

**INITIAL SAFETY FACTOR ASSESSMENT**  
**40 C.F.R. PART 257.73**  
**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 §257.73(e), requires the owner or operator of an existing CCR surface impoundment to conduct periodic safety factor assessments. The owner or operator must document that the minimum safety factors outlined in §257.73(e)(1)(i) through (iv) for the critical embankment section are achieved.

Plant McDonough 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 hereby certify that the documentation above is accurate based on current available information.

James C. Pegues, P.E.  
Licensed GA PE No. 17419

