INITIAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT PLANT SMITH ASH POND GULF POWER COMPANY

Section §257.73(a)(2) of EPA's regulations requires the owner or operator of an existing CCR surface impoundment to conduct periodic hazard potential classification assessments. The owner or operator must document the hazard potential of each surface impoundment as a high hazard potential CCR unit, a significant hazard potential CCR unit or a low hazard potential CCR unit.

The CCR surface impoundment located at Gulf Power Company's Plant Smith, also referred to as the Plant Smith Ash Pond, is located in Southport, Florida. The CCR surface impoundment is formed by an engineered perimeter dike around most sides, with some portions of the impoundment being incised. The CCR unit is bounded to the northwest by plant facilities, the plant's intake canal to the west and an inactive CCR landfill on the east side of the northern portion of the impoundment. The remainder of the impoundment is bordered by undeveloped lands. North Bay is located approximately 300-ft to 500-ft south of the impoundment.

Based on the potential impacts in the unlikely event of an embankment failure, a hazard potential classification of Low Hazard Potential has been assigned to the Plant Smith Ash Pond, in that failure or mis-operation of the CCR unit would result in no probable loss of human life and low economic and/or environmental losses, with losses principally limited to the Owner's property.

I hereby certify that the hazard potential classification was conducted in accordance with 40 C.F.R. Part 257.73 (a)(2).

James C. Pegues, P.E.

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