

**LOCATION RESTRICTIONS DEMONSTRATION
UNSTABLE AREAS (40 C.F.R. PART 257.64)
PLANT BOWEN PRIVATE INDUSTRY SOLID WASTE DISPOSAL FACILITY
(ASH LANDFILL)
GEORGIA POWER COMPANY**

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257 and Part 261) requires the owner or operator of an existing CCR landfill to make a demonstration that the facility meets certain location restrictions. Per § 257.64, the owner or operator must demonstrate that the facility is not located within an unstable area; otherwise, a demonstration must be made that 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. An unstable area is defined in the CCR rule 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 can include poor foundation conditions, areas susceptible to mass movements and karst terrains.

The CCR Landfill, known as the Plant Bowen Landfill, is located nine (9) miles southwest of Cartersville in Bartow County, Georgia. The plant is bordered by the Etowah River to the north and east, and Euharlee Creek to the northwest and west. Plant Bowen's Landfill is currently comprised of six (6) CCR disposal cells (Cells 1, 2, 3, 4, 9 and 10). A review of the site geology, hydrogeology, and information available on site surface and subsurface conditions was performed at the time that the landfill was initially permitted and is described in the Site Acceptability Report and Demonstration of Engineering Measures. This review indicates that portions of the landfill property are underlain by geologic formations that are susceptible to karst topography. Based on this determination, the landfill design and state permit plans incorporated measures to mitigate conditions that may result in significant differential settling of the foundation of the landfill cells. Additionally, the cell construction records and certifications for Cells 1,2,3,4, 9 and 10 were reviewed to confirm that the existing Plant Bowen Landfill cells were constructed using recognized and generally accepted good engineering and construction practices implemented to maintain the integrity and proper functioning of the containment and leachate collection and removal systems of the constructed cells.

I hereby certify that for the existing cells at Georgia Power's Plant Bowen Landfill, the unstable area location restriction demonstration meets the requirements of 40 C.F.R. Part 257.64(a) with the designated mitigation measures.



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