

**LINER DESIGN CRITERIA
40 C.F.R. PART 257.71
PLANT DANIEL ASH POND B
MISSISSIPPI 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 Daniel Ash Pond B was constructed with a liner consisting of a 60-mil HDPE geomembrane. There is also an underlying 2-ft thick layer of compacted clay having a minimum hydraulic conductivity of 1×10^{-7} cm/sec in direct contact with the geomembrane on the bottom of the pond, but the clay liner does not extend up the side slopes of the pond. The constructed liner therefore does not meet the requirements for a composite liner as outlined in §257.71(a)(1)(ii).

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

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