

**PERIODIC HAZARD POTENTIAL ASSESSMENT  
PLANT GORGAS 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 Gorgas, also referred to as the Plant Gorgas Ash Pond, is located near Parrish, Walker County, Alabama. The CCR surface impoundment is formed by an engineered cross-valley embankment on the north side of the impoundment. The Mulberry Fork of the Black Warrior River is located downstream of the embankment and impoundment. In the unlikely event of an embankment failure, water and CCR could potentially impact the Mulberry Fork of the Black Warrior River to the north of the impoundment as well as structures located along the river both upstream and downstream of the Plant Gorgas Ash Pond.

Based on the dam breach models prepared for development of the initial Emergency Action Plan for the Ash Pond, the hazard potential classification for the Plant Gorgas Ash Pond was determined to be High Hazard Potential, in that failure or mis-operation of the CCR unit could potentially result in loss of human life due to a sudden rise in river levels. A review of current conditions in and around the Plant Gorgas Ash Pond indicates that a High 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.

  
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