

**LINER DESIGN CRITERIA
40 C.F.R. PART 257.71
PLANT MCMANUS ASH POND No. 1 (AP-1)
GEORGIA POWER COMPANY**

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257 & Part 261), § 257.71(a)(1), requires the owner or operator of an existing surface impoundment to document whether or not the unit 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 Plant McManus AP-1 is located on Plant McManus property northwest of Brunswick, Georgia. The Plant McManus AP-1 is in the process of being closed through removal of the CCR from the CCR unit. As of March 2018, approximately 60% of the CCR has been removed. AP-1 is dewatered as required to facilitate excavation of ash for removal. All CCR is being excavated, transported, and disposed of in an offsite Solid Waste permitted landfill. Closure is anticipated to be completed 4th Quarter 2018. The pond dike and primary spillway are intact and continue to impound water. During ash pond closure, accumulated water is managed by a temporary water treatment system in accordance with a dewatering plan approved by the Georgia Environmental Protection Division. The treated water is then discharged via the NPDES permitted outfall located at the westernmost corner of AP-1. When discharged, the treated water is sampled and monitored in accordance with the approved dewatering plan.

The CCR surface impoundment known as Plant McManus AP-1 was not constructed with a liner that meets any of these criteria.

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


James C. Pegues, P.E.

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