

US EPA ARCHIVE DOCUMENT

September 28, 2009

Mr. Stephen Hoffman
Office of Resource Conservation and
Recovery (5304P)
U.S. Environmental Protection Agency
2733 South Crystal Drive, Fifth Floor
Arlington, Virginia 22202

Re: Final Safety Inspection Report for Plant Gorgas

Dear Mr. Hoffman:

By a letter dated September 14, 2009, the U.S. Environmental Protection Agency ("EPA") provided to Alabama Power Company ("APC") the final report regarding certain facilities for the management of coal combustion byproducts at APC's Plant Gorgas ("Final Report"). EPA's Final Report was prepared on behalf of EPA by Paul C. Rizzo Associates, Inc. and was dated September 2009.

For decades, APC has gone to great lengths to ensure that its structures and practices for the management of coal combustion byproducts are safe and protective of human health and the environment. We are pleased that EPA's on-site inspection and document review have confirmed that APC's facilities are well built, well maintained, and well run. As noted in the Final Report, the inspectors found that "the structures and the Plant appeared to be well maintained and in good working order." More specifically, regarding the ash pond, EPA's report observes as follows: "The rockfill embankment forming Rattlesnake Dam and the associated spillway, weir flow discharge structure, and associated piping were found to be well maintained and in good condition at the time of inspection." Similarly, the gypsum pond structures "were found to be in good condition at the time of inspection, with no signs of distress, settlement, or instability noted." Accordingly, EPA's report demonstrates that there is no discernible threat of a release of coal combustion byproducts at Plant Gorgas.

The Final Report includes five recommendations with respect to certain minor maintenance and inspection issues. APC generally concurs in the recommendations and offers the following additional comments:

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- Recommendation No. 1, pertaining to visual inspections by site personnel on at least a monthly basis, to include a log sheet to record observations: APC implemented these measures prior to receiving this recommendation. Site personnel perform visual inspections at a greater frequency than that recommended.
- Recommendation No. 2, pertaining to an existing weir box: APC has cleared the weir box and is in the process of evaluating whether a repair or replacement of the box is necessary. APC intends to include the monitoring of this feature as part of its inspection process.
- Recommendation No. 3, pertaining to monitoring a minor condition noted in the report: APC intends to monitor this issue and take any measure as APC may deem necessary to ensure the continued integrity of the structure. No such measure is necessary at the present time.
- Recommendation No. 4, to ensure vegetative cover at the gypsum pond: APC has begun preparing the gypsum pond slopes for reseeded and will continue to monitor the establishment of vegetative cover
- Recommendation No. 5, to continue to control vegetation: APC intends to continue to control vegetation, as it has in the past.

APC is pleased to continue to cooperate on a voluntary basis with EPA's efforts to gather information regarding the management of coal combustion byproducts at various facilities around the country. APC appreciates this opportunity to comment. Please direct any future correspondence on this issue to me.

Sincerely,

A handwritten signature in blue ink that reads "Matthew W. Bowden" with a stylized flourish at the end.

• Matthew W. Bowden
Vice President
Environmental Affairs