

US EPA ARCHIVE DOCUMENT

Matthew W. Bowden
Vice President
Environmental Affairs

600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291

Tel 205.257.4075
Fax 205.257.4349



May 19, 2011

VIA E-MAIL AND OVERNIGHT DELIVERY

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 Gaston

Dear Mr. Hoffman:

By a letter dated April 20, 2011, 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 Gaston ("Final Report"). EPA's Final Report was prepared on behalf of EPA by Dewberry & Davis, LLC, and was dated April 2011.

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 "no recognized existing or potential management unit safety deficiencies." More specifically, regarding the ash pond, EPA's report observes as follows: "dike embankments and spillway appear to be structurally sound based on a review of the engineering data provided by the owner's technical staff and Dewberry engineers' observations during the site visit." Accordingly, EPA's report demonstrates that there is no discernible threat of a release of coal combustion byproducts at Plant Gaston.

The Final Report includes recommendations on several minor issues. APC generally concurs in the recommendations and offers the following additional comments:

- Recommendation pertaining to sloughs and erosion rills along the embankment downstream slopes: APC has repaired shallow sloughs and erosion rills along the embankment downstream slopes. We continue to monitor the condition of the embankment downstream slopes through our

regular monitoring and inspection activities. New sloughs or erosion rills are repaired as they are noted by the plant staff in their regular inspections.

- Recommendation pertaining to the interior drainage channels: APC concurs in the recommendation to maintain clear interior drainage channels to the south settling pond. APC has maintained clear drainage paths in the past and will continue to do so.
- Recommendation pertaining to the acceptability of “green wall” plantings: APC maintains that the “green wall” plantings at the crest near the south end of the west embankment provide screening benefits and do not affect the structural integrity of the impoundment. We are pleased that the report finds APC’s determination to be acceptable.
- Recommendation pertaining to the surveillance and monitoring program: APC continues to execute its regular monitoring and inspection activities, which includes monitoring of the area noted in the report’s recommendation.

APC appreciates this opportunity to comment. We 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. Please direct any future correspondence on this issue to me.

Sincerely,



Matthew W. Bowden
Environmental Affairs Vice President