

**LOCATION RESTRICTION DEMONSTRATION  
UNSTABLE AREAS (40 C.F.R. 257.64)  
PLANT CRIST LANDFILL NO. 1  
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 landfill to make a demonstration that the facility meets certain location restrictions. Per §257.64, the owner or operator must demonstrate 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 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. [40 C.F.R. §257.53]. Unstable areas can include poor foundation conditions, areas susceptible to mass movements and karst terrains.

The CCR landfill, referred to as Landfill No. 1, is located at Gulf Power Company's Plant Crist, north of Pensacola, Florida. 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 and 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 and silty sands. Site geologic units consist of terrace and recent terrace sedimentary soils (including the Citronelle Formation). The CCR unit is not located within karst terrain (limestone is 200+ feet deep at this site), and the site and its surrounding areas are not subject to mass movements (e.g. landslides). Therefore, Landfill No. 1 is not located within an unstable area.

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

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