

**LOCATION RESTRICTION DEMONSTRATION
SEISMIC IMPACT ZONE (40 C.F.R. 257.63)
PLANT SMITH ASH POND
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 §257.63, the owner or operator must demonstrate that the facility is not located within a seismic impact zone; otherwise, a demonstration must be made that all structural components including liners, leachate collection and removal systems and surface water control systems are designed to resist the maximum horizontal acceleration in lithified earth material for the site. A seismic impact zone is defined as an area having a 2% or greater probability that the maximum expected horizontal acceleration, expressed as a percentage of the earth's gravitational pull (g), will exceed 0.10g in 50 years.

The CCR surface impoundment, referred to as the Ash Pond, is located at Gulf Power Company's Plant Smith near Southport, Florida. The Peak Ground Acceleration for the facility location, as determined using the online USGS Unified Hazard Tool, Conterminous U.S. 2014 (v4.0.x) was determined to be 0.032. Therefore, the facility is not located within a seismic impact zone.

I hereby certify that the seismic impact zone location restriction demonstration was conducted in accordance with and meets the requirements of 40 C.F.R. §257.63.

James C. Pegues, P.E.

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