LOCATION RESTRICTION DEMONSTRATION
UNSTABLE AREAS (40 C.F.R. 257.64)
PLANT DANIEL NORTH ASH MANAGEMENT UNIT
MISSISSIPPI POWER COMPANY

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257 and Part 261), §257.64, requires the owner or operator of an existing CCR landfill to make a demonstration that the facility is not located within an unstable area; otherwise, a demonstration must be made that recognized and generally accepted good engineering practices have been incorporated into the design of the CCR unit to ensure that the integrity of the structural components of the CCR unit will not be disrupted. An unstable area is defined in the CCR rule as a location that is susceptible to natural or human induced events or forces capable of impairing the integrity, including structural components of some or all the CCR unit that are responsible for preventing releases from such unit. Unstable areas can include poor foundation conditions, areas susceptible to mass movements and karst terrains.

The CCR landfill located at Mississippi Power Company's Plant Daniel referred to as the Plant Daniel North Ash Management Unit is located on Plant Daniel property, north of Moss Point, Mississippi. The CCR landfill is formed by excavations in natural soils as well as the construction of earthen embankments. The embankments have been properly constructed using mechanical stabilization, compacted to a density sufficient to withstand the range of loading conditions. The foundations beneath the embankments and the CCR unit generally consist of competent medium stiff to stiff clays and medium dense sands. Furthermore, the CCR unit is not located within karst terrain, and the site and its surrounding areas are not subject to mass movements (e.g. landslides).

I hereby certify that the unstable area location restriction demonstration was conducted in accordance with and meets the requirements of 40 C.F.R. Part 257.64.

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