

**INITIAL SAFETY FACTOR ASSESSMENT
40 C.F.R. PART 257.73
PLANT GADSDEN ASH POND
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 Plant Gadsden Ash Pond has undergone physical closure activities and is in the process of completing the regulatory requirements of §257.102(d). It no longer impounds free water nor receives CCR. As such, the Gadsden Ash Pond no longer meets the definition of a CCR Surface Impoundment.

I hereby certify that the documentation above is accurate based on current available information.


James C. Pegues, P.E.

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