

EMERGENCY ACTION PLAN

Georgia Power Company
Plant Yates
Ash Pond AP-2 Dam
State ID: 038-063-04138
NID: GA04184
Coweta County, GA

I hereby certify that this Emergency Action Plan has been prepared in accordance with the requirements of the United States Environmental Protection Agency Coal Combustion Residual (CCR) rule (40 C.F.R. Part 257.73).



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ISSUE DATE: October 23, 2020
REVISION #: 3

REVISION RECORD

In accordance with 40 C.F.R. Part 257.73, this Emergency Action Plan (EAP) must be amended whenever there is a change in conditions that would substantially affect the EAP in effect. Additionally, the EAP must be evaluated, at a minimum, every five years to ensure the information is accurate. As necessary, this EAP must be updated and a revised EAP placed in the facility's operating record as required by 40 C.F.R. Part 257.105(f)(6).

Revision Number	Date	Sections Affected/Reason
0	04/17/17	Creation of Initial EAP
1	7/20/18	Updated Incident Response Flowchart in Appendix C, Added Ga. System Operator Phone Number and Corrected EMA Contacts on Response Notification Flowchart in Appendix D.
2	10/6/20	Changed GPC Environmental Affairs to GPC Environmental & Natural Resources, Updated Section 2.0 to reflect current conditions, Added Resources Available to Support Emergency Response Efforts Section (Section 7.0), Updated Appendix C to current format, Updated Coweta County EMA Director contact information in Appendix D, Added Emergency Notification Log Sheet & Post Incident Reporting Form in Appendix E.
3	10/23/20	Updated Appendix D to include 911 in Coweta County contact block, added – CCR to the end of GPC Environmental and Natural Resources (E&NR), and deleted E&NR Civil Support.

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ACRONYMS AND ABBREVIATIONS

CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
E&CS	Engineering & Construction Services
EAP	Emergency Action Plan
EMA	Emergency Management Agency
EPA	Environmental Protection Agency
FERC	Federal Energy Regulatory Commission
GDOT	Georgia Department of Transportation
GEMA	Georgia Emergency Management Agency
GEOP	Georgia Emergency Operations Plan
GPC	Georgia Power Company
H:V	Horizontal:Vertical
HDPE	High-Density Polyethylene
ID	Inside Diameter
SCS	Southern Company Services

DEFINITIONS

Adverse Consequences. Negative impacts that may result from the failure of a dam. The primary concerns are loss of life, economic loss (including property damage), lifeline disruption and environmental impact.

Category I Dam. State of Georgia Safe Dams Program designation for Hazard Potential indicating that improper operation or failure would result in a probable loss of human life.

Category II Dam. State of Georgia Safe Dams Program designation for Hazard Potential indicating that improper operation or failure would not be expected to result in a probable loss of human life.

Coal Combustion Residuals (CCR). Fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers.

CCR Surface Impoundment. A natural topographic depression, man-made excavation, or diked area which is designed to hold an accumulation of CCR and liquids, and the unit treats, stores, or disposes of CCR.

Dam/Dike/Embankment. An artificial barrier that has the ability to impound water, wastewater, or any liquid-borne material for the purpose of storage.

Dam Failure. Catastrophic type of failure characterized by the sudden, rapid and uncontrolled release of impounded water or the likelihood of such an uncontrolled release. It is recognized that there are lesser degrees of failure and that any malfunction or abnormality outside the design assumptions and parameters that adversely affect a dam's primary function of impounding water is properly considered a failure. These lesser degrees of failure can progressively lead to or heighten the risk of catastrophic failure. They are, however, normally amenable to corrective action.

Imminent Failure (Condition A Emergency). Failure of a dam/dike/embankment is imminent or has occurred.

Potential Failure (Condition B Emergency). A potential failure condition of a dam/dike/embankment is a developing condition, but adequate time is available to properly evaluate the problem and implement corrective actions that may alleviate or prevent failure.

Non-Failure Condition. A condition that will not, by itself, lead to a failure, but that requires investigation and notification of internal and/or external personnel.

Emergency. A condition that develops unexpectedly, endangers the structural integrity of the dam, and requires immediate action. An emergency can lead to Adverse Consequences in the event of Imminent Failure.

Filter. One or more layers of granular material graded to allow seepage through or within the layers while preventing the migration of material from adjacent zones.

Inundation Map. A graphic representation of the inundation zone that shows the potential impact area due to a breach of the Ash Pond. The inundation maps in this procedure are based on a specific computer-modeled dam breach scenario; therefore, the boundaries depicted are estimates for that particular model. *The models are considered conservative but larger floods could potentially occur.* Please refer to Appendix B.

Inundation Zone. Area subject to flooding in the event of increased flows due to a dam/dike/embankment failure.

Piping. The progressive development of internal erosion of the dam/dike/embankment or foundation material by seepage.

Probable Maximum Flood. The flood that may be expected from the most severe combination of critical meteorologic and hydrologic conditions that are reasonably possible in the drainage basin.

Sunny Day Failure. A night or day failure that occurs during fair weather or when weather-related flooding is not occurring.

1.0 STATEMENT OF PURPOSE

This Emergency Action Plan (EAP) has been prepared for the Plant Yates Ash Pond AP-2 (AP-2) to meet the requirements of 40 C.F.R. Part 257.73(a)(3). The EAP identifies potential safety emergency conditions at the Plant Scherer Ash Pond and specifies actions to be followed to minimize potential loss of life and property damage if such conditions exist.

This EAP will provide responding personnel with:

- Pertinent information and description related to Plant Yates AP-2;
- Definition of events or circumstances that represent a safety emergency;
- Procedures that will be followed to detect a safety emergency;
- Notification procedures in the event of a safety emergency;
- Information to assist in decision making;
- A list of responsible persons and their respective responsibilities;
- Provisions for an annual face-to-face meeting with local emergency responders;
- Contact information for emergency agencies and other emergency responders
- Contact information for additional resources and outside agencies; and
- Maps that delineate the downstream area that could be affected in the event of a failure.

2.0 FACILITY DESCRIPTION

The Eugene A. Yates Power Plant (Plant Yates) was once a seven-unit, coal fired, power generation facility. Currently, Plant Yates Units 1-5 are in the process of demolition and Plant Yates Units 6 and 7 have been converted to natural gas. AP-2 was designed to receive, and store coal combustion residuals produced during the electric power generating process at Plant Yates. Plant Yates ceased burning coal in 2015 and thus ceased sluicing ash to AP-2 at that time. AP-2 also serves as a low-volume waste treatment pond for the plant. This EAP covers emergency response procedures for AP-2.

AP-2 has an earthen embankment/dam on its western side and is approximately 63 acres in size at its normal pool elevation of 722 feet (Appendix A – Figure 1 and Figure 2). The dam currently has a maximum height of approximately 39 feet.

Originally AP-2 had a top of dike elevation of 721 ft. and a corresponding surface area of 50 acres. During an expansion that took place between 1969 and 1970 the embankment height was raised to the current elevation of 729 ft. As part of that construction, a bench was created on the downstream slope of the new structure at elevation 710 ft. The primary discharge structure was relocated approximately 20 feet to the east to allow for the new upstream toe.

In 1976, a diversion berm was constructed in AP-2 to allow increased detention time of wastewater. The two areas created by the diversion berm are hydraulically connected by an open channel ditch which flows from the upper section to the lower section. The upper portion has been used as a settling basin for coal combustion residuals while the lower portion is utilized as a pool for recycling water back to the plant and/or to prepare water for final discharge.

The previous primary discharge structure was abandoned and a new one built in 2019. The new primary discharge structure is located on the northern shore in the central portion of AP-2 and consists of a concrete inlet structure with a 24-inch slide gate that controls flow into a 30-inch diameter fiber reinforced pipe that outlets to the permitted NPDES discharge point on the Chattahoochee River. Elevation 720 feet is the lowest water surface elevation that can be maintained with this system. The auxiliary spillway is an open channel set at approximate elevation 725.4 feet and is located near the left/south abutment. The spillway approach is lined with riprap and continues to a concrete control structure. The spillway channel through the abutment is lined with a concrete filled erosion protection blanket. The spillway outfall is constructed with stair-stepping gabion baskets with concrete on the top surface.

The exposed upstream face of the dam is covered with rip rap. The crest surface is composed of grass and a gravel access drive. Downstream slopes are covered by a combination of grass and riprap. The natural slopes of the Chattahoochee River are covered with gabion erosion protection mattresses, but are not formally considered a part of the AP-2 embankment.

The AP-2 dam is classified as a Category II structure by the Georgia Department of Natural Resources – Environmental Protection Division – Safe Dams Program (Georgia Safe Dams Program) and has been assigned a Significant Hazard Potential classification under 40 C.F.R. Part 257.73 of the Environmental Protection Agency's (EPA's) Coal Combustion Residuals (CCR) Rule. These classifications, by definition, indicate that structural failure or misoperation of the CCR unit would result in no probable loss of human life but could potentially result in economic loss and/or environmental damage.

A failure of the dam at AP-2 would inundate the Chattahoochee River basin near the dam. There are no other dams located downstream of AP-2 that would be impacted by its failure. The peak water surface elevations associated with the breach scenario were computed to be less than the current FEMA 100-year water surface elevations. The limits of potential flooding in the event of failure of the AP-2 dam can be seen on the Inundation Maps, which are included as Appendix B. The provided inundation maps were developed based on the results of routing the breach wave downstream using the computer software, HEC-RAS. HEC-RAS is a general application one-dimensional hydraulic model that can perform unsteady flow routing through an open channel system that may also include culverts, bridges, levees, tributaries, storage areas, and other dams. Unsteady flow analyses allow for flow conditions that vary temporally and spatially such as a dam breach simulation. Breach parameters such as failure time, breach width, and breach side slopes were selected from industry accepted empirical formulas. Water surface elevation data was extracted from the hydraulic model and plotted on best available LiDAR topographic information for the downstream areas.

Normal river/lake levels and the flow from simulated dam breaches were superimposed over topographical maps to identify areas subject to flooding. *These flood extents are provided for planning purposes only; actual flooding can vary due to actual conditions present at the time of the failure.*

3.0 DETECTION, EVALUATION, AND CLASSIFICATION PROCEDURES FOR EMERGENCIES

3.1 Inspection Schedule and Condition Detection/Evaluation

Trained personnel from Plant Yates inspect the AP-2 dam on a regular basis to pre-emptively detect conditions, in a timely manner that could indicate a potential issue so that it can be addressed. Personnel from the Plant's Environmental Compliance group perform weekly inspections; and SCS E&CS Fossil Dam Safety (Fossil Dam Safety) personnel perform semi-annual inspections. The Georgia Safe Dams Program carries out independent inspections every two years.

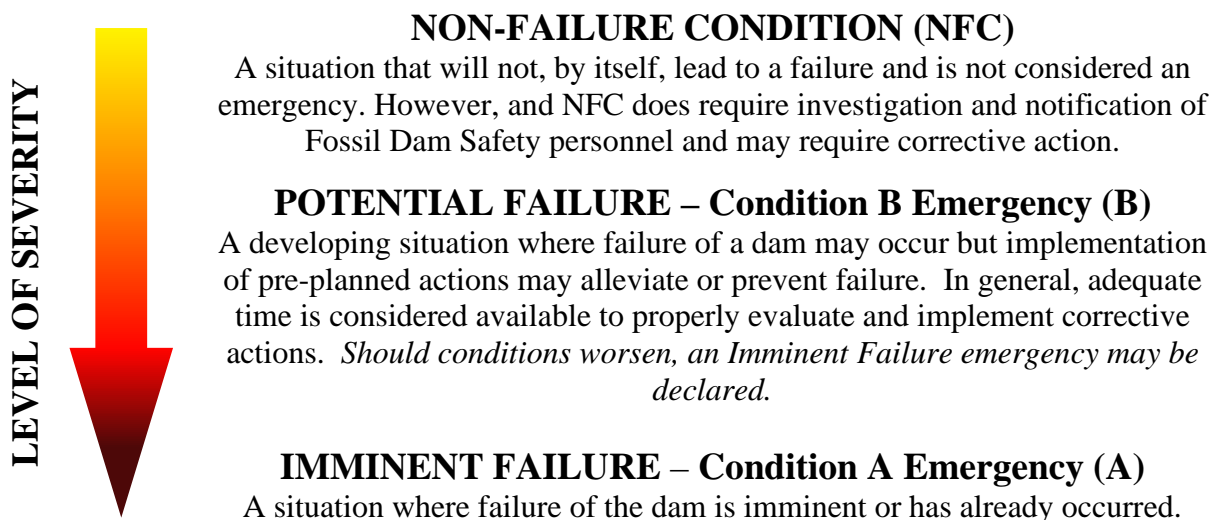
Piezometers are installed along the AP-2 dam. The piezometers are read on a regular basis by plant personnel, and the results are reported to Fossil Dam Safety for evaluation.

Plant personnel conducting inspections of the dams are trained on an annual basis by engineers from Fossil Dam Safety on the appropriate surveillance and monitoring requirements.

Any issues discovered during an inspection are reported to Fossil Dam Safety as prescribed in the Safety Procedure for Dams and Dikes at Fossil Generation Plants (GEN10004). The Fossil Dam Safety Engineer(s) working with plant personnel will recommend a corrective course of action, as needed.

3.2 Condition Severity Classifications

AP-2 dam emergencies will be classified based on the type of event, severity of the situation, and the time required to take corrective measures. This procedure covers the following severity classifications:



3.3 Guidance for Determining the Condition Severity Level

The following table details potential situations that could occur at the AP-2 dam. *The Condition Level indicated in the right-most column corresponds with the Condition Severity Classifications in Section 3.2 above.*

Event	Situation	Emergency Level
Auxiliary Spillway Flow	AP-2 water surface elevation at auxiliary spillway crest or spillway is flowing with no active erosion	NFC
	Auxiliary spillway flowing with active gully erosion	B
	Auxiliary Spillway flow that could result in flooding of people downstream if the AP-2 level continues to rise	B
	Auxiliary Spillway flowing with an advancing headcut that is threatening the control section	A
	Auxiliary Spillway flow that is flooding people downstream	A
Embankment Overtopping	AP-2 level is 1 foot below the top of the dam	B
	Water from AP-2 is flowing over the top of the dam	A
Seepage	New seepage areas in or near the dam	NFC
	New seepage areas with cloudy discharge or increasing flow rate	B
	Seepage with discharge greater than 10 gallons per minute	A
Dropouts/ Depressions	Observation of new dropouts or depressions in AP-2 or on the dam	B
	Rapidly enlarging dropout or depression	A
Embankment Cracking	New cracks in the embankment greater than ¼-inch wide without seepage	NFC
	Cracks in the dam with seepage	B
Embankment Movement	Visual movement/slippage of the dam slopes	NFC
	Sudden or rapidly proceeding slides of the dam slopes	A
Instruments	Instrumentation readings beyond predetermined/historic values	NFC
Earthquake	Measurable earthquake felt or reported on or within 50 miles of the dam	NFC
	Earthquake resulting in visible damage to the dam or its appurtenances	B
	Earthquake resulting in uncontrolled release of water from the dam	A
Security Threat	Verified bomb threat that, if carried out, could result in damage to the dam	B
	Detonated bomb that has resulted in damage to the dam or its appurtenances	A
Sabotage / Vandalism	Damage to dam or its appurtenances that could adversely impact the functioning of the dam	NFC
	Modification to the dam or its appurtenances that could adversely impact the functioning of the dam	NFC
	Damage to dam or its appurtenances that has resulted in seepage flow	B
	Damage to the dam or its appurtenances that has resulted in uncontrolled water release	A

4.0 INCIDENT RESPONSE

The following situations and conditions should be evaluated when performing condition severity detections and evaluations.

Overtopping. AP-2 consists of a 63-acre storage area. The inflow design flood consists of the rainfall that falls within the limits of the surface impoundment, runoff from approximately 622 acres of adjoining watershed, and a nominal amount (relative to rainfall) of process flows. Additionally, run-off from Ash Ponds B, B', and 3 are ultimately routed into AP-2. The drainage area for these basins totals an additional 723 acres (total drainage area of 1,408 acres). The impoundment and its spillways are designed and operated to safely manage the 1,000-year storm event.

Seepage. Failures due to internal erosion and/or piping resulting from seepage would be detected in the early stages during the regular inspections conducted by plant personnel. Inspectors are trained to look for evidence of seepage. In addition, piezometer readings will reveal changes in subsurface water pressure. Inspection reports, including piezometer readings, are transmitted to trained dam safety engineers for evaluation. Therefore, the conditions that could lead to failures of this type would likely be discovered and corrected, making an actual failure a remote possibility.

Slope Instability. Slope instability would be demonstrated by sloughing of dam/dike slopes, which would be detected by Environmental Compliance personnel in their weekly inspections. The conditions that could potentially lead to a failure of this type would also be detected in advance and corrected making an actual failure a remote possibility.

In the event that conditions are detected that could potentially lead to a dam failure, the flowcharts in Appendices C (Incident Response) and D (Response Notification) will be used to respond to the situation and alert applicable personnel and emergency agencies. In that situation, local emergency management agencies (EMAs) would respond and begin warnings and evacuations as soon as possible following the declaration of a safety emergency.

4.1 Access to the Site

Plant personnel are able to access the dam from the north by paved or gravel-surfaced roadways from the main portion of Plant Yates. Figures 1 and 2 show the location of AP-2 on Plant property.

4.2 Response during Periods of Darkness

Plant Yates is operational and manned 24 hours a day every day, and personnel and equipment will be able to access the site at any time. Response times would not vary significantly from daylight conditions.

4.3 Response during Weekends and Holidays

Plant Yates is operational and/or manned 24 hours a day every day, and personnel and equipment will be able to access the site at any time. The response times of certain personnel may be affected, but 24-hour contact information is included in the EAP for responsible personnel.

4.4 Response during Adverse Weather

The dam is accessed by paved and gravel-surfaced roads and is accessible during periods of adverse weather. Response times are not expected to be greatly affected by severe flooding.

5.0 RESPONSIBLE PERSONS AND RESPONSIBILITIES

Designated personnel have been trained in the use of these response procedures and are aware of their responsibilities in making the procedures effective. The chain of command and the individual responsibilities for plant personnel, public officials, and agencies are outlined below.

5.1 Plant Manager

The Plant Manager is ultimately responsible for the content, effectiveness, and implementation of the response procedures. The Plant Manager normally serves as the Incident Commander or designates this person. *Plant Managers have the authority and responsibility to direct all on-site activities.*

The Plant Manager or his designee will assess the conditions, direct the corrective and protective measures necessary to mitigate the condition(s), and, if necessary, declare an emergency condition. The Plant Manager or his designee will also declare the termination of an emergency condition. Once outside agencies are notified, the Plant Manager or his designee is responsible for keeping EMA informed of any changes in conditions. See Incident Commander responsibilities for further details.

5.2 Duty Officer

The Duty Officer is the 24-hour point of contact for all plant emergencies. If the Plant Manager is unavailable and the Duty Officer is on-site, he/she will assume the duties and responsibilities of the Incident Commander until properly relieved by the Plant Manager or other designee.

5.3 Incident Commander

The Plant Manager or his designee is the Incident Commander. If neither is available, Operations Shift Team Leader or the Duty Officer will assume the duties and responsibilities of the Incident Commander until properly relieved by the Plant Manager or ranking member of the Management Team.

The Incident Commander is responsible for:

1. Verifying that an emergency condition exists.
2. Assessing and declaring the emergency condition.
3. Consulting with Fossil Dam Safety to evaluate conditions and determine remediation actions.
4. Emergency Actions
 - a. If necessary, implement actions to lower the water level in the impoundment in consultation with Fossil Dam Safety.
 - b. Call-out of personnel necessary to perform the work required on plant site during the emergency.
5. Ensure the notification process as outlined in the Response Notification Flowchart (Appendix D) is completed in an expedient manner.

6. Other responsibilities include:
 - a. Establishing lines of communication from the plant to the local and state EMAs.
 - b. Ensuring emergency sources of power are available for the operation of essential equipment such as emergency lighting.
 - c. Ensuring the availability of heavy equipment and trained operators to aid in the mitigation effort.

5.4 Plant Security Department

The Plant Security Department is responsible for securing company property and controlling access to company facilities. The Plant Security Department will also perform emergency notifications to Plant Environmental Compliance, the Georgia System Operator, and outside agencies as shown on Response Notification Flowchart (Appendix D). This consists of local and state EMAs. **These notifications are mandatory when an emergency condition has been declared by the Plant Manager or Incident Commander.**

5.5 Plant Environmental Compliance

Environmental Compliance personnel are responsible for assessing conditions, contacting the Plant Manager, obtaining assistance from Fossil Dam Safety, and for providing technical updates to the Emergency Coordinator. Compliance personnel can also request assistance from GPC Environmental Affairs.

5.6 Georgia System Operator

The Georgia System Operator contacts the National Weather Service to inform them of conditions at the plant that may lead to potential flooding downstream.

5.7 Fossil Dam Safety

Fossil Dam Safety is responsible for coordinating and providing the technical support necessary to mitigate the emergency condition and for notifying the Hydro Services General Manager of the emergency condition. Fossil Dam Safety shall also notify GPC Supply Chain Management and the Georgia Safe Dams Program as shown on the Response Notification Flowchart (Appendix D).

5.8 GPC Personnel

Environmental Affairs

GPC Environmental Affairs is responsible for coordinating long-term environmental response (after the initial response) and to remediate environmental issues and provide the technical support necessary for any remediation needs. Environmental Affairs is also responsible for all communications with environmental regulatory agencies for appropriate reporting of releases to the environment and for securing variances to existing permits, if needed.

If necessary, Environmental Affairs will also help secure approved remediation contractors for the specific emergency condition that may exist. They will also provide additional support, such as emergency manpower, material, equipment, and expertise to assist in mitigation efforts, if needed.

Corporate Communications

GPC Corporate Communications is responsible for coordinating the GPC media response and will schedule news briefings and prepare news releases, as required. GPC Corporate Communications will also work with local and State Public Information Officers to ensure that timely, accurate, and consistent information is made available to media outlets.

Corporate Security

GPC Corporate Security is responsible for supporting Plant Security personnel and contracting with local law enforcement for additional security personnel as needed.

Supply Chain Management

Supply Chain Management is responsible for obtaining additional equipment and materials necessary to mitigate the emergency condition and begin the recovery process.

5.9 Emergency Agencies

Local EMAs are responsible for planning and implementing evacuation and sheltering plans as well as directing search, rescue, and recovery efforts. If additional resources are required, the local agencies can contact the Georgia Emergency Management Agency (GEMA) for assistance.

The local EMAs are the point of contact between plant personnel and local jurisdictions. The EMAs are responsible for the direction and control of emergency operations at the local level and keeping local government officials informed of the status of emergency operations.

GEMA generally becomes involved in an emergency situation if the local agencies are not capable of handling the situation or if assistance is requested by a local agency or by the Governor. Refer to the "Georgia Emergency Operations Plan" (GEOP) for an explanation of specific functions. GEMA has responsibilities similar to the local EMAs but is also responsible for mobilizing state military support as well as State Disaster Center operations.

5.10 Law Enforcement

Local Law Enforcement agencies are notified by the appropriate EMA. GEMA notifies the State Patrol as well as the Georgia Department of Transportation (GDOT). Law Enforcement is responsible for traffic control and can assist with evacuation, mitigation, and rescue activities.

6.0 NOTIFICATION PROCEDURES

Communication during an emergency event will primarily be by company phone. In the event of system failure, Southern Linc radios and cell phones would be utilized as an alternate method of communication. These numbers are listed on the Response Notification Flowchart located in Appendix D.

Local and state EMA will be notified in the event of an emergency, and these agencies will be responsible for notifying the public. In the event of an imminent failure, local and state EMA's will be notified to immediately begin evacuation procedures. GPC Corporate Communications will provide information for media outlets and will be responsible for communicating relevant information to the public.

6.1 Incident Response Flowchart for Imminent Failure and Potential Failure Emergencies

This Procedure and the following Incident Response Flowchart (below in text and in Appendix C in visual) for Imminent Failure and Potential Failure Emergencies shall be posted at appropriate locations at Plant Yates. Personnel responsible for executing mitigation and/or emergency actions shall be thoroughly familiar with their responsibilities under this EAP.

- A. When a Condition B or Condition A situation is detected, notify plant personnel in accordance with the Incident Response Flowchart (below and in Appendix C). Plant Environmental Compliance should contact Fossil Dam Safety immediately for technical consultation. Fossil Dam Safety will provide the evaluation of the conditions and provide a determination if there is an immediate threat to the dam/dike. If there is an immediate threat of dam/dike or dike failure, declare an **Imminent Failure Emergency** and proceed to Step I.
- B. If no immediate threat is detected, determine if the problem detected could possibly lead to failure of the dam/dike. If there is a potential for failure but corrective measures may be taken to moderate or alleviate failure, declare a **Potential Failure Emergency** (Condition B) and proceed to Step C.
- C. If a **Potential Failure Emergency** has been declared, notify personnel and agencies listed on the Response Notification Flowchart (Appendix D). Document all communications using the appropriate forms contained in Appendix E. Once outside agencies have been notified of an issue or potential problem, plant management is responsible for keeping local EMAs informed of any change in conditions.
- D. Begin corrective measures to attempt to alleviate or prevent failure.
- E. Evaluate the effectiveness of the corrective measures. If the corrective actions are successful, update all personnel/agencies previously contacted of the status of the improved conditions and document relevant communications using the forms provided in Appendix E. At this time, the Emergency Coordinator will end the emergency condition. Fossil Dam Safety will be responsible for preparing the after-action report.

- F. If the corrective measures are not effective, Fossil Dam Safety will determine if there is time to take additional corrective measures.
- G. If there is not time to take additional corrective measures and failure is imminent, declare an **Imminent Failure Emergency** (Condition A) and proceed to Step I.
- H. If there is time to implement additional corrective measures, return to Step E. Additional support can be requested from Civil Field Services or outside contractors, as needed.
- I. If an **Imminent Failure Emergency** has been declared by the Plant Manager or his designee, ensure that all personnel have been moved to a safe area and perform notifications per the Response Notification Flowchart (Appendix D). Document all communications using the appropriate forms contained in Appendix E. Once outside agencies have been notified of a problem or potential problem, the Plant Manager or his designee is responsible for keeping local EMAs informed of any change in conditions. Fossil Dam Safety will be responsible for preparing the after-action report.

6.2 Additional Considerations

All communication shall be documented using the *Data Recording Sheet* located in Appendix E.

7.0 RESOURCES AVAILABLE TO SUPPORT EMERGENCY RESPONSE EFFORTS

7.1 Alternative Sources of Power

There are no electrically powered gates or other equipment used for operating the Ash Pond AP-2 dam. Generators can be obtained from both plant inventory and/or from multiple local equipment rental companies, if needed.

7.2 Emergency Materials and Equipment

Materials

The following materials are stockpiled on-site

- #10 washed sand (GDOT 10NS)
- # 89 stone
- # 57 stone
- Rip rap (GDOT Type 3)

These materials are protected by fencing and are labeled “**For Emergency Use Only**”. Appendix F contains the instructions for how to construct an emergency reverse filter.

Equipment

Equipment necessary to take corrective actions is maintained by Plant Yates personnel. This could include, but is not limited, to the following equipment:

- Portable light stands
- Rubber tire loaders
- Tracked heavy equipment
- Skid Steer Loaders
- Dump Trucks

Other equipment such as additional emergency lighting can be obtained from both plant inventory and/or from multiple local equipment rental companies, if needed.

7.3 Reducing Flows into the Reservoir

Flow into Ash Pond AP-2 is a combination of run-off from the upstream drainage basin and Plant Yates operations. In case of emergency lowering, all pumping into AP-2 from Plant operations will be ceased.

7.4 Lowering Water Level

The primary spillway for Ash Pond AP-2 consists of a concrete lined, earthen channel located at the left/southern dam abutment. The spillway has a control section on the order of 45 feet wide at approximate elevation 725.4 feet. In addition, the operational plant discharge can lower the water to approximate elevation 420 feet. United Rentals should be contacted to mobilize large portable pumps for lowering of the reservoir lower than elevation 420 feet. Portable, diesel pumps with capacities ranging from 7,500 to 15,000 GPM can be mobilized to AP-1 within 48-

hours or less of notification. United Rentals will be contacted as part of support once the EAP is activated. If the EAP has not been activated and emergency lowering is required, the Duty Officer should be contacted to coordinate support.

8.0 PROVISIONS FOR ANNUAL COORDINATION MEETING

An annual face-to-face meeting will be held with representatives of Plant Yates, GPC, and the emergency response agencies described in this plan. These emergency response agencies receiving invitations to participate in the annual meeting will include:

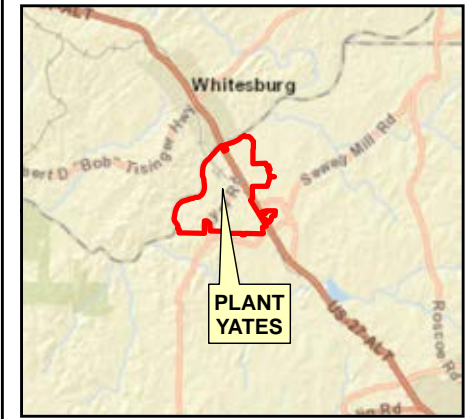
- Carroll County Emergency Management Agency
- Coweta County Emergency Management Agency
- Heard County Emergency Management Agency
- Georgia Environmental Protection Division - Safe Dams Program

The County EMA organizations may, at their discretion, invite other response agencies, such as the sheriff's department, fire department, or GEMA to participate in the annual meeting as well.

APPENDIX A

Plant Yates Location Map – Figure 1

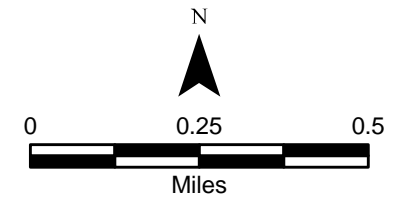
Ash Pond AP-2 Overview – Figure 2



0 2.5 5
Miles 1 in = 5 miles

LEGEND

- Plant Boundary
- Ash Pond AP-2 Boundary



1 inch = 1,500 feet

NOTE: Right-of-way boundaries are included within plant boundary for clarity.

FIGURE 1
PLANT YATES LOCATION MAP
COWETA COUNTY, GEORGIA

**Southern Company Services
FOR
Georgia Power
Company**

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LEGEND

- Plant Boundary
- Ash Pond AP-2 Boundary

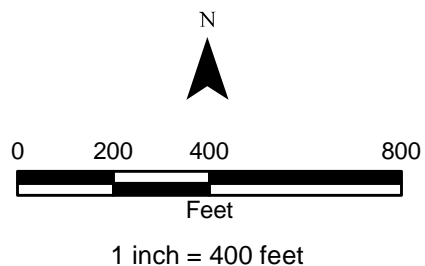


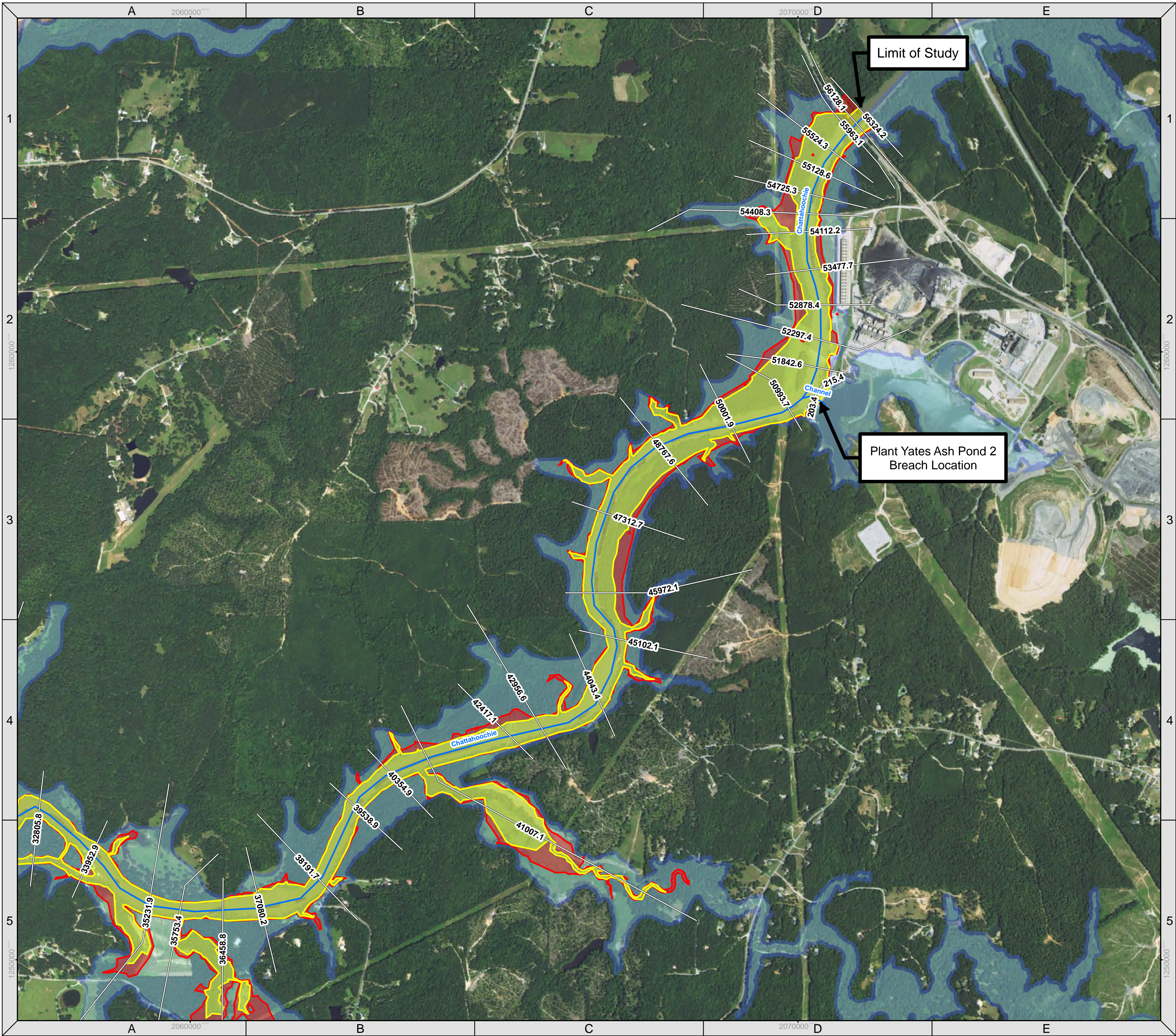
FIGURE 2
ASH POND OVERVIEW
PLANT YATES
COWETA COUNTY, GEORGIA

Southern Company Services
FOR
Georgia Power Company

APPENDIX B

Inundation Maps

PLANT YATES ASH POND 2 DAM DAM BREACH INUNDATION MAP



River Station	Normal Water Surface Elevation (ft)	Sunny Day Flow at Max WS Elevation (cfs)	Sunny Day Max WS Elevation (ft)	Sunny Day Change in Water Surface Elevation (ft)	Design Storm Flow at Max WS Elevation (cfs)	Design Storm Max WS Elevation (ft)	Design Storm Change in Water Surface Elevation (ft)
215.35	698	12092.8	701.3	3.3	20856.1	702.5	4.5
203.42	695.8	12088.8	700.6	4.8	20293.6	701.9	6.1
CHATTAHOOCHEE RIVER							
56324.2	691	100	696.9	5.9	100	699.3	8.3
56128.1	691	99.9	696.9	5.9	99.6	699.3	8.3
55963.1	691	99.2	696.9	5.9	98.2	699.3	8.3
55524.3	691	99.9	696.9	5.9	96.1	699.3	8.3
55128.6	689	101.1	696.9	7.9	94.8	699.3	10.3
54725.3	689	101.3	696.9	7.9	93.4	699.3	10.3
54408.3	689	95.4	696.9	7.9	91.8	699.3	10.3
54112.2	689	101.1	696.9	7.9	89.7	699.3	10.3
53477.7	689	65.3	696.9	7.9	94.6	699.3	10.3
52878.4	689	78.2	696.9	7.9	113.9	699.3	10.3
52297.4	689	62.5	697	8	89.5	699.3	10.4
51842.6	688	-130.3	697	9	-215.9	699.4	11.4
50993.7	687.3	5281	696.9	9.5	8909.1	699.2	11.9
50001.9	687	5060.4	696.1	9.1	8435.9	698.4	11.4

River Station	Normal Water Surface Elevation (ft)	Sunny Day Flow at Max WS Elevation (cfs)	Sunny Day Max WS Elevation (ft)	Sunny Day Change in Water Surface Elevation (ft)	Design Storm Flow at Max WS Elevation (cfs)	Design Storm Max WS Elevation (ft)	Design Storm Change in Water Surface Elevation (ft)
48767.6	687	5006.7	695.5	8.5	8315.8	697.6	10.6
47312.7	687	4820.4	694.3	7.3	7969.3	696.3	9.3
45972.1	686	4746.4	692.6	6.6	7684	694.4	8.4
45102.1	686	4484.1	690.9	4.9	7279	692.7	6.7
44043.5	682.3	4040.3	689.8	7.5	6649.2	691.8	9.5
42956.6	681.7	3913	689.5	7.8	6337.1	691.4	9.7
42417.1	681.4	3825.3	689.2	7.9	6139	691.2	9.8
41007.1	680.6	3441.1	688.4	7.7	5530.4	690.3	9.7
40354.9	680.3	3290.4	687.9	7.5	5352.3	689.9	9.5
39538.9	680.2	3197.6	687.5	7.3	5218.9	689.5	9.3
38191.7	679.7	3000.3	687	7.2	4984.4	688.8	9.1
37080.2	679	2891.2	686.6	7.6	4802	688.4	9.4
36458.8	678.7	2843.1	686.3	7.6	4701.7	688.1	9.3
35753.4	679.4	2797.2	685.9	6.6	4608.4	687.6	8.3
35231.9	678.8	2771.5	685.7	6.9	4568.7	687.4	8.6
33952.9	677.9	2745.4	685.3	7.3	4533.1	686.8	8.9
32805.8	678.3	2741.5	684.7	6.3	4523.1	686.1	7.8

Projection
NAD 1983 StatePlane Georgia West FIPS 1000 Feet

NOTES
1. THE INUNDATION AREAS DEPICTED ARE THOSE RESULTING FROM THE HYPOTHETICAL FAILURE OF PLANT YATES ASH POND DAM. THE FOLLOWING SCENARIOS ARE SHOWN HEREIN:
A. SUNNY DAY CONDITIONS WITH BREACH OF PLANT YATES ASH POND DAM.
B. DESIGN FLOOD WITH BREACH OF PLANT YATES ASH POND DAM.

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SOURCE: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEX, GETMAPPING, AEROGRIID, IGN, IGP, SWISSTOPO, AND THE GIS USER COMMUNITY

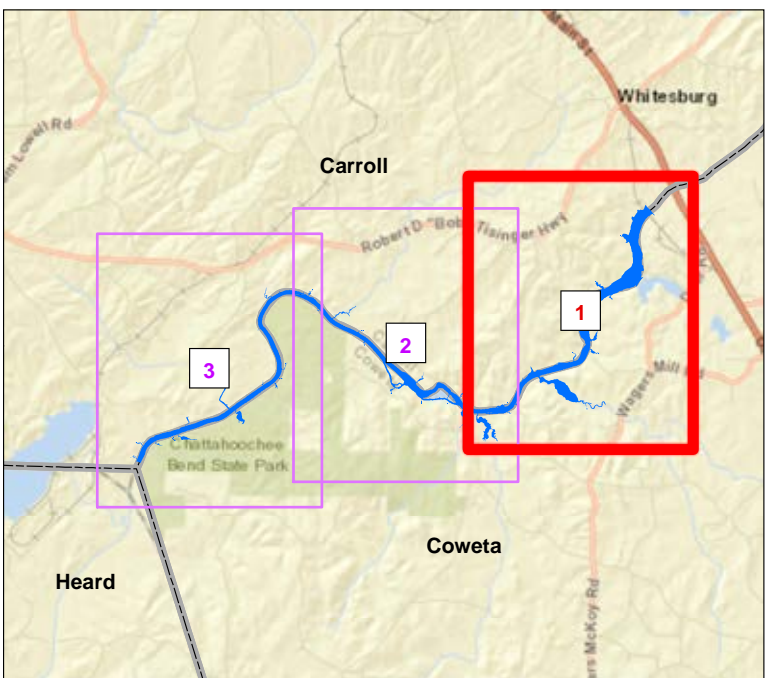
Legend

Sunny Day with Breach

Design Storm with Breach

100yr_Floodplain

Stream Centerline



Plant Yates Ash Pond Inundation Map

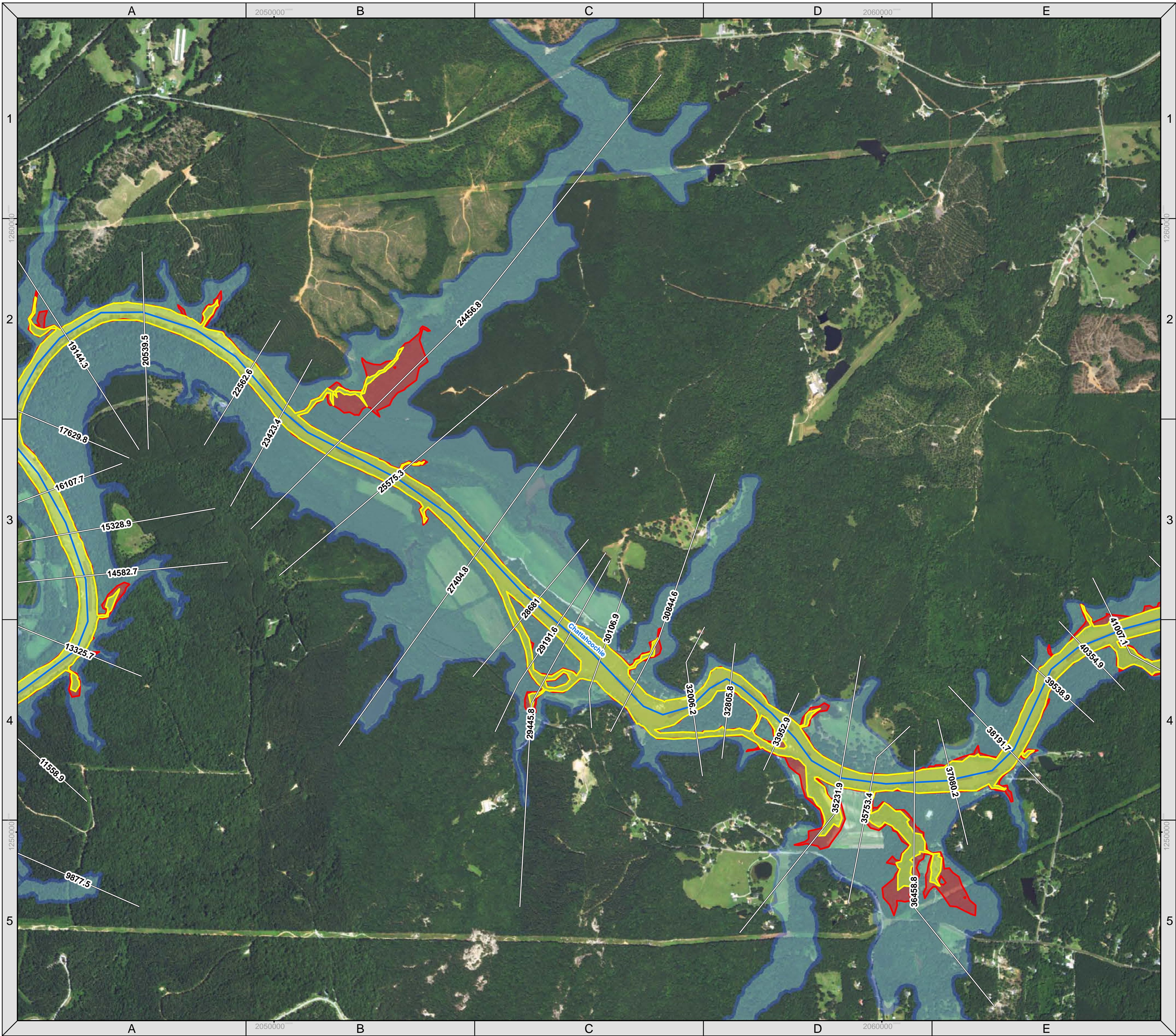
GEORGIA POWER
A SOUTHERN COMPANY

Page 1 of 3

Issue Date:SEPTEMBER 21, 2016

PLANT YATES ASH POND 2 DAM

DAM BREACH INUNDATION MAP



River Station	Normal Water Surface Elevation (ft)	Sunny Day Flow at Max WS Elevation (cfs)	Sunny Day Max WS Elevation (ft)	Sunny Day Change in Water Surface Elevation (ft)	Design Storm Flow at Max WS Elevation (cfs)	Design Storm Max WS Elevation (ft)	Design Storm Change in Water Surface Elevation (ft)
41007.1	680.6	3441.1	688.4	7.7	5530.4	690.3	9.7
40354.9	680.3	3290.4	687.9	7.5	5352.3	689.9	9.5
39538.9	680.2	3197.6	687.5	7.3	5218.9	689.5	9.3
38191.7	679.7	3000.3	687	7.2	4984.4	688.8	9.1
37080.2	679	2891.2	686.6	7.6	4802	688.4	9.4
36458.8	678.7	2843.1	686.3	7.6	4701.7	688.1	9.3
35753.4	679.4	2797.2	685.9	6.6	4608.4	687.6	8.3
35231.9	678.8	2771.5	685.7	6.9	4568.7	687.4	8.6
33952.9	677.9	2745.4	685.3	7.3	4533.1	686.8	8.9
32805.8	678.3	2741.5	684.7	6.3	4523.1	686.1	7.8
32006.2	678	2740.4	683.4	5.4	4504.3	684.7	6.7
30844.6	676.4	2466.4	680.5	4.1	3967.8	682.3	5.9
30106.8	673.6	2400.3	680.2	6.7	3880.8	682	8.5
29445.8	672.5	2392.7	680.2	7.6	3855	682	9.5

River Station	Normal Water Surface Elevation (ft)	Sunny Day Flow at Max WS Elevation (cfs)	Sunny Day Max WS Elevation (ft)	Sunny Day Change in Water Surface Elevation (ft)	Design Storm Flow at Max WS Elevation (cfs)	Design Storm Max WS Elevation (ft)	Design Storm Change in Water Surface Elevation (ft)
29191.6	672.1	2385.6	680.1	8.1	3842.1	681.9	9.8
28681	671.5	2333.9	679.7	8.2	3746.8	681.5	10
27404.8	671.4	2194.4	679	7.6	3557.4	680.9	9.5
25575.4	671.3	2023.9	678.1	6.8	3317.4	680	8.7
24456.8	670.8	1983.7	677.8	7	3253.8	679.7	8.9
23423.4	670.7	1957	677.5	6.8	3212.7	679.4	8.7
22562.6	670.4	1941.5	677.4	6.9	3186.1	679.2	8.8
20539.5	669.3	1910.3	676.9	7.6	3132.8	678.7	9.4
19144.3	669.3	1877.1	676.3	7.1	3063.6	678	8.8
17629.8	669.6	1775.6	675.4	5.8	2772.9	677.1	7.6
16107.7	668.2	1330.1	674.8	6.6	2102.1	676.7	8.5
15328.9	667.9	1272.8	674.7	6.9	2022.3	676.6	8.8
14582.7	668.1	1201.9	674.6	6.5	1928.9	676.5	8.4
13325.7	667.8	1144.2	674.5	6.7	1850.3	676.4	8.6

Projection
NAD 1983 StatePlane Georgia West FIPS 1000 Feet

NOTES
1. THE INUNDATION AREAS DEPICTED ARE THOSE RESULTING FROM THE HYPOTHETICAL FAILURE OF PLANT YATES ASH POND DAM. THE FOLLOWING SCENARIOS ARE SHOWN HEREIN:
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B. DESIGN FLOOD WITH BREACH OF PLANT YATES ASH POND DAM.

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SOURCE: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEX, GETMAPPING, AEROGRIID, IGN, IGP, SWISSTOPO, AND THE GIS USER COMMUNITY

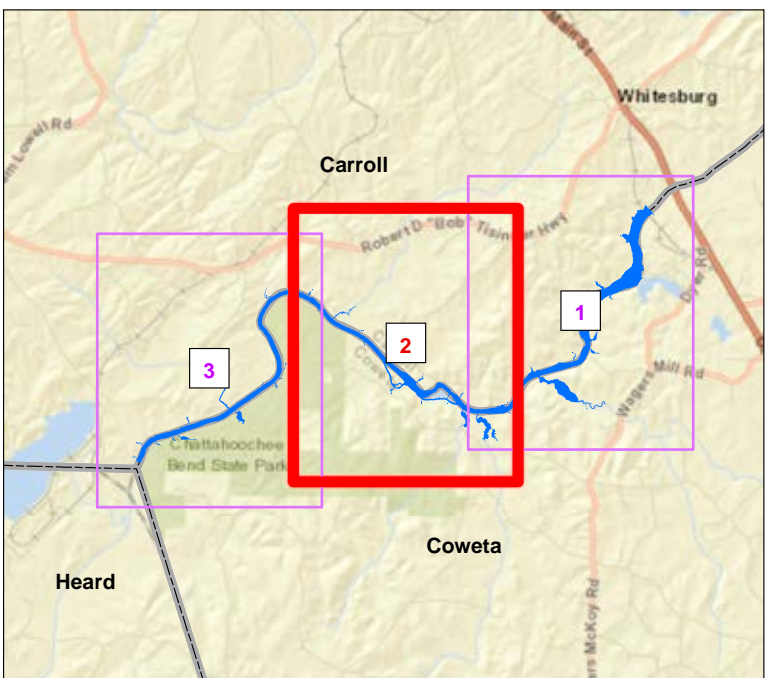
Legend

Sunny Day with Breach

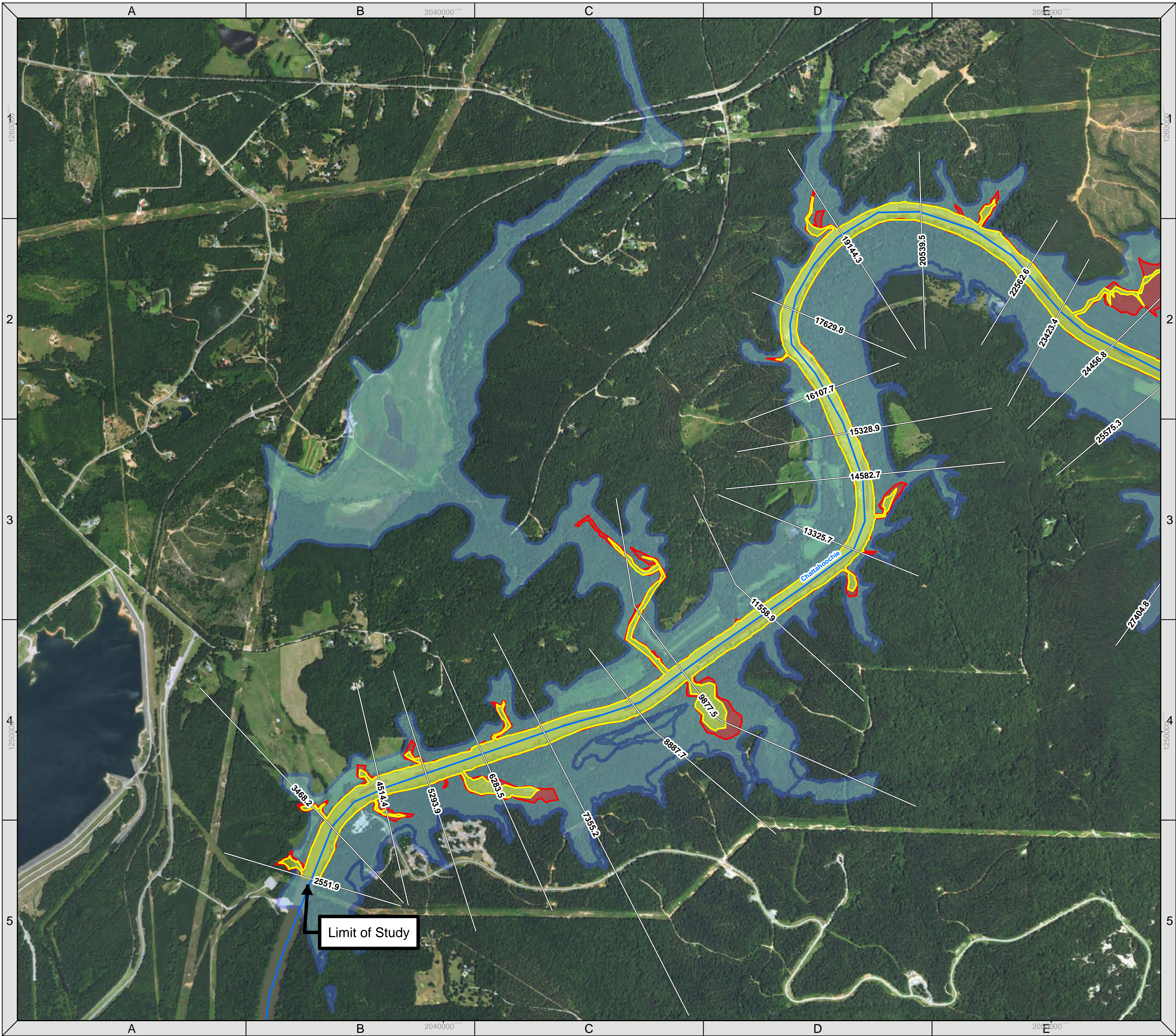
Design Storm with Breach

100yr_Floodplain

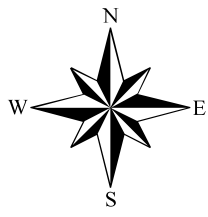
Stream Centerline



PLANT YATES ASH POND 2 DAM DAM BREACH INUNDATION MAP



River Station	Normal Water Surface Elevation (ft)	Sunny Day Flow at Max WS Elevation (cfs)	Sunny Day Max WS Elevation (ft)	Sunny Day Change in Water Surface Elevation (ft)	Design Storm Flow at Max WS Elevation (cfs)	Design Storm Max WS Elevation (ft)	Design Storm Change in Water Surface Elevation (ft)
25575.4	671.3	2023.9	678.1	6.8	3317.4	680	8.7
24456.8	670.8	1983.7	677.8	7	3253.8	679.7	8.9
23423.4	670.7	1957	677.5	6.8	3212.7	679.4	8.7
22562.6	670.4	1941.5	677.4	6.9	3186.1	679.2	8.8
20539.5	669.3	1910.3	676.9	7.6	3132.8	678.7	9.4
19144.3	669.3	1877.1	676.3	7.1	3063.6	678	8.8
17629.8	669.6	1775.6	675.4	5.8	2772.9	677.1	7.6
16107.7	668.2	1330.1	674.8	6.6	2102.1	676.7	8.5
15328.9	667.9	1272.8	674.7	6.9	2022.3	676.6	8.8
14582.7	668.1	1201.9	674.6	6.5	1928.9	676.5	8.4
13325.7	667.8	1144.2	674.5	6.7	1850.3	676.4	8.6
11558.9	666.9	1090.4	674.3	7.5	1770.4	676.2	9.3
9877.5	666.8	1068	674.2	7.5	1740.8	676.1	9.3
8887.7	666.9	1062.6	674.2	7.3	1731.3	676.1	9.1
7355.2	666.8	1055.5	674.1	7.3	1717.3	676	9.2
6283.5	666.8	1052.7	674.1	7.3	1715.6	675.9	9.2
5293.9	665.9	1051.7	674	8.1	1715	675.9	9.9
4514.4	666.6	1051.1	674	7.4	1713.5	675.8	9.2
3468.2	665.6	1050.7	673.9	8.3	1712.6	675.8	10.1
2551.9	665.8	1050.5	673.9	8.1	1712.5	675.7	9.9



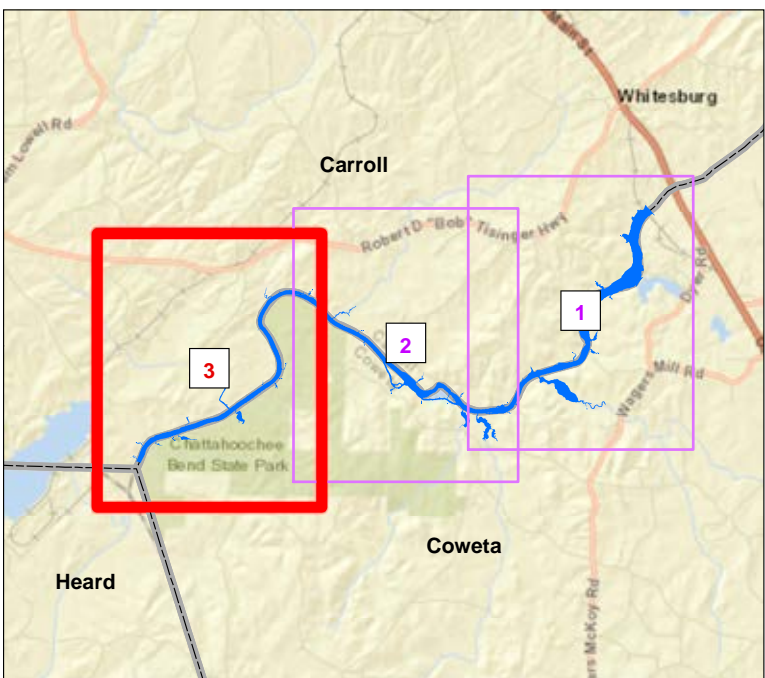
Projection

NAD 1983 StatePlane Georgia West FIPS 1000 Feet

1 inch = 900 feet
0 300 600 1,200 1,800 2,400 Feet

Legend

- Sunny Day with Breach
- Design Storm with Breach
- 100yr_Floodplain
- Stream Centerline



Plant Yates Ash Pond Inundation Map



Page 3 of 3

Issue Date:SEPTEMBER 21, 2016

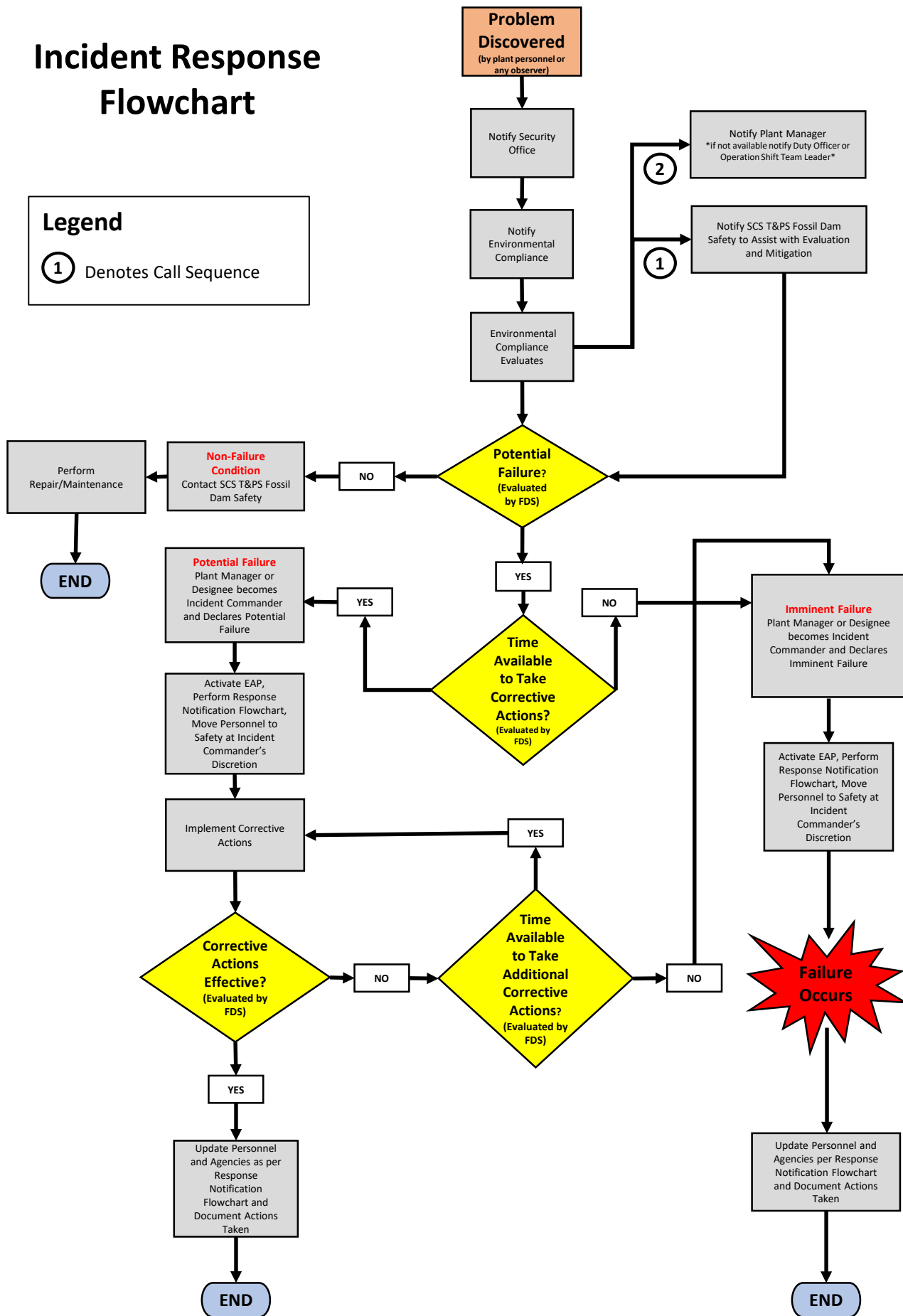
APPENDIX C

Incident Response Flowchart

Incident Response Flowchart

Legend

① Denotes Call Sequence

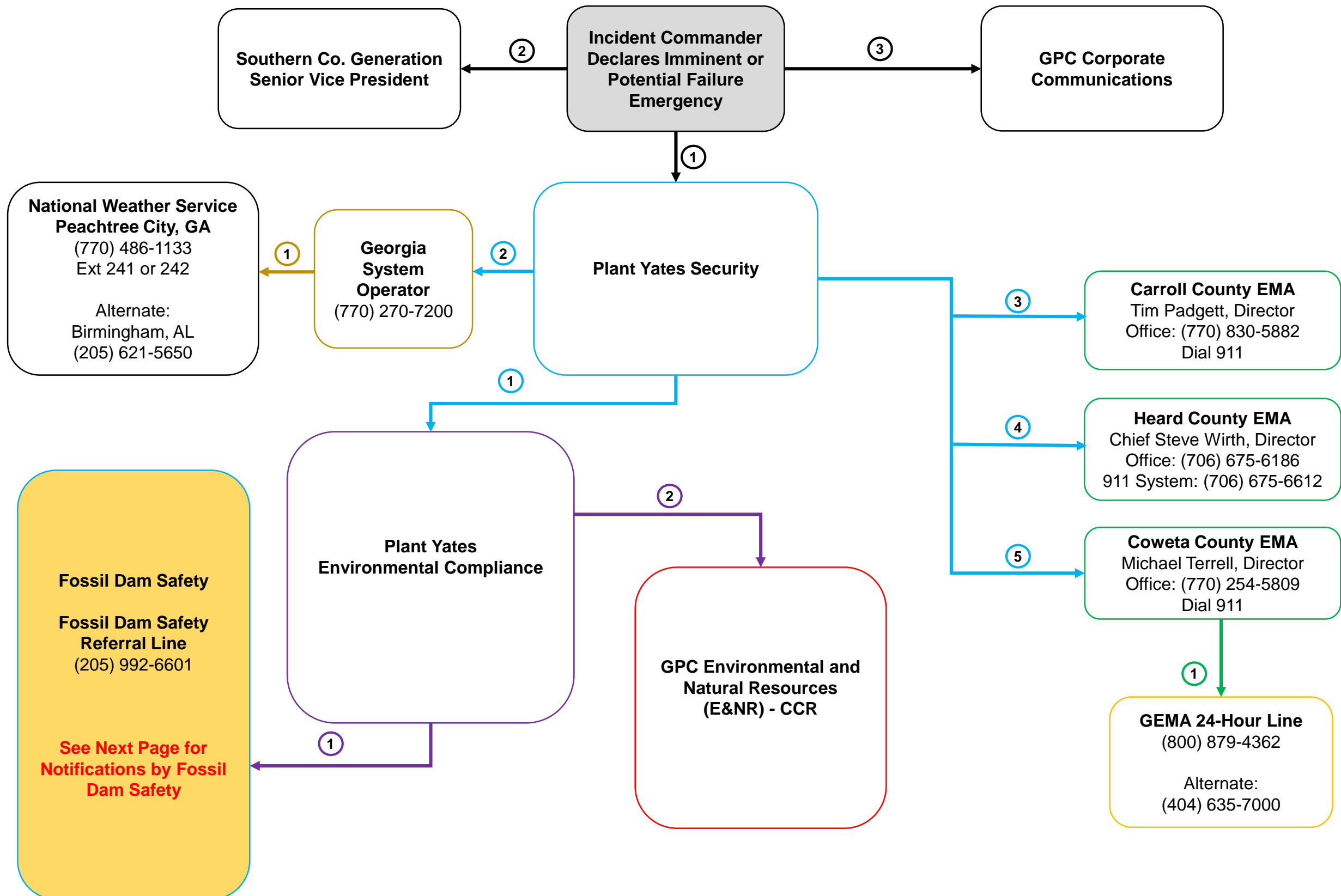


APPENDIX D

Response Notification Flowchart

Response Notification Flowchart

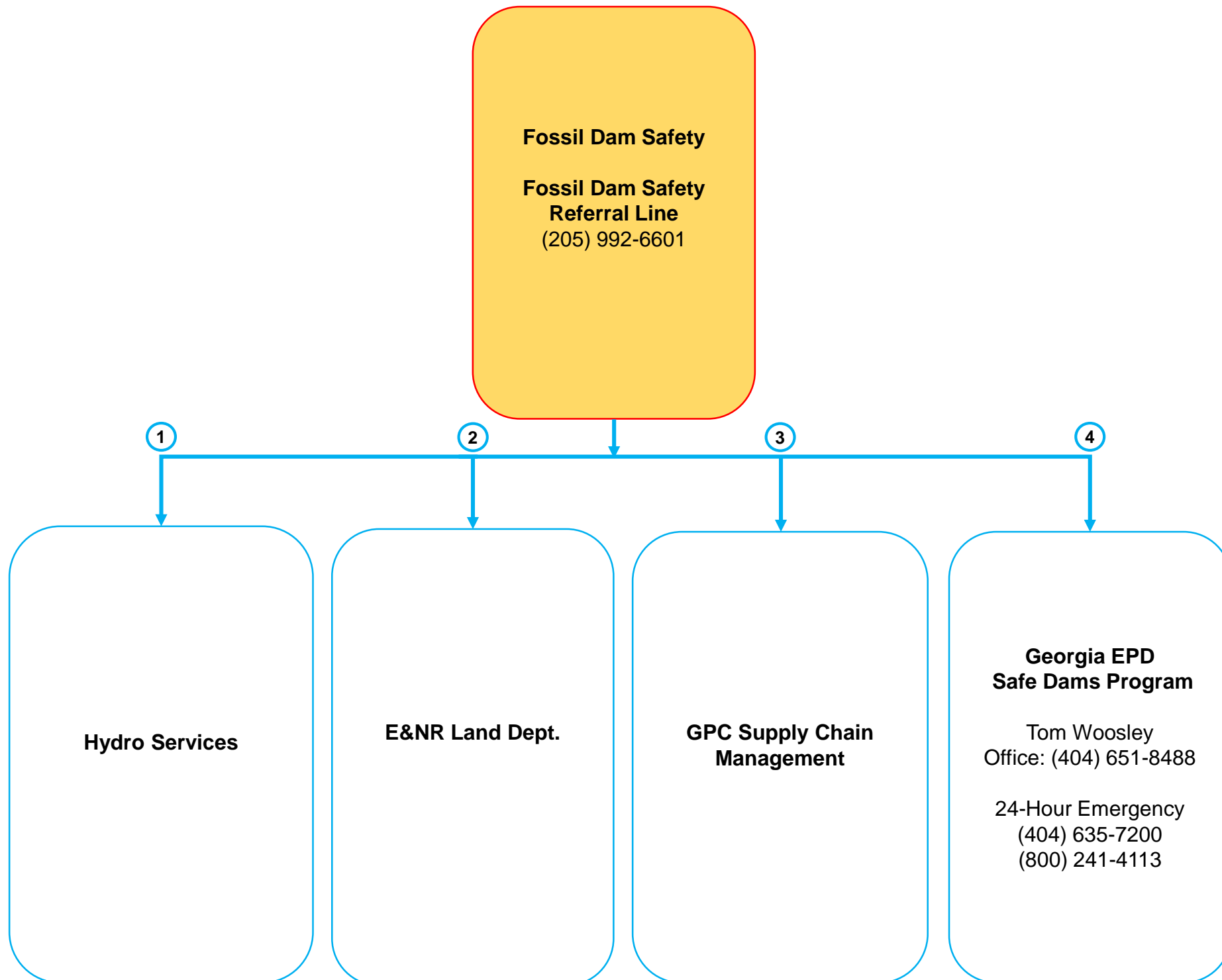
Imminent Failure or Potential Failure Emergencies



Response Notification Flowchart

Imminent Failure or Potential Failure Emergencies

Fossil Dam Safety Notifications



APPENDIX E

Emergency Notification Log Sheet

Data Recording Sheet

Post Incident Reporting Form

EMERGENCY ACTION PLAN

EMERGENCY NOTIFICATION LOG SHEET

The Emergency Notification Log Sheet is for use in an event of an emergency to document notifications. *Please refer to the Response Notification Flowchart for name and numbers of agencies / personnel to be contacted.* **All notifications must be documented.**

TO BE USED BY PLANT MANAGER / INCIDENT COMMANDER:

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Security Office					
SVP / SPO					
GPC Corporate Communications					

TO BE USED BY SECURITY OFFICE:

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Environmental Compliance					
Georgia System Operator					
Carroll County EMA					
Coweta County EMA					
Heard County EMA					

TO BE USED BY ENVIRONMENTAL COMPLIANCE:

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
SCS Fossil Dam Safety					
GPC Environmental & Natural Resources					

EMERGENCY ACTION PLAN

EMERGENCY NOTIFICATION LOG SHEET

The Emergency Notification Log Sheet is for use in an event of an emergency to document notifications. *Please refer to the Response Notification Flowchart for name and numbers of agencies / personnel to be contacted.* **All notifications must be documented.**

TO BE USED BY GEORGIA SYSTEM OPERATOR:

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
National Weather Service					

TO BE USED BY GPC ENVIRONMENTAL & NATURAL RESOURCES (E&NR):

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Civil Support					

TO BE USED BY FOSSIL DAM SAFETY:

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Hydro Services					
E&NR Land Department					
GPC Supply Chain Management					
GA Safe Dams Program					

EMERGENCY ACTION PLAN
DATA RECORDING SHEET
PLANT SCHERER MAIN STORAGE POND / LAKE JULIETTE

The Data Recording Sheet will be used to record important information relating to dam safety emergency.

Team Member(s): _____

Date of Incident: _____

Time of Incident: _____

Type of Emergency: _____

Incident Commander: _____

Description of Events:* _____

What is Being Done:* _____

*Attach additional pages as necessary.

For incoming questions, refer all calls to *(See Response Notification Flowchart):*

Media Inquiries: Georgia Power Company Corporate Communications.

EMA Inquiries: Plant Manager/Incident Commander

Environmental Agency Inquiries: GPC Environmental and Natural Resources

Emergency Action Plan Post Incident Reporting Form

Dam name: Plant Yates Ash Pond AP-2 Dam

NID ID#: GA-04184

Report Prepared By: _____

Date: _____

Emergency Description

Site Map



Location

Potential Causes

Weather Conditions

Current Dam Condition

APPENDIX F

Instructions for the Construction of an Emergency Reverse Filter

EMERGENCY REVERSE FILTER CONSTRUCTION

The purpose of the reverse filter is to slow down the flow of water in order to reduce the ability of the water to carry soil particles. The size of the soil particle that a flow of water can carry is a function of the 3rd power of the velocity of the flow. The slower the velocity, the less soil the water can carry. The other function of the filter is to trap soil particles before they exit.

The usual components of a reverse filter are as follows:

-) GDOT washed #10 sand (10NS)
-) # 89 stone
-) # 57 stone
-) GDOT Type 3 rip rap

These materials should be stockpiled in a location where they can easily and quickly be moved to the seepage site. Two truckloads of each type of material should be stored in a convenient location that is out of the way. It is best if they are located so that a backhoe or front end loader can pick them up and transfer them directly to the seepage site. Transport schemes that require multiple vehicles and multiple operators are usually impossible to implement at night or on weekends. The stockpiles should be labeled “Granular Filter Stockpile – Emergency Use Only” to keep them from being appropriated for other purposes by those unaware of their purpose.

To build a reverse filter over a boil or area of concentrated seepage, follow the directions below. A cross section of the reverse filter construction is provided on the next page.

- 1) Clear loose material from around the site.
- 2) Place 6” of #10 washed sand over the area of concern, and extend it for at least 12” beyond the seepage limits.
- 3) Place 6” of #89 stone over the sand, and extend it for at least 6” beyond the sand.
- 4) Place 6” of #57 stone over the sand, and extend it for at least 6” beyond the #89 stone.
- 5) If necessary to stabilize the #57 stone, place rip rap on top of the #57 stone. Conditions that may make the rip rap necessary are anticipated surface flows that might wash away the filter or increasing seepage flows that may try to shift the lighter filter materials.

If the flow is too fast for the sand to remain in place, a layer of #57 stone or GDOT Type 3 rip rap may be placed over the boil to slow the flow down. This is followed by a layer of #89 stone, then the sand, and then the #89, #57 and rip rap in succession.

Sometimes a seep will pop out on the edge of a newly applied filter. In this case, it is generally necessary to apply the granular filter as a blanket to the general area rather than as a spot treatment. The layers are as described above but will cover a larger area.

Filter fabric or geotextile is not acceptable as a substitute for the sand. The fabric tends to smear and clog if applied in a wet situation.

CROSS SECTION OF A REVERSE FILTER OVER A SEEP OR BOIL

