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Birmingham, Alabama 35291



March 24, 2016

U.S. Army Corps of Engineers  
Mobile District-Regulatory Branch  
109 St. Joseph Street  
Mobile, Alabama 36602

Attention: Ms. Amy Gavin

Reference: **After-the-Fact Pre-Construction Notification – Nationwide Permit 14**  
Alabama Power Company  
Barry Electrical Generation Plant – South Evacuation Bridge Upgrades  
Mobile County, Alabama

#### REQUESTED ACTION

This document is submitted by Alabama Power Company ("APC") to the U.S. Army Corps of Engineers ("Corps") requesting that the following activity be covered under provisions as authorized by **Section 10 of the River and Harbor Act of 1899 ("Section 10") (33 U.S.C. 403) and 33 U.S.C. 401 et seq.; 33 U.S.C. 1344; 33 U.S.C., and 33 CFR Chapter II § 330.6 and 40 CFR Chapter I Subpart b 230.1**, the following proposed activities are covered under provisions of **Nationwide Permit 14 (NWP 14) Linear Transportation Projects**.

This NWP authorizes the activities required for the construction, expansion, modification, or improvement of linear transportation projects (e.g., roads, highways, railways, trails, airport runways, and taxiways) in waters of the United States. For linear transportation projects in non-tidal waters, the discharge cannot cause the loss of greater than 1/2-acre of waters of the United States. The permittee must submit a pre-construction notification to the district engineer prior to commencing the activity if: (1) the loss of waters of the United States exceeds *1/10-acre*; or (2) there is a discharge in a special aquatic site, including wetlands. (See general condition 31.) (Sections 10 and 404).

Loss to waters of the United States as a result of the proposed project are below the 1/10<sup>th</sup> acre threshold for a Pre-Construction Notification, however, as a result of no evidence of previously authorized permitting, an after-the-fact PCN and Section 10 permit is required by the U.S. Army Corps of Engineers-Regulatory Division.

(1) **PERMITEE:** Alabama Power Company  
Environmental Affairs  
600 North 18<sup>th</sup> Street  
Birmingham, Alabama 35291-0830  
(250) 257-1047

Attention: Carl Hubbert, Jr.

## (2) PROJECT LOCATION AND DESCRIPTION:

Alabama Power Company is proposing to upgrade an existing steel and concrete constructed bridge crossing over waters considered navigable under Section 10 of the Rivers and Harbors Act (RHA). The bridge crosses a man-made plant discharge canal that is connected to the Mobile River, a RHA Section 10.

Specifically the site is located at N31.0011 Latitude W88.0053 Longitude, in Section 31, Township 01 North, and Range 01 East, in Mobile County, Alabama. See *Exhibits*. The project is located in HUC 03160204 Mobile Tensaw watershed.

## (3) DESCRIPTION OF THE PROPOSED PROJECT

### *Project Purpose*

The purpose of the project is to provide safe ingress and egress to the coal ash disposal area with a structure having sufficient loading capacity to support heavy earth moving and haulage equipment. The bridge is also a designated emergency evacuation route in case of an emergency, which enables efficient and pre-planned evacuation of the facility.

### *Project Details and Impacts to waters of the United States*

The purpose of the proposed project is to provide safe access for heavy earth moving and haulage equipment and vehicle access crossing over the subject canal. In order to maintain continuing service to the area, compliance with federal and state regulations, upgrades to infrastructures, construction and maintenance are an ongoing process. On April 17, 2015, the U.S. Environmental Protection Agency released the final rule - Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals (CCRs) from Electric Utilities - for the management and disposal of CCRs. Under Subpart D, 40 CFR, Part 257, the new rule establishes minimum national criteria for purposes of determining which solid waste disposal facilities and solid waste management practices do not pose a reasonable probability of adverse effects on health or the environment. As a result of these, and other new federal air regulations, Plant Barry is in the process of converting its steam boilers from coal to natural gas. The existing coal ash pond that has been used in the past to dispose ash will be cleaned-out and closed following strict guidelines promulgated by USEPA. Part of the closure activities will require that ash material be removed and hauled away to a permitted solid landfill.

The existing bridge was constructed in the late 1960's or early 1970's. It measures 170 feet in length and 20 feet in width. In order to sufficiently support the anticipated loads of earth moving equipment, structural upgrades are required.

The crossing will involve the placement of twelve (12) - 14" diameter steel pipes to be pile driven adjacent to the existing bridge into the subject water bottom substrate. There will be six (6) piles on both sides of the bridge. Bridge supports will be pile driven steel pipes filled with concrete. The bridge decking and structural support will be widened by 4 feet in width on both sides to enable cross-beam placement underneath the bridge structure to support the anticipated load ratings. Per the design, for a 14" diameter pipe approximately 228 pipe-feet, 9.03 yds<sup>3</sup> of concrete will be needed.