

**LOCATION RESTRICTIONS DEMONSTRATION  
UNSTABLE AREAS (40 C.F.R. PART 257.64)  
PLANT SCHERER PRIVATE INDUSTRY SOLID WASTE DISPOSAL FACILITY  
(PLANT SCHERER 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 §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.

The CCR Landfill, known as the Plant Scherer Landfill, is located at Georgia Power Company's Plant Scherer, approximately 8 miles northeast of Forsyth, Georgia. Plant Scherer's Landfill is currently comprised of Cell 1 and the PAC Ash Cell. A review of the site geology, hydrogeology, and information available on site surface and subsurface conditions was performed at the time that the landfill was initially permitted and is described in the Site Acceptability Report. This review confirmed that the landfill is not located within an unstable area having on-site soil conditions, on-site geologic or geomorphologic features, and/or on-site human-made features or events (both surface and subsurface) that may result in significant differential settling of the foundation of the landfill cells. Additionally, the cell construction records for Cells 1 and the PAC/Ash Cell were reviewed to confirm that the Plant Scherer Landfill cells were constructed using recognized and generally accepted good engineering and construction practices implemented to ensure firm subgrade soils and maintain the integrity and proper functioning of the containment and leachate collection and removal systems of the constructed cells.

I hereby certify that for the existing cells at Georgia Power's Plant Scherer CCR Landfill, the unstable areas location restriction demonstration meets the requirements of 40 C.F.R. 257.64(a).



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