LEGACY CCR SURFACE IMPOUNDMENT EMERGENCY ACTION PLAN

Georgia Power Company
Plant Arkwright
Ash Pond No.3 (AP-3)
State ID: 011-037-04238
NID: GA03967
Bibb County, GA

I hereby certify that this Emergency Action Plan has been prepared in accordance with the United States Environmental Protection Agency Coal Combustion Residual (CCR) Rule (40 C.F.R.§ 257.100(f)(2)(v) and 40 C.F.R. § 257.73(a)(3)).

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ISSUE DATE: 05/08/2026
REVISION #: 0

REVISION RECORD

In accordance with 40 C.F.R.§ 257.100(f)(2)(v) and 40 C.F.R. § 257.73(a)(3), 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. § 257.105(f)(6).

Revision Number	Date	Sections Affected/Reason
0	05/08/2026	Creation of Initial EAP

TABLE OF CONTENTS

APPENDICES

ACRONYMS AND ABBREVIATIONS

AP-3	Plant Arkwright Ash Pond No.3
CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
EAP	Emergency Action Plan
EMA	Emergency Management Agency
EPA	Environmental Protection Agency
GASDP	Georgia Department of Natural Resources Environmental Protection Division – Safe Dams Program Division
GAEPD	Georgia Environmental Protection Division
GDOT	Georgia Department of Transportation
GEMA/HS	Georgia Emergency Management and Homeland Security Agency
GEOP	Georgia Emergency Operations Plan
GPC	Georgia Power Company
H:V	Horizontal:Vertical
HEC-RAS	Hydrologic Engineering Center's River Analysis System
HDPE	High-Density Polyethylene
HEC-RAS	Hydrologic Engineering Center's River Analysis System
H&H	Hydrological and Hydraulic
ID	Inside Diameter
MSL	Mean Sea Level
NID	National Inventory of Dams
NS	Norfolk Southern Corporation
SCS	Southern Company Services
T&PS	SCS Technical and Project Solutions

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 dammed area which is designed to hold an accumulation of CCR and liquids, and the unit treats, stores, or disposes of CCR.

Dam/Dike/Embankment. Berm or ridge of either natural or man-made materials used to prevent the movement of liquids, sludges, solids or other materials.

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.

Hazard Potential Classification (40 CFR 257.53). The possible adverse incremental consequences that result from the release of water or stored contents due to failure of the diked CCR surface impoundment or mis-operation of the diked CCR surface impoundment or its appurtenances. The hazardous potential classifications include high hazard potential CCR surface impoundment, significant hazard potential CCR surface impoundment, and low hazard potential CCR surface impoundment, which terms mean:

> **High Hazard Potential CCR Surface Impoundment -** A diked surface impoundment where failure or mis-operation will probably cause loss of human life.
>
> **Significant Hazard Potential CCR Surface Impoundment -** A diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.
>
> **Low Hazard Potential CCR Surface Impoundment -** A diked surface impoundment where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the surface impoundment's property owners.

Inundation Map. A graphic representation of the inundation zone that shows the potential impact area due to a breach of the surface impoundment. 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 see Section 2.0 and Appendix B.

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

Legacy CCR Surface Impoundment. A CCR surface impoundment that no longer receives CCR but contained both CCR and liquids on or after October 19, 2015, and that is located at an inactive electric utility or independent power producer.

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 Arkwright Ash Pond No.3 (AP-3) to meet the requirements of 40 C.F.R.§ 257.100(f)(2)(v) and 40 C.F.R. § 257.73(a)(3). The purpose of this EAP is to minimize danger to human life, economic and ecological damage, and to protect property and assets by providing a pre-planned course of action in the event of a possible, impending, or actual dam failure at Plant Arkwright AP-3.

This EAP will provide responding personnel with:

- Pertinent information related to Plant Arkwright AP-3;
- 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;
- A list of resources available to support the response effort;
- 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

This EAP covers emergency response procedures for AP-3 at Plant Arkwright. Plant Arkwright, located in Macon-Bibb County, Georgia, was a four (4) coal fired unit electric generating facility that began operation in 1941 and was retired in 2002. Demolition of the plant was completed in 2003. An overview of Plant Arkwright and the surrounding area is shown in Appendix A – Figure 1. AP-3 was initially constructed as a surface impoundment in the late 1970's and began to receive and store CCR produced during the electric generating process at Plant Arkwright from construction completion until 2002.

AP-3 was created by construction of the main dike across the existing valley at the south edge of the pond area. CCR was sluiced behind the dike via a sluice line that crossed both the Norfolk Southern Railroad and Arkwright Road. In 2009, AP-3 was closed by constructing a geosynthetic clay liner overlain by eighteen (18) inches of soil cover and vegetation in accordance with Georgia Solid Waste Rules 391.3-4. A Closure Certificate was issued by GA EPD for AP-3 on August 19, 2010. AP-3 is no longer designed to, nor can, impound water; therefore, it no longer functions as a surface impoundment. While no longer designed, nor able to, impound water, the 25-ft high dam downstream embankment still exists on the southern edge of the site.

AP-3, as originally constructed, received stormwater run-on from two intermittent streams from the north and west. In 2005, the configuration of AP-3 was adjusted, and a pond was established at the North end to divert the offsite stormwater drainage into a diversion channel constructed on the east side of AP-3. This man-made surface channel discharges surface water through a weir structure located at the southeastern corner of the site and into the wetlands area located further south near Beaverdam Creek. As part of the closure of AP-3, the drop outlet structure near the dam at AP-3 was removed and two 36-inch diameter pipes were installed to direct flow from the top deck into the diversion channel.

As of November 2025, AP-3 is not a classified dam structure by the Georgia Department of Natural Resources - Environmental Protection Division - Safe Dams Program. However, per the National Inventory of Dams the current hazard classification of the dam is noted as Low hazard. In the Initial Hazard Potential Classification Assessment completed by Stantec in 2026 the site was assigned a Significant Hazard Potential classification under 40 C.F.R.§ 257.100(f)(2)(v) and 40 C.F.R. § 257.73(a)(3).

The EAP herein is in effect as required for a Significant Hazard Potential Surface Impoundment and assumes existing conditions of AP-3 as of November 2025 (i.e., AP-3 cannot impound water, landfill is capped, etc.). However, the inundation maps included as Attachment B present the potential inundation area during a future interim construction scenario where the CCR in AP-3 has been excavated with the dam in place and a retained water surface at the crest of the original dam, as discussed below.

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 LiDAR topographic information for the downstream areas. The height of the dam is approximately 25 feet as measured from the crest to the lowest portion of the embankment at the downstream toe. The purpose of the study was to evaluate the impact of a hypothetical “worst-case” failure scenario during future closure-by-removal construction where the dam is assumed to impound a full pool and breach during a simulated “sunny-day” failure event. It is noted that a “sunny-day” event is a non-storm event where the hypothetical failure of the structure is initiated with the water in the impoundment at the top of the dike. The inundation extents from the simulated dam breach were superimposed over aerial imagery to identify areas subject to flooding. The inundation extents are within the FEMA 1-percent-annual-chance floodplain and would have limited impact during a breach event due to the relatively small volume contained. ***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 Emergency Detection/Evaluation

Trained, on-site personnel inspect AP-3 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 in a timely manner. Personnel from the Georgia Power Company (GPC) Renewable and Resilient Generation Compliance & Support group perform inspections on a 7-day or less basis and SCS Dam Safety engineers perform annual inspections as required by the CCR Rule, and external consultants perform semiannual inspections as required by the GAEPD. In addition, inspections are performed after significant events such as storms, floods, or earthquakes.

Personnel conducting 7-day interval inspection inspections of AP-3 dam are trained on an annual basis by engineers from SCS Dam Safety on the appropriate surveillance and inspection requirements. Required checklists provide a mechanism to help ensure all pertinent items are inspected and that the dams and other structures are sound, as well as track that action is taken, as needed, based on the findings. Any issues discovered during an inspection are reported to SCS Dam Safety as prescribed in the Safety Procedure for Dams and Dikes at Fossil Generation Plants (GEN10004). The SCS Dam Safety Engineer(s) working with the external closure consultant and the GPC Generation Compliance & Support group will recommend a corrective course of action, as needed.

SCS Engineers or other qualified personnel inspect any maintenance or remediation performed since their previous inspection, check the status of work recommended at prior inspections, ensure that emergency notification information is current, evaluate any items noted during plant personnel inspections and respond, as needed.

3.2 Condition Severity Classifications

AP-3 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 emergency classifications:

NON-FAILURE CONDITION (NFC)

A situation that will not, by itself, lead to a failure and is not considered an emergency. However, an NFC does require investigation and notification of Dam Safety personnel and may require corrective action.

POTENTIAL FAILURE – Condition B Emergency (B)

A developing situation where failure of a dam may occur, but implementation of pre-planned actions may alleviate or prevent failure. In general, adequate time is considered available to properly evaluate and implement corrective actions. Should conditions worsen, an Imminent Failure emergency may be declared.

IMMINENT FAILURE – Condition A Emergency (A)

A situation where failure of the dam is imminent or has already occurred.

3.3 Guidance for Determining the Condition Severity Level

The following table details potential situations that could occur at AP-3. The condition level indicated in the right-most column corresponds with the condition severity classifications in Section 3.2 above.

Event	Situation	Condition Level
Embankment Overtopping	Impoundment level is 1 foot below the top of the dam	NFC
	Water from the top deck is flowing over the top of the dam	B
	Damage or blockage of the top deck culvert's causes water to be impounded behind the dam and overtop	B
Seepage	New seepage area 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
Sinkholes	Observation of new sinkhole in impoundment area or on embankment	B
	Rapidly enlarging sinkhole	A
Embankment Cracking	New cracks in the embankment greater than ¼-inch wide without seepage	NFC
	Cracks in the embankment with seepage	B
Embankment Movement	Visual movement/slippage of embankment slopes	NFC
	Sudden or rapidly proceeding slides of the embankment slopes	A
Instruments	Instrumentation readings beyond predetermined values	NFC
Earthquake	Measurable earthquake felt or reported on or within 50 miles of the dike	NFC
	Earthquake resulting in visible damage to the embankment	B
	Earthquake resulting in uncontrolled release of CCR from the facility	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 dike or appurtenances	A
Sabotage/ Vandalism	Damage to dam or appurtenances that could adversely impact the functioning of the dam	NFC
	Modification to the dam or appurtenances that could adversely impact the functioning of the dike	NFC
	Damage to dam or appurtenances that has resulted in seepage flow	B
	Damage to dam or appurtenances that has resulted in uncontrolled release of CCR	A

4.0 INCIDENT RESPONSE

The majority of past failures of earthen dams across the United States can be attributed to overtopping and seepage leading to internal erosion, piping, and slope instability. Detection and mitigation of potential failure modes through embankment failure of the unit's slopes is described below.

Overtopping

AP-3 does not impound water. Stormwater is able to flow off the top of the closed unit through the two 36-inch diameter culvert pipes at the southeast corner of the unit. However, in the event of the culverts being damaged, blocked, or overwhelmed to where water is unable to flow from the top of the deck, overtopping of the dam is considered a potential failure mode.

Seepage

While AP-3 does not have an existing pool and is unable to impound water in its current configuration, there is an elevated phreatic condition within the stored material behind the dam which could lead to potential seepage along the dam face. 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. Inspection reports are transmitted to SCS Dam Safety for evaluation. Therefore, the conditions that could lead to failures of this type would likely be discovered and corrected early, making an actual failure a remote possibility.

Slope Instability

Slope instability would be demonstrated by sloughing of embankment slopes, which would be detected by routine observations and/or weekly inspections by GPC Renewable and Resilient Generation Compliance & Support personnel. 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 embankment failure, the flowcharts in Appendix 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 with warnings and evacuations as soon as possible following the declaration of a safety emergency.

4.1 Access to the Site

GPC and emergency personnel are able to access the dam by paved or gravel-surfaced roadways Figure 1 in Appendix A illustrates the location of AP-3 on Plant property.

Plant Arkwright AP-3 entrance is on the west side of Arkwright Road just north of:
5211 Arkwright Road
Macon, Georgia 31210

Lat/Long:
Main Entrance at Arkwright Road: 32°55'41.58"N, 83°42'9.07"W

4.2 Response during Periods of Darkness

Plant Arkwright is no longer operational and thus is not manned 24 hours a day every day. Personnel are typically on site 5 days a week during normal business hours. Personnel and equipment are able to access the site at any time. Response times would not vary significantly from daylight conditions. 24-hour contact information is included in the EAP for responsible personnel.

4.3 Response during Weekends and Holidays

Plant Arkwright is no longer operational and thus is not manned 24 hours a day every day. Personnel are typically on site 5 days a week during normal business hours. 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

AP-3 is accessed by paved and gravel-surface roads and is accessible during periods of adverse weather. Severe flooding of roads is not anticipated to impact response times.

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 Director of Renewable and Resilient Generation

The Director of Renewable and Resilient Generation is ultimately responsible for the content, effectiveness, and implementation of the response procedures. The Director of Renewable and Resilient Generation normally serves as the Incident Commander or designates this person. The Director of Renewable and Resilient Generation has the authority and responsibility to direct all on-site activities.

The Director of Renewable and Resilient Generation or their 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 Generation Support Manager or his designee will declare the termination of an emergency condition. Once outside agencies are notified, the Director of Renewable and Resilient Generation or his/her designee is responsible for keeping the EMAs informed of any changes in conditions. See Incident Commander responsibilities for further details.

5.2 Renewable & Resilient Generation Compliance & Support Manager

The Renewable and Resilient Generation Compliance & Support Manager is the 24-hour point of contact for all plant emergencies. If the Director of Renewable and Resilient Generation is unavailable and the Renewable and Resilient Generation Compliance & Support Manager is on-site, they will assume the duties and responsibilities of the Incident Commander until properly relieved by the Director of Renewable and Resilient Generation or other designee.

5.3 Incident Commander

The Director of Renewable and Resilient Generation or Renewable and Resilient Generation Compliance & Support Manager or their designee is the Incident Commander. If neither is available, the Plant Environmental Compliance Lead will assume the duties and responsibilities of the Incident Commander until properly relieved by the Generation Support Manager.

The Incident Commander is responsible for:

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

c. Other responsibilities include:

1. Establishing lines of communication from the plant to the local and state EMAs.
2. Ensuring emergency sources of power are available for the operation of essential equipment such as emergency lighting.
3. Ensuring the availability of heavy equipment and trained operators to aid in the mitigation effort.

5.4 Renewable and Resilient Generation Environmental Compliance

Renewable & Resilient Generation Environmental Compliance personnel are responsible for assessing conditions, contacting the Director of Renewable & Resilient Generation, obtaining assistance from Dam Safety, and for providing technical updates to the Incident Commander. Compliance personnel can also request assistance from GPC Environmental Affairs, if conditions warrant.

5.5 Georgia Systems Operator

The Georgia System Operator contacts the National Weather Service to inform them of conditions at AP-3 that may lead to potential flooding downstream.

5.6 Dam Safety

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

5.7 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. 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 Renewable and Resilient Generation 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 Director of Renewable and Resilient Generation.**

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.

5.8 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 and Homeland Security Agency (GEMA/HS) 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/HS 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/HS has responsibilities similar to the local EMAs but is also responsible for mobilizing state military support as well as State Disaster Center operations.

5.9 Law Enforcement

Local Law Enforcement agencies are notified by the appropriate EMA. GEMA/HS 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 EMAs 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 EAP and the following Incident Response Flowchart (below and in Appendix C) for Imminent Failure and Potential Failure Emergencies shall be posted at appropriate locations at Plant Arkwright. Personnel responsible for executing mitigation and/or emergency actions shall be thoroughly familiar with their responsibilities under this EAP.

For Non-Failure Conditions, notification should be made to Dam Safety.

A. Once a problem is discovered, a call is made to notify the Renewable & Resilient Generation Environmental Compliance Lead. They will then notify GPC Environmental Affairs and Dam Safety engineers immediately for technical consultation. Dam Safety will provide an evaluation of the conditions and will help compliance and management determine if the problem is a **Non-Failure Condition (NFC)**, **Potential Failure (Condition B Emergency) or an Imminent Failure (Condition A Emergency)**. If there is an immediate threat of dam failure, the Renewable & Resilient Generation Environmental Compliance Lead will declare an **Imminent Failure (Condition A Emergency)** and proceed to Step J.

B. If the problem is evaluated and not deemed by Dam Safety to have the potential to cause failure, the dam will be in a **Non-Failure Condition (NFC).** This is not an emergency condition, and no emergency condition will be declared. For this condition, appropriate personnel will be notified. Repair or maintenance activities shall be scheduled and completed expeditiously and follow-up inspections and analysis shall be completed by Dam Safety.

C. If the problem is evaluated and Dam Safety determines that it could potentially fail the dam and there IS time for corrective measures to be implemented that could possibly mitigate the risk of failure, then Dam Safety will notify the Incident Commander and a **Potential Failure Emergency (Condition B)** will be declared. Proceed to Step E.

D. If the problem is evaluated and Dam Safety determines that it could potentially fail the dam and there IS NOT time for corrective measures to be implemented that could possibly mitigate the risk of failure, then Dam Safety will notify the Incident Commander and an **Imminent Failure (Condition A Emergency)** will be declared. Proceed to Step J.

E. If a **Potential Failure (Condition B Emergency)** has been declared, the Incident Commander will activate the EAP, and notifications will be made on the Response Notification Flowchart (Appendix D). He/she will document all communications using the appropriate forms contained in Appendix E. Once outside agencies have been notified of an issue or potential problem, The GPC Corporate Security or their designee is responsible for keeping local EMAs informed of any change in conditions.

F. Begin corrective measures to attempt to alleviate or prevent failure.

G. 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 Incident Commander will end the emergency condition. SCS Dam Safety will be responsible for preparing the after-action report, which is located in Appendix E.

H. If the corrective measures are not effective, Dam Safety will determine if there is time to take additional corrective measures.

I. If there is not time to take additional corrective measures and failure is imminent, declare an **Imminent Failure (Condition A Emergency)** and proceed to Step J.

J. If there is time to implement additional corrective measures, return to Step E. Additional support can be requested from SCS Civil Field Services or outside contractors, as needed.

K. If an **Imminent Failure (Condition A Emergency)** has been declared by the Incident Commander or their 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 GPC Corporate Security or their designee is responsible for keeping local EMAs informed of any change in conditions. Dam Safety will be responsible for preparing the after-action report, which is in Appendix E.

6.2 Additional Considerations

All emergency phone calls should be recorded on the *Emergency Notification Log Sheet* contained in Appendix E.

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

After an Imminent Failure (Condition A Emergency) has occurred Dam Safety should complete a Post Incident Report using the form located in Appendix E.

7.0 RESOURCES AVAILABLE TO SUPPORT EMERGENCY RESPONSE EFFORTS

Once an emergency has been declared, a consistent message shall be developed and communicated to personnel on the Response Notification Flowchart.

7.1 Alternative Sources of Power

There are no electrically-powered gates or other equipment used for accessing AP-3. Power is available at multiple locations near AP-3 and emergency generators are available for use if needed during emergency operations.

7.2 Emergency Materials and Equipment

Materials

The following materials are stockpiled on site.

- # 3 Stone
- # 57 Stone
- GDOT 10 NS Sand

These materials are protected by silt fencing or safety 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 includes, but is not limited, to the following equipment:

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

Equipment listed above can be obtained from both Georgia Power inventory and/or from local equipment rental companies.

7.3 Reducing Flows into the Reservoir

Reduction of flows onto the site is not feasible and flow is limited to stormwater runoff.

7.4 Lowering Water Level

AP-3 is currently closed and does not store water, lowering the water level is not feasible. If ponding occurs on the top deck of AP-3, large portable pumps can be mobilized for lowering water levels should the need arise. Water ponded within AP- 3 during closure construction will be removed by large portable pumps.

8.0 PROVISIONS FOR ANNUAL COORDINATION MEETING

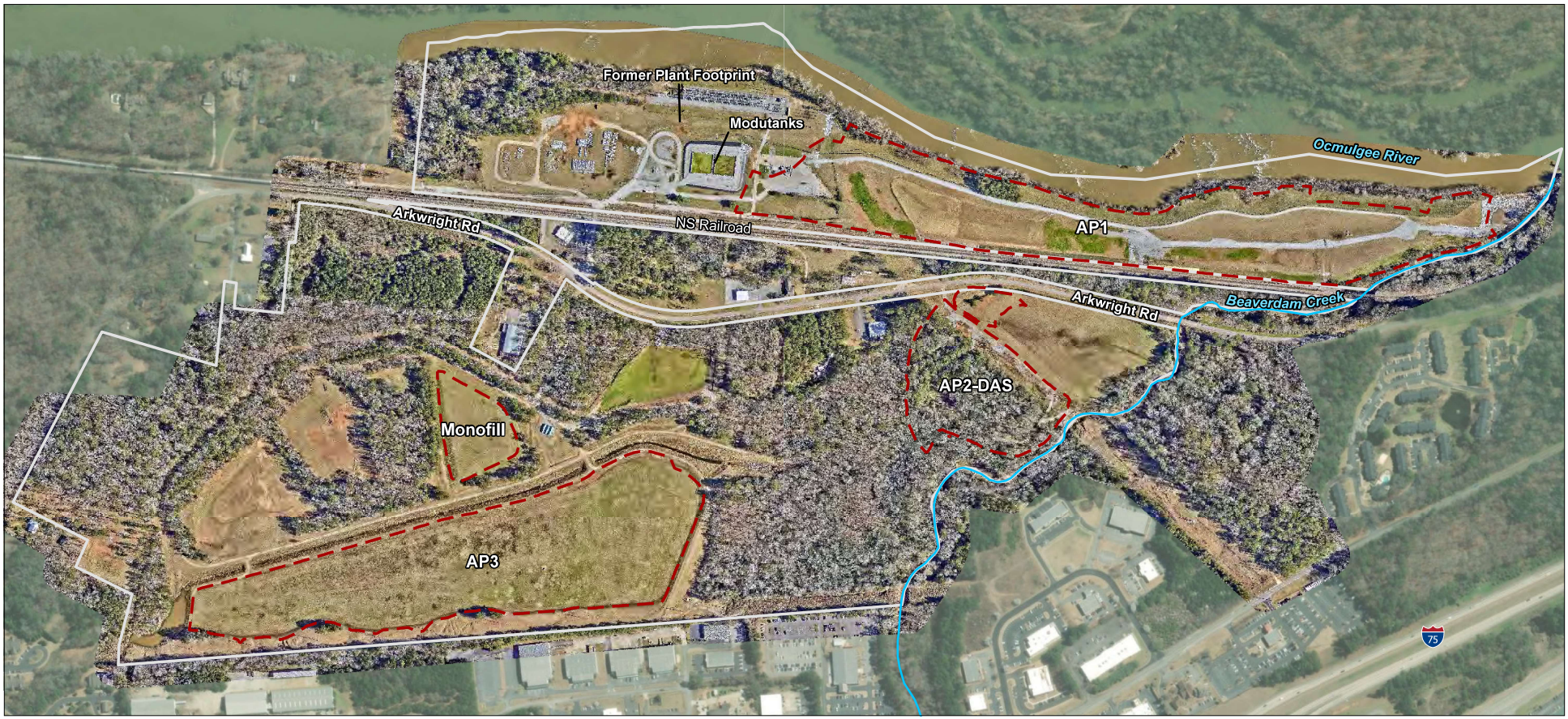
An annual face-to-face meeting will be held with representatives of Plant Arkwright, GPC, and the emergency response agencies described in this plan. These emergency response agencies receiving invitations to participate in the annual meeting may include:

- Macon-Bibb Emergency Management Agency
- Jones County Emergency Management Agency

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

APPENDIX A

Plant Arkwright Location Map – Figure 1



Legend
- Beaverdam Creek
- CCR Unit
- Property Boundary

0 500 1,000 Feet
(At original document size of 11x17)
1:6,000

N

Stantec

Project Location
Macon County, Georgia

Prepared by DMB on 2025-10-23
TR by CJ on 2025-10-23

Client/Project
175518230
Georgia Power
Plant Arkwright
AP1, AP2, AP3, and Monofill Closure

Figure No.
1

DRAFT

Title
Plant Arkwright Site Map

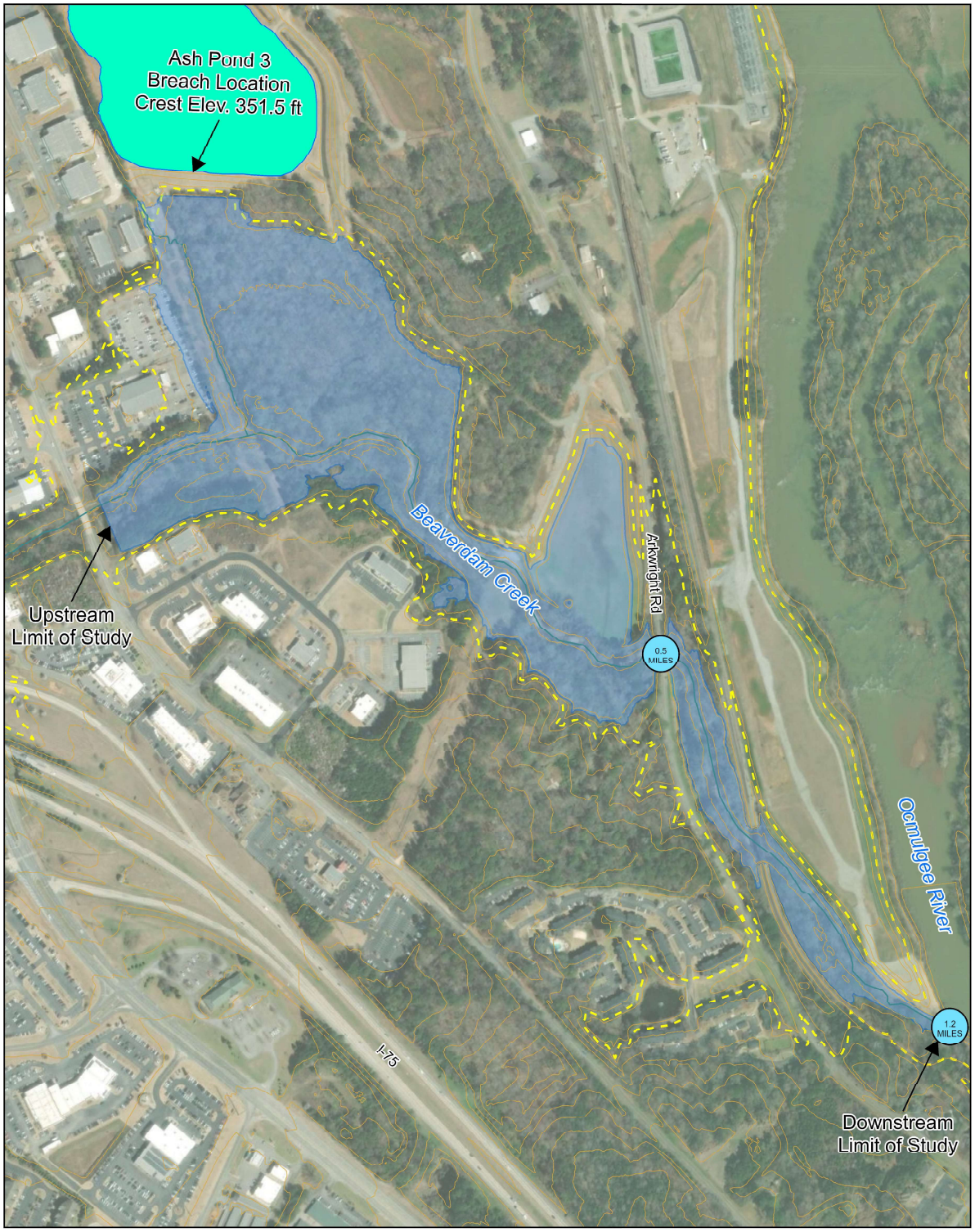
Page 1 of 1

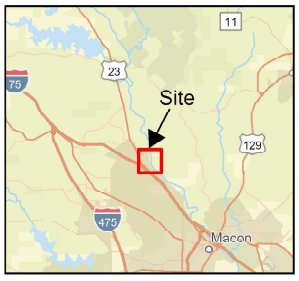
Notes
1. Coordinate System: NAD83 Georgia West ft
2. Background: Background: Esri, TomTom, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS, USFWS, Maxar. Plant imagery provided by client and is dated 6/24/2025.

U:\175518230\gis\mxds\Plant_Arkwright_SiteMap\ArkwrightSiteMap\ArkwrightSiteMap.aprx Plant Arkwright Site Map Revised: 2025-10-23 By: mbrough

APPENDIX B

Inundation Maps





Legend

- Initial Conditions WSE - 351.5 ft
- AP-3 Breach Inundation Boundary
- Effective 100-year Inundation Boundary
- Contour (10-ft Interval)
- Distance Downstream From Dam

0 500 1,000 Feet

N

Stantec

Project Location
Plant Arkwright
Bibb County, GA

Client/Project 175570002

Client: Georgia Power Plant Arkwright

Figure No.
1

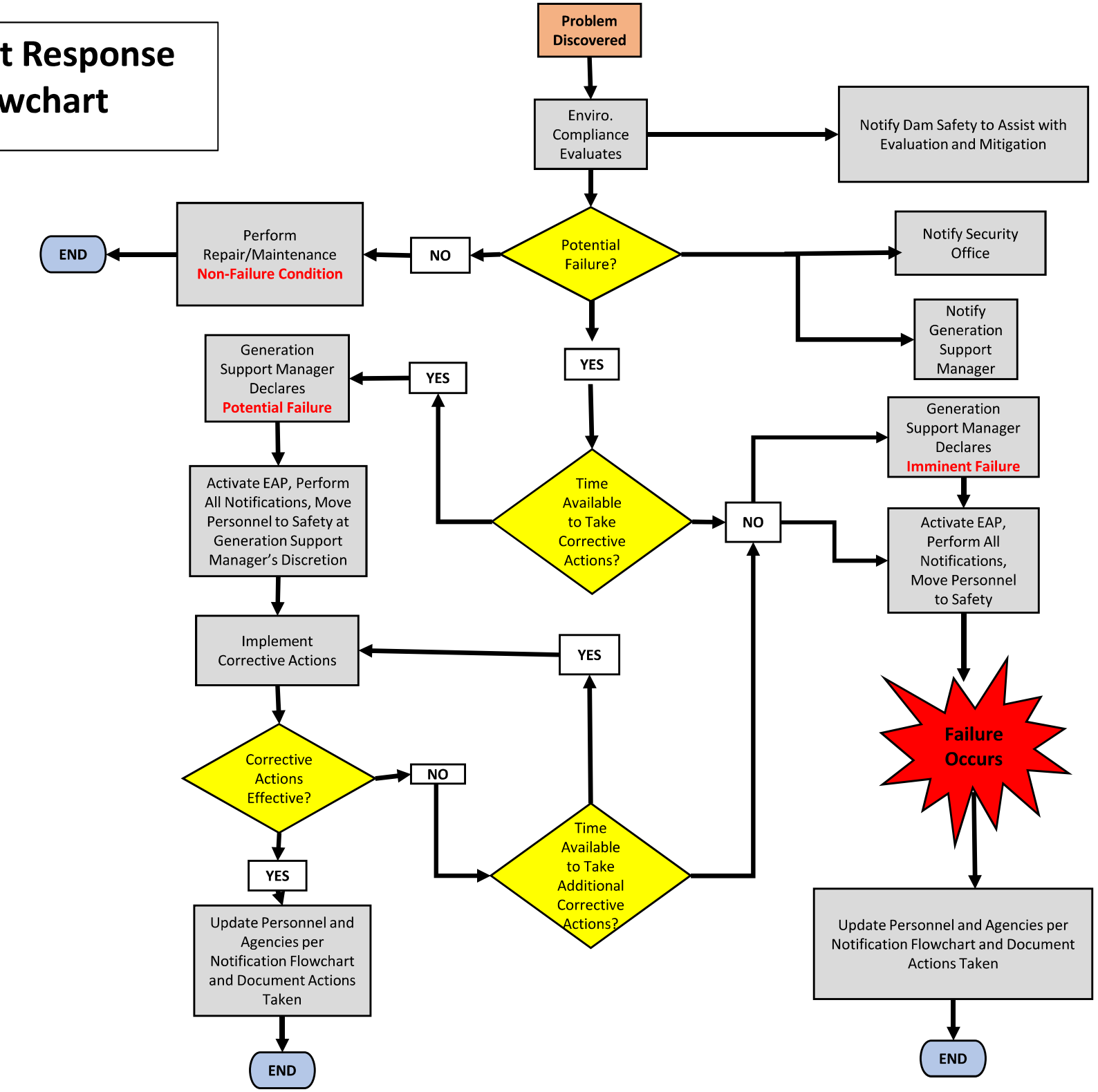
Title
Ash Pond 3 Breach Inundation Map

Notes
1. Coordinate System: NAD 1983 StatePlane Georgia West FIPS 1002 (US Feet)
2. AP-3 is currently closed in place. The inundation mapping shown represents a "worst-case" scenario during a future condition associated with closure-by-removal construction. For this scenario, it is assumed that the ash has been removed and that water has filled the area to the crest of the dam. As shown, the inundation extents associated with this scenario are within the 100-year floodplain.

APPENDIX C

Incident Response Flowchart

Incident Response Flowchart



APPENDIX D

Response Notification Flowchart

Response Notification Flowchart

Imminent Failure or Potential Failure Emergencies

Legend

(1) Denotes Call Sequence

Renewable & Resilient Generation Environmental Compliance
(404) 718-9078

(1) **Incident Commander**

(2) **GPC Corporate Communications**

(1) **Southern Company Generation VP**

(2) **GPC Corporate Security**

(1) **Bibb County EMA**
24-Hour: (478) 751-7500
Spencer Hawkins, Director
Office: (478) 870-2500
Cell: (478) 954-8143
Robert McCord, Deputy Director
(478) 737-1539

(2) **Jones County EMA**
Jessica Tyler, Director
Office: (478) 986-6672
Cell: (478) 986-1941
Thomas Coleman, Fire Chief
Cell: (478) 796-4452

(3) **GEMA 24-Hour Line**
(800) 879-4362

Alternate:
(404) 635-7000

(4) **Georgia System Operator**
(470) 785-1170

(3) **SCS Dam Safety**

SCS Dam Safety Referral Line (24-Hr)
(205) 992-6601

See Next Page for Notifications by SCS Dam Safety

(4) **GPC Environmental Affairs**

(1) **National Weather Service Peachtree City, GA**
(770) 486-1133
Ext 241 or 242

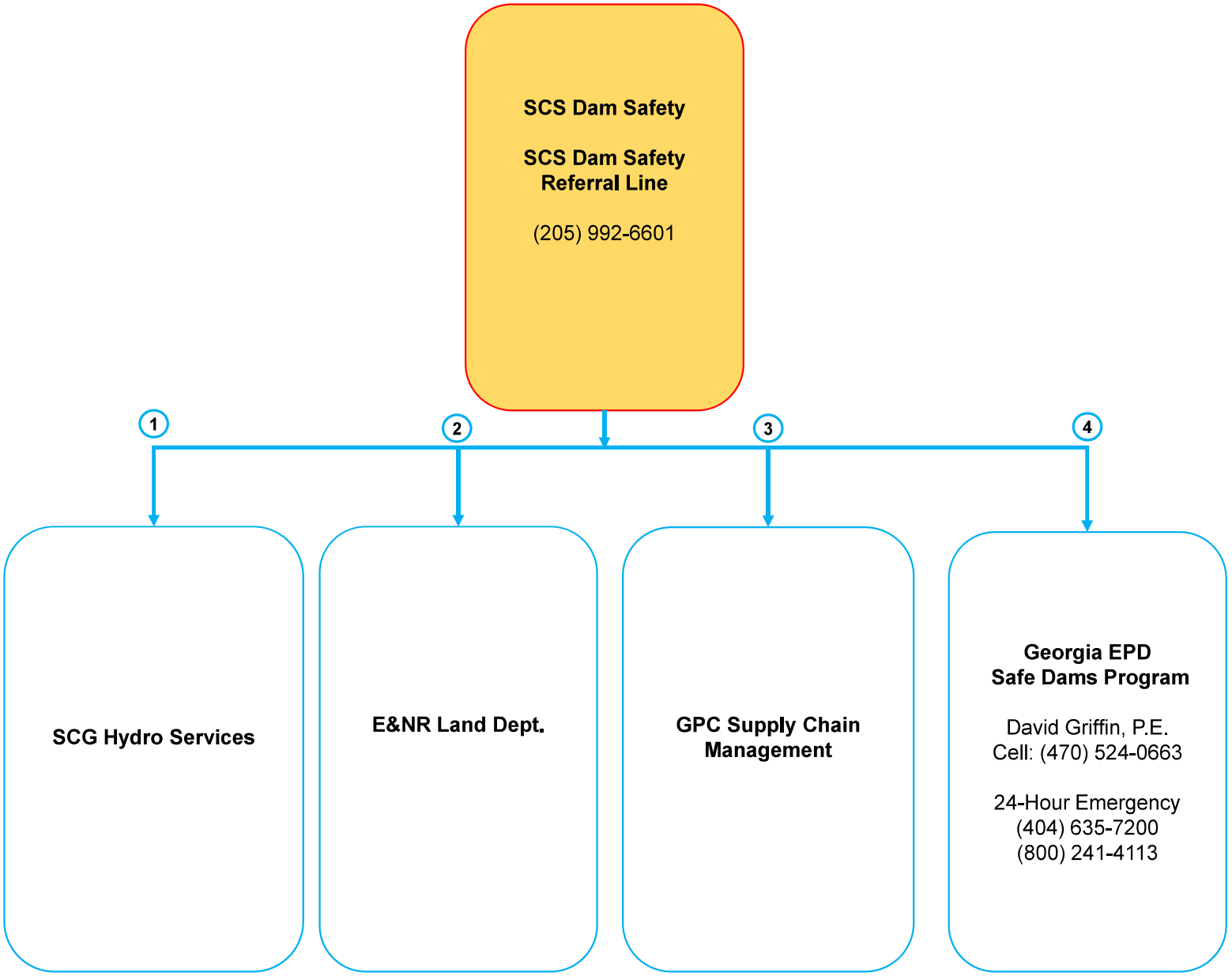
Alternate:
Birmingham, AL
(205) 664-3410

Response Notification Flowchart

Imminent Failure or Potential Failure Emergencies
Dam Safety Notifications

Legend

(1) Denotes Call Sequence



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 DIRECTOR OF RENEWABLE & RESILIENT INCIDENT COMMANDER:

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

TO BE USED BY SECURITY OFFICE:

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Renewable & Resilient Generation Environmental Compliance					
Georgia System Operator					
Bibb County EMA					
Jones County EMA					

To be used by Bibb County/ Jones County EMA

GEMA/HS	

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 RENEWABLE & RESILIENT GENERATION ENVIRONMENTAL COMPLIANCE:

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Dam Safety					
GPC Enviro. Affairs					

TO BE USED BY GEORGIA SYSTEM OPERATOR:

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

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 SCS DAM SAFETY:

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Hydro Sevices					
GPC Land Department					
GPC Supply Chain Management					
Georgia EPD Safe Dams Program					

EMERGENCY ACTION PLAN
DATA RECORDING SHEET

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: _____

Emergency Coordinator: _____

Description of Events:* _____

_____

_____

_____

_____

What is Being Done:* _____

_____

_____

_____

_____

*Attach additional pages as necessary.

For incoming questions, refer all calls to:

Media Inquiries:	Georgia Power Company Corporate Communications
EMA Inquiries:	Plant Manager/Emergency Coordinator
Environmental Agency Inquiries:	GPC Environmental Affairs

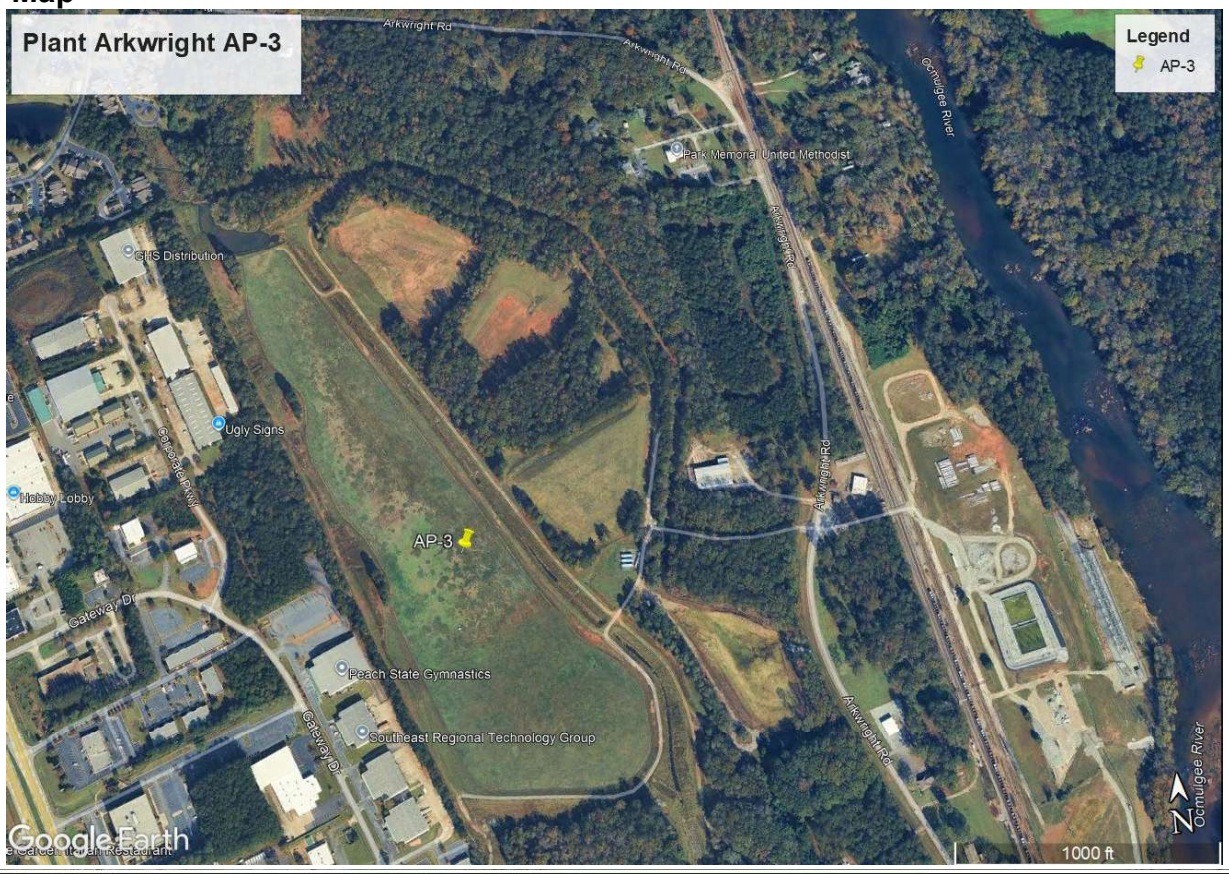
Emergency Action Plan
Post Incident Reporting Form

Dame Name: Plant Arkwright AP-3 NID ID#: Not Applicable

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 "Emergency 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