

**LOCATION RESTRICTION DEMONSTRATION
UNSTABLE AREAS (40 C.F.R. PART 257.64)
PLANT YATES ASH POND 1 (AP-1)
GEORGIA POWER COMPANY**

Plant Yates AP-1 is subject to the timelines announced in 81 Fed. Reg. 51802 (Aug. 5, 2016). EPA's "Disposal of Coal Combustion Residuals from Electric Utilities Final Rule" (40 C.F.R. Part 257.64) requires that a CCR surface impoundment must not be located within an unstable area unless it is demonstrated that generally accepted good engineering practices have been incorporated into the design of the CCR unit to ensure that the integrity of the structural components of the CCR unit will not be disrupted. An unstable area is defined in the CCR rule as a location that is susceptible to natural or human induced events or forces capable of impairing the integrity, including structural components of some or all of the CCR unit that are responsible for preventing releases from such unit. Unstable areas can include poor foundation conditions, areas susceptible to mass movements and karst terrains.

No unstable areas have been identified at AP-1. The foundations beneath the embankments and the CCR unit generally consist of stable and competent silts and silty sands. The CCR unit is not located within karst terrain, and the site and its surrounding areas are not subject to mass movements (e.g. landslides). AP-1 has undergone closure-by-removal and the containment embankment can no longer hold surface water. The only infrastructure is a drainage pipe to remove surface water from the impoundment.

I hereby certify that for Georgia Power's Plant Yates AP-1, the unstable areas location restriction demonstration meets the requirements of 40 C.F.R. § 257.64(a).


Richard T Deason, P.E.
Atlantic Coast Consulting, Inc.

SEAL

