

**LOCATION RESTRICTION DEMONSTRATION
WETLANDS (40 C.F.R. 257.61)
PLANT CRIST GYPSUM STORAGE AREA
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 §257.61, the owner or operator must demonstrate that the facility is not located within wetlands; otherwise, a demonstration must be made that certain criteria are met, as outlined in §257.61(a)(1). Wetlands, as defined in 40 C.F.R. 232.2, means those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.

The lined CCR surface impoundment, referred to as the Gypsum Storage Area, is located at Gulf Power Company's Plant Crist, north of Pensacola, Florida. At the time of design of the facility, wetlands determinations were made by a Consultant retained by Gulf Power. There were no wetlands identified in the area of the current Plant Crist Gypsum Storage Area. A few isolated hydric plants were identified in the general area, but the Gypsum Storage Area was sited so that these plants were located outside of the construction disturbed area.

Construction and operation of the facility did not and does not cause or contribute to:

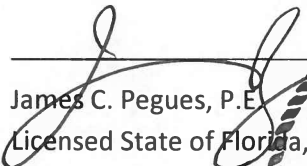
- A violation of any applicable state or federal water quality standard;
- A violation of any applicable toxic effluent standard or prohibition under section 307 of the Clean Water Act;
- Jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of a critical habitat protected under the Endangered Species Act of 1973;
- A violation of any requirement under the Marine Protection, Research, and Sanctuaries Act of 1972 for the protection of a marine sanctuary.

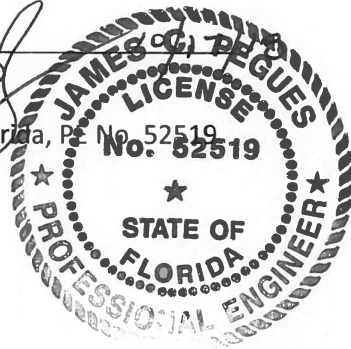
Appropriate erosion and sedimentation controls were utilized during the construction of the facility. Therefore, there was no degradation of wetlands due to erosion, stability and migration of native wetland soils or fill materials used to support the Gypsum Storage Area.

The volume and chemical nature of the gypsum stored in the facility has not caused or contributed to degradation of wetlands.

Previous analyses have indicated that the lined facility was constructed with perimeter embankments that are stable and meet all required minimum factors of safety outlined in the CCR rule. Therefore, catastrophic release of CCR from the unit has not occurred during its years of operation and is not expected, and therefore no impacts to fish, wildlife or other aquatic resources or their habitat have occurred or are expected.

I hereby certify that the wetlands location restriction demonstration was conducted in accordance with and meets the requirements of 40 C.F.R. §257.61.


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



The seal is circular with a double-line border. The outer ring contains the text "JAMES C. PEGUES" at the top and "PROFESSIONAL ENGINEER" at the bottom, separated by two stars. The inner ring contains "LICENSE" at the top and "STATE OF FLORIDA" at the bottom, also separated by two stars. In the center, it reads "No. 52519".