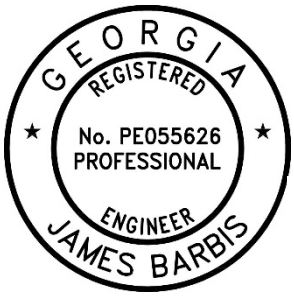
LEGACY CCR SURFACE IMPOUNDMENT EMERGENCY ACTION PLAN

Georgia Power Company
Plant Harllee Branch
Ash Pond C (AP-C)
State ID: 117-027-05839
NID: GA06336
Putnam County, GA

I hereby certify that this Emergency Action Plan has been prepared in accordance with the United States Environmental Protection Agency Coal Combustion Residuals (CCR) Rule (40 C.F.R. Part 257.100(f)(2)(v) and 40 C.F.R. Part 257.73(a)(3)) and the Georgia Department of Natural Resources Environmental Protection Division CCR Rule (391-3-4-.10(4)(b)).



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ISSUE DATE: **05/06/2026**
REVISION #: **0**

REVISION RECORD

In accordance with the United States Environmental Protection Agency Coal Combustion Residuals (CCR) Rule (40 C.F.R. Part 257.100(f)(2)(v) and 40 C.F.R. Part 257.73(a)(3)) and the Georgia Department of Natural Resources Environmental Protection Division CCR Rule (391-3-4-.10(4)(b)), 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) and 391-3-4-.10(8).

Revision Number	Date	Sections Affected/Reason
0	05/06/2026	Creation of Initial EAP

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ACRONYMS AND ABBREVIATIONS

AP-B	Plant Harllee Branch Ash Pond B
AP-C	Plant Harllee Branch Ash Pond C
AP-D	Plant Harllee Branch Ash Pond D
AP-E	Plant Harllee Branch Ash Pond E
CCR	Coal Combustion Residuals
C.F.R.	Code of Federal Regulations
CMP	Corrugated Metal Pipe
EAP	Emergency Action Plan
El.	Elevation
EMA	Emergency Management Agency
ft	Feet
GA EPD	Georgia Department of Natural Resources Environmental Protection Division
GA SDP	Georgia Department of Natural Resources Environmental Protection Division – Safe Dams Program
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
HDPE	High-Density Polyethylene
HEC-RAS	Hydrologic Engineering Center's River Analysis System
in.	Inch
NAVD 88	North American Vertical Datum of 1988

NFC	Non-Failure Condition
NID	National Inventory of Dams
NPDES	National Pollutant Discharge Elimination System
SCS	Southern Company Services
USEPA	United States Environmental Protection Agency
WWTS	Wastewater Treatment System

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

Dam Failure. A catastrophic type of failure characterized by the sudden, rapid, and uncontrolled release of impounded water or stored contents 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 or stored contents is properly considered a failure. These lesser degrees of failure can progressively lead to or heighten the risk of a 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 developing but adequate time is available to properly evaluate the problem and implement corrective actions that may alleviate or prevent failure.
>
> **Non-Failure Condition (NFC).** A condition that will not, by itself, lead to a failure, but 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 C.F.R. 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 hazard potential classifications include high hazard potential CCR impoundment, significant hazard potential CCR surface impoundment and low hazard 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 a dam/dike/embankment. 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.

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 Harllee Branch (Plant Branch) Ash Pond C (AP-C) to meet the requirements of the United States Environmental Protection Agency (USEPA) Coal Combustion Residuals (CCR) Rule (40 C.F.R. Part 257.100(f)(2)(v) and 40 C.F.R. Part 257.73(a)(3)) and the Georgia Department of Natural Resources Environmental Protection Division (GA EPD) CCR Rule (391-3-4-.10(4)(b)). The purpose of this EAP is to minimize danger to human life and economic and ecological damage and to protect property and assets by providing a pre-planned course of action in the event of possible, impending, or actual dam failure at AP-C.

This EAP will provide responding personnel with:

- Pertinent information related to AP-C;
- 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

Plant Branch is located on approximately 3,200 acres off State Route 24 (US 441) on the northern shore of Lake Sinclair near Milledgeville and Eatonton in Putnam County, Georgia. The site formerly operated as a coal-fired power plant that commenced power generation in 1965, ceased generating electricity prior to April 2015, and was decommissioned in 2019. AP-C is one of the five surface impoundments (A, B, C, D, and E) constructed to receive and store CCR during the power generating process at Plant Branch. AP-C is currently inactive and will be closed by removal by relocating the CCR to a permitted on-site landfill and/or selling the CCR for beneficial use. An overview of Plant Branch and the surrounding area is shown in Appendix A – Figure 1.

Construction of the AP-C dam was completed in November 1970 by establishing a rock base partially across the cove and building an earthen dam on top of the rock base. The dam crest elevation varies with a minimum elevation of 400 feet (ft) North American Vertical Datum of 1988 (NAVD 88). The maximum height of the dam is approximately 83 ft from the crest of the embankment to the downstream toe at Elevation (El.) 317 ft NAVD 88. The upstream slope is approximately 2 Horizontal:1 Vertical (2H:1V), and the downstream slope ranges from approximately 1.6H:1V to 2H:1V. The exposed portions of the upstream slopes and eastern and western crests and their respective downstream slopes are covered with grass. The southern crest is covered with graded aggregate base, and the exposed portion of its respective downstream slope is armored with riprap.

AP-C encompasses approximately 69 acres and does not currently hold ponded water. The auxiliary spillway, permitted under National Pollutant Discharge Elimination System (NPDES) Permit Number GA0026051 as Outfall Number 04, is located along the southwestern embankment of the CCR surface impoundment and includes two 24-inch (in.) diameter high-density polyethylene (HDPE) pipes. The northern pipe is approximately 250-ft long with an upgradient invert elevation at El. 395.70 ft NAVD 88 and a downgradient invert elevation at El. 378.54 ft NAVD 88. The southern pipe is approximately 250-ft long with an upgradient invert elevation at El. 395.91 ft NAVD 88 and a downgradient invert elevation at El. 378.33 ft NAVD 88. An overview of AP-C is shown in Appendix A – Figure A-2, and the auxiliary spillway is shown in Appendix A – Figure A-3.

AP-C is classified as a Category II structure by the Georgia Department of Natural Resources Environmental Protection Division – Safe Dams Program (GA SDP), where AP-C meets the definition of a dam by GA EPD but there is no probable loss of human life in the event of a dam failure or mis-operation of the facility. AP-C has also been assigned a Significant Hazard Potential classification under the USEPA CCR Rule (40 C.F.R. Part 257.100(f)(2)(v) and 40 C.F.R. Part 257.73(a)(3)) and the GA EPD CCR Rule (391-3-4-.10(4)(b)). This classification, by definition, indicates that there is no probable loss of human life in the event of a dam failure or mis-operation of the facility, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns. State Route 24 (US 441), located between Plant Branch and Lake Sinclair, could be impacted by the dam failure, along with potentially several other local roads.

The limits of potential flooding following the failure of the AP-C dam are shown on the inundation maps included in Appendix B. The inundation maps were developed under the conservative assumption that AP-C's retained water surface is at the crest of the dam; however, as noted above, AP-C does not currently hold ponded water. The inundation maps illustrate the results of routing the breach wave downstream of

AP-C using Hydrologic Engineering Center's River Analysis System (HEC-RAS). HEC-RAS is a general application one-dimensional, two-dimensional, or combined one-dimensional/two-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 including failure time, breach width, and breach side slopes were selected from industry accepted empirical formulas. The impounded mass was conservatively modelled as water with 100 percent of the mass mobilizing during the breach. Water surface elevation data was extracted from the hydraulic model and plotted on best available topographic information for the downstream areas. The analysis evaluated the impact of a hypothetical dam failure on downstream water surface elevations during a simulated "sunny-day" failure event per GA SDP's Engineer Guidelines. A "sunny-day" event is a non-storm event where hypothetical failure of the structure is initiated with the water surface elevation in the impoundment at the crest of the dam to simulate the worst-case scenario.

Normal river/lake levels and the flow from the simulated dam breach were superimposed over topographical and aerial 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, on-site personnel inspect AP-C on a regular basis to pre-emptively detect conditions 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 and Support group perform inspections on a 7-day or less basis, and Southern Company Services (SCS) Dam Safety engineers perform annual inspections as required by the CCR Rule and semiannual inspections as prescribed by the Safety Procedure for Dams and Dikes at Fossil Generation Plants (GEN 10004). Additionally, inspections are performed after significant events such as storms, floods, or earthquakes.

Personnel conducting 7-day interval inspections of AP-C 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 to track that action is taken, as needed, based on the findings. Any issues discovered during an inspection are reported to SCS Dam Safety as required by GEN 10004. The SCS Dam Safety engineer(s) working with the external closure consultant and the Renewable and Resilient Generation Compliance and 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.

Instrumentation including six piezometers, as well as flow from three seepage drains and five sumps, are measured on a 30-day or less basis, and the results are reported to SCS Dam Safety for compilation and evaluation.

3.2 Condition Severity Classifications

AP-C 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:

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 by SCS Dam Safety 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 the AP-C dam. The Condition Level indicated in the right-most column corresponds with the Condition Severity Classifications in Section 3.2.

Event	Situation	Condition Level
Auxiliary Spillway Flow	AP-C water surface elevation at auxiliary spillway crest or spillway is flowing with no active erosion	NFC
	Auxiliary spillway flowing with active gully erosion	NFC
	Auxiliary spillway flowing with an advancing headcut that is threatening the control section	NFC
Embankment Overtopping	AP-C level is 1 foot below the top of the dam	B
	Water from AP-C 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 on the AP-C dam	B
	Rapidly enlarging dropout or depression on the AP-C dam	A
Embankment Cracking	New cracks in the embankment greater than ¼-in. wide without seepage	NFC
	Cracks in the embankment with cloudy seepage or increasing flow rate	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 the 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 the 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 majority of past failures of earthen dams across the United States can be attributed to overtopping and seepage leading to internal erosion, piping failure, and slope instability. Detection and mitigation procedures for these potential failure modes are described below:

Overtopping. The drainage area associated with AP-C is approximately 74 acres, which includes direct rainfall and runoff from adjacent areas. With a maximum allowable starting water surface elevation at El. 391.9 ft NAVD 88, the auxiliary spillway at AP-C can adequately manage the 1,000-year, 24-hour storm event without overtopping the dam (i.e., El. 400 ft NAVD 88). In times of extreme flooding, personnel will be dispatched to monitor the dam and discharge mechanisms. Any potential overtopping would be discovered prior to the actual overtopping of the dam by proactive inspections and surveillance.

Seepage. Failures due to internal erosion and/or piping resulting from seepage would be detected in the early stages during the regular inspections. Inspectors are trained to look for evidence of seepage. In addition, piezometer readings will help reveal changes in subsurface water pressure. Inspection reports and instrumentation readings are transmitted to SCS Dam Safety periodically 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 the dam slopes, which would be detected by security personnel during their daily patrols or by Renewable and Resilient Generation Compliance and Support personnel during their 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, begin warnings, and initiate evacuations as soon as possible following the declaration of a safety emergency.

4.1 Access to the Site

Plant and emergency personnel are able to access the dam from the main entrance of Plant Branch using a combination of paved and gravel roadways.

Plant Branch's Main Entrance Street Address:
1100 Milledgeville Road
Milledgeville, Georgia 31061

Latitude / Longitude:
Main Entrance: 33°11'40"N / 83°17'41"W
Twin Bridges Road Entrance: 33°13'19"N / 83°20'17"W
North Dennis Station Road Entrance: 33°12'50"N / 83°20'33"W
South Dennis Station Road Entrance: 33°11'44"N / 83°20'17"W

AP-C Dam West/Left Abutment: 33°11’9”N / 83°18’27”W
AP-C Dam East/Right Abutment: 33°11’17”N / 83°18’8”W

Normal Non-Flooding Conditions

From North or South on State Route 24 (US 441): Enter Plant Branch from the main entrance on State Route 24 (US 441). Travel approximately 0.3 miles northwest and turn left onto a paved road. Travel roughly 0.1 miles southwest and turn left onto a gravel/dirt road. Continue approximately 0.7 miles to reach the east/right abutment of the dam.

Flooding/Road Closure Conditions

If State Route 24 (US 441) is significantly impacted by flooding, the dam should be accessed using the Twin Bridges Road or Dennis Station Road entrances.

From Northwest or Southeast on State Route 212 (Kinderhook Road): To access the Twin Bridges Road entrance, travel approximately 5.7 miles northeast on Twin Bridges Road from the junction of State Route 212 (Kinderhook Road) and Twin Bridges Road, and the gate and subsequent dirt road will be on the right.

To access the north Dennis Station Road entrance, travel approximately 5.2 miles northeast on Twin Bridges Road from the junction of State Route 212 (Kinderhook Road) and Twin Bridges Road. Turn right onto Dennis Station Road and travel approximately 0.5 miles. The gate and subsequent gravel road will be on the left.

To access the south Dennis Station Road entrance, travel approximately 5.2 miles northeast on Twin Bridges Road from the junction of State Route 212 (Kinderhook Road) and Twin Bridges Road. Turn right onto Dennis Station Road and travel approximately 1.8 miles. The gate and subsequent dirt road will be on the left.

4.2 Response during Periods of Darkness

Plant Branch is accessible 24 hours a day, 7 days a week. Response times would not vary significantly from daylight conditions. Portable light stands and generators are available at the plant for night-time operations, if needed. Refer to Section 7.0 for a list of additional resources available to support the response effort.

4.3 Response during Weekends and Holidays

Plant Branch is accessible 24 hours a day, 7 days a week. The response times of certain personnel may be affected during weekends and holidays. However, 24-hour contact information for responsible personnel is included in Appendix D.

4.4 Response during Adverse Weather

The dam is accessed by paved and gravel-surfaced roads and is accessible during periods of adverse weather. If severe flooding causes road closures, alternative access routes will need to be considered and response times may be adversely affected. Alternative routes are presented in Section 4.1, if needed.

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

5.2 Renewable and Resilient Generation Compliance and Support Manager

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

The Incident Commander is responsible for:

1. Verifying that an emergency condition exists.

2. Assessing and declaring the emergency condition.

3. Consulting with SCS 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 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 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.**

5.5 Renewable and Resilient Generation Environmental Compliance

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

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. The National Weather Service has the authority to transmit emergency messages to the public through different media (TV, radio, etc.).

5.7 SCS Dam Safety

SCS Dam Safety is responsible for coordinating and providing the technical support necessary to mitigate the emergency condition and for notifying the GA SDP and GPC Hydro Services. SCS Dam Safety shall also notify GPC Land Management which oversees Lake Resources and GPC Supply Chain Management as shown on the Response Notification Flowchart (Appendix D).

5.8 GPC Personnel

GPC Environmental Affairs

GPC Environmental Affairs is responsible for coordinating long-term environmental response (after the initial response) and for remediating environmental issues and providing the technical support necessary

for any remediation or corrective action needs. GPC Environmental Affairs is also responsible for communicating with environmental regulatory agencies, reporting environmental releases, and obtaining environmental permits or variances to existing permits, if needed.

If necessary, GPC Environmental Affairs will also help secure approved contractors for environmental emergency conditions 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 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.

5.10 Law Enforcement

Local Law Enforcement agencies are notified by the appropriate EMAs. GEMA/HS notifies the Georgia 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. Notification numbers are listed on the Response Notification Flowchart located in Appendix D.

Local EMAs will be notified in the event of an emergency, and these agencies will be responsible for notifying the public and state agencies. In the event of an imminent failure, local 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 Branch. 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 SCS Dam Safety.

A. Once a problem is discovered, a call is made to notify the Plant's Security Office. The Security Office will then notify Renewable and Resilient Generation Environmental Compliance Lead unless they are already on site and informed of the situation. The Renewable and Resilient Generation Environmental Compliance Lead will notify SCS Dam Safety engineers immediately for technical consultation, then brief the Director of Renewable and Resilient Generation of the situation. SCS 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 Director of Renewable and Resilient Generation or Incident Commander will declare an **Imminent Failure (Condition A Emergency)** and proceed to Step J.

B. If the problem is evaluated and not deemed by SCS 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 SCS Dam Safety.

C. If the problem is evaluated and SCS 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 SCS 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 SCS 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 SCS 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). They 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 Incident Commander 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, SCS 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 Incident Commander or their designee is responsible for keeping local EMAs informed of any change in conditions. SCS 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 SCS Dam Safety should complete a Post Incident Report using the form located in Appendix E.

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

7.0 RESOURCES AVAILABLE TO SUPPORT EMERGENCY RESPONSE EFFORTS

7.1 Alternative Sources of Power

There are no electrically-powered spillway gates or other equipment used for operating the dam. Emergency power can be obtained from both GPC inventory and/or from local equipment rental companies, if needed, during emergency operations.

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 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 is maintained by plant 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 GPC inventory and/or from local equipment rental companies.

7.3 Reducing Flows into the Reservoir

The only water entering AP-C is direct rainfall and runoff from adjacent areas, so further reduction of flows into the CCR surface impoundment is no longer feasible.

7.4 Lowering Water Level

Equipment rental companies should be contacted to mobilize large portable pumps to lower the reservoir in case of an emergency. Portable diesel pumps with capacities ranging from 7,500 to 15,000 gallons per minute can be mobilized to AP-C within 48 hours or less of notification. The equipment rental companies

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 Renewable and Resilient Generation Environmental Compliance and Support Lead should be contacted to coordinate support.

8.0 PROVISIONS FOR ANNUAL COORDINATION MEETING

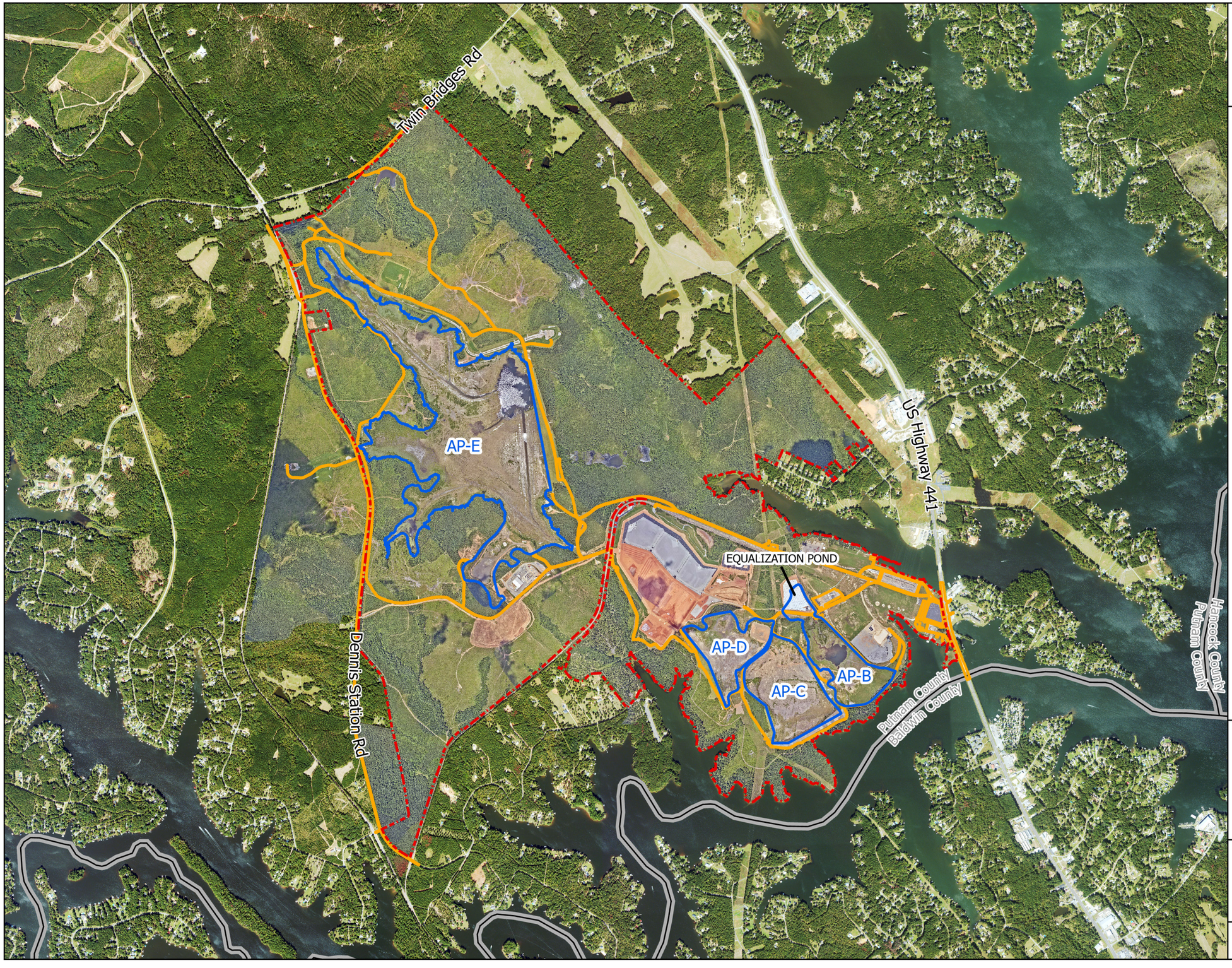
An annual face-to-face meeting will be held with representatives of Plant Branch, GPC, and the emergency response agencies described in this plan. These emergency response agencies receiving invitations to participate in the annual meeting may include:

- Putnam County EMA
- Baldwin County EMA
- Hancock County EMA
- GA SDP

The county EMA organizations may, at their discretion, contact 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 Branch Location Map - Figure A-1
AP-C Overview - Figure A-2
AP-C Auxiliary Spillway - Figure A-3



N

LEGEND

- Plant Branch Property Boundary
- Ash Pond Boundaries
- Access Roads
- County Boundaries

NOTES:
1. ELEVATION PROVIDED IN FEET (FT) REFERENCED TO THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD 88).
2. COORDINATE SYSTEM: NAD 1983 STATE PLANE GEORGIA WEST_FIPS (U.S. FEET).
3. PROPERTY BOUNDARY PROVIDED BY SOUTHERN COMPANY SERVICES.

0 1,500 3,000

Scale in Feet

PLANT BRANCH LOCATION MAP

GEORGIA POWER COMPANY
PLANT BRANCH AP-C
PUTNAM COUNTY, GEORGIA

Prepared For: Georgia Power

Prepared By: Geosyntec consultants

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FIGURE A-1

N

LEGEND

- Plant Branch Property Boundary
- County Boundaries
- Ash Pond Boundaries
- Access Roads

NOTES:
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3. PROPERTY BOUNDARY PROVIDED BY SOUTHERN COMPANY SERVICES.

0 250 500
Scale in Feet

AP-C OVERVIEW

GEORGIA POWER COMPANY
PLANT BRANCH AP-C
PUTNAM COUNTY, GEORGIA

Prepared For: Georgia Power

Prepared By: Geosyntec consultants

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FIGURE A-2

N

LEGEND

- Plant Branch Property Boundary
- County Boundaries
- Ash Pond Boundaries
- Access Roads

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3. PROPERTY BOUNDARY PROVIDED BY SOUTHERN COMPANY SERVICES.

0 50 100
Scale in Feet

AP-C AUXILIARY SPILLWAY

GEORGIA POWER COMPANY
PLANT BRANCH AP-C
PUTNAM COUNTY, GEORGIA

Prepared For: Georgia Power

Prepared By: Geosyntec consultants

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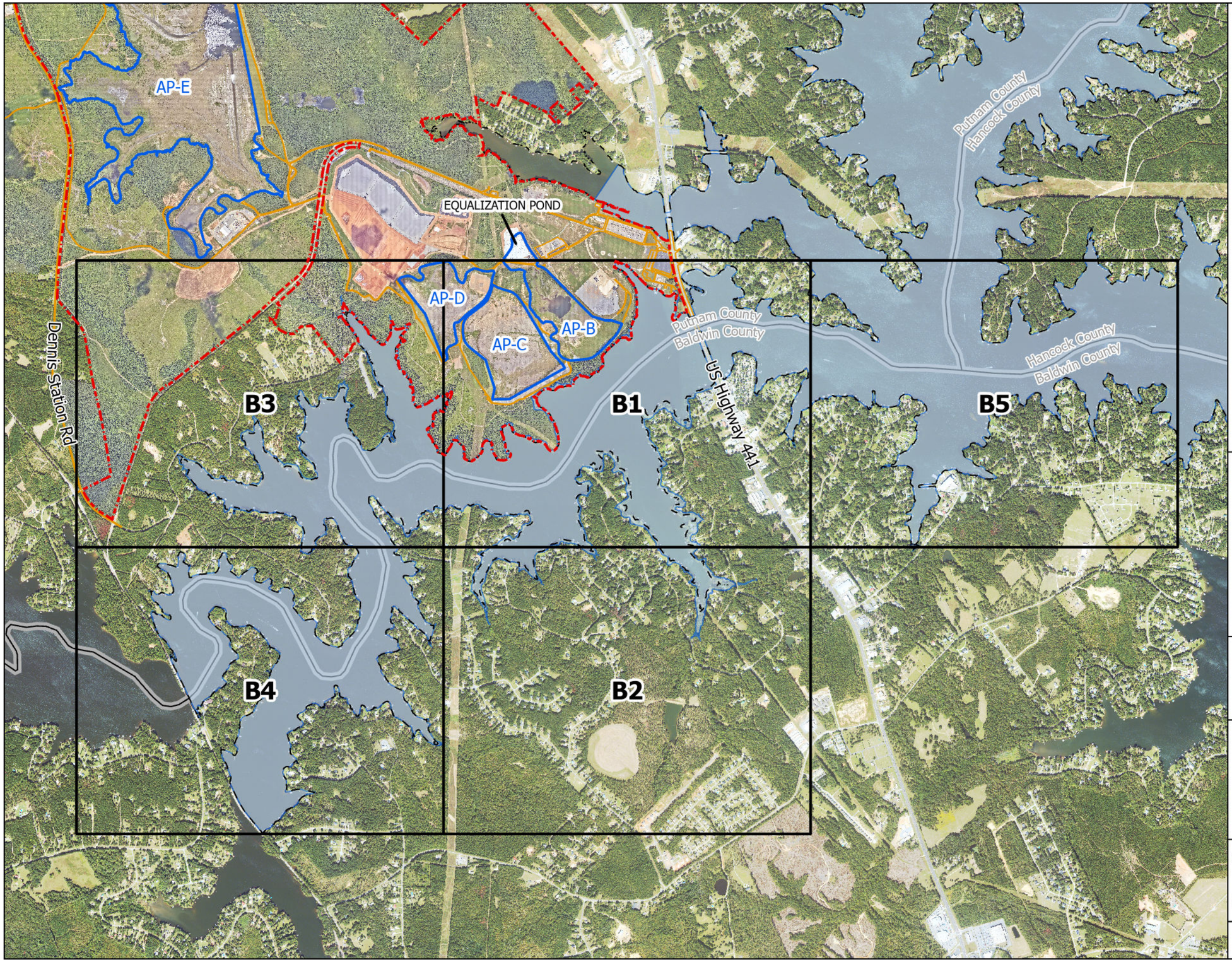
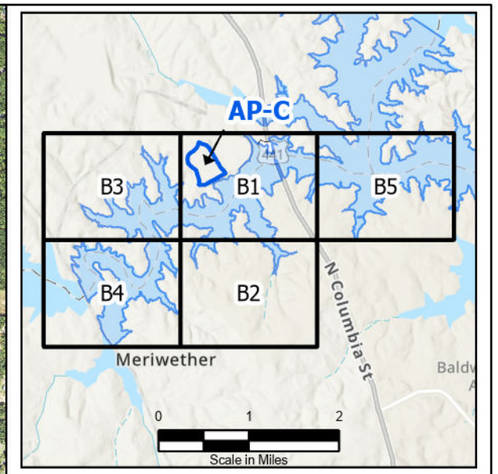
FIGURE A-3

APPENDIX B

Inundation Maps





LEGEND

- Plant Branch Property Boundary
- Sheet Index
- Lake Sinclair Boundary
- Sunny Day Inundation
- Ash Pond Boundaries
- Access Roads
- County Boundaries

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6. THE ACTUAL BREACH INUNDATION ZONES MAY VARY FROM THAT SHOWN AND ARE DEPENDENT ON THE HYDROLOGIC AND BREACH CONDITIONS AT THE TIME OF FAILURE.
7. NO STRUCTURES WERE INUNDATED BASED ON RESULTING WATER SURFACE ELEVATIONS AND GROUND ELEVATIONS FROM NATIONAL STRUCTURE INVENTORY.

0 1,500 3,000
Scale in Feet

N

AP-C INUNDATION MAPS

GEORGIA POWER COMPANY
PLANT BRANCH AP-C
PUTNAM COUNTY, GEORGIA

Prepared For: Georgia Power

Prepared By: Geosyntec consultants

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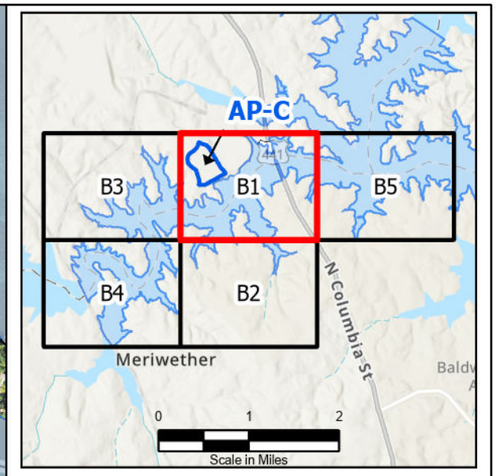
FIGURE
B-INDEX



LEGEND

- Locations
- Plant Branch Property Boundary
- Lake Sinclair Boundary
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0 500 1,000
Scale in Feet

N

Location	River Miles Downstream of AP-C	Time from Breach to Initial Wave (h:mm)	Time from Breach to Maximum Wave (h:mm)	Maximum Water Surface Elevation (ft-NAVD88)	Peak Discharge (cfs)
1	0.83	0:07	0:30	343.3	14,350
2	0.65	0:05	0:17	344.3	20,150
3	0.35	0:02	0:27	342.6	29,100
4	1.22	0:10	0:41	341.0	15,250
5	2.05	0:16	1:02	339.9	7,250
6	3.24	0:25	1:29	339.0	2,700
7	2.91	0:24	1:23	339.0	3,850
8	1.56	0:13	0:43	339.2	5,700
9	2.13	0:19	0:51	338.9	2,000

AP-C INUNDATION MAPS

GEORGIA POWER COMPANY
PLANT BRANCH AP-C
PUTNAM COUNTY, GEORGIA

Prepared For: Georgia Power

Prepared By: Geosyntec consultants

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FIGURE B1

Figure B1

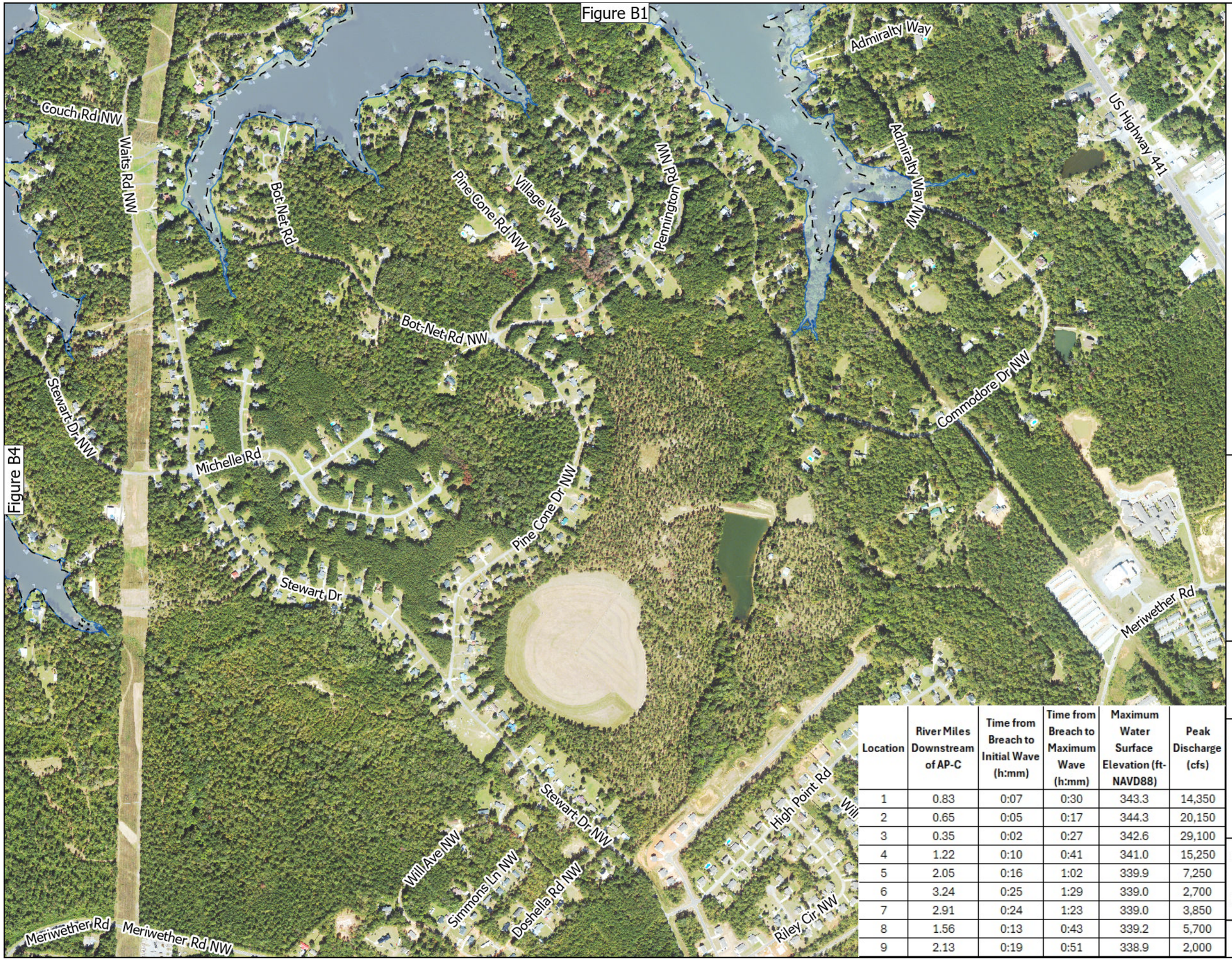
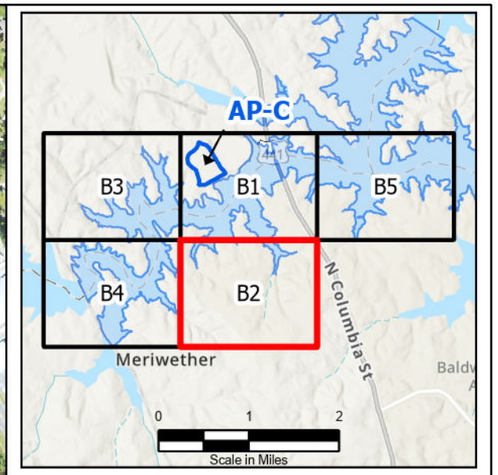


Figure B4



LEGEND

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0 500 1,000
Scale in Feet

N

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7	2.91	0:24	1:23	339.0	3,850
8	1.56	0:13	0:43	339.2	5,700
9	2.13	0:19	0:51	338.9	2,000

AP-C INUNDATION MAPS

GEORGIA POWER COMPANY
PLANT BRANCH AP-C
PUTNAM COUNTY, GEORGIA

Prepared For: Georgia Power

Prepared By: Geosyntec consultants

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FIGURE B2

Location	River Miles Downstream of AP-C	Time from Breach to Initial Wave (h:mm)	Time from Breach to Maximum Wave (h:mm)	Maximum Water Surface Elevation (ft-NAVD88)	Peak Discharge (cfs)
1	0.83	0:07	0:30	343.3	14,350
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8	1.56	0:13	0:43	339.2	5,700
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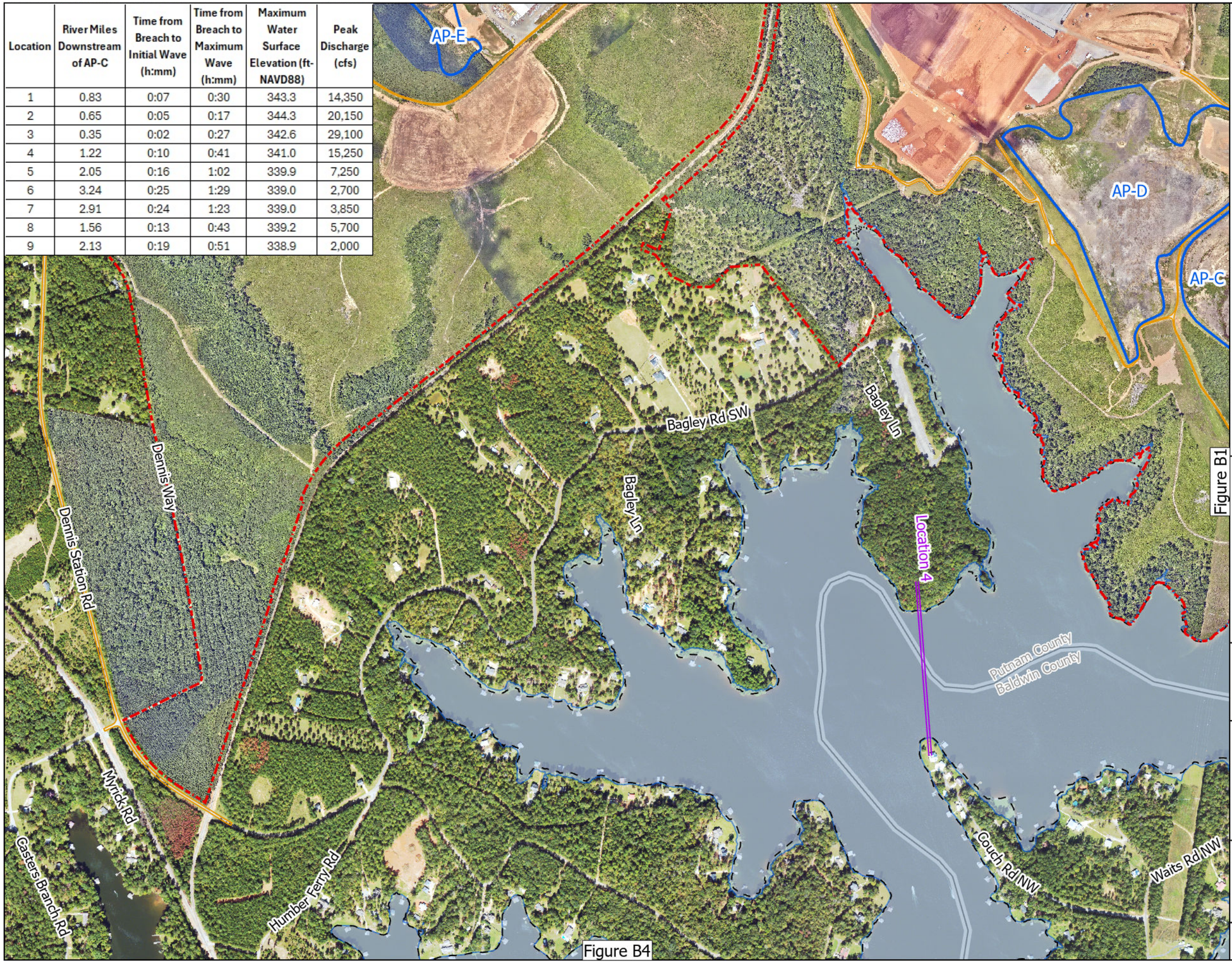

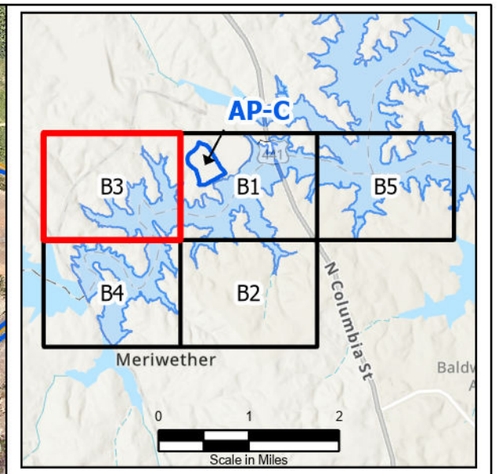

LEGEND

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0 500 1,000
Scale in Feet

N

AP-C INUNDATION MAPS

GEORGIA POWER COMPANY
PLANT BRANCH AP-C
PUTNAM COUNTY, GEORGIA

Prepared For: Georgia Power

Prepared By: Geosyntec consultants

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FIGURE B3

Figure B3

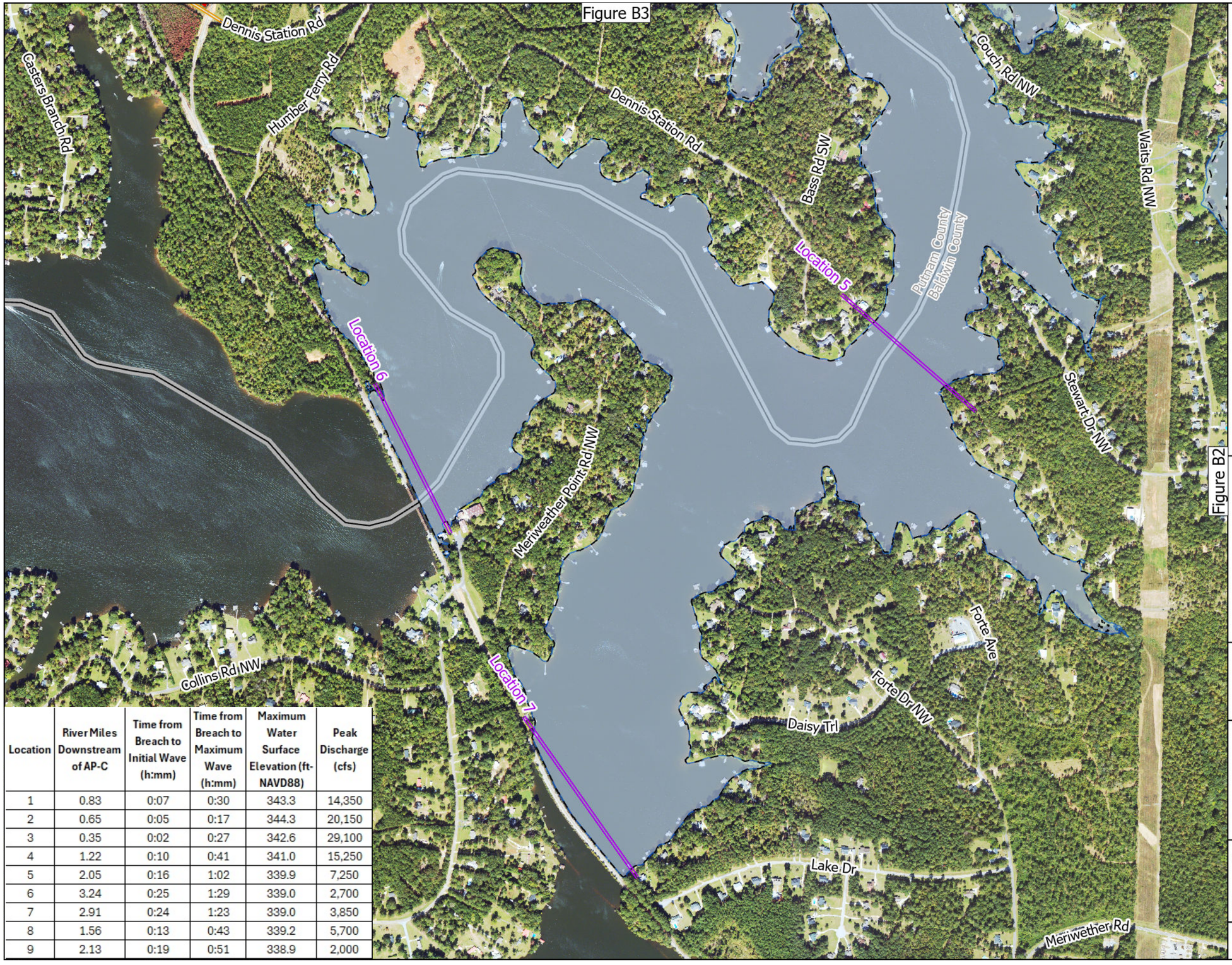
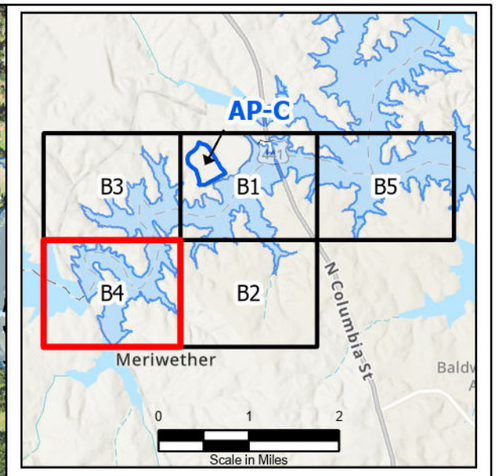


Figure B2



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0 500 1,000
Scale in Feet

N

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AP-C INUNDATION MAPS

GEORGIA POWER COMPANY
PLANT BRANCH AP-C
PUTNAM COUNTY, GEORGIA

Prepared For: Georgia Power

Prepared By: Geosyntec consultants

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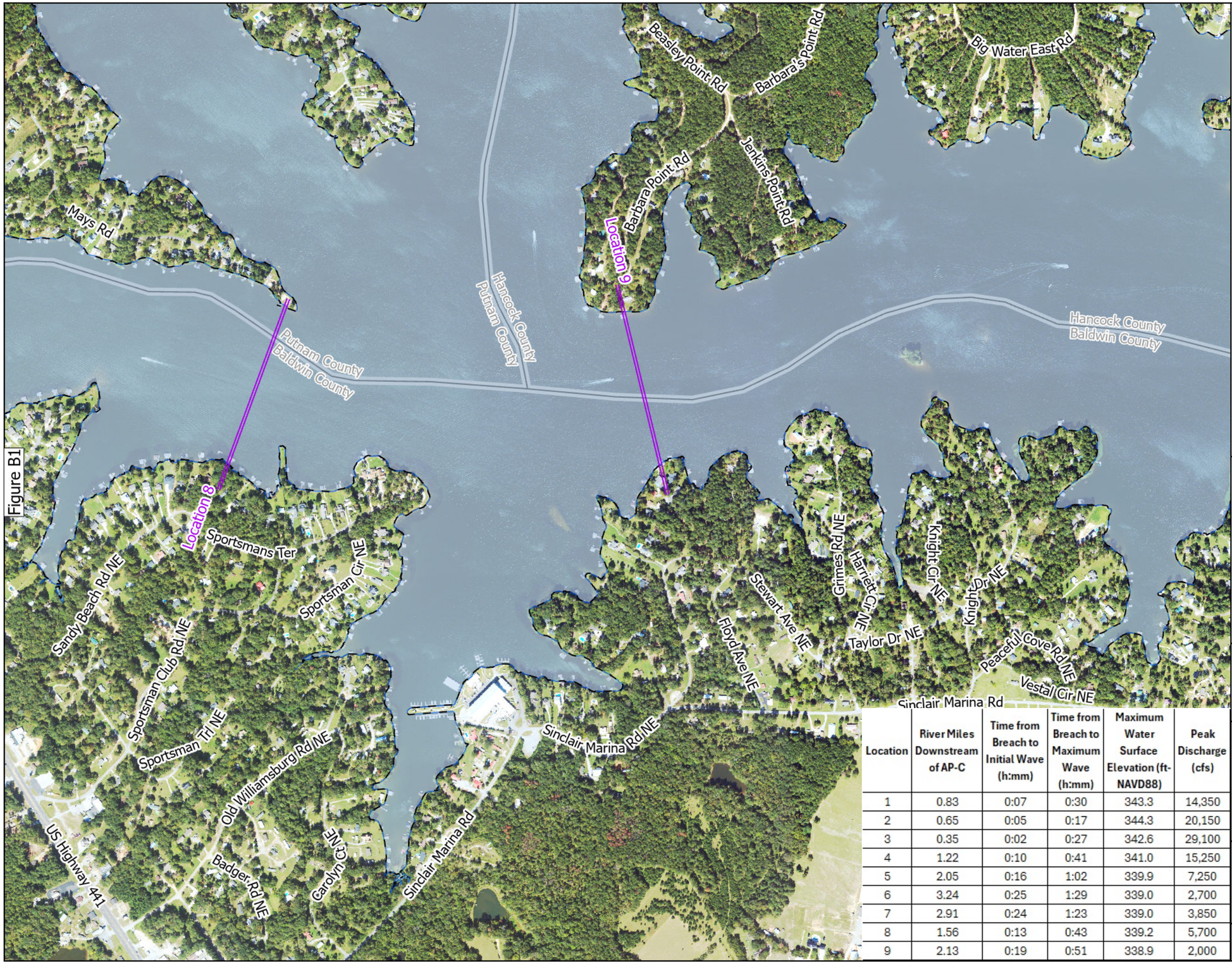
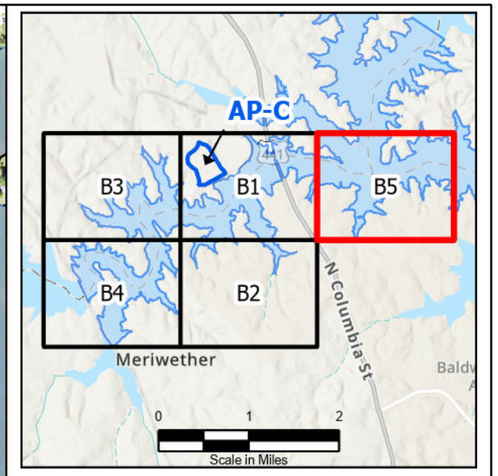
FIGURE B4

Figure B1





LEGEND

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0 500 1,000
Scale in Feet

N

AP-C INUNDATION MAPS

GEORGIA POWER COMPANY
PLANT BRANCH AP-C
PUTNAM COUNTY, GEORGIA

Prepared For: Georgia Power

Prepared By: Geosyntec consultants

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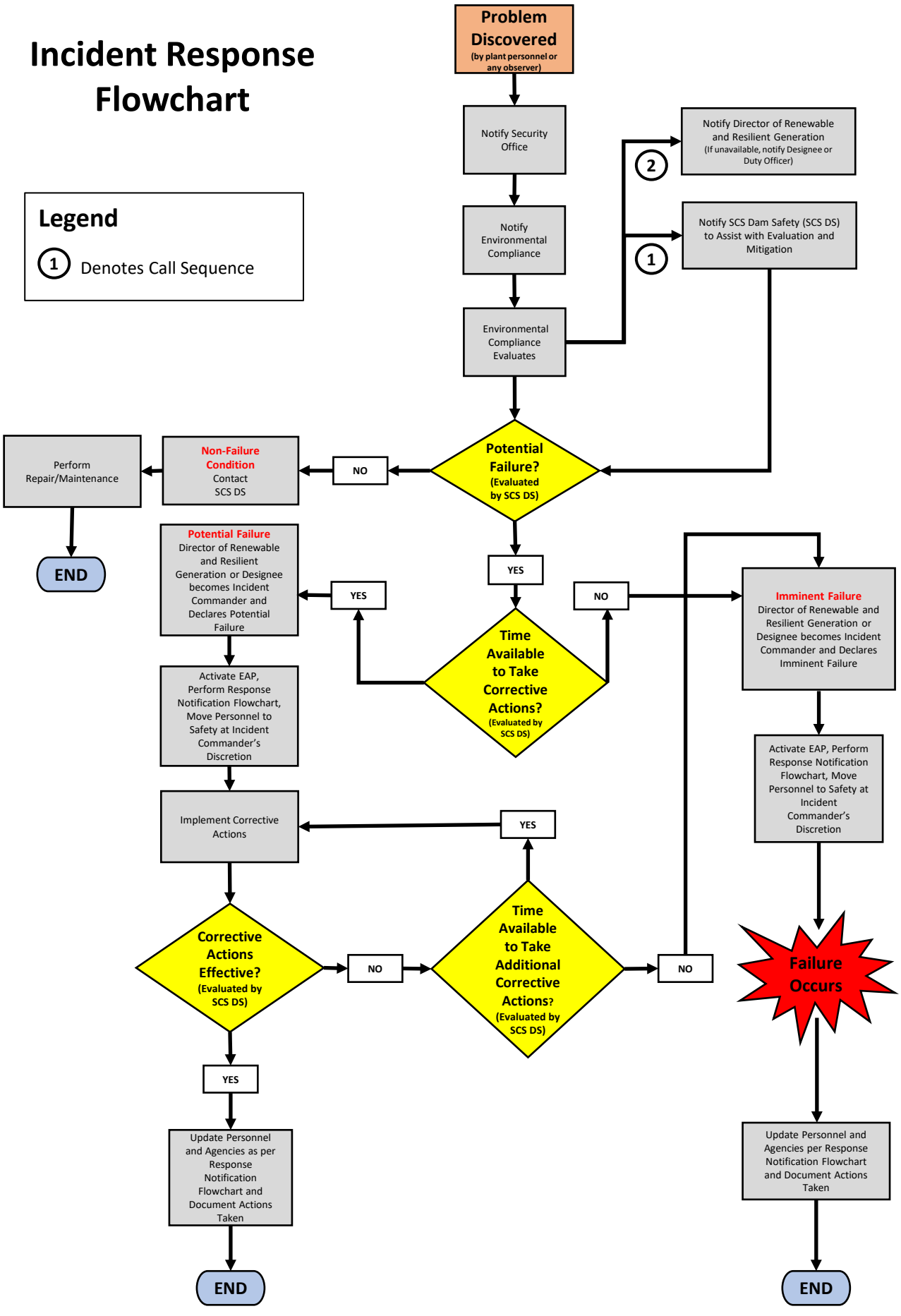
FIGURE B5

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

Incident Commander Declares Imminent or Potential Failure Emergency

(2) → **Southern Co. Generation Senior Vice President / Senior Production Officer**

(3) → **GPC Corporate Communications**

(1) → **Plant Branch Security**

(1) → **Georgia System Operator**
470-785-1170

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

Alternate:
Birmingham, AL
(205) 664-3410

(3) → **Putnam County EMA**
Howard Sills, Director (Sheriff)
Office: (706) 485-8557
Cell: (478)-288-7965

Alternate:
Russell Blenk, Chief Deputy
Cell: (478)-288-7966

Dial 911

(4) → **Baldwin County EMA**
Wayne Johnson, Director
Office: (478) 445-3406
Cell: (478) 456-0367

After hours call Baldwin County 911
(478) 445-4891

(5) → **Hancock County EMA**
Mario Chapple, Director
Office: (706) 444-5388

(1) → **GEMA/HS 24-Hour Line**
(800) 879-4362

Alternate:
(404) 635-7000

(1) → **Renewable and Resilient Generation Environmental Compliance and Support**

(2) → **GPC Environmental Affairs**

(1) → **SCS Dam Safety**

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

See Next Page for Notifications by SCS Dam Safety

Response Notification Flowchart

Imminent Failure or Potential Failure Emergencies
Dam Safety Notifications

Legend

(1) Denotes Call Sequence

SCS Dam Safety

SCS Dam Safety Referral Line

(205) 992-6601

1

GPC Hydro Services

2

GPC Land Management / Lake Resources

3

GPC Supply Chain Management

4

Georgia Safe Dams Program

David Griffin, P.E.
Cell: (470) 524-0663

24-Hour Emergency
(404) 635-7200
(800) 241-4113

APPENDIX E

Emergency Notification Log Sheet
Data Recording Sheet
Post Incident Reporting Form

EMERGENCY ACTION PLAN
EMERGENCY NOTIFICATION LOG
PLANT BRANCH ASH POND C (AP-C) DAM

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 AND RESILIENT GENERATION / INCIDENT COMMANDER:

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

TO BE USED BY PLANT BRANCH SECURITY:

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Renewable and Resilient Generation Environmental Compliance and Support					
Georgia System Operator					
Putnam County EMA					
Baldwin County EMA					
Hancock County EMA					

EMERGENCY ACTION PLAN
EMERGENCY NOTIFICATION LOG
PLANT BRANCH ASH POND C (AP-C) DAM

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 AND RESILIENT GENERATION ENVIRONMENTAL COMPLIANCE AND SUPPORT:

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
SCS Dam Safety					
GPC Environmental Affairs					

TO BE USED BY GEORGIA SYSTEM OPERATOR:

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

TO BE USED BY SCS DAM SAFETY:

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
GPC Hydro Services					
GPC Land Management / Lake Resources					
GPC Supply Chain Management					
Georgia Safe Dams Program					

Notes:

EMERGENCY ACTION PLAN
DATA RECORDING SHEET
PLANT BRANCH ASH POND C (AP-C) DAM

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:	GPC Corporate Communications
EMA Inquiries:	Plant Manager/Incident Commander
Environmental Agency Inquiries:	GPC Environmental Affairs

Emergency Action Plan

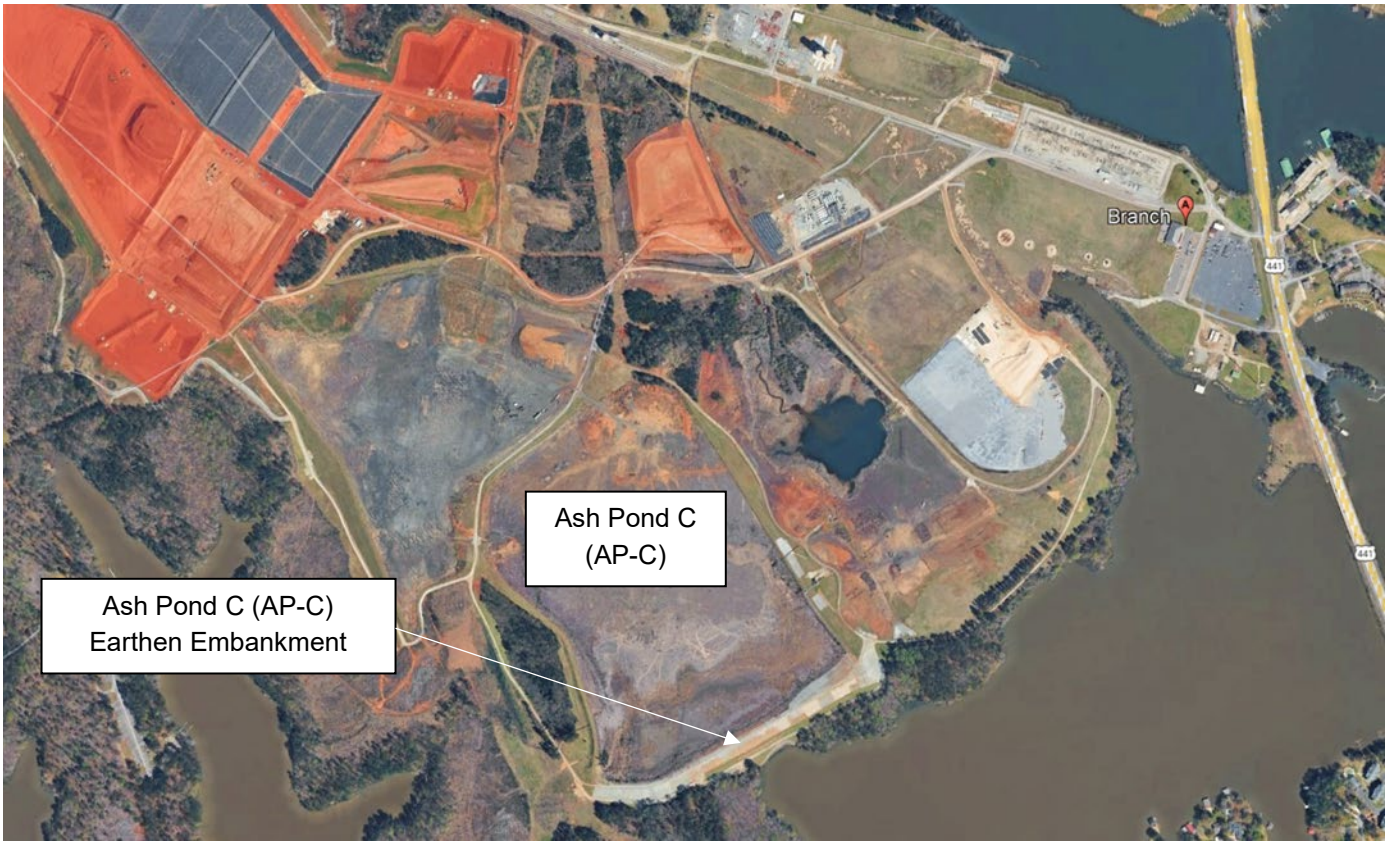
Post Incident Reporting Form

Dam Name: Plant Branch Ash Pond C (AP-C) Dam NID ID#: GA-06336

Report Prepared By: _____ Date: _____

Emergency Description

Site Map



Location

Potential Causes

Weather Conditions

Current Dam Conditions

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