

**LOCATION RESTRICTIONS DEMONSTRATION
UNSTABLE AREAS 391-3-4-.10(3) and 40 CFR § 257.64
PLANT BRANCH CCR LANDFILL
GEORGIA POWER COMPANY**

The US Environmental Protection Agency's (USEPA's) Final Rule for Disposal of Coal Combustion Residuals from Electric Utilities (40 CFR Part 257 and Part 261), § 257.64 and GA EPD CCR Rule, Chapter 391-3-4-.10(3), which incorporates the requirements of 40 CFR § 257.64 by reference, require that an existing or new CCR landfill, existing or new CCR surface impoundment, or any lateral expansion of a CCR unit must not be located in an unstable area unless 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. See Ga. Comp. R. & Regs. R. 391-3-4-.10(3)(b); 40 C.F.R. § 257.64(a).

The CCR Rule defines an unstable area 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".

As described in the Site Acceptability Report, the Plant Branch CCR Landfill (CCR Landfill) Site is located in the Piedmont Physiographic Province and is underlain by saprolite of the metamorphic gneiss and amphibolite bedrock. The saprolite typically consists of sandy clays and silty or clayey sands. This type of material is not prone to differential settling. There is also no evidence that any area of the CCR Landfill Site is susceptible to mass movements. This region does not contain natural sinkholes, collapsible soils, or thick organic deposits. The CCR Landfill Site does not include natural or human-made features that are known to be unstable areas. The USGS National Karst Map (2014) shows locations having karst or the potential for development of karst and pseudokarst in the contiguous United States. A review of the map showed no karst or pseudokarst in the vicinity of the CCR Landfill.

I hereby certify that the design for the CCR Landfill and its structural components at GPC's Plant Branch facility meets the requirements of GA EPD Rule 391-3-4-.10(3) and USEPA Rule 40 CFR § 257.64.



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5/24/2024

Date