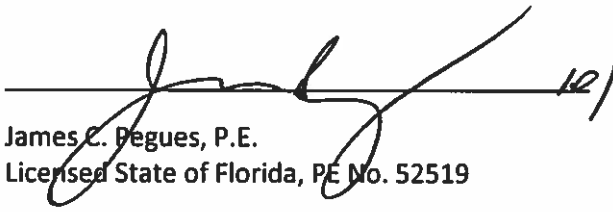


**LINER DESIGN CRITERIA
40 C.F.R. PART 257.71
PLANT CRIST GYPSUM STORAGE AREA
GULF POWER COMPANY**

Section 257.71(a)(1) of EPA's regulations requires a demonstration as to whether or not an existing CCR surface impoundment was constructed with (i) a minimum of 2 feet of compacted soil having a hydraulic conductivity of no more than 1×10^{-7} cm/sec, (ii) a composite liner meeting the requirements of § 257.70(b), or (iii) an alternate liner meeting the requirements of §257.70(c).

The CCR surface impoundment known as the Plant Crist Gypsum Storage Area was constructed with a liner consisting of a 60-mil HDPE geomembrane overlying (and in direct and uniform contact with) a lower liner component of a geosynthetic clay liner (GCL) . Therefore, the liner at the Plant Crist Gypsum Storage Area meets the requirements of § 257.71(a)(1)(iii), thereby meeting the requirements of §257.70(c).

I attest that the documentation above is accurate based on current available information.


James C. Pegues, P.E.
Licensed State of Florida, PE No. 52519

