PERIODIC STRUCTURAL STABILITY ASSESSMENT
391-3-4-.10(4) and 40 C.F.R. § 257.73
PLANT BOWEN ASH POND 1 (AP-1)
GEORGIA POWER COMPANY

The Federal CCR Rule, and, for Existing Surface Impoundments where applicable, the Georgia CCR Rule (391-3-4-.10) require the owner or operator of an existing CCR surface impoundment to conduct initial and periodic structural stability assessments. The owner or operator must conduct an assessment of the CCR unit and document whether the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded therein. *See* 40 C.F.R. § 257.73(d); Ga. Comp. R. & Regs. r. 391-3-4-.10(4)(b). In addition, the Rules require a subsequent assessment be performed within 5 years of completion of the previous assessment. *See* 40 C.F.R. § 257.73(f)(3); Ga. Comp. R. & Regs. r. 391-3-4-.10(4)(b). The previous Periodic Hazard Potential Classification Assessment was placed in the Operating Record on October 15, 2021.

The CCR surface impoundment known as Plant Bowen AP-1 is located on Plant Bowen property near Euharlee in south Bartow County, Georgia, approximately 7 miles west-southwest of the city of Cartersville.

The Notification of Intent to Initiate Closure was placed in the Operating Record on December 31, 2020, and closure activities are underway. AP-1 is being closed in place in a consolidated, lined footprint within AP-1. Dewatering activities have removed free liquids from AP-1. Stormwater run-off following a storm event is routed off-site. All contact water is routed to the Contact Water Ponds and discharged to the wastewater treatment system. Based on the ongoing closure activities, AP-1 no longer impounds water. The closure has been designed to have no negative impact on the stability of the perimeter dams.

AP-1 was formed by the construction of an engineered perimeter dam which bounds the impoundment on the east, south and west sides, and approximately two-thirds of the north side. The remaining portions of the impoundment are contained by natural ground. The dam foundation and abutments consist of residual silty and sandy clays of low to medium plasticity. The residual soils immediately underlying the dam are considered to be stiff to very stiff. The strength of the residual soil generally decreases with depth to the top of rock, a common phenomenon in karst terrain. In certain sections of

the dam, the lower residual soils have been improved through a grouting program. AP-1 is located in an unstable geological area (karst), as defined by 40 C.F.R § 257.53, but does not meet the unstable ground requirements of 40 C.F.R § 257.64(a). (See Location Restriction Demonstration, October 17, 2018). Recognized and generally accepted good engineering practices have been incorporated into the closure design of AP-1 to ensure that the integrity of the structural components of AP-1 will not be disrupted. The AP-1 dam has been designed, constructed, operated, and maintained with stable foundations and abutments.

The northern 125 acres of the impoundment (North Stack Area) is a dry stack area with ash stacked above the crest of the dam. The North Stack Area is being excavated for beneficial use. The southern portion of the dam has been lowered and the recycle water pond and NPDES Discharge structure once located on the southern portion of the impoundment have been removed as a part of closure construction. CCR excavation and disposal cell construction are also underway in the southern area of AP-1.

Based on its current condition and the ongoing closure activities, AP-1 no longer impounds water, hence, surface erosion, wave action, and rapid drawdown are not a concern. The outboard slope of the perimeter dike is well vegetated.

The perimeter earth dam has been properly constructed using mechanical stabilization and compacted to a density sufficient to withstand the range of loading conditions. Inspections of the AP-1 dam are conducted on a regular basis. No actual or potential structural weaknesses of the dam or abutments, nor any existing conditions that would negatively impact the stability of the AP-1 dam and abutments, were documented in the recent inspection reports.

Vegetated slopes of the dam are properly maintained to a manageable height that allows for routine visual inspections.

The unexcavated areas of the North Stack are covered with a vegetated soil cover. Non-contact storm water run-off from the covered areas of the North Stack is currently collected in a HDPE lined perimeter drainage ditch and routed through discharge pipes installed in the upper section of the west dam extending down the downstream slope to a detention pond constructed at the downstream toe. The storm water is routed from the detention pond to Euharlee Creek. All contact stormwater run-off from

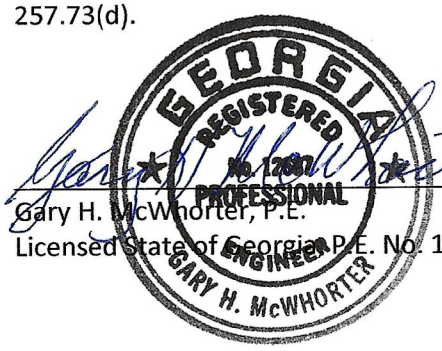
the disturbed areas of the North Stack and southern portion of AP-1 is routed to HDPE lined, temporary contact water ponds and is pumped to the water treatment facility supporting closure activities. There are no primary or auxiliary spillways constructed beneath or through the impoundment's perimeter dam. The existing inflow management system for AP-1 will adequately manage flow during and following the peak discharge from the inflow design flood without overtopping the perimeter dams. (See 2026 Periodic Inflow Design Flood Control System Plan.)

The existing inflow management system, except for certain sections of the northern perimeter toe sumps for the northern stack area, as configured and constructed as of the second quarter of 2026, is designed, constructed, operated, and maintained to adequately manage flow during and following the peak discharge from the 1000-yr, 24-hr design storm. The north exterior toe ditch sump network overtops during the design storm; however, these features intercept only stormwater falling on the north stack area exterior slope, do not contact CCR, and their overflow does not affect flood routing within AP-1 or threaten dam integrity. Calculations indicate AP-1 will adequately manage flow during and following the peak discharge of the inflow design flood without overtopping the perimeter dams.

The impoundment was originally designed with an emergency discharge structure which was located in the northern dam. This structure was abandoned by grouting in the 1980's and is inspected as part of the AP-1 inspection process.

A review of current conditions indicates the downstream slopes of the dam are not subject to inundation from adjacent water bodies.

I hereby certify that the structural stability assessment was conducted in accordance with 40 C.F.R. § 257.73(d).



10/12/2026

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