

**LINER DESIGN CRITERIA  
40 C.F.R. PART 257.71  
PLANT GASTON GYPSUM POND 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 Gaston Gypsum Pond was constructed with a liner consisting of a 60-mil HDPE geomembrane in direct contact with an underlying 2-ft thick layer of compacted clay having a minimum hydraulic conductivity of  $1 \times 10^{-7}$  cm/sec. The constructed liner meets the requirements for a composite liner as outlined in § 257.70(b), as referenced in §257.71(a)(1)(ii).

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

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