

**LOCATION RESTRICTION DEMONSTRATION
UNSTABLE AREAS (40 C.F.R. 257.64)
PLANT SCHERER 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) requires the owner or operator of an existing CCR surface impoundment 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.

Based upon a review of available geologic mapping and historical information, as well as geotechnical explorations by AECOM and other consultants, no unstable areas have been identified at AP-1. Additionally, over 30 years of satisfactory performance and the October 17, 2016 Initial Safety Factor Assessment by Georgia Power Company indicate that the embankments meet the minimum factors of safety required under the rule. The foundations beneath the embankments and the CCR unit generally consist of stable and competent silts and silty sands. The CCR unit is not located within karst terrain, and the site and its surrounding areas are not subject to mass movements (e.g. landslides). Opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data, and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

I hereby certify that, to the best of my knowledge, information, and belief, for Georgia Power's Plant Scherer AP-1, the unstable areas location restriction demonstration meets the requirements of 40 C.F.R. § 257.64(a), and that the information contained in this demonstration is true and correct and has been prepared in accordance with generally accepted good engineering practices.



Douglas W. Carr, P.E.



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