


**LOCATION RESTRICTION DEMONSTRATION  
UNSTABLE AREAS (40 C.F.R. 257.64)  
PLANT DANIEL ASH POND B  
MISSISSIPPI 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 §257.64, 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 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 of 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 surface impoundment located at Mississippi Power Company's Plant Daniel also referred to as the Plant Daniel Ash Pond B is located on Plant Daniel property, north of Moss Point, Mississippi. The CCR surface impoundment is formed by excavation into natural soils and construction of engineered perimeter embankments. The perimeter embankments have been properly constructed using mechanical stabilization, compacted to a density sufficient to withstand the range of loading conditions. Factor of safety assessments have indicated that the embankments meet the minimum factors of safety required under the rule. The foundations beneath the embankments and the CCR unit generally consist of stable and competent medium stiff to stiff clays and clays, along with medium dense to dense clayey and silty sands and sand. The CCR unit is not located within active 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.

James C. Pegues, P.  
Licensed State of Mississippi, PE No. 18942

A circular professional engineer seal for the State of Mississippi. The seal features a double-line border with the text "STATE OF MISSISSIPPI" at the bottom and "LICENSED PROFESSIONAL ENGINEER" at the top. In the center, the name "JAMES C. PEGUES" is written in a curved path, and the license number "18942" is printed below it.