

**LOCATION RESTRICTION DEMONSTRATION
PLACEMENT ABOVE THE UPPERMOST AQUIFER (40 C.F.R. 257.60)
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 §257.60, 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 CCR surface impoundment, referred to as the Ash Pond, is located at Gulf Power Company's Plant Smith, near Southport, Florida. Based on the review of groundwater data, it appears that the base of the Ash Pond is located less than 1.52 meters (5 feet) above the upper limit of the uppermost aquifer. Accordingly, the Ash Pond is required to cease receiving CCR and non-CCR waste streams no later than October 31, 2020, in accordance with § 257.101(b)(1)(i).

Based on hydrogeologic data from the Plant area, the Ash Pond is absent the minimum 5-foot separation between the base of the CCR unit and the upper limit of the uppermost aquifer as required by 40 C.F.R. §257.60, and therefore under current operating conditions does not meet this location restriction.

James C. Pegues, P.E.

Licensed State of Florida PE No. 52519

