NOTIFICATION OF INTENT TO INITIATE CLOSURE
PLANT GADSDEN INACTIVE CCR SURFACE IMPOUNDMENT
ALABAMA POWER COMPANY
GADSDEN, ALABAMA

Alabama Power Company (APC) intends to close the CCR Surface Impoundment located at Plant Gadsden in Gadsden, Alabama under the requirements of 40 CFR Part 257, §257.100. The Plant Gadsden surface impoundment is an inactive surface impoundment, as defined in §257.53, and not receive CCR on or after October 19, 2015, but did contain both CCR and liquids on that date.

Closure of the surface impoundment will be conducted under §257.100(b)(1), closure by leaving CCR in place. The surface impoundment will be closed in a manner that will control, minimize or eliminate, to the extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate, or contaminated runoff to the ground or surface waters or to the atmosphere. Closure will also preclude the probability of future impoundment of water, sediment or slurry. Measures will be taken during design and construction of the closure system that provide for major slope stability to prevent the sloughing or movement of the final cover system. Closure will also minimize the need for further maintenance of the CCR unit.

Prior to installation of the final cover system, the surface impoundment must be dewatered. The removal of wastewater from the impoundment will be accomplished through the use of pumps located in the clear pool area. The wastewater will be routed to an engineered system for treatment prior to discharge. Additional best management practices will be used as necessary. All water removed from the impoundment will be monitored for compliance with the plant's NPDES permit prior to discharge.

Remaining surficial and near-surface wastes will be stabilized to support construction of and performance of the final cover system. Stabilization will be accomplished by the removal of water from the near surface materials through gravity flow, the use of geosynthetic reinforcement, and/or the use of ash and earthen materials to establish a stabilized subgrade for the support of construction equipment and final cover materials.

A final cover system will be installed that is designed to minimize infiltration and erosion. Design of the cover system is underway, but final decisions about the specific details of the final cover have not yet been reached. The cover system will, however, meet or exceed the requirements of §257.100(b)(3)(i) of 40 CFR Part 257, or the requirements of an alternative final cover system meeting the requirements of §257.100(b)(3)(ii). The final cover system will include a geosynthetic liner component, and therefore, the permeability of the final cover system will be less than or equal to the permeability of the natural subsoils present beneath the surface impoundment. The disruption of the integrity of the final cover system will be minimized through a design that accommodates settling and subsidence. The cover system will provide protection from wind or water erosion.

Tentative schedule for closure is as follows:

- Design — Ongoing
- Award of Closure Construction Contract — Q2 2016
- Removal of Free Liquids — Q1-Q2 2016
- Contractor Mobilization — Q2 2016
- Stabilization of Surficial CCR & Grading — Q2 2016 to Q2 2017
- Construction of Final Cover — Q4 2016 to Q4 2017
- Certification of Closure — Q1 2018

By signature below, certification is made that

- The final cover system will meet the requirements of §257.100(b)(3)(i) or §257.100(b)(3)(ii) of 40 CFR Part 257, and
- It is technically feasible to complete closure of the surface impoundment under the requirements of §257.100 by April 17, 2018.

12/11/15

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