

**LOCATION RESTRICTION DEMONSTRATION
UNSTABLE AREAS (40 C.F.R. 257.64)
PLANT YATES ASH POND 3 (AP-3)
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 § 257.64, the owner or operator must demonstrate that the facility is not located within an unstable area; otherwise, a demonstration must be made that recognized and 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-3. 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).

I hereby certify that for Georgia Power's Plant Yates AP-3, the unstable areas location restriction demonstration meets the requirements of 40 C.F.R. § 257.64(a).


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