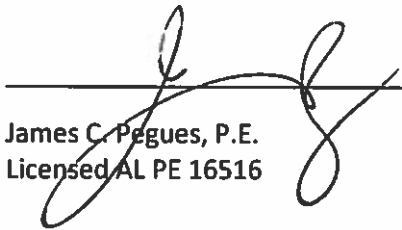


**LINER DESIGN CRITERIA  
40 C.F.R. PART 257.71  
PLANT GORGAS ASH STORAGE SURFACE IMPOUNDMENT  
ALABAMA POWER COMPANY**

Section § 257.71(a)(1) of EPA's regulations requires a demonstration as to whether or not an existing CCR surface impoundment was constructed with (i) a minimum of 2 feet of compacted soil having a hydraulic conductivity of no more than  $1 \times 10^{-7}$  cm/sec, (ii) a composite liner meeting the requirements of § 257.70(b), or (iii) an alternate liner meeting the requirements of §257.70(c). The CCR surface impoundment known as the Plant Gorgas Ash Pond was not constructed with a liner that meets any of these criteria.

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

James C. Pegues, P.E.  
Licensed AL PE 16516



10/12/11

