PERIODIC HAZARD POTENTIAL CLASSIFICATION ASSESSMENT (REVISION 3) 391-3-4-.10(4) AND 40 C.F.R. PART 257.73 PLANT MCMANUS ASH POND 1 (AP-1) GEORGIA POWER COMPANY

The Federal CCR Rule and the Georgia CCR Rule (391-3-4-.10) require the owner or operator of an existing CCR surface impoundment to conduct initial and periodic hazard potential classification assessments. *See* 40 C.F.R. § 257.73(a)(2); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)¹. A direct final rule revision to a partial vacatur of the Final Rule became effective on October 4, 2016. This revision eliminated the exemption for inactive CCR surface impoundments and required such units to meet the same requirements as existing CCR surface impoundments. The owner or operator must classify the hazard potential of each CCR surface impoundment as either a high hazard potential CCR surface impoundment, a significant hazard potential CCR surface impoundment, or a low hazard potential CCR surface impoundment and document the basis of the classification. In addition, the Rules require a subsequent assessment be performed within 5 years of the previous assessment. *See* 40 C.F.R. § 257.73(f)(3); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)¹.

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 has undergone CCR removal in accordance with 40 C.F.R. § 257.102(c). On November 27, 2019, Georgia Power submitted a certification of removal report demonstrating completion of CCR removal activities for McManus AP-1. Based on review of the report and an inspection of AP-1 on December 13, 2019, Georgia EPD acknowledged completion of CCR removal in a letter dated January 10, 2020. Based on the potential impacts in the unlikely event of an embankment failure, a revised hazard potential classification of Low 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, nor would it result in economic loss and/or environmental losses as there is no longer any CCR present that could be released outside the CCR unit.

I hereby certify that the reassessment of the hazard potential classification for Plant McManus AP-1 was conducted in accordance with 40 C.F.R. § 257.73(a)(2).

R \cap G G No. PE0017419 PROFESSIONAL 23 James C. Pegues, ENGINEE Licensed State of GAPE No. 17412