

**GROUNDWATER MONITORING SYSTEM CERTIFICATION**  
**40 CFR 257.91(f)**  
**ASH POND 3 (AP-3), ASH POND A (AP-A), ASH POND B (AP-B) & ASH POND B' (AP-B')**  
**PLANT YATES, GEORGIA POWER COMPANY**

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 CFR Part 257 and Part 261), §257.91, requires the owner or operator of an existing CCR unit to install a groundwater monitoring system. The owner or operator must obtain a certification from a qualified professional engineer stating that the groundwater monitoring system has been designed and constructed to meet the requirements of 40 CFR Part 257.91.

A Professional Engineer certification for a multi-unit monitoring network was provided for AP-3 and AP-B/B' on October 17, 2017. AP-A is an inactive surface impoundment that is now subject to the revised requirements of 40 CFR §257.100 and is being added to this multi-unit system in accordance with the timeline provided by 40 CFR §257.100(e)(5)(i). This multi-unit groundwater monitoring system has been designed for Plant Yates to meet the requirements of 40 CFR Part 257.91(d), and the detection monitoring requirements specified in 40 CFR Part 257.91(a) through (c).

According to 40 CFR §257.91(a), the groundwater monitoring system must consist of a sufficient number of wells, installed at appropriate locations and depths, to yield groundwater samples from the uppermost aquifer that:

1. Accurately represent the quality of background groundwater that has not been affected by leakage from a CCR unit; and
2. Accurately represent the quality of groundwater passing the waste boundary of the CCR unit.

40 CFR §257.91(b) states that the number, spacing, and depths of groundwater monitoring system must be determined based upon site-specific technical information that must include a characterization of:

- (1) Aquifer thickness, groundwater flow rate, groundwater flow direction, including seasonal and temporal fluctuations in groundwater flow; and
- (2) Saturated and unsaturated geologic units and fill materials overlying the uppermost aquifer, materials comprising the uppermost aquifer, and materials comprising the confining unit defining the lower boundary of the uppermost aquifer, including, but not limited to, thicknesses, stratigraphy, lithology, hydraulic conductivities, porosities and effective porosities.

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**CERTIFICATION**

I hereby certify that the groundwater monitoring system for the CCR Unit located at Georgia Power's Plant Yates located at 708 Dyer Road, Newnan, Georgia, and designated as Ash Ponds: AP-3, AP-A, AP-B, and AP-B' has been designed and constructed to meet the requirements of 40 CFR Part 257.91.



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