LOCATION RESTRICTION DEMONSTRATION SEISMIC IMPACT ZONE (40 C.F.R. 257.63) PLANT SCHERER ASH POND 1 (AP-1) GEORGIA POWER COMPANY

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257 and Part 261) requires the owner or operator of an existing CCR surface impoundment to make a demonstration that the facility meets certain location restrictions. Per § 257.63, the owner or operator must demonstrate that the facility is not located within a seismic impact zone; otherwise, a demonstration must be made that all structural components including liners, leachate collection and removal systems and surface water control systems are designed to resist the maximum horizontal acceleration in lithified earth material for the site. A seismic impact zone is defined as an area having a 2% or greater probability that the maximum expected horizontal acceleration, expressed as a percentage of the earth's gravitational pull (g), will exceed 0.10g in 50 years.

Based upon a review of the United States Geological Survey on-line hazard tool (found at http://earthquake.usgs.gov/hazards/apps/), structural and geotechnical design analysis by AECOM and others, and 2016 CCR Safety Factor demonstration in accordance with § 257.73, the structural components at AP-1 were demonstrated to be stable under the maximum anticipated horizontal acceleration. Opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data, and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

I hereby certify that, to the best of my knowledge, information, and belief, for Georgia Power's Plant Scherer AP-1, the seismic impact zone location restriction demonstration meets the requirements of 40 C.F.R. § 257.63(a), and that the information contained in this demonstration is true and correct and has been prepared in accordance with generally accepted good engineering practices.

No. PE040522 PROFESSIONA

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Douglas W. Carr, P.E.

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