

**LOCATION RESTRICTIONS DEMONSTRATION
UNSTABLE AREAS (391-3-4-.10(3) and 40 C.F.R. §257.64)
PLANT BOWEN CCR LANDFILL PERMIT 008-018D(CCR)
GEORGIA POWER COMPANY**

The Federal CCR Rule and the Georgia CCR Rule require the owner or operator of an existing or new CCR landfill to 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 Federal 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. See Ga. Comp. R. & Regs. R. 391-3-4-.10(3)(b); 40 C.F.R. §257.64(a).

The CCR 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 currently consists of six (6) constructed and operational CCR disposal cells (Cells 1, 2, 3, 4, 9 and 10). The CCR solid waste permit 008-018D(CCR) includes plans for future Cells 5, 6, 7 and 8, the subject of this location restriction demonstration. A review of the site geology, hydrogeology, and available information on site surface and subsurface conditions was performed at the time that the landfill was initially permitted and is described in the Composite Site Acceptability Report for CCR Landfill Permit. The Report 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 solid waste permit plans incorporate measures to mitigate conditions that may result in significant differential settling of the foundation of the future landfill cells. Cells 5, 6, 7 and 8 will be constructed using recognized and generally accepted good engineering and construction practices to maintain the integrity and proper functioning of the containment and leachate collection and removal systems to the extent that the integrity of the structural components will not be disrupted. 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.

I hereby certify that for the existing and future Cells 5, 6, 7, and 8 at Georgia Power's Plant Bowen CCR Landfill, the unstable area location restriction demonstration meets the requirements of Georgia EPD Rule 391-3-4-.10(3); USEPA 40 C.F.R. §257.64(a) with the designated mitigation measures.



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