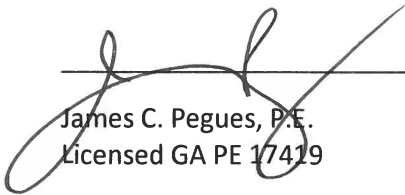


**LINER DESIGN CRITERIA
40 C.F.R. PART 257.71
PLANT MCDONOUGH ASH POND 1 (AP-1)
GEORGIA POWER COMPANY**

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257 and Part 261) subsection §257.71(a)(1) requires a demonstration as to whether or not an existing CCR surface impoundment was constructed with (i) a minimum of 2 feet of compacted soil having a hydraulic conductivity of no more than 1×10^{-7} cm/sec, (ii) a composite liner meeting the requirements of § 257.70(b), or (iii) an alternate liner meeting the requirements of §257.70(c). The CCR surface impoundment known as Plant McDonough AP-1 was not constructed with a liner that meets any of these criteria.

It should be noted that AP-1 has undergone closure in accordance with §257.102(d), no longer impounds free water nor receives CCR, and is in the process of obtaining a solid waste permit under the Georgia Rules for Solid Waste Management, 391-3-4-.10. As such, AP-1 no longer meets the definition of a CCR Surface Impoundment.

I attest that the documentation above is accurate based on current available information.


James C. Pegues, P.E.
Licensed GA PE 17419

