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August 18, 2014

By Overnight Delivery

Mr. Stephen Hoffman
Office of Resource Conservation and
Recovery
U.S. Environmental Protection Agency
Two Potomac Yard
2733 South Crystal Dr. 5th Floor, N5237
Arlington, Virginia 22202-2733

Re: Gulf Power Company
Plant Crist
Pensacola, Florida
Assessment of Dam Safety of Coal Combustion Surface Impoundments
Final Report-July 2014

Dear Mr. Hoffman:

On or around July 23, 2014, Gulf Power Company ("GPC") received the United States Environmental Protection Agency's ("EPA") document entitled "Assessment of Dam Safety of Coal Combustion Surface Impoundments-Final Report (July 2014)" ("Final Report") for GPC's Plant Crist. By letter dated July 18, 2014, EPA requested a response from GPC as to how GPC intends to address the recommendations found in the Final Report. Please find below GPC's response to this EPA request as well as other GPC comments regarding the conclusions and recommendations in the Final Report. For ease of reference, relevant EPA conclusion and recommendation headings in the Final Report are repeated below followed by GPC's response.

Finally, GPC requests that EPA maintain this entire letter and any related attachments as confidential business information not subject to disclosure for purposes

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of 5 U.S.C. Section 552(b)(2), (4) and (7) and 18 U.S.C. Section 1905.

Conclusions

1.3.1.1 Conclusions Regarding Structural Soundness of the CCW Impoundments

GPC has no comments regarding these conclusions in this section of the Final Report.

1.3.1.2 Conclusions Regarding the Hydrologic/Hydraulic Safety of CCW Impoundments

In its Final Report, CDM Smith notes that the CCW impoundments at Plant Crist have adequate capacity to pass and/or store the 50% PMP storm event without overtopping. GPC agrees with this statement and it has no additional comments regarding this and other conclusions in this section of the Final Report.

1.3.1.3 Conclusions Regarding Adequacy of Supporting Technical Documentation

CDM Smith provides in the Final Report that the technical documentation provided by GPC for the Gypsum Storage Pond, Process Sedimentation Pond and Process Return Water Pond are adequate. GPC agrees with this conclusion and it has no additional comments regarding this and other conclusions in this section of the Final Report.

1.3.1.4 Conclusions Regarding Description of the CCW Impoundments

CDM Smith states that the description and design drawings submitted by Southern Company Generation Engineering and Construction Services for the Gypsum Storage Pond, Process Sedimentation Pond and Process Return Water Pond were generally consistent with the visual observations. GPC agrees with this conclusion and it has no additional comments regarding this and other conclusions in this section of the Final Report.

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1.3.1.5 Conclusions Regarding Field Observations

During the assessment, the following items were noted by CDM Smith:

1. Several animal burrows were observed on the west and east embankments.
2. Discontinuities and settlement of the riprap-covered west embankment's exterior slope.
3. Areas of surface erosion and erosion rills were observed on the exterior of the North.

All of these items were fully addressed by GPC through corrective measures taken subsequent to the site visit in August 2012.

In addition, the Final Report provides that several areas of possible seepage were noted during the inspection by CDM Smith. As discussed by GPC representatives at the time of the assessment and as reflected in documents provided at the time of the inspection and in subsequent GPC information submittals, the ponds are constructed with composite liner systems and there was a significant rainfall event the day before the site inspection. GPC does not agree that there was seepage occurring from the gypsum CCW impoundments identified in the Final Report.

Finally, the Final Report concludes that "[n]o apparent unsafe conditions or conditions in need of immediate remedial action were observed at the Plant Crist CCW impoundments." GPC agrees with this specific conclusion in this section of the Final Report.

1.3.1.6 Conclusions Regarding Adequacy of Maintenance and Methods of Operation

In its Final Report, CDM Smith concludes that the "current operation and maintenance procedures appear to be adequate. There was no existing evidence of spills, significant repairs, or releases of impounded coal ash slurry." GPC agrees with this conclusion and it has no additional comments regarding this and other conclusions in this section of the Final Report.

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1.3.1.7 Conclusions Regarding Adequacy of Surveillance and Monitoring Program

In its Final Report, CDM Smith states that "Gulf Power's surveillance program is inadequate." CDM Smith goes on to provide that while GPC performs weekly, monthly and yearly inspections, the inspections do not include a monitoring program to measure or document the rate, volume and turbidity of possible seepage flow emerging from the embankment slopes. GPC strongly disagrees with this conclusion. GPC's Plant Crist has a very robust inspection program where it conducts weekly, monthly and yearly inspections. The checklists used during these inspections include reference to and documentation of any noted areas of seepage or other wet spots. Any such areas noted are visually monitored for evidence of change in flow or turbidity. As the ponds are constructed with composite liners, any wet areas are most likely associated with intermittent rainfall events known to occur frequently in Florida. Thus, the implementation of a monitoring program as suggested by CDM Smith is unnecessary. Moreover, even if such a monitoring program was implemented, there is typically insufficient flow to allow for proper turbidity sampling.

1.3.1.8 Conclusions Regarding Suitability for Continued Safe and Reliable Operation

In its Final report, CDM Smith concludes that "Plant Crist's CCW impoundments' embankments do not show evidence of unsafe conditions requiring immediate remedial efforts, but maintenance to correct deficiencies noted above is recommended." GPC agrees with CDM Smith's conclusion except as otherwise noted by GPC above.

Recommendations

1.3.2.1 Recommendations Regarding the Hydrologic/Hydraulic Safety

CDM Smith did not have any recommendations and a GPC response is unnecessary.

1.3.2.2. Recommendations Regarding the Technical Documentation for Structural Stability

CDM Smith did not have any recommendation and a GPC response is unnecessary.

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1.3.2.3. Recommendations Regarding Field Observations (Gypsum Pond)

Gypsum Storage Pond

CDM Smith notes in its Final Report the existence of animal burrows on the west and east exterior slopes of the Gypsum Storage Pond. CDM Smith also notes that vegetation cover may have hidden additional burrows. CDM Smith recommends removing the animals and backfilling the burrows with compacted structural fill to protect the integrity of the embankments.

GPC Response. Subsequent to the August 2012 site inspection, GPC promptly addressed the potential animal burrows described by CDM Smith. The recommendations offered by CDM Smith are already part of GPC's weekly inspection program that is conducted in accordance with Southern Company written procedures that were provided to EPA.

CDM Smith notes in its Final Report areas of possible seepage. CDM Smith recommends regular monitoring of the embankment slopes to detect and monitor seepage. The monitoring program should include measuring/documenting the rate, volume and turbidity of flow emerging from the embankment slopes.

GPC Response. As provided in its response to **1.3.1.7 Conclusions Regarding Adequacy of Surveillance and Monitoring Program**, GPC does not agree that there are areas of seepage around the Gypsum Storage Pond, Process Sedimentation Pond or Process Return Water Pond and GPC does not believe that implementation of CDM Smith's recommendations are necessary.

In its Final Report, CDM Smith notes voids and missing riprap and it recommends that the existing riprap be removed and the embankment slope restored to no steeper than 2.5H:1V or the original contour (whichever is flatter) with compacted structure fill.

GPC Response. This recommendation has already been implemented by GPC.

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Process Sedimentation Pond

In the Final Report, erosion rills were noted by CDM Smith during their site inspection.

GPC Response. All areas of concern that were noted in the 2012 inspection were subsequently addressed and vegetation was re-established in the identified areas. Pursuant to Southern Company written procedures, any erosion rills identified during weekly inspections are repaired in a timely manner.

In the Final Report, CDM Smith notes that potential seepage was observed on the northeast embankment, adjacent to the access road to the crest.

GPC Response. As provided in its response to **1.3.1.7 Conclusions Regarding Adequacy of Surveillance and Monitoring Program**, GPC does not agree that there are areas of seepage and GPC does not believe that implementation of CDM Smith's recommendations on this point are necessary.

1.3.2.4. Recommendations Regarding Surveillance and Monitoring Program

CDM Smith notes in its Final Report that regular monitoring is essential and if seepage areas are observed, services of a qualified engineer should be retained to assess the areas and recommend remedial actions. CDM Smith also suggests that inspections should also be made following periods of heavy rainfall or high waters on the Escambia River. Inspection records should be retained for a minimum of three years.

GPC Response As discussed during the site inspection and as reflected in documentation provided to EPA, CDM Smith's recommendations were already being implemented as standard practice at Plant Crist in accordance with existing Southern Company written procedures. GPC has available to it Southern Company engineers that can be contacted at any time to evaluate and address potential issues regarding the structural integrity and safe operation and maintenance of the Plant Crist CCW impoundments. Pursuant to the previously referenced Southern Company written procedures, GPC routinely inspects the CCW impoundments at Plant Crist after heavy rainfall events and during times when Escambia River water levels are high.

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1.3.2.5 Recommendations Regarding Continued Safe and Reliable Operation

CDM Smith notes in its Final Report that they received a copy of the Southern Company Generation's Emergency Action Plan (EAP) dated December 13, 2012. CDM Smith indicates that the EAP does not include a general location plan, a site plan, names and phone numbers of internal and external emergency contacts, or descriptive information regarding the CCW impoundments. CDM Smith recommends that GPC develop a site-specific EAP for the CCW impoundments.

GPC Response. GPC currently has most of the information noted by CDM Smith on GPC's internal website. All of the CDM Smith noted items are included in Attachment A which includes relevant portions of the EAP. Names and telephone numbers of individuals identified in the EAP as emergency contacts have been partially redacted to protect their privacy. The full names and related contact information for those individuals are reflected in the EAP which is available to appropriate GPC Plant Crist employees.

Should you have any questions regarding these responses or the information contained therein, please do not hesitate to contact GPC's Mike Markey at (850) 444-6573.

Sincerely,



James O. Vick
Director
Environmental Affairs

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cc: Nik Budney, Gulf Power Company
Mike Markey, Gulf Power Company
Jim Pegues, Southern Company Generation Technical Services
Russell Badders, Esq., Beggs & Lane
Michael Petrovich, Esq., Hopping Green & Sams

Handwritten signature

ATTACHMENT A
Section 1.3.2.5 Responses

Dam and Dike Inspection Guidelines

Plant Crist

6-27-14

1.0 Purpose

Provide a guidance document for Plant Crist personnel to follow, that will assure compliance with the Southern Company Generation **Safety Procedure for Dams and Dikes** (GEN-10003, Rev 1) issued on 4-30-12 which is under **Appendix A** of this guidance document.

2.0 Applicability

This guidance document and the above referenced Southern Company Procedure applies to dikes, slopes, dams, and water control structures that are a part of the following Plant Crist water retaining structures/impoundments:

- Chemical Cleaning Waste Pond (North and East Dikes)
- Oil Skimmer Pond (East Dike)
- Ash Pond (North, East, South, and West Dikes)
- Unit 6 Closed Cycle Cooling Tower Canal Dike (North Rocked Dike)
- Gypsum Stack Out Pond Dikes (West, North and East Dikes)
- Gypsum Sediment Pond Dikes (North, East and South Dikes)
- Gypsum Return Water Pond Dikes (West/North Dikes)
- Fly Ash Landfill "Active" Cell Stormwater Diversion Dike
- Ash Landfill Stormwater Collection Pond Dike (East Dike)
- Interim/Bottom Ash Landfill Stormwater Diversion Dike (East Dike)

Currently there is no water retaining structures, located on the Plant Crist property, classified as FERC licensed structures.

The following is a paraphrased summary of impoundment related requirements, contained in sections VIII.C, D, and E of the Plant's NPDES Permit No. FL0002275 which are included under **Appendix B** of this guidance document:

- Ash impoundments shall be operated and maintained in accordance with all applicable State regulations to prevent discharge to waters of the State.
- Annual impoundment integrity inspections shall be performed by qualified personnel with knowledge and training in impoundment integrity.
- Within 30 days of the annual integrity inspection, a responsible officer shall certify that no breaches or structural defects have occurred that have caused discharges to surface waters of the State and that no changes were observed that may indicate a potential compromise to impoundment integrity during the previous calendar year.
- The above certification shall include a statement that the ash pond provides the necessary minimum wet weather detention volume for a 10-year, 24-hour rainfall event and maximum dry weather Plant waste flows that could occur during a 24-hour period.
- Follow-up inspections shall be performed, within 7 days after large or extended rain events (i.e., 25-year, 24 –hour event).
- Notification to the FDEP shall be made, within 24 hours of a critical condition being suspected that may result in a potential discharge to surface waters of the State.
- A proposed course of corrective action and implementation schedule shall be submitted to the FDEP, within 15 days from the time the FDEP was notified of a confirmed critical condition.
- All pertinent impoundment permits, design, construction, operation, maintenance, inspections, corrective actions, etc shall be maintained on-site and made available to the FDEP inspectors upon request.

Currently there are is no dam safety instrumentation installed on any of the Plant Crist water retaining structures or impoundments.

3.0 Responsibilities

The Plant Manager will be responsible for ensuring on-site compliance with dam safety requirements.

The Plant Compliance Department will have specific responsibility for developing, revising, and implementing these Dam and Dike Inspection Guidelines in a manner consistent with the most current Southern Company Generation Safety Procedure for Dams and Dikes.

Gulf Power Company's Corporate Environmental Affairs Department will provide technical support to the Plant and have responsibility for interfacing with State and Federal environmental regulatory agencies.

Southern Company Generation Hydro Services will provide technical support and annual dam safety training to the Plant personnel and will conduct an annual visual inspections of all applicable water retaining structures/impoundments.

4.0 Plant Compliance Department Responsibilities (Specific)

The Plant's Environmental Compliance Analyst and Specialist will be responsible for the following:

- Maintain proper vegetation control on all water retaining structures (dams and dikes) to ensure adequate visibility for comprehensive visual inspections to be performed. Grass on all applicable dams and dikes, shall be mowed to a height of approximately 4-6 inches at least twice per year unless drought or other circumstances make mowing unnecessary.
- Perform weekly visual inspections of all water retaining structures, listed under section 2.0, using the approved "Plant Dam Safety Inspection Report" form included under **Appendix C** of this guidance document. Visual inspections will be performed more frequently, if warranted by previous maintenance history, by unusual circumstances as described in the Southern Company Procedure for Dams and Dikes (Sec 10003.220.3), or by site specific conditions.
- Keep Plant management informed of the condition of all water retaining structures.
- Ensure that sufficient financial resources are included in the Plant's budgets to assure compliance with the current revision of the Southern Company Generation Safety Procedure for Dams and Dikes.
- Co-ordinate the implementation of any corrective actions identified through weekly Plant inspections or annual SCG Hydro Services inspections, as being necessary to assure dam and dike safety.
- Retain all inspection reports and related documentation (weekly inspections, SCG Hydro Services inspections, corrective actions taken, etc.) for the life of the Plant plus six years.
- Support SCG Hydro Services personnel while on-site performing annual visual inspections of the Plant's water retaining structures.
- Assure Plant personnel performing visual inspections attend the annual dam safety training conducted by SCG Hydro Services.

- Ensure a current Dam Safety Emergency Contacts card is posted in each of the Plant's control rooms and other conspicuous locations as designated by the plant manager and that Plant personnel are adequately trained on their use.
- Ensure granular materials are kept on-site in quantities and locations to support prompt response to emergency dam failure situations. Material stockpiles shall be identified and protected with safety fence enclosure consistent with the requirements of section 1003.440 of the current revision of the Southern Company Generation Safety Procedure for Dams and Dikes.
- Revise this guidance document and visual inspection form, as necessary, to assure compliance with the current revision of the Southern Company Generations Safety Procedure for Dams and Dikes (GEN 10003). Revisions to this guidance document or visual inspection form, must be approved by SCG Hydro Services dam safety engineers prior to being implemented by the Plant.
- Perform a visual inspection of affected water retaining and control structures as soon as safety allows and/or there is sufficient visibility, following **Unusual Circumstances** such as:
 - Severe rain event
 - Post storm (hurricane, tornado, etc),
 - High river or stream flow
 - Unusually high tide
 - Earthquake (SCG Hydro Services will notify Plant Management of such an event)

These "Unusual Circumstance Event Inspections" are to be documented using the inspection checklist under **Appendix B**, with a copy being sent to SCG Hydro Services immediately upon completion.

If there are any areas of concern or suspected dam safety problems, noted by Plant personnel during visual inspections or at any other time, they are to be immediately communicated to SCG Hydro Services by phone. A copy of the inspection checklist, or any other pertinent information, noting the unusual condition or concern is to be promptly emailed or faxed to SCG Hydro Services.

- Assure that any proposed new water retaining structures, planned dredging inside existing impoundments and proposed modifications to existing dams and associated structures (including discharge structures, internal retaining structures, diversion dikes and dry ash storage within existing ponds) are reviewed and approved by SCG Hydro Services prior to and during design and construction.

- Ensure that SCG Hydro Services are contacted and included in the review and approval process for new water retaining structures, planned dredging operations and for any modifications to existing structures.

5.0 Southern Company Generation Hydro Services Responsibilities (Specific)

Perform an annual visual inspection of all water retaining structures, listed under section 2.0 above. Conduct an exit meeting with Plant personnel to discuss the observations made during the inspection and to point out any items that need immediate attention.

Provide annual training for Plant Crist personnel responsible for dam and dike inspection activities.

Provide technical support to Plant Crist personnel responsible for dam and dike inspection and repair activities.

Appendix A

Southern Company Generation

Safety Procedure for Dams and Dikes

GEN-10003, Rev 1

4-30-12

GEN-10003, Rev. 1

APPROVAL:

Executive Vice President, CPO,
Southern Company Generation


SIGNATURE
1-30-12
Date

Southern Company Generation

**Safety Procedure
for
Dams and Dikes**

Revision	Issue Date	Prepared By	Approved By	Change Description
0	06-29-2009	Hydro Services	J. Stewart	Initial issue
1	05-01-2012	Hydro Services	D. Jones	Miscellaneous administrative revisions
2				

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10003.000 Purpose

Safe operation of water retaining structures is required to ensure public safety, environmental safety and to protect Company assets. A comprehensive dam safety program sets forth guidelines for the safe operation of water retaining structures.

A coordinated, pre-planned, effective emergency response is crucial to lessen the danger to public and environmental safety and to minimize the risk to Company assets.

This procedure documents responsibility for dam safety actions including inspection, reporting, analysis, regulatory compliance, and emergency response.

This procedure also documents vegetation control standards for dams and dikes.

This procedure will be formally reviewed by SCG Hydro Services within two years from the current approval date and revised as needed. Following review, the procedure will be submitted for Chief Production Officer approval, whether or not any revisions are made. Revision will be made prior to the two-year review if dictated by legal, business or regulatory requirements.

10003.100 General Information

10003.110 Definitions

Toe – the junction of the downstream slope or surface with the original ground surface

Water retaining structure – an artificial barrier that has the ability to impound water, wastewater, or any liquid-borne material for the purpose of storage: dam, dike

Water control structure – structure appurtenant to a water retaining structure that allows conveyance of water, controls the direction or rate of discharge or maintains a prescribed water elevation, such as a spillway gate or discharge structure

Crest – top of the dam

Dam Safety Engineer – Individual determined by the Hydro Services Principal Engineer responsible for condition assessment of dams and the General Manager - Hydro to be qualified to conduct dam safety inspections and evaluations based on education, experience or other qualifications.

10003.120 Dam Safety Criteria

10003.120.1 FERC-Licensed Structures

FERC-licensed structures shall be governed by the FERC criteria as set forth in the FERC Engineering Guidelines or as approved by FERC on a case-by-case basis.

10003.120.2 Other Structures

Where structures are under the jurisdiction of a state dam safety program, the criteria set forth in that program shall apply. Where structures are not governed by a state dam safety program, generally accepted engineering criteria for slope stability, structural stability, and hydraulic adequacy shall apply.

10003.130 Regulatory Interface

The environmental organizations of the individual operating companies will be responsible for the interface with State and Federal environmental regulatory agencies. In practice, SCG Hydro Services may provide technical interface with State and Federal regulatory agencies regarding dam safety.

10003.140 Compliance

SCG dams and dikes will meet applicable dam safety requirements or have a plan for investigation and remediation to meet these requirements.

The plant manager will be responsible for ensuring on-site compliance with dam safety requirements. Appropriate reference to and/or provisions of this procedure should be included in the plant's general emergency plan documents.

10003.200 Inspections

10003.210 Inspection Applicability

This procedure is applicable to the following water retaining structures:

- hydroelectric project dams
- ash pond dams and dikes (active or water retaining)
- cooling water and make-up water pond dams and dikes
- gypsum pond dikes
- other similar structures as requested by generating plants

10003.220 Inspection Scheduling

10003.220.1 Inspections by Plant Personnel

Plant personnel will inspect the water retaining structures weekly at a minimum, unless more frequent inspection is warranted by previous maintenance history or by site specific conditions.

10003.220.2 Inspections by Dam Safety Engineers

Structures will be inspected by SCG Hydro Services dam safety engineers annually at a minimum. More frequent inspections will be conducted if warranted by circumstances

that exist at a particular location, such as previous maintenance history or unusual events. If deemed necessary, Hydro Services may obtain assistance in the inspections from qualified personnel working in other SCG engineering departments or the operating companies.

Plant management will be contacted (ideally 30 days or more prior to the inspection date) by SCG Hydro Services to schedule a mutually acceptable date. The following items shall be discussed at this time:

- a) Status of previous inspection recommendations
- b) Proper vegetation control to ensure the Dam Safety Engineer has adequate visibility to perform a comprehensive inspection.
- c) Identify plant personnel to take part in the inspection (should include personnel who conduct weekly plant inspections to the extent possible).
- d) Any necessary arrangements such as safety equipment or transportation needed to conduct the inspection.

10003.220.3 Unusual Circumstances

The water retaining and control structures will be inspected by either plant personnel and/or a Dam Safety Engineer any time one of the following unusual circumstances occurs:

- a) Severe rain event
- b) Post storm (hurricane, tornado, etc.)
- c) High river or stream flow (if adjacent to a river or stream)
- d) Unusually high tide (if adjacent to a tidal area)
- e) Earthquake

Plant personnel will notify SCG Hydro Services if any of these events occurs at their site. SCG Hydro Services will notify plant management in the event of an earthquake.

This inspection will be conducted as soon as safety allows and/or there is sufficient visibility. SCG Hydro Services may request plant personnel to perform these inspections. Results of such inspections shall be reported to SCG Hydro Services immediately upon completion. Depending on the findings of the inspection by plant personnel, a follow-up inspection may be conducted by SCG Hydro Services.

10003.230 Inspection Methodology

Inspections should be conducted using a checklist that is specific to the water retaining structure and/or water control structure being inspected.

10003.230.1 Checklist for Inspection by Plant Personnel

The inspection checklist will be developed and maintained by SCG Hydro Services dam safety engineers cooperatively with plant personnel. Modifications to the existing

inspection checklists to accommodate the particular needs of a specific location will be made to the extent possible. However, any such revisions will be approved by SCG Hydro Services dam safety engineers. Only those checklists approved and issued by SCG Hydro Services dam safety engineers will be utilized for the weekly dam safety inspection.

10003.230.2 Checklist for Inspection by Dam Safety Engineers

The Dam Safety Engineer will utilize a site specific inspection checklist during inspections to help insure that all pertinent items are covered in the inspection. This checklist will contain at a minimum all of the dam inspection items on the weekly checklist and may contain additional items related to the dam safety engineer inspection. Inspection findings will be documented in detail in the report on the inspection (see 10003.240.2).

10003.240 Inspection Documentation

10003.240.1 Documentation of Inspections by Plant Personnel

Inspections performed by plant personnel shall be documented on the checklist described in section 10003.230.1.

Any areas of concern identified during the inspection should be brought to the attention of the assigned SCG Hydro Services Dam Safety Engineer immediately by phone. If unable to contact the assigned Dam Safety Engineer, call the Dam Safety Referral Line number noted on the checklist for the Engineer on duty. Fax or email a copy of the checklist noting the unusual condition or concern to SCG Hydro Services.

Completed weekly inspection checklists shall be retained by each plant for the life of the plant plus six years.

10003.240.2 Documentation of Inspections by Dam Safety Engineers

Inspections performed by the Dam Safety Engineer shall be documented on the checklist as described in section 10003.230.2. Once the inspection is concluded, the Dam Safety Engineer will conduct an exit meeting with the plant personnel to discuss the observations made during the inspection and to point out any items that need immediate attention. The Dam Safety Engineer will prepare a standardized report for distribution in a timely manner that provides detailed information regarding inspection observations and recommendations.

This report shall contain (at a minimum):

- a) Instrumentation review (if applicable)
- b) Observations
- c) Recommendation items requiring immediate attention for the safety of the structure (if any are identified)

- d) Items requiring attention to assure the long-term safety of the structure (if any are identified).

These reports shall be retained by SCG Hydro Services for the life of the corporation.

10003.240.2.1 Dam Safety Engineer Inspection Recommendation Tracking

Inspection reports will include:

- New recommendations
- The status of all of the recommendations from the immediately previous inspection.
- The outstanding recommendations from earlier inspections and the status of these recommendations as determined on the current inspection.

New recommendations will include a schedule for completion determined by the plant staff in consultation with SCG Hydro Services. The plant staff will provide a timely written response to the inspection report with confirmation of the schedule. Hydro Services will track the recommendations to completion.

10003.240.2.2 Dam Safety Engineer Inspection Report Distribution

Inspection reports will be distributed to the following:

1. CPO
2. SPO
3. Plant Manager or Superintendent (as addressee)
4. Plant Compliance Manager (if applicable)
5. Any other personnel designated by the Plant Manager
6. OPCO Environmental Manager
7. Hydro General Manager
8. Hydro O&M Manager (Hydro facilities only)

10003.300 Instrumentation

If dam safety instrumentation is installed at the site, instrument readings are to be reported to SCG Hydro Services as soon as possible, but within a maximum of five working days of being taken. Instrument readings will be reviewed by SCG Hydro Services as soon as possible, but within a maximum of five working days of receipt. (These maximums may be reduced as necessary if site specific conditions at a particular location dictate that a shorter review time is appropriate.) The schedule for instruments read by the plant shall be entered into the Plant's work order management system for compliance tracking.

Data from installed instrumentation can provide early warning for potential problems and is important to the success of the Dam Safety Program. Readings from installed instruments should be made on schedule and shall be taken by a qualified individual who has undergone applicable training.

Instrumentation readings shall be retained at the plant site for the current year plus one additional year.

Abnormal instrument readings shall be brought to the attention of SCG Hydro Services immediately by phone. If necessary, call the Dam Safety Referral Line for the contact information of the Engineer on Duty.

Dam movement surveys require a significant amount of post-processing and therefore cannot be accommodated in the five working day window cited above. These results should be forwarded to SCG Hydro Services as soon as possible. The movement survey results will be reviewed by SCG Hydro Services as soon as possible after receipt.

10003.400 Emergency Response

10003.410 Emergency Notification

SCG Hydro Services maintains two dam safety referral phone numbers, one each for the Atlanta and Birmingham offices. Each office will maintain an on-call roster so that an engineer is available for response at all times. The referral phone number will connect with a recorded message that provides the caller with the name and contact information for the Engineer on Duty at the time. The referral phone number and the contact information for the individual Dam Safety Engineers will be included on cards distributed to the SCG plants. These cards shall be posted in the Control Room and other conspicuous locations as designated by the plant manager.

10003.420 Dam Safety Problem Reporting

Suspected dam safety problems shall be brought to the attention of the assigned SCG Hydro Services Dam Safety Engineer immediately by phone. If unable to contact the assigned Dam Safety Engineer, call the Dam Safety Referral Line number for contact information for the Engineer on duty.

FERC requires that any condition affecting the safety of a FERC-licensed hydro project be reported to them immediately. FERC describes a condition affecting safety by saying: "Such conditions may include, but are not limited to, gate operation failure, piping, seepage, slides, unusual instrumentation readings, sinkholes, sabotage, natural disasters (floods, earthquakes) and other signs of instability of any project works. Additional conditions, include, but are not limited to, reservoir monitoring instrumentation and communication systems malfunction or failure, and remote control systems malfunction or failure."

For problems occurring at hydro plants, SCG Hydro Services will be responsible for notification of FERC and, if applicable, state dam safety agencies.

10003.430 Emergency Equipment

In conjunction with the designated plant management team, equipment present at the plant location for loading or moving material (or other uses) may be utilized, as necessary, to respond to emergency conditions at the dams.

10003.440 Emergency Supplies

In order to be able to deal with boils or large seeps in a timely manner, granular materials for constructing filters shall be stockpiled at earth embankments. These stockpiles should be located as near to the toe of the embankment as practical so that the material can readily be moved to any location along the toe of the dam. The amounts and specifications for material to be stockpiled at each location will be determined by SCG Hydro Services. These stockpiles shall be protected with a silt fence, safety fence enclosure or other equivalent means approved by SCG Hydro Services and shall be labeled "Emergency Filter Stockpile, Emergency Use Only".

10003.500 Training

SCG Hydro Services will be responsible for development and maintenance of a training program for plant personnel who conduct weekly dam safety inspections of water retaining structures. All personnel conducting inspections will be required to have this training on an annual basis. The typical training session will include instructor-led classroom training followed by on-the-job-training with Dam Safety Engineers.

The classroom training may consist of technical presentations using training materials such as FEMA publications and Association of State Dam Safety Officials or United States Society on Dams training programs as well as materials developed by SCG Hydro Services.

Dam Safety Engineers will provide on-the-job-training on the actual retaining structures and demonstrate appropriate inspection procedures and techniques. The Dam Safety Engineer will also conduct training on proper instrument reading procedures and data recording for the sites with installed instrumentation that is read by qualified plant personnel.

10003.600 Vegetation Control

A uniform cover of a suitable species of grass shall be maintained on all earth dams or dikes. The grass should be mowed at least twice a year at a reasonable height to facilitate adequate inspection, unless drought or other circumstances make mowing unnecessary. Mowing should be done with appropriate equipment in such a way as to minimize damage to the dam or grass cover from mower tires or blades.

Dam crests should be protected by a suitable granular surface material if traffic prevents establishment of a good grass cover. The use of bottom ash or similar CCB materials for

this purpose should be limited to material that is free of pyrites or other components that would be harmful to grass.

Generally, trees and woody brush should not be allowed on the slopes, crest or along the water line of any dam or dike. Exceptions to this provision (in the case of beneficial vegetation or other situations) may be made as deemed appropriate by SCG Hydro Services dam safety engineers. The areas adjacent to the toe of the dam and the contact of the dam and the abutment should also be clear of trees and woody brush to distances deemed appropriate by SCG Hydro Services dam safety engineers (ideally a minimum of 20 feet).

Outlet structures and associated inlet and outlet channels should be kept free of vegetation that would impede the flow of water.

10003.700 Modification of Retaining Structures and Water Levels

The FERC and state safe dams organizations require that any modifications to water retaining structures (that they regulate) be reviewed and approved by their organization prior to construction. In addition, FERC requires that any soil boring program on a FERC-regulated structure be reviewed and approved by FERC prior to implementation. For FERC regulated structures, SCG Hydro Services will serve as the contact with FERC and, if applicable, with the state dam safety regulatory agencies in these matters.

Proposed new water retaining structures, planned dredging inside existing impoundments and proposed modifications to existing dams and associated structures (including discharge structures, internal retaining structures, diversion dikes and dry ash storage within existing ponds) shall be reviewed with SCG Hydro Services prior to and during design and construction. SCG Hydro Services shall be included in the review and approval process for new water retaining structures, planned dredging operations and for modifications to existing structures.

Increases in maximum pond elevations shall be reviewed with SCG Hydro Services prior to exceeding existing maximum elevations.

10003.800 References

The documents listed below contain both general and specific guidance on topics related to the safety of dams and dikes. Requirements and provisions of these documents may or may not apply to a specific dam or dike covered under this procedure.

FEMA-93 Federal Guidelines for Dam Safety Rev. April, 2004

FEMA-473 Technical Manual for Dam Owners - Impacts of Animals on Earthen Dams Rev. September, 2005

FEMA-534 Technical Manual for Dam Owners - Impacts of Plants on Earthen Dams Rev. September, 2005

Page 8 of 9

FERC Engineering Guidelines, Ch. 14 Dam Safety Performance Monitoring Program
Rev. July, 2005

Georgia Environmental Protection Division Rules for Dam Safety Environmental Rule 391-3-8. Authorized by OCGA 12-5-370 GA Safe Dams Act of 1978.

Georgia Safe Dams Program Engineering Guidelines v.3.1, Georgia EPD Safe Dams Program, 2007.

Mississippi Commission on Environmental Quality Dam Safety Regulation LW-4
Revised August 2005

Northwest Florida Water Management District, Chapter 40A-4, Florida Administrative Code

Southern Company Records Management home page
<http://compliance.southernco.com/records-mgmt/SoCoRecordsMgtHome.html>

The Southern Company Records and Information Management Retention Schedule,
Revision 19, March 28, 2011.
http://compliance.southernco.com/records-mgmt/records-mgmt-home/SOCORIMRetentionSchedule03_28_2011.pdf

Appendix B

Gulf Power Company

Plant Crist

NPDES Permit # FL0002275

Expiration Date 1-27-16

Sections Pertaining to Impoundments

PERMITTEE: Gulf Power Company
FACILITY: Crist Electric Generating Plant

PERMIT NUMBER: FL0002275 (Major)
EXPIRATION DATE: January 27, 2016

C. Impoundment Design, Construction, Operation, and Maintenance

1. All ash impoundments used to hold or treat wastewater and other associated wastes shall be operated and maintained to prevent the discharge of pollutants to waters of the State, except as authorized under this permit.
2. Operation and maintenance of any ash impoundment shall be in accordance with all applicable State regulations. When practicable, piezometers or other instrumentation shall be used as a means to aid monitoring of impoundment integrity.

D. Impoundment Integrity Inspections

1. No later than January 31, 2011, and annually thereafter, all impoundments shall be inspected by qualified personnel with knowledge and training in impoundment integrity. Annual inspections shall include observations of dike and toe areas for erosion, cracks or bulges, seepage, wet or soft soil, changes in geometry, the depth and elevation of the impounded water, sediment or slurry, freeboard, changes in vegetation such as overly lush, dead or unnaturally tilted vegetation, and any other changes which may indicate a potential compromise to impoundment integrity.
2. Within 30 days after the annual inspection, a qualified, responsible officer shall certify to the Department that no breaches or structural defects resulting in the discharges to surface waters of the State and that no changes were observed which may indicate a potential compromise to impoundment integrity during the previous calendar year.

The certification shall also include a statement that the ash pond provides the necessary minimum wet weather detention volume to contain the combined volume for all direct rainfall and all rainfall runoff to the pond resulting from the 10-year, 24-hour rainfall event and maximum dry weather plant waste flows which could occur during a 24-hour period.

3. The permittee shall conduct follow-up inspections within 7 days after large or extended rain events (i.e., 25-year, 24-hour precipitation event).
4. In the event that a critical condition in the ash impoundment, such as the conditions listed below, is suspected that may result in a potential discharge to surface waters of the State, the permittee shall notify the Department within twenty-four (24) hours of becoming aware of the situation and provide a proposed course of corrective action and implementation schedule within fifteen (15) days from the time existence of the critical condition is confirmed and the Department was notified.

Critical conditions include observed changes such as concentrated seepage on the downstream of the slope, at the top of the slope, or downstream from the toe of the slope, evidence of slope instability including sloughing, bulging, or heaving of the downstream slope, or subsidence of the impoundment slope or crest, cracking of surface on the crest or either face of the impoundment, or general or concentrated seepage in the vicinity of or around any conduit through the impoundment may be signs imminent impoundment failure and should be addressed immediately.

E. Reporting and Recordkeeping Requirements for Impoundments

1. The summarized findings of all monitoring activities, inspections, and corrective actions pertaining to the impoundment integrity, and operation and maintenance of all impoundments shall be documented and kept on-site in accordance with permit Condition V.3, and made available to Department inspectors upon request.
2. Starting with the issuance of this permit, all pertinent impoundment permits, design, construction, operation, and maintenance information, including but not limited to: plans, geotechnical and structural integrity studies, copies of permits, associated certifications by qualified, Florida-registered professional engineer, and regulatory approvals, shall be kept on site in accordance with permit Condition V.3 and made available to Department inspectors upon request.

Appendix C

Gulf Power Company

Plant Crist

Dam Safety Inspection Report Form

Revision 1

5-22-14

Plant Crist
Dam Safety Inspection Report

Weekly Inspection

Unusual Event Inspection

Specify

Hydro Services Emergency No - 404-506-6005

Hydro Services Site Contact : Hugh Armitage - 404-506-7109

Rev. 1 (5-22-14)

Weather Conditions:

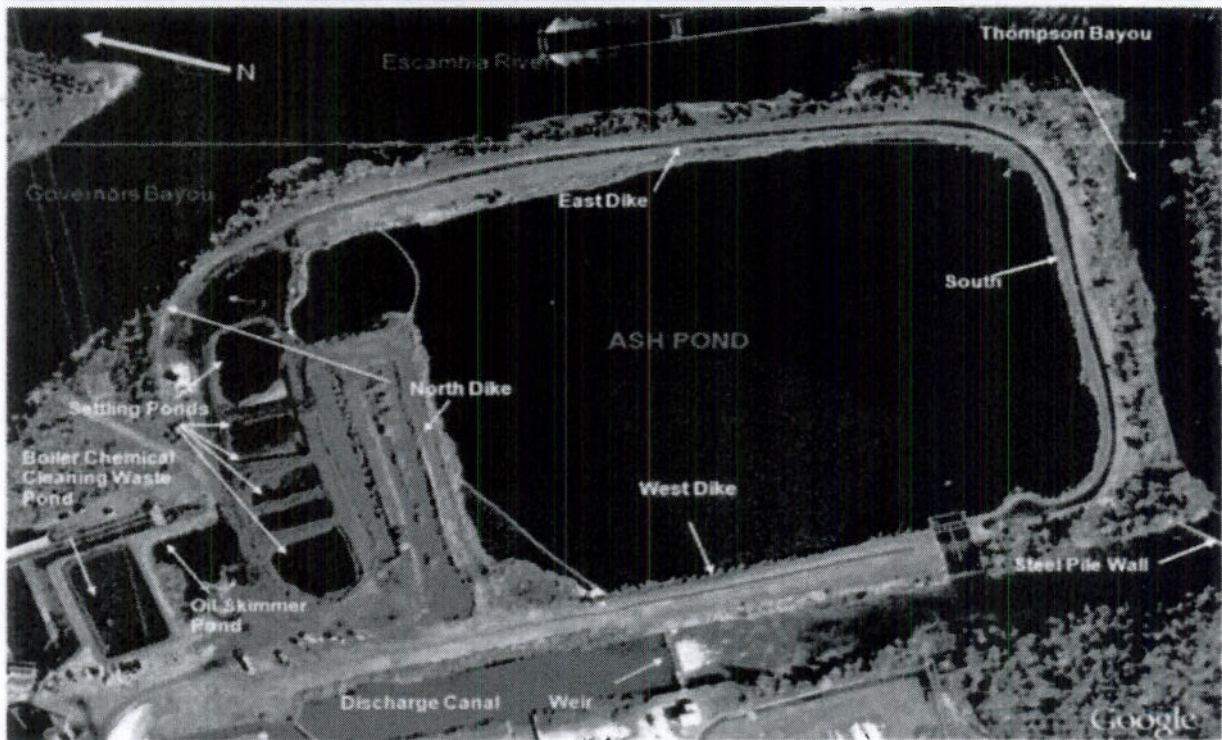
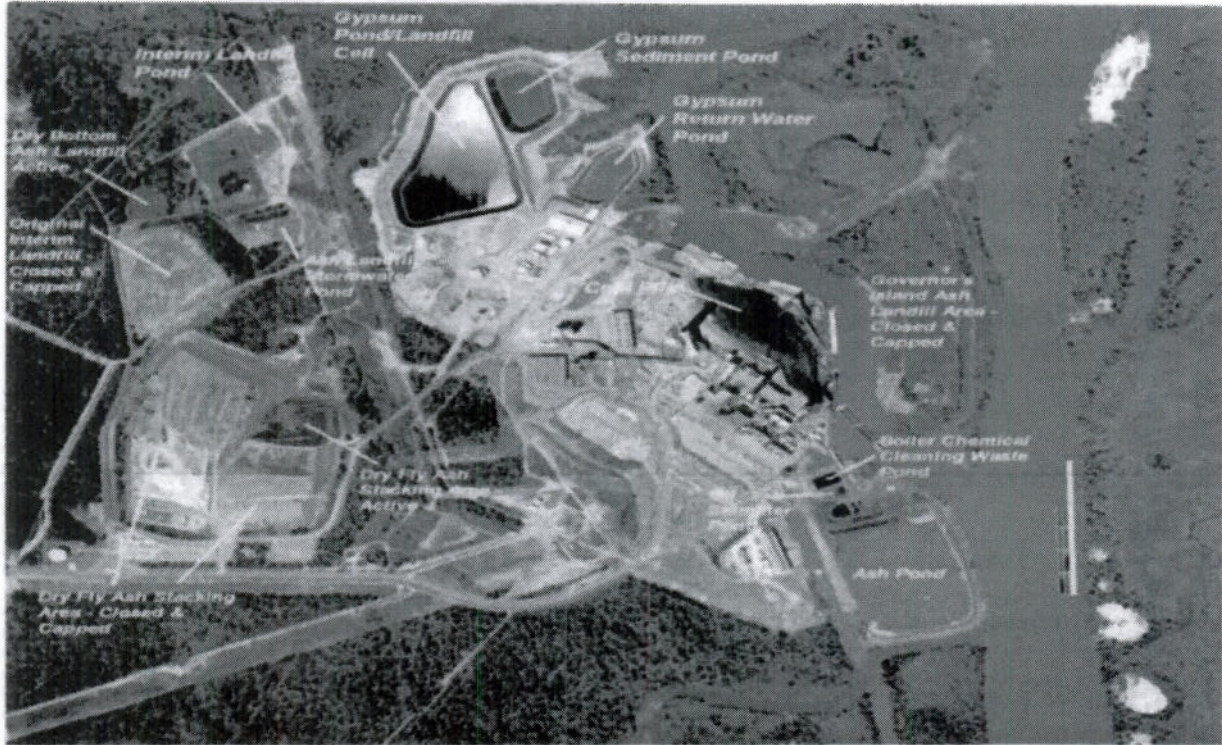
Date / Time of Inspection:

Rainfall: Past 24 hrs-

Past week-

Inspected By:

Plant Crist Pond Locations



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Plant Crist
Dam Safety Inspection Report

<u>1. Boiler Chemical Cleaning Waste Pond (North/East Fabri-Form Dikes)</u>	<u>Observation</u>	Comments (Identify if upstream or downstream slope or both)
a. Water Level/Freeboard	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
b. Crest	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
c. Slope (Upstream/Downstream)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
d. Toe (where visible)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
e. Vegetation growing in Fabri-Form Mat	Yes <input type="radio"/> No <input type="radio"/>	
f. Fabri-Form Mat Damage/Depressions	Yes <input type="radio"/> No <input type="radio"/>	
g. Wet/Saturated Areas	Yes <input type="radio"/> No <input type="radio"/>	
h. Evidence of Seepage	Yes <input type="radio"/> No <input type="radio"/>	
i. Water Boils	Yes <input type="radio"/> No <input type="radio"/>	
j. Instability Observed	Yes <input type="radio"/> No <input type="radio"/>	
<u>2. Oil Skimmer Pond (East Dike)</u>	<u>Observation</u>	Comments (Identify if upstream or downstream slope or both)
a. Water Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
b. Solids Accumulation Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
c. Vegetation Height	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
d. Crest	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
e. Slope (Upstream/Downstream)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
f. Toe (where visible)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
g. Wet/Saturated Areas	Yes <input type="radio"/> No <input type="radio"/>	
h. Evidence of Seepage	Yes <input type="radio"/> No <input type="radio"/>	
i. Water Boils	Yes <input type="radio"/> No <input type="radio"/>	
j. Instability Observed	Yes <input type="radio"/> No <input type="radio"/>	
k. Depressions	Yes <input type="radio"/> No <input type="radio"/>	
l. Bare Spots on Slope	Yes <input type="radio"/> No <input type="radio"/>	
m. Animal Burrows	Yes <input type="radio"/> No <input type="radio"/>	
n. Ant Mounds (Active)	Yes <input type="radio"/> No <input type="radio"/>	
<u>3. Ash Pond (North/East/South/West Dikes)</u>	<u>Observation</u>	Comments (Identify if upstream or downstream slope or both)
a. Water Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
b. Solids Accumulation Level - Settling Basins	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
c. Sloughing/Erosion/Rip Rap-NE Slope	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
d. Sloughing/Erosion/Rip Rap-Rest of Slopes	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
e. Vegetation Height on Slopes	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
f. Wet Spot-South End of West Dike Slope	Yes <input type="radio"/> No <input type="radio"/>	Yes = No flow observed - but being monitored weekly for any change
g. Wet Spot-North End of West Dike Slope	Yes <input type="radio"/> No <input type="radio"/>	Yes = No flow observed - but being monitored weekly for any change
h. Crest	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
i. Slope (Upstream/Downstream)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
j. Toe (where visible)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
k. Emergency Aggregate Materials In Place	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
l. Wet/Saturated Areas-Other than NW Dike	Yes <input type="radio"/> No <input type="radio"/>	
m. Evidence of Seepage	Yes <input type="radio"/> No <input type="radio"/>	
n. Water Boils	Yes <input type="radio"/> No <input type="radio"/>	
o. Instability Observed	Yes <input type="radio"/> No <input type="radio"/>	
p. Depressions	Yes <input type="radio"/> No <input type="radio"/>	
q. Bare Spots on Slopes	Yes <input type="radio"/> No <input type="radio"/>	
r. Animal Burrows	Yes <input type="radio"/> No <input type="radio"/>	
s. Ant Mounds (Active)	Yes <input type="radio"/> No <input type="radio"/>	

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Plant Crist
Dam Safety Inspection Report

<u>4. Unit 6 Cooling Tower Canal (North Rocked Dike)</u>	<u>Observation</u>	Comments (Identify if upstream or downstream slope or both)
a. Water Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
b. Solids Accumulation Level - North Basin	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
c. Vegetation on Rock Slope	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
d. Crest (Rocked Road)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
e. Rocked Slope (Downstream)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
f. Wet/Saturated Areas	Yes <input type="radio"/> No <input type="radio"/>	
g. Evidence of Seepage	Yes <input type="radio"/> No <input type="radio"/>	
h. Water Boils	Yes <input type="radio"/> No <input type="radio"/>	
i. Instability Observed	Yes <input type="radio"/> No <input type="radio"/>	
j. Depressions	Yes <input type="radio"/> No <input type="radio"/>	
<u>5. Gypsum Pond/Landfill (West/North Dikes)</u>	<u>Observation</u>	Observations - Comments (Indicate upstream or downstream slope)
a. Water Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
b. Solids Accumulation Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
c. Vegetation Height on Slopes	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
d. Crest	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
e. Slope (Upstream/Downstream)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
f. Toe (where visible)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
g. Wet/Saturated Areas	Yes <input type="radio"/> No <input type="radio"/>	
h. Evidence of Seepage	Yes <input type="radio"/> No <input type="radio"/>	
i. Water Boils	Yes <input type="radio"/> No <input type="radio"/>	
j. Instability Observed	Yes <input type="radio"/> No <input type="radio"/>	
k. Depressions	Yes <input type="radio"/> No <input type="radio"/>	
l. Bare Spots on Slopes	Yes <input type="radio"/> No <input type="radio"/>	
m. Animal Burrows	Yes <input type="radio"/> No <input type="radio"/>	
n. Ant Mounds (Active)	Yes <input type="radio"/> No <input type="radio"/>	
<u>6. Gypsum Sediment Pond (North/East/South Dikes)</u>	<u>Observation</u>	Comments (Identify if upstream or downstream slope or both)
a. Water Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
b. Solids Accumulation Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
c. Vegetation Height on Slopes	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
d. Crest	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
e. Slope (Upstream/Downstream)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
f. Toe (where visible)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
g. Emergency Overflow Structure (East Slope)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
h. Wet/Saturated Areas	Yes <input type="radio"/> No <input type="radio"/>	
i. Evidence of Seepage	Yes <input type="radio"/> No <input type="radio"/>	
j. Water Boils	Yes <input type="radio"/> No <input type="radio"/>	
k. Instability Observed	Yes <input type="radio"/> No <input type="radio"/>	
l. Depressions	Yes <input type="radio"/> No <input type="radio"/>	
m. Bare Spots on Slopes	Yes <input type="radio"/> No <input type="radio"/>	
n. Animal Burrows	Yes <input type="radio"/> No <input type="radio"/>	
o. Ant Mounds (Active)	Yes <input type="radio"/> No <input type="radio"/>	
<u>7. Gypsum Return Water Pond (West/North Dikes)</u>	<u>Observation</u>	Comments (Identify if upstream or downstream slope or both)
a. Water Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
b. Solids Accumulation Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
c. Vegetation Height on Slopes	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
d. Crest	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
e. Slope (Upstream/Downstream)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
f. Toe (where visible)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
g. Emergency Overflow Structure (West Slope)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
h. Wet/Saturated Areas	Yes <input type="radio"/> No <input type="radio"/>	
i. Evidence of Seepage	Yes <input type="radio"/> No <input type="radio"/>	
j. Water Boils	Yes <input type="radio"/> No <input type="radio"/>	

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Plant Crist
Dam Safety Inspection Report

k. Instability Observed	Yes <input type="radio"/> No <input type="radio"/>	
l. Depressions	Yes <input type="radio"/> No <input type="radio"/>	
m. Bare Spots on Slopes	Yes <input type="radio"/> No <input type="radio"/>	
n. Animal Burrows	Yes <input type="radio"/> No <input type="radio"/>	
o. Ant Mounds (Active)	Yes <input type="radio"/> No <input type="radio"/>	

8. Dry Fly Ash Stacking Area-Active (Stormwater Diversion Dike)	Observation	Comments (Identify if upstream or downstream slope or both)
a. Water Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
b. Solids Accumulation Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
c. Drain Pipe Condition/Blockage	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
d. Vegetation Height on Slopes	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
e. Crest	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
f. Slope (Upstream/Downstream)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
g. Toe (where visible)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
h. Wet/Saturated Areas	Yes <input type="radio"/> No <input type="radio"/>	
i. Evidence of Seepage	Yes <input type="radio"/> No <input type="radio"/>	
j. Water Boils	Yes <input type="radio"/> No <input type="radio"/>	
k. Instability Observed	Yes <input type="radio"/> No <input type="radio"/>	
l. Depressions	Yes <input type="radio"/> No <input type="radio"/>	
m. Bare Spots on Slopes	Yes <input type="radio"/> No <input type="radio"/>	
n. Animal Burrows	Yes <input type="radio"/> No <input type="radio"/>	
o. Ant Mounds (Active)	Yes <input type="radio"/> No <input type="radio"/>	

9. Ash Landfill Stormwater Pond (East Dike)	Observation	Comments (Identify if upstream or downstream slope or both)
a. Water Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
b. Solids Accumulation Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
c. Cofferdam Condition/Blockage (South)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
d. Cofferdam Condition/Blockage (North)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
e. Vegetation Height on Slopes	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
f. Crest	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
g. Slope (Upstream/Downstream)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
h. Toe (where visible)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
i. Wet/Saturated Areas	Yes <input type="radio"/> No <input type="radio"/>	
j. Evidence of Seepage	Yes <input type="radio"/> No <input type="radio"/>	
k. Water Boils	Yes <input type="radio"/> No <input type="radio"/>	
l. Instability Observed	Yes <input type="radio"/> No <input type="radio"/>	
m. Depressions	Yes <input type="radio"/> No <input type="radio"/>	
n. Bare Spots on Slopes	Yes <input type="radio"/> No <input type="radio"/>	
o. Animal Burrows	Yes <input type="radio"/> No <input type="radio"/>	
p. Ant Mounds (Active)	Yes <input type="radio"/> No <input type="radio"/>	

10. Interim Landfill Pond (Stormwater Diversion Dike)	Observation	Comments (Identify if upstream or downstream slope or both)
a. Water Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
b. Solids Accumulation Level	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
c. Drain Pipe Condition/Blockage	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
d. Vegetation Height on Slopes	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
e. Crest	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
f. Slope (Upstream/Downstream)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
g. Toe (where visible)	Yes <input type="radio"/> No <input type="radio"/>	Yes = Good Condition
h. Wet/Saturated Areas	Yes <input type="radio"/> No <input type="radio"/>	
i. Evidence of Seepage	Yes <input type="radio"/> No <input type="radio"/>	
j. Water Boils	Yes <input type="radio"/> No <input type="radio"/>	
k. Instability Observed	Yes <input type="radio"/> No <input type="radio"/>	
l. Depressions	Yes <input type="radio"/> No <input type="radio"/>	
m. Bare Spots on Slopes	Yes <input type="radio"/> No <input type="radio"/>	
n. Animal Burrows	Yes <input type="radio"/> No <input type="radio"/>	
o. Ant Mounds (Active)	Yes <input type="radio"/> No <input type="radio"/>	

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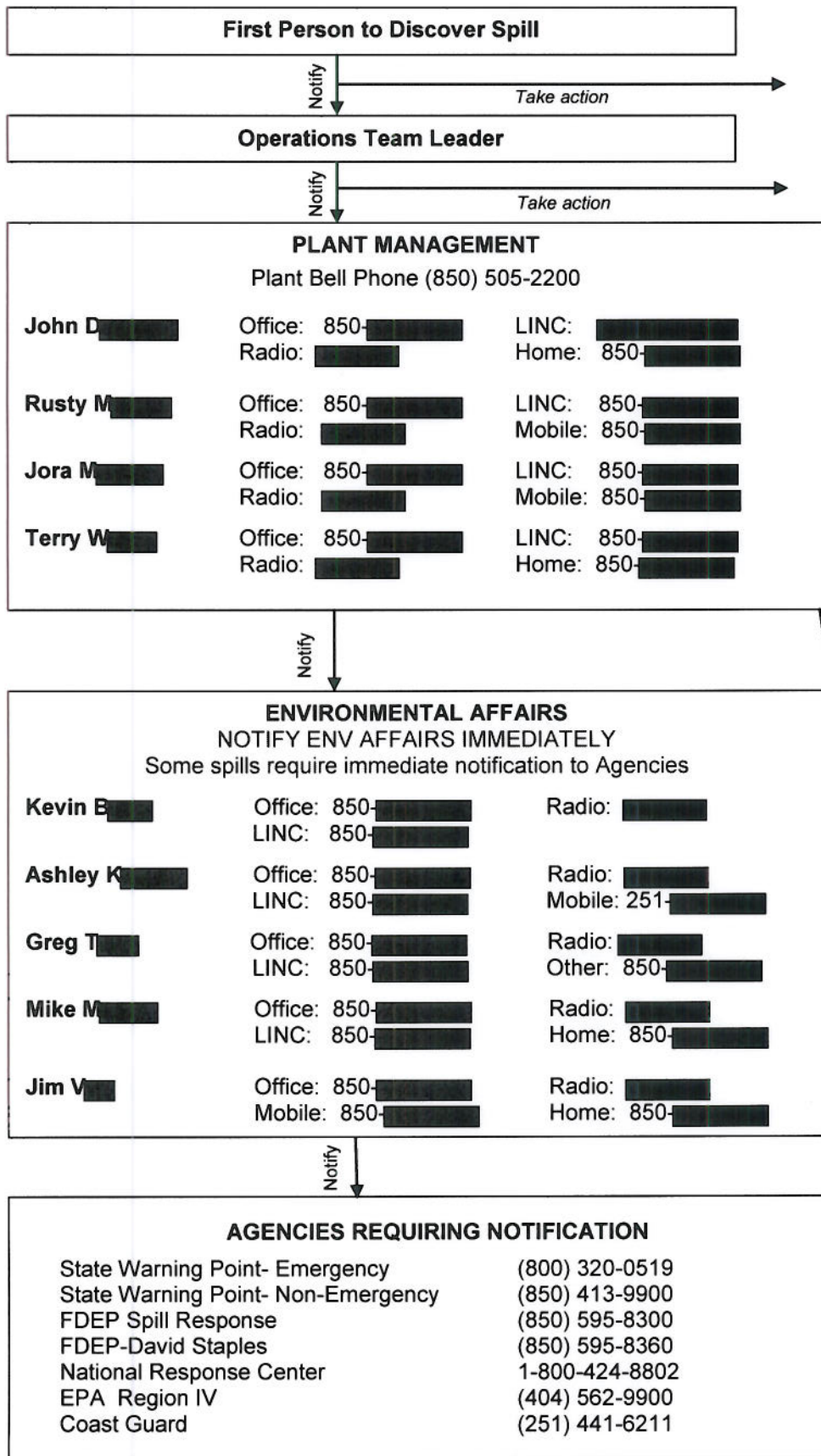
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Crist Electric Generating Plant Oil and Chemical Spill Contingency Plan

Revised 08/2012

NOTIFICATIONS

ACTIONS



If conditions are hazardous (i.e., fire, potential explosion), do not approach.

IF POSSIBLE, STOP THE SOURCE OF THE SPILL IMMEDIATELY

The release should be confined to the smallest area possible. Use absorbent materials or any reasonable measures to stop the spread of the spilled contaminant.

Take immediate action to prevent the spill from reaching surface waters. Use absorbent materials, drip pans, dig a diversion ditch, or use soil to form a berm.

If the release reaches water, attempt to place booms to contain the release, or if necessary, block drainage downstream of spill to prevent further discharge.

Clean-Up Contractors

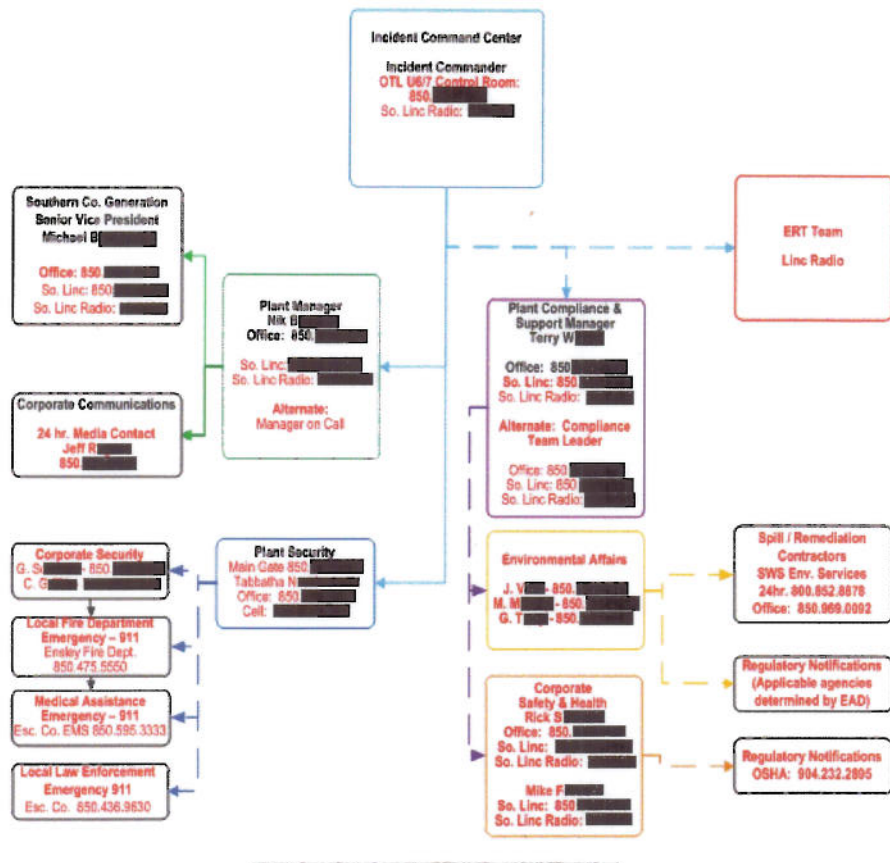
Southern Waste Services:
(850) 969-0092
(8:00 AM – 5:00 PM M-F)

1-800-852-8878
(24 hour Number)

Summary of Bulk Chemical Reporting Requirements

Chemical Name	CAS/313 Category Codes	Reportable Quantity
Anhydrous Ammonia	7664-41-7	100 lbs
Ferric Chloride	7705-08-0	1,000 lbs
Sodium hydroxide	1310-73-2	1,000 lbs
Hydrochloric Acid (conc <37%)	7647-01-0	5,000 lbs or 110 gallons inside of secondary containment of registered storage tank
Sulfuric acid	7664-93-9	1,000 lbs
Urea		1,000 gallons
Treated & untreated wastewater and potable water		1,000 gallons
Petroleum products	<p>Discharge causes a sheen or film in waterways</p> <p>Discharge equal to or exceeding 25 gallons on a pervious surface</p> <p>Groundwater or soil sampling results exceeding State cleanup standards</p> <p>For registered storage tanks, the following notification requirements apply:</p> <ul style="list-style-type: none"> • 100 gallons on impervious surfaces, other than secondary containment • 500 gallons inside secondary containment 	

3130.720 INCIDENT RESPONSE COMMUNICATION FLOWCHART



SOUTHERN COMPANY GENERATION HYDRO SERVICES

Dam Safety Emergency Contacts

*Dam Safety Emergency Hotline — 404.506.6005

NAME	OFFICE	LINC/RADIO	CELL	HOME
G [redacted] Joel [redacted]	404 [redacted]	404 [redacted]	770 [redacted]	770 [redacted]
A [redacted], Hugh	404 [redacted]	404 [redacted]	404 [redacted]	770 [redacted]
W [redacted], Ronald [redacted]	404 [redacted]	404 [redacted]	404 [redacted]	770 [redacted]
B [redacted], Todd	404 [redacted]	—	404 [redacted]	—

*The Dam Safety Emergency Hotline advises as to which person is on duty.
If that person cannot be reached, call anyone on this list.