

**LOCATION RESTRICTION DEMONSTRATION  
UNSTABLE AREAS (40 C.F.R. PART 257.64)  
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 §257.64 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-3 and AP-4 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-3 and AP-4 are not considered to be susceptible to significant differential settlement and therefore meet 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-3 and AP-4, the units are not located in an area prone to disruption due to geologic features at the site and thus meet the requirements of §257.64(b)(2).
- Local human made features – there are no known instances of structural instability at AP-3 and AP-4 at the time of this submittal. Additionally, the human-made features at the units 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 units and therefore meet the requirements of §257.64(b)(3).

Based on the evaluations summarized above, AP-3 and AP-4 are not located in an unstable area, nor are the units located in areas that include poor foundation conditions, areas susceptible to mass movements, or karst terrain. Therefore, based on current geologic information, AP-3 and AP-4 meet the location restriction requirement for unstable areas as required per §257.64.

I hereby certify that for Georgia Power's Plant McDonough AP-3 and AP-4, 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.**