LOCATION RESTRICTION DEMONSTRATION UPPERMOST AQUIFER (40 C.F.R. 257.60) PLANT YATES ASH POND 3 (AP-3) GEORGIA 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 §257.60, an existing CCR surface impoundment must be constructed with a base that is located no less than 1.52 meters (five feet) above the upper limit of the uppermost aquifer or demonstrate that will not be an intermittent, recurring or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table).

The uppermost aquifer at Plant Yates is typically encountered in the saprolite or in the upper weathered and fractured metamorphic bedrock. Georgia Power initiated closure of AP-3 in 2018. Based on the hydrogeologic data, Georgia Power's Plant Yates AP-3, under current conditions, does not meet the location restriction requirements of 40 C.F.R. § 257.60(a).

PROFESSIONAL

Richard T Deason, P.E.

Atlantic Coast Consulting, Inc.

10/11/18