

**UPDATED HAZARD POTENTIAL ASSESSMENT
PLANT GORGAS ASH POND
ALABAMA POWER COMPANY**

Section §257.73(a)(2) of EPA's regulations requires the owner or operator of an existing CCR surface impoundment to conduct periodic hazard potential classification assessments. 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.

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.

Based on the dam breach models prepared for development of the Emergency Action Plan for the Ash Pond, the hazard potential classification for the Plant Gorgas Ash Pond has been 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.

I hereby certify that the hazard potential classification was conducted in accordance with 40 C.F.R. Part 257.73 (a)(2).

James C. Pegues, P.E.

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