

US EPA ARCHIVE DOCUMENT

June 3, 2011

**VIA OVERNIGHT DELIVERY AND E-MAIL TO**  
**HOFFMAN.STEPHEN@EPA.GOV,**  
**KOHLER.JAMES@EPA.GOV, AND**  
**ENGLANDER.JANA@EPA.GOV**

Mr. Stephen Hoffman  
U.S. Environmental Protection Agency  
Two Potomac Yard  
2733 South Crystal Drive  
Fifth Floor, N-5237  
Arlington, Virginia 22202-2733

**Re: Draft Safety Inspection Report for Plant Gadsden**

Dear Mr. Hoffman:

On May 5, 2011, the U.S. Environmental Protection Agency (“EPA”) provided to Alabama Power Company (“APC”) a draft report regarding certain facilities for the management of coal combustion byproducts at APC’s Plant Gadsden (“Draft Report”). The Draft Report was prepared by Dewberry & Davis, LLC (“Dewberry”), and dated April 2011. This letter provides the comments of APC.

APC is generally satisfied with the content and conclusions of the Draft Report. The report concludes that the units inspected are in “satisfactory” condition, which is the most favorable category. We also understand the potential hazard rating to be based exclusively on the consequences of a failure of a structure, not the likelihood of such an event.

The Draft Report also includes one recommendation regarding a minor maintenance issue, namely, to remove rip rap located at an outfall structure. APC has completed the recommended action.

In addition, APC provides the following comments on various discrete issues. On page vii, in the table of contents, the date of the document listed as Appendix A, Document 12, should be changed from July 1978 to May 1976. Also in the table of contents on page vii, the date of the document listed as Appendix A, Document 13, should be changed from July 2008 to May 1976. In Section 4.1.2, third paragraph, APC

June 3, 2011

Page 2

does not regard the road as new; we recommend revising the first sentence to read as follows up to the comma: "In 2010, the access road was reconstructed along the top of the upper pond south dike, . . . ." On page 5-4, fourth paragraph, APC does not regard the road as new; we recommend replacing the phrase "a new roadway" with "the roadway." In the same paragraph, the figure referenced in the third sentence appears on page 5-5 and appears as Figure 5.2.3-1; it should probably be marked as Figure 5.2.3-3, and the reference on page 5-4 should be revised accordingly. On page 5-6, the figure that appears as Figure 5.2.4-4 probably should be marked as Figure 5.2.4-2. On page 5-9, the second figure that appears as Figure 5.3.3-1 probably should be marked as Figure 5.3.3-2. On page 6-1, it is correct as stated in Section 6.1.3 that no spillway hydraulic data was provided; however, spillway analysis is unnecessary because storage capacity is sufficient to handle a 100 year, 24-hour rain event, as the report observes in Section 6.1.2. On page 9-1, first paragraph, the phrase "Miller Steam Plant" should be replaced with the phrase "Plant Gadsden." In the same paragraph, "plant manager" should be replaced with "plant management." Also on page 9-1, "biannual" can mean either twice per year or every other year; we would recommend the unambiguous term "biennial."

Thank you for this opportunity to comment. Please direct any future correspondence on this issue to me.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew W. Bowden". The signature is written in a cursive style with a large, sweeping initial "M".

Matthew W. Bowden  
Vice President  
Environmental Affairs