

**LOCATION RESTRICTION DEMONSTRATION  
PLACEMENT ABOVE THE UPPERMOST AQUIFER (40 C.F.R. PART 257.60)  
PLANT MCDONOUGH-ATKINSON ASH PONDS 3 AND 4 (AP-3 AND AP-4)  
GEORGIA POWER COMPANY**

Plant McDonough AP-3 and AP-4 are subject to the timelines announced in 81 Fed. Reg. 51802 (Aug. 5, 2016). Provision §257.60 of the United States Environmental Protection Agency's "Disposal of Coal Combustion Residuals from Electric Utilities Final Rule" (40 C.F.R. Part 257) requires that a CCR surface impoundment be constructed with a base that is located no less than five feet above the uppermost aquifer, or must not have 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.

The uppermost aquifer at Plant McDonough is typically encountered within the overburden and upper bedrock, depending on topographic location. Based on current hydrogeologic information, AP-3 and AP-4 do not meet the requirement of separation of five feet above the upper limit of the uppermost aquifer as required per §257.60(a). Georgia Power initiated closure of AP-3 and AP-4 as Combined CCR Unit AP-3/4 in 2016 in compliance with state and federal CCR rules.



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**Golder Associates Inc.**