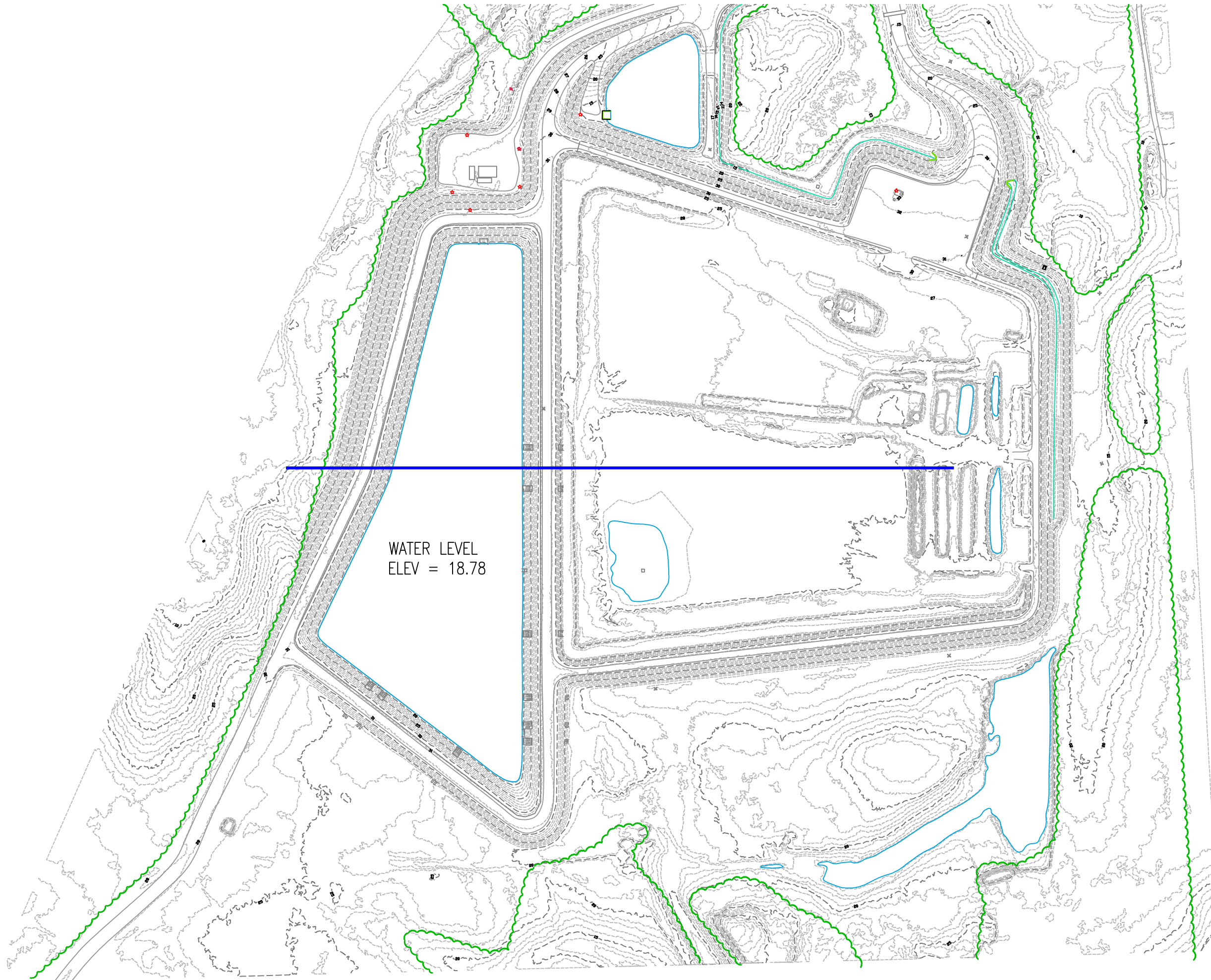
NOTES:
 1. GRIDLINES AND COORDINATES SHOWN ARE IN PLANT GRID.



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Southern Company Services, Inc. All Rights Reserved. This document contains proprietary, confidential, and/or trade secret information of the Southern Company. Copying or distribution of this document for use other than approved use, distribution, copying, dissemination, or disclosure of any portion hereof is prohibited.												Southern Company Generation Engineering and Construction Services FOR				Alabama Power Company																								
PLANT BARRY UNIT 5 FGD PROJECT GYPSUM STORAGE AREA CELL NO. 1-OPERATIONS PLAN FINAL STACKING PLAN																																								
BY	CHK'D	CIVIL APPR	ELECT APPR	LYC APPR	MECH APPR	SECC NGR	BY	CHK'D	CIVIL APPR	ELECT APPR	LYC APPR	MECH APPR	SECC NGR	BY	CHK'D	CIVIL APPR	ELECT APPR	LYC APPR	MECH APPR	SECC NGR	BY	CHK'D	CIVIL APPR	ELECT APPR	LYC APPR	MECH APPR	SECC NGR	BY	CHK'D	CIVIL APPR	ELECT APPR	LYC APPR	MECH APPR	SECC NGR	SCALE	PRJ/J.D.	DRAWING NUMBER	SHEET	CONF'D	REV
EEJ	PMG	BRH	JTM	KAH	TDJ	CKT	JWM	PMG	BRH	JTM	KAH	TDJ	CKT																						1"=50'	210800	E5C11048	1	FINAL	1

Attachment B

Figure – Analysis Section Location



WATER LEVEL
ELEV = 18.78