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October 7, 2019

VIA E-MAIL AND CERTIFIED MAIL; RETURN RECEIPT REQUESTED

Mr. Eric L. Sanderson
Chief, Solid Waste Branch
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, AL 36110-2400

Re: Request for Extension of Closure Timeframe for the Plant Gorgas Bottom Ash Landfill

Dear Mr. Sanderson:

Alabama Power Company (APC) previously prepared a notification of intent to close the Plant Gorgas Bottom Ash Landfill. This notification of intent to close was placed in the Plant Gorgas Operating Record on April 15, 2019 as required by ADEM Admin. Code r. 335-13-15-.07(3)(g) and 40 C.F.R. §257.102(g). Notification was also provided to the Director, as required by r. 335-15-.08(2)(i)7 and §257.106(i)(7). According to r. 335-13-15-.07(3)(f)1.(i) and §257.102(f)(1)(i), closure of an existing CCR landfill must be completed within six months of commencing closure activities. Although work has progressed without major interruption since April 15, 2019, the closure process at the Plant Gorgas Bottom Ash Landfill will not be completed within the required timeframe. Therefore, we write to request an extension of the closure timeframe for one year in accordance with r. 335-13-15-.07(3)(f)2.

Under r. 335-13-15-.07(3)(f)2.(ii)(III) and §257.102(f)(2)(ii)(C), the timeframe to complete closure of a CCR landfill may be extended in one-year increments for a maximum of two one-year extensions. For each one-year extension sought, the owner or operator must substantiate the factual circumstances demonstrating the need for the extension.

As outlined in the notification of intent to close and other closure related documents, ash will be consolidated by excavation and grading to an area located on the northern end of the existing footprint. The southern end of the existing footprint will be used to construct a new stormwater runoff pond. While there have not been any major issues experienced during the work to date, the amount of work required is more than can be accomplished within a six-month time frame. Oftentimes the closure of a landfill only requires the installation of the final cover system. However, for the Plant Gorgas Bottom Ash Landfill, there is a significant amount of grading work required to move and consolidate the ash prior to the installation of the final cover system.

Since closure activities began on April 15, 2019, the Contractor performing the work has installed and maintained all required erosion and sediment control structures. The Contractor also

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completed demolition of the previously existing Bottom Ash Management Operations structures and equipment and has cleared the perimeter of the limits of work.

The southern end of the existing landfill footprint, where the new stormwater runoff pond is to be constructed and where ash is being removed for relocation to the northern end of the footprint, covers approximately 6.5 acres. As of September 30, 2019, approximately 4.5 acres of the total 6.5 acres has been certified as having ash removed. Approximately 270,000 cubic yards of material has been moved to the northern end of the existing landfill footprint. Grading of the new stormwater pond is underway and completion of the new stormwater pond is expected to be completed by the end of October 2019.

Grading of the final footprint has proceeded concurrently with the removal and consolidation of ash from the southern end of the landfill to the northern end, as this material is being used to achieve final subgrade. After all ash placement is completed and the subgrade has been shaped to design grades, cover soil will be placed over the ash and then final cover construction will begin.

At the present time, we anticipate that only one one-year extension will be required for completion of closure activities, and that closure will be completed no later than October 15, 2020. However, in the event of unforeseen or uncontrollable conditions, Alabama Power will communicate the need for an additional timeframe extension.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Thank you for your attention to this matter. Please feel free to contact me if we may be of any assistance to the Department in its consideration of Alabama Power's request.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Godfrey", written in a cursive style.

Mike Godfrey
Environmental Affairs General Manager