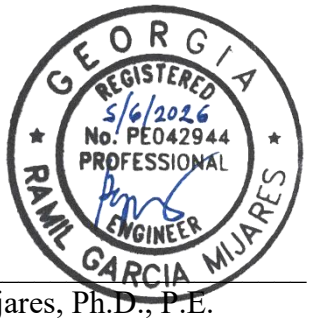
LEGACY CCR SURFACE IMPOUNDMENT EMERGENCY ACTION PLAN

Georgia Power Company
Plant Mitchell
Ash Pond 1 (AP-1)
State ID: 101-016-04002
NID: GA04917
Mitchell and Dougherty Counties, 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

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ACRONYMS AND ABBREVIATIONS

AP-1	Plant Mitchell Ash Pond 1
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
GDNREPD	Georgia Department of Natural Resources 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
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 damed 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 Ash Pond. The inundation maps in this procedure are based on a specific computer-modeled dam breach scenario; therefore, the boundaries depicted are estimates for that particular model. *The models are considered conservative but larger floods could potentially occur.* Please refer to 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 Mitchell Ash Pond 1 (AP-1) 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 reduce the risk 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 AP-1.

This EAP will provide responding personnel with:

- Pertinent information related to AP-1;
- 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 Mitchell was a power generating facility that historically operated as a coal fired facility and ceased generating electricity in April 2015. The Plant Mitchell Ash Pond 1 (AP-1) was constructed as a part of three coal combustion residuals (CCR) surface impoundments (Ash Ponds) to store CCR from the former coal-fired power plant. Plant Mitchell once operated as a coal-fired power plant located near Albany, Georgia and ceased generating electricity in April 2015. An overview of Plant Mitchell and the surrounding area is shown in Appendix A – Figure 1. AP-1 construction began in January 1962 as a part of Plant Mitchell Unit No. 3 expansion and ceased operations in 1980. AP-1 is currently undergoing closure by removal wherein CCR materials are being removed from the impoundment and transported by rail and truck for beneficial use or disposal at an approved landfill. The Notification of Intent to Initiate Closure of AP-1 was placed in the Operating Record in Q4 2019. This EAP covers emergency response procedures for AP-1.

AP-1 is approximately 53 acres in size at its normal pool elevation of 191 feet (Appendix A – Figure 2). AP-1 has earthen embankments (also referred to as dams) on its north, east, south, and west sides. The AP-1 dam has a maximum height of approximately 26 feet on the west side. Downstream slopes are predominately covered with grass with four areas of riprap protection (one on the northern dam, two on the western dam, and one on the southern dam adjacent to Ash Pond 2 (AP-2)). The outfall structure, formerly located at the southern end of the western dam, has been removed and the horizontal barrel has been abandoned in-place by grouting. A grass and a gravel drive provide access around the dam crest.

AP-1 has been 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). This classification, by definition, indicates that there is no probable loss of human life in the event of a dam failure or misoperation of the facility, but can cause an economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns. There are no structures or other dams that could be impacted by the failure of the AP-1 dam. The Radium Springs Road/Old GA State Highway No. 3 located to the west of Plant Mitchell would be affected by the failure of the AP-1 dam.

The Emergency Action Plan herein is in effect as required for a Significant Hazard Potential Surface Impoundment and assumes a future interim construction scenario where the CCR in AP-1 has been excavated with the dam in place and a retained water surface at the crest of the dam. The dam is breached in this condition, as discussed below.

The limits of potential flooding in the event of failure of the AP-1 dam can be seen on the Inundation Map, which is included as Appendix B. The provided inundation map was developed based on the results of routing the breach wave downstream using the computer software, HEC-RAS, version 6.6. HEC-RAS is a general application 1D/2D 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 flows analyses allow for flow conditions that vary temporally and spatially such as a dam breach simulation. Breach parameters such as failure time, breach width, and breach side slopes were selected from industry accepted empirical formulas. Water surface elevation data was extracted from the hydraulic model and plotted on best available LiDAR topographic information for the downstream areas. A sensitivity analysis of an alternative dam breach location in the northwest corner of AP-1 near the location of the previously removed emergency spillway structure was performed and did not indicate any inundation of structures.

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

3.0 DETECTION, EVALUATION, AND CLASSIFICATION PROCEDURES FOR EMERGENCIES

3.1 Inspection Schedule and Emergency Detection/Evaluation

Trained, on-site personnel inspect AP-1 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 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 semiannual inspections as prescribed by the Safety Procedure for Dams and Dikes at Fossil Generation Plants (GEN 10004). In addition, inspections are performed after significant events such as storms, floods, or earthquakes.

Personnel conducting 7-day interval inspections of AP-1 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 tracked and 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 GEN 10004. 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-1 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 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 to SCS Dam Safety who 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-1 dam. 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	AP-1 level is 1 foot below the top of the dam	B
	Water from AP-1 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-1 dam	B
	Rapidly enlarging dropout or depression on the AP-1 dam or embankment	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 the dam slopes	NFC
	Sudden or rapidly proceeding slides of the dam slopes	A
Instruments	Instrumentation readings beyond predetermined/historical values	NFC
Earthquake	Measurable earthquake felt or reported on or within 50 miles of the dam	NFC
	Earthquake resulting in visible damage to the dam or its appurtenances	B
	Earthquake resulting in uncontrolled release of water from the dam	A
Security Threat	Verified bomb threat that, if carried out, could result in damage to the dam	B
	Detonated bomb that has resulted in damage to the dam or its appurtenances	A
Sabotage / Vandalism	Damage to dam or its appurtenances that could adversely impact the functioning of the dam	NFC
	Modification to the dam or its appurtenances that could adversely impact the functioning of the dam	NFC
	Damage to dam or its appurtenances that has resulted in seepage flow	B
	Damage to dam or its appurtenances that has resulted in uncontrolled water release	A

4.0 INCIDENT RESPONSE

The majority of 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 these potential failure modes is described below:

Overtopping. The AP-1 impoundment has a relatively small watershed area. The contributing drainage area to AP-1 is approximately 0.083 mi^2 and consists primarily of the dam and impoundment. AP-1 can safely store the 1,000-year, 24-hour storm event. However, in the unlikely event of overtopping the attached mapping in Appendix B indicates the "worst case" inundation potential.

Seepage. Failures due to internal erosion and/or piping resulting from seepage would be detected in the early stages during the regular inspections conducted by plant personnel. Inspectors are trained to look for evidence of seepage and internal erosion. In addition, piezometer readings will help reveal changes in subsurface water pressure. Inspection reports and instrumentation readings are transmitted to SCS Dam Safety for evaluation. With the exception of the lined, temporary storage, Contact Water Lagoon in the northeast corner, AP-1 has been dewatered and is essentially dry with no impounded water. Any collected stormwater is pumped to the Contact Water Lagoon or to the site stormwater control system. Therefore, the conditions that could lead to failures of this type would likely be discovered and corrected before an actual failure occurred, making the possibility of failure by this mechanism unlikely.

Slope Instability. Slope instability would be demonstrated by sloughing of 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 unlikely.

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

4.1 Access to the Site

Plant and emergency personnel are able to access the dam by paved or gravel surfaced roadways from the Plant Mitchell access/entrance road. Figures 1 and 2 in Appendix A show the location of AP-1 within the Plant property.

Plant Mitchell Street Address: 5200 Radium Springs Road
Albany, GA 31705

Lat/Long:
Entrance: 31°26'33.6" N, 84°08'12.8" W
AP-1 Dam: 31°26'19.00" N, 84°08'09.00" W

Normal Non-Flooding Conditions

Enter Plant Mitchell from either north or south on Radium Springs Road at the south gate entrance located at 5200 Radium Springs Road and pass the security trailer to reach a parking area located to the south, directly across from the security trailer. Continue south through the parking area and follow the gravel road approximately 0.2 miles.

Flooding/Road Closure Conditions

If Radium Springs Road/Old GA State Highway No. 3 is impacted by high flows, response times by outside agencies or personnel would be affected. If entrance to the Plant Mitchell main entrance as in non-flooding conditions described above is not possible, access will have to be gained through woodlands to the north and east or through the pecan grove to the south.

4.2 Response during Periods of Darkness

Personnel and equipment are able to access the site at any time. Response times would not vary significantly from daylight conditions.

4.3 Response during Weekends and Holidays

Personnel and equipment will be able to access the site at any time. 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 closure of off-site access roads such as Radium Springs Road, response times may be adversely affected and are discussed in Section 4.1.

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 also 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 and 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, he/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 Renewable and Resilient Generation 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 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 for providing technical updates to the Incident Commander. Compliance personnel can also request assistance from GPC Environmental Affairs, if conditions warrant.

5.6 Georgia Systems Operator

The Georgia System Operator contacts the National Weather Service to inform them of conditions at AP-1 that may lead to potential flooding downstream.

5.7 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).

5.8 GPC Personnel

Environmental Affairs

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

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

Corporate Communications

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

Corporate Security

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

Supply Chain Management

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

5.9 Emergency Agencies

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

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 Mitchell. 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). 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 Incident Commander or his/her 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 his 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.

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

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.

7.0 RESOURCES AVAILABLE TO SUPPORT EMERGENCY RESPONSE EFFORTS

7.1 Alternative Sources of Power

There are no electrically-powered gates or other equipment used for operating the dam. Power is available at multiple locations 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

- #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 or power can be obtained from both plant inventory and/or from local equipment rental companies.

7.3 Reducing Flows into the Reservoir

Plant process flows are no longer directed to AP-1 and with the exception of the lined, temporary Contact Water Lagoon, AP-1 no longer impounds water. The only water that enters AP-1 is

precipitation that falls directly into it, and a limited amount of stormwater runoff which is pumped either to the Contact Water Lagoon or to the site stormwater control system. Therefore, reduction of flows into the pond is no longer feasible.

7.4 Lowering Water Level

As AP-1 is currently undergoing closure by removal, the water level has been lowered significantly below previous operating levels with minimal, temporary standing water. The need (and ability) to lower the water level in AP-1 is limited. However, large portable pumps can be mobilized for lowering water levels should the need arise. Based on current relationships with rental companies as well as existing closure contractor, portable diesel pumps with capacities ranging from 7,500 to 15,000 GPM can be mobilized to AP-1 within 48-hours or less of notification. If the EAP has not been activated and emergency lowering is required, the Renewable and Resilient Generation Compliance & Support Lead should be contacted to coordinate support.

8.0 PROVISIONS FOR ANNUAL COORDINATION MEETING

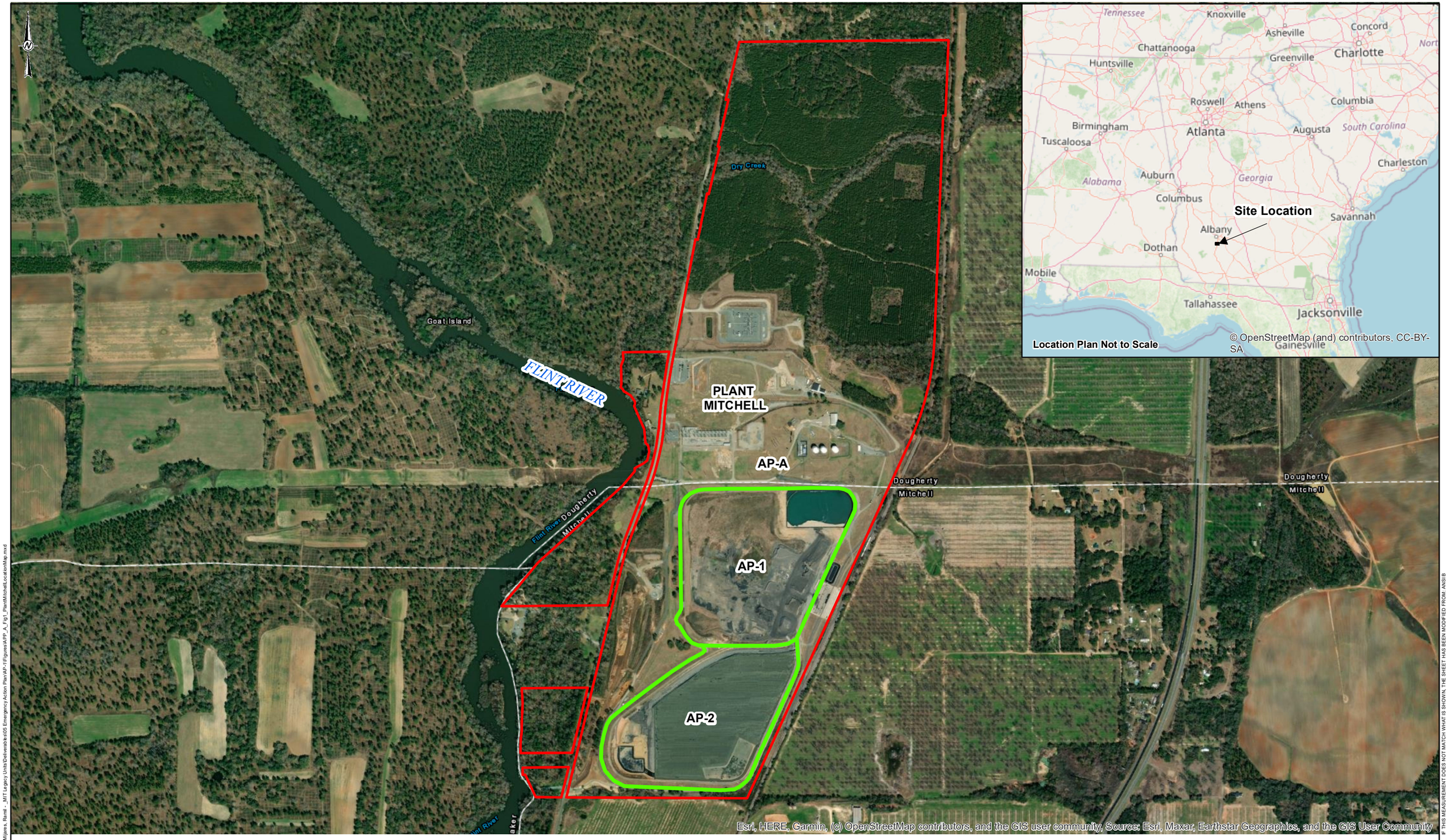
An annual face-to-face meeting will be held with representatives of Plant Mitchell, GPC, and the emergency response agencies described in this plan. These emergency response agencies receiving invitations to participate in the annual meeting may include:

- Dougherty County Emergency Management Agency
- Albany Public Works
- Mitchell County Emergency Management Agency
- Georgia Environmental Protection Division - Safe Dams Program

The County EMAs 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 Mitchell Location Map – Figure 1
AP-1 Overview – Figure 2



PLANT BOUNDARY

APPROXIMATE LIMITS OF PLANT MITCHELL ASH PONDS

0 0.5 1
MILES

CLIENT
SOUTHERN COMPANY SERVICES, INC. (SCS)

DATE	2025-12-12
PREPARED	NRM
REVIEWED	ARF
APPROVED	RGM

PROJECT
CCR LEGACY UNITS DESIGN CRITERIA SUPPORT
PLANT MITCHELL ASH POND 1

TITLE
LOCATION MAP

PROJECT No.	CONTROL	Rev.	FIGURE
US0037149.0170		0	1

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET HAS BEEN MODIFIED FROM: ANSI B

Path: C:\Users\USNM706669\WSP O365\Mijares, Ramil - _MIT Legacy Units\Deliverables\05 Emergency Action Plan\AP-1\Figures\AP-1_Fig1_PlantMitchellLocationMap.mxd

APPROXIMATE LIMITS OF PLANT MITCHELL ASH POND 1

0 130 260 520

Feet

CLIENT
SOUTHERN COMPANY SERVICES, INC. (SCS)

wsp

DATE	2025-12-12
PREPARED	NRM
REVIEWED	ARF
APPROVED	RGM

PROJECT
CCR LEGACY UNITS DESIGN CRITERIA SUPPORT
PLANT MITCHELL ASH POND 1

TITLE
ASH POND 1 OVERVIEW

PROJECT No.	CONTROL	Rev.	FIGURE
US0037149.0170		0	**2**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET HAS BEEN MODIFIED FROM: ANSI B

1 in

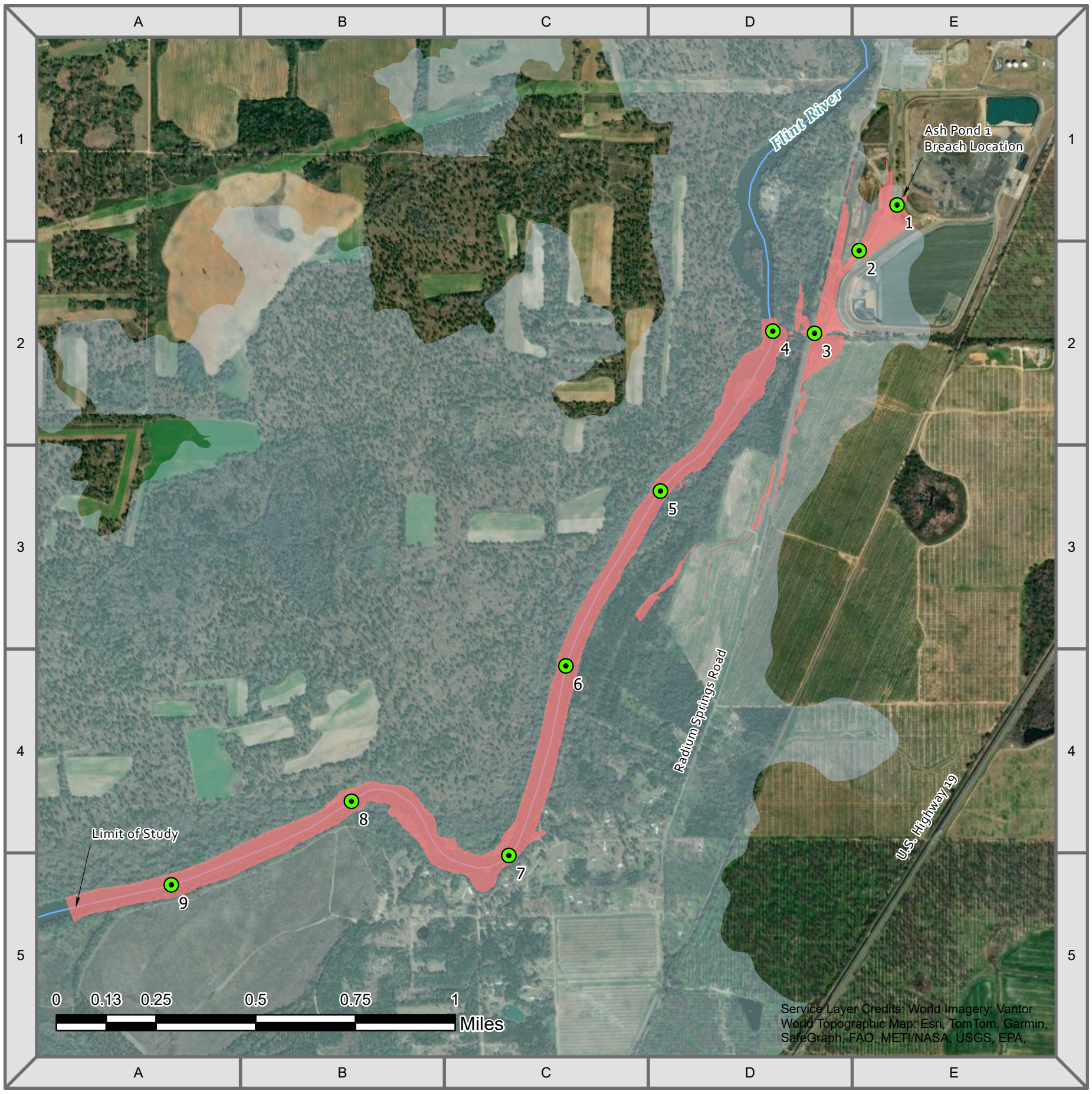
0

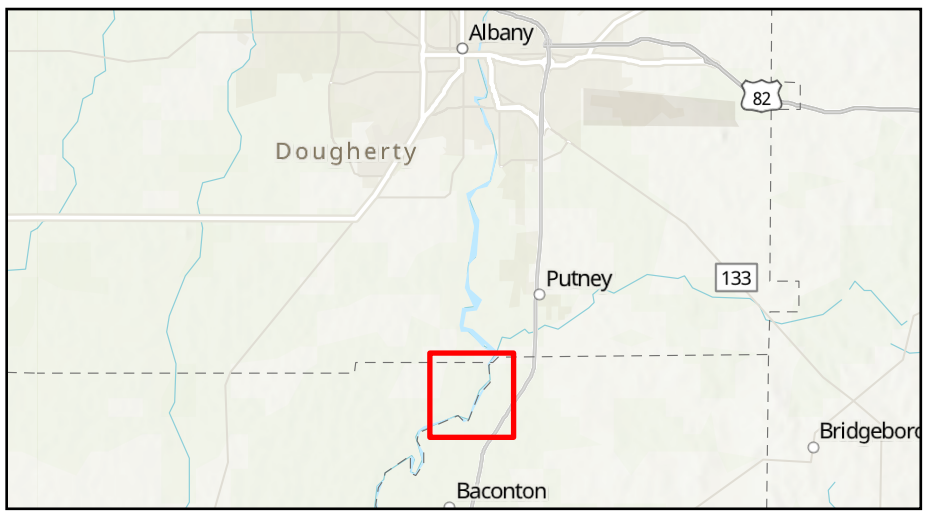
Path: C:\Users\USNM706669\WSP O365\Mijares, Ramil - _MIT Legacy Units\Deliverables\05 Emergency Action Plan\AP-1\Figures\APP_A_Fig2_AP1_Overview.mxd

APPENDIX B

Inundation Map

PLANT MITCHELL ASH POND 1 DAM
DAM BREACH INUNDATION MAP





Legend

N
W E
S

- Nodes
- River Centerline
- 100-Year Floodplain
- 1000-Year Design Storm Breach Inundation Boundary

Node/Cross-Section Label	Distance from Dam (miles)	Design Storm Time to Initial Wave (hours)	Design Storm Time to Max Wave (hours)	Design Storm Max WS Elevation (feet)	Design Storm Water Surface Elevation Increase (feet)[1]
1	0.03	0.02	0.05	169.44	3.26
2	0.18	0.07	0.22	168.50	4.88
3	0.41	0.22	1.55	165.94	6.35
4	0.47	1.05	2.32	142.93	0.24
5	0.96	3.12	7.68	142.32	0.54
6	1.45	5.73	13.52	142.14	0.52
7	1.92	9.18	19.98	142.06	0.44
8	2.06	13.75	25.27	142.00	0.38
9	2.52	19.15	28.04	141.89	0.27

[1] Depth of flooding for 2D mesh area.

Notes:
1. Mapping of flooded areas and flood wave travel times are approximate. Timing and extent of actual inundation may differ from information presented on this map.
2. It is prudent to assume that areas outside, but adjacent to, the inundation limits shown could also be flooded.
3. Inundation Map for breach during design storm event.

CLIENT
SOUTHERN COMPANY SERVICES (SCS)

WSP USA INC.
3348 PEACHTREE RD NE
BUILDING 200, SUITE 1100
ATLANTA, GEORGIA 30326

PREPARED	NRM
REVIEWED	YCS
APPROVED	SJC

PROJECT
PLANT MITCHELL CCR LEGACY RULE
EMERGENCY ACTION PLAN

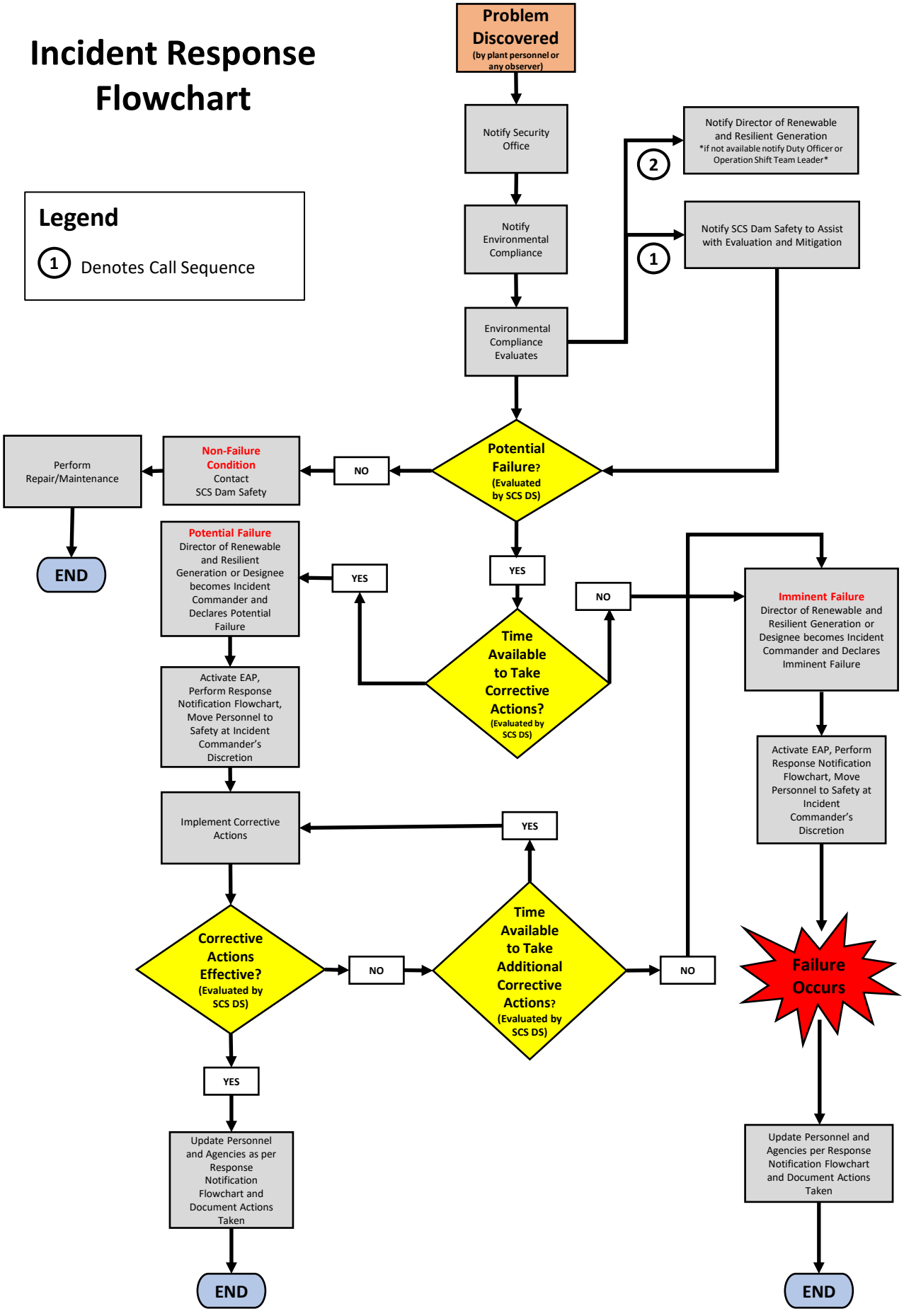
TITLE
PLANT MITCHELL ASH POND 1
INUNDATION MAP

PROJECT No.	DATE (YYYY-MM-DD)	Rev.	FIGURE
US0037149.0170	2025-12-18	0	1

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**

(3) → **GPC Corporate Communications**

(1) → **Plant Mitchell 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) → **Albany-Dougherty County EMA**
911 Dispatch: (229) 431-2132
Chief Cedric Scott, Director
Office: (229) 302-1903
Cell: (229) 854-3108
Alternate: James Brown, Interim Deputy Director
Cell: (229) 407-0943

(4) → **Albany Public Works**
Office: (229) 302-1800
(229) 302-1805
Press “0” for Operator

(5) → **Mitchell County EMA**
911 Dispatch: (229) 336-2007
Russell Moody, Director
Office: (229) 336-2060
Cell: (229) 873-0691
Alternate: Gary Rice
County Administrator
Cell: (229) 319-0043

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

Alternate:
(404) 635-7000

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

(2) → **GPC Environmental Affairs**

(1) → **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

Hydro Services

2

E&NR Land Dept.

3

GPC Supply Chain Management

4

Georgia EPD
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 MITCHELL ASH POND AP-1 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 Mitchell Security					
SVP / SPO					
GPC Corporate Communications					

TO BE USED BY PLANT MITCHELL SECURITY:

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Environmental Compliance					
Georgia System Operator					
Albany-Dougherty County EMA					
Albany Public Works					
Mitchell County EMA					

TO BE USED BY RENEWABLE AND RESILIENT GENERATION ENVIRONMENTAL COMPLIANCE & SUPPORT:

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

EMERGENCY ACTION PLAN
EMERGENCY NOTIFICATION LOG
PLANT MITCHELL ASH POND AP-1 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 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
Hydro Services					
GPC E&NR Land Department					
Supply Chain Management					
GA Safe Dams Program					

Notes

EMERGENCY ACTION PLAN
DATA RECORDING SHEET
PLANT MITCHELL ASH POND AP-1 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 Mitchell Ash Pond AP-1 Dam NID ID#: GA-04917

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