

INITIAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT
40 C.F.R. PART 257.73
PLANT MCMANUS 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 and Part 261), §257.73(a)(2), requires the owner or operator of an existing CCR surface impoundment to conduct initial and periodic hazard potential classification assessments. The owner or operator must classify the hazard potential of each CCR surface impoundment as either a high hazard potential CCR surface impoundment, significant hazard potential CCR surface impoundment, or low hazard potential CCR surface impoundment and document the basis of this classification.

The CCR surface impoundment known as Plant McManus AP-1 is located in Glynn County, northwest of Brunswick, Georgia on Plant McManus property. AP-1 was created by construction of the main dike, which bounds AP-1 on the east, south and west sides, and approximately two-thirds of the north dike. The remaining portions of the impoundment are contained by natural ground. Plant facilities are located to the southwest of the impoundment. A residential area is located on higher ground to the east of the facility. Undeveloped tidal marsh is located to the north and southeast.

The Plant McManus AP-1 is in the process of being closed through removal of the CCR from the CCR unit. As of March 2018, approximately 60% of the CCR has been removed. AP-1 is dewatered as required to facilitate excavation of ash for removal. All CCR is being excavated, transported, and disposed of in an offsite Solid Waste permitted landfill. Closure is anticipated to be completed 4th Quarter 2018. The pond dike and primary spillway are intact and continue to impound water. During ash pond closure, accumulated water is managed by a temporary water treatment system in accordance with a dewatering plan approved by the Georgia Environmental Protection Division. The treated water is then discharged via the NPDES permitted outfall located at the westernmost corner of AP-1. When discharged, the treated water is sampled and monitored in accordance with the approved dewatering plan

Based on the potential impacts in the unlikely event of an embankment failure, a hazard potential classification of Significant Hazard Potential has been assigned to AP-1, in that failure or mis-operation

of the CCR unit would result in no probable loss of human life but could potentially result in economic loss and/or environmental damage.

I hereby certify that the hazard potential classification was conducted in accordance with 40 C.F.R. Part 257.73 (a)(2).

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