


**LOCATION RESTRICTION DEMONSTRATION
UNSTABLE AREAS (40 C.F.R. PART 257.64)
HUFFAKER ROAD (PLANT HAMMOND) PRIVATE INDUSTRIAL LANDFILL
(HUFFAKER ROAD 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 40 C.F.R § 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.

Plant Hammond's Huffaker Road Landfill is located on property owned by Georgia Power Company, near Rome, Georgia. Parcels A, B and E of the landfill have been constructed and receive CCR waste. The parcels were constructed in general accordance with the quality control requirements and permit drawings of the unit. The construction quality control requirements included compaction specifications for structural fill and the compacted clay layer for the landfill base. Available construction records indicate compaction requirements were achieved during foundation preparation. A siting report determined the landfill site was generally underlain by sandy clayey silt and silty clay and shale bedrock that is generally not susceptible to karst features. No unstable areas were identified in the siting report. Based on a review of the available information, Huffaker Road Landfill is not located in an unstable area that could result in significant differential settlement or mass movement damaging the facility.

I hereby certify that for the existing parcels at Georgia Power's Plant Hammond Huffaker Road Landfill, the unstable area location restriction demonstration meets the requirements of 40 C.F.R § 257.64(a).



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