

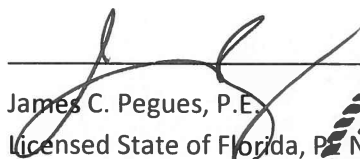
**LOCATION RESTRICTION DEMONSTRATION
PLACEMENT ABOVE THE UPPERMOST AQUIFER (40 C.F.R. 257.60)
PLANT CRIST GYPSUM STORAGE AREA
GULF POWER COMPANY**

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257 and Part 261) requires the owner or operator of an existing CCR surface impoundment to make a demonstration that the facility meets certain location restrictions. Per §257.60, the owner or operator must demonstrate that the facility has been constructed with a base that is located no less than 1.52 meters (5 feet) above the upper limit of the uppermost aquifer, or must demonstrate that there will not be an intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table).

The lined CCR surface impoundment, referred to as the Gypsum Storage Area, is located at Gulf Power Company's Plant Crist, north of Pensacola, Florida. At the time of siting and design of the facility, a series of borings were drilled and piezometers installed to establish normal and seasonal high groundwater levels. Groundwater level readings were taken over a period of several months at the site.

At the time of final design, the base of the facility was established so that it was greater than 5 feet above the measured seasonal high groundwater level, and the CCR unit was constructed in accordance with the design elevations.

I hereby certify that the uppermost aquifer separation location restriction demonstration was conducted in accordance with and meets the requirements of 40 C.F.R. §257.60.


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