

US EPA ARCHIVE DOCUMENT

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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 Greene County

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 Greene County ("Final Report"). EPA's Final Report was prepared on behalf of EPA by Dewberry & Davis, LLC, and was dated November 2010.

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 Greene County.

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

- Recommendation pertaining to wet spots at toe of the dam: APC continues to execute its regular monitoring and inspection activities, which includes

monitoring the area noted in the report's recommendation and taking such action as APC deems appropriate.

- Recommendation pertaining to animal burrows: APC concurs in the recommendation to continually repair animal burrows. This has been APC's practice in the past, and APC will continue to do so.
- Recommendation pertaining to encroachment of vegetation: APC continues to execute its regular monitoring and inspection activities, which includes monitoring and removing encroaching vegetation.

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