LOCATION RESTRICTION DEMONSTRATION
UNSTABLE AREAS (40 C.F.R. PART 257.64)
PLANT MCDONOUGH-ATKINSON ASH POND 1 (AP-1)
GEORGIA POWER COMPANY

Plant McDonough AP-1 is subject to the timelines announced in 81 Fed. Reg. 51802 (Aug. 5, 2016). Provision §257.64 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 must not be located in an unstable area unless it is demonstrated that generally accepted good engineering practices have been incorporated into the design to ensure that the integrity of the structural components of the CCR unit will not be disrupted. Per the CCR Rule, an unstable area is defined 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 release from the unit. The following criteria were evaluated for AP-1 with regards to unstable areas:

- Local soil conditions and differential settling – based on the engineering evaluations of subsurface conditions, slope stability, and potential settlement and liquefaction, AP-1 is not considered to be susceptible to significant differential settlement and therefore meets the requirements of §257.64(b)(1).
- Local geologic features – based on review and evaluation of the local geologic features in the vicinity of AP-1, the unit is not located in an area prone to disruption due to geologic features at the site and thus meets the requirements of §257.64(b)(2).
- Local human made features – there are no known instances of structural instability at AP-1 at the time of this submittal. Additionally, the human-made features at the Unit have been assessed along with known future activities, and neither are anticipated to have a potential adverse impact on the structural components or integrity of the closed unit and therefore AP-1 meets the requirements of §257.64(b)(3).

Based on the evaluations summarized above, AP-1 is not located in an unstable area based on current information, and the unit is not located in an area of poor foundation conditions, an area susceptible to mass movements, or karst terrain. Therefore, based on current geologic information, AP-1 meets the location restriction requirement for unstable areas as required per §257.64.

I hereby certify that for Georgia Power's Plant McDonough AP-1, the unstable areas location restriction demonstration meets the requirements of 40 C.F.R. Part 257.64(a).

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Golder Associates Inc.