

**LOCATION RESTRICTION DEMONSTRATION
UNSTABLE AREAS (40 CFR 256.64)
PLANT MCMANUS ASH POND 1 (AP-1)
GEORGIA POWER COMPANY**

Plant McManus AP-1 is subject to the timelines announced in 81 Fed. Reg. 51802 (Aug. 5, 2016). EPA's "Disposal of Coal Combustion Residuals from Electric Utilities Final Rule" (40 CFR 257.64), requires that existing CCR surface impoundments must not be located in an unstable area unless recognized and generally-accepted good engineering practices have been incorporated into the design of the CCR unit to ensure that the integrity of the structural components of the CCR unit will not be disrupted. 40 CFR 257.53 defines an unstable area as "a location that is susceptible to natural or human-induced events or forces capable of impairing the integrity, including structural components, of some or all of the CCR unit that are responsible for preventing releases from such unit."

Plant McManus is underlain by very fine sands and clays interpreted to be the Upper Satilla Formation and not susceptible to liquefaction. There is no known history of issues associated with settlement or differential settlement at AP-1. Therefore, soil conditions in the vicinity and beneath AP-1 should not result in significant differential settlement.

Plant McManus is located in the Southeast Georgia Embayment, a depositional basin formed during the subsidence of the continental margin and episodic rise and fall of sea levels. The area has unconsolidated and semi-consolidated sedimentary rocks. These sedimentary rocks are Cretaceous age and younger and are comprised of two facies: clastic sediments with minor limestone components and shallow-water platform carbonate units. Karst features that are present over much of the extent of the Floridian aquifer system have not been identified at Plant McManus. The site is considered to have a low potential for mass movements due to the relatively flat topographic profile.

The perimeter embankments and associated infrastructure (i.e. pipes, intake structures, spillway, etc.) are human-made features that were put in place to create AP-1. The *Initial Structural Stability Assessment, 40 C.F.R. Part 257.73, Plant McManus Ash Pond 1 (AP-1), Georgia Power Company* (Southern Company, certified by James C. Pegues, P.E., April 2018) concluded that the structural components of AP-1 are stable.

I hereby certify that for Georgia Power's Plant McManus AP-1, the unstable areas location restriction demonstration meets the requirements of 40 CFR 256.64 (a).



11/26/19

J. Robin Blanton, P.E.

Date



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