

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

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities Final Rule" (40 C.F.R. Part 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. The USEPA CCR Rule 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." Unstable areas may include poor foundation soil conditions, areas susceptible to mass movements, and geological conditions such as karst terrains.

The soil conditions in the vicinity and beneath AP-1 are firm to hard sandy silt, sandy clay, and silt, and not susceptible to liquefaction. There is no known history of issues associated with settlement or differential settlement at Plant Wansley (Plant) or near AP-1.

The USGS National Karst Map (2014), which shows locations of karst and potential karst areas in soluble rocks in the contiguous United States, does not indicate the presence of karst conditions in the vicinity of AP-1. AP-1 is underlain by high-grade metamorphic rocks which are not affected by karst processes.

Over 40 years of operational history with no evidence of unstable conditions indicate little potential for erosion of foundation soils or mass wasting of valley side slopes. Based on the foregoing, under existing geologic conditions the structural elements of AP-1 are not prone to disruption due to geologic features.

AP-1 and the associated separator dike represent human-made features that include pipes, spillways, and an outlet control structure. The *Initial Structural Stability Assessment for Plant Wansley Ash Pond (AP-1)* developed in October 2016 concluded that the structural components of AP-1 are stable. There are no known features or activities at AP-1 capable of impairing the integrity of the structural components of the unit and therefore AP-1 is not prone to disruption due to human-made features.

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

Cuneyt Gokmen, P.E.

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No. 28504

PROFESSIONAL

Licensed State of GA,

ENGINEER

CUNEYT GOKMEN

PE No. 28504