

INTRODUCTION

PLANT WANSLEY ASH POND 1 (AP-1) CLOSURE

HEARD AND CARROLL COUNTIES, GEORGIA

FOR



**Georgia
Power**

MARCH 2023



Geosyntec 
consultants

TABLE OF CONTENTS

1.	PURPOSE	1
2.	SITE BACKGROUND	1
3.	CLOSURE STRATEGY	2
4.	WEBSITE ADDRESS	2
5.	CCR PERMITTING REQUIREMENTS	3
5.1	General CCR Unit Permit Application Requirements	3
5.2	Existing CCR Surface Impoundment Permit Application Requirements	3

LIST OF ACRONYMS

AP-1	Ash Pond 1
CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
CQA	Construction Quality Assurance
GA EPD	Georgia Environmental Protection Division
GPC	Georgia Power Company
USEPA	United States Environmental Protection Agency
WTP	water treatment plant

1. PURPOSE

In November 2016, Georgia Environmental Protection Division (GA EPD) adopted amendments to the State's Rules for Solid Waste Management. These amendments require all Coal Combustion Residuals (CCR) units in Georgia to obtain a state solid waste handling permit. The amendments were from, and incorporate by reference, the provisions contained in the Federal CCR Rule administered by the United States Environmental Protection Agency (USEPA) in Title 40 of the Code of Federal Regulations (CFR) §257 (40 CFR §257). On December 16, 2019, USEPA signed notice approving the GA EPD CCR Rule, which is to be administered in lieu of the Federal CCR Rule.

Pursuant to these requirements, Georgia Power Company (GPC), the owner and operator of Plant Wansley (Plant or Site) in Heard and Carroll Counties near Carrollton, Georgia, submits the enclosed CCR permit application package for the closure of Ash Pond 1 (AP-1), the existing CCR surface impoundment at Plant Wansley, proposed to be closed through CCR removal (Closure by Removal). This permit application package has been developed in compliance with the Georgia Rules for Solid Waste Management, Chapter 391-3-4-.10(9). This section of the permit application introduces the Site, describes the closure strategy, and provides the website address where publicly accessible documents will be maintained.

2. SITE BACKGROUND

The Site is located on 5,200 acres, adjacent to the west bank of the Chattahoochee River, in Heard and Carroll Counties near Carrollton, Georgia. Operational in 1976, Plant Wansley has two coal-fired units capable of producing 1,840 megawatts of electricity. Northwest of the main Plant, two ponds, separated by a 3,000-ft long, 105-ft high earthen Separator Dike, were constructed via valley fill: (i) 590-acre storage water pond to provide water for Plant operations, and (ii) 343-acre CCR pond (AP-1) for storage of CCR generated from Plant operations. On the southwest end of AP-1 is a small (625-ft long) earthen dike that separates AP-1 from a pond constructed to receive stormwater runoff diverted away from AP-1. Adjacent to this dike is the emergency outflow for AP-1 which sits at elevation 802 ft NAVD88. Upon Plant startup in 1976, process flows, containing both fly ash and bottom ash resulting from the coal burning process, were sluiced from the Plant and deposited into AP-1. In 2008, two temporary gypsum storage cells were constructed on top of the CCR delta within AP-1, adjacent to the Separator Dike.

Historically, AP-1 received CCR, including fly ash, bottom ash, boiler slag, and gypsum, along with the byproduct produced from flue gas desulfurization (synthetic gypsum), as well as other low-volume and uniquely associated waste streams produced by the Plant during coal combustion operations. Sluicing of CCR into AP-1 ceased in April 2019 and all burning of coal ceased at Plant Wansley in August 2022 following Public Service Commission approval. The present inventory of CCR within AP-1 is approximately 15.9 million cubic yards. As stated in the Notification of Intent to Initiate Closure, dated April 17, 2019, GPC intends to close AP-1. That notice will be updated to indicate that the closure strategy for AP-1 has changed from closure in place to closure by removal of CCR, as detailed in this permit application.

3. CLOSURE STRATEGY

Pursuant to both the Federal and State Regulations, GPC is closing AP-1 at the Site, as well as all CCR ponds across its fleet of current and former coal fired generating units. GPC is proposing to close Plant Wansley AP-1 as reflected in this permit application package using a Closure by Removal approach. The following details a list of key closure steps identified for the closure of AP-1:

- Site preparation, including but not limited to, clearing trees, grading, constructing access roadways and laydown construction areas, and installing initial erosion and sediment controls;
- Installation, testing, start-up, and operation of the AP-1 water treatment plant (WTP);
- Removal of the full volume of CCR to its bottom in AP-1 as defined by the visual interface between CCR and underlying native soils with the complete drawdown of the free pool within AP-1;
- Removal of a minimum six inches of additional soils after reaching the CCR/native soil interface;
- Performing Construction Quality Assurance (CQA) activities to ensure removal of visible CCR and minimum six-inch soil layer in accordance with the CQA Plan;
- Placement of all excavated materials into the GA EPD approved onsite CCR landfill (note the Existing CCR Landfill onsite will be modified and permitted with GA EPD under a separate application process) or other solid waste facility approved to accept CCR;
- Restoration of the base grades of the impoundment with hydroseed;
- Addition of riprap and berm along the Separator Dike; and
- Refill of the former AP-1 via natural processes for potential plant uses.

4. WEBSITE ADDRESS

The information applicable to Plant Wansley AP-1 that is required to be posted on a publicly accessible internet site is found, and will continued to be posted, at the following GPC website address:

<https://www.georgiapower.com/company/environmental-compliance/ccr-rule-compliance-data/ccr-rule-compliance-plant-list/plant-wansley.html>

5. CCR PERMITTING REQUIREMENTS

GPC has prepared this permit application for the Closure by Removal of AP-1 to address the GA EPD CCR Rules specified for existing surface impoundments as required in 391-3-4-.10(9)b and 391-3-4-.10(9)(c)(5), as follows:

5.1 GENERAL CCR UNIT PERMIT APPLICATION REQUIREMENTS

- 391-3-4-.10(9)(b)1. – *“A completed form designated by EPD.”*

The completed form is included in Section 2 of Part A of this permit application.

- 391-3-4-.10(9)(b)2. – *“Written verification that the site conforms to all local zoning or land use ordinances.”*

Zoning confirmation is included in Section 4 of Part A of this permit application.

- 391-3-4-.10(9)(b)3. – *“Property boundary survey and legal description.”*

The property boundary survey and legal description is included in the Closure Drawings (Drawing 3) in Section 8 of Part A of this permit application.

- 391-3-4-.10(9)(b)4. – *“Financial assurance mechanism meeting the criteria in Rule 391-3-4-.13.”*

In compliance with applicable securities laws and regulations, GPC will provide specific cost estimates for closure to GA EPD under separate cover. The costs will include all items necessary to complete the project in accordance with the Closure Plan. Cost estimates will be generated in current dollars and adjusted annually for inflation. GPC will provide a demonstration of financial assurance upon approval of closure cost estimate by GA EPD.

- 391-3-4-.10(9)(b)5. – *“A qualified professional engineer's certification that all application requirements have been met.”*

The Professional Engineer’s certification is included in Section 3 of Part A of this permit application.

5.2 EXISTING CCR SURFACE IMPOUNDMENT PERMIT APPLICATION REQUIREMENTS

- 391-3-4-.10(9)(c)5.(i) - *Location restriction demonstrations required by 40 CFR 257.60, 40 CFR 257.61, 40 CFR 257.62, 40 CFR 257.63, and 40 CFR 257.64.*

The location restriction demonstrations have been completed and posted on the GPC website; copies are included in CCR Postings (Section 5 of Part B of this permit application), for the following location restrictions:

- placement above the uppermost aquifer (40 CFR §257.60);
 - wetlands (40 CFR §257.61);
 - fault areas (40 CFR §257.62);
 - seismic impact zone (40 CFR §257.63); and
 - unstable areas (40 CFR §257.64).
- *391-3-4-.10(9)(c)5.(ii) - Description of the CCR surface impoundment's design criteria required by 40 CFR 257.71 and 40 CFR 257.73.*

A permanent identification marker was installed immediately adjacent to AP-1 in October 2015.

The Plant Wansley AP-1 surface impoundment is being closed by removal in accordance with State CCR Rule 391-3-4-.10(7)(b) which incorporates the Federal closure requirements in 40 CFR §257.101 and 40 CFR §257.102.

Information on the design criteria of the existing surface impoundment is posted on the GPC website under “Environmental Compliance.” Copies of the related internet postings are provided in the CCR Postings (Section 5 of Part B within this permit application).

- *391-3-4-.10(9)(c)5.(iii) - Description of how the CCR surface impoundment's operating criteria required by 40 CFR 257.80, 40 CFR 257.82, and 40 CFR 257.83 are met.*

The fugitive dust control plan, hydrologic and hydraulic capacity requirements, and inspection requirements are included in the CCR Postings (Section 5 of Part B within this permit application). Provisions of these plans that are applicable during the closure of AP-1 are included in the Closure Plan (Section 7 of Part A of this permit application).

- *391-3-4-.10(9)(c)5.(iv) - Groundwater monitoring plan in accordance with Rule 391-3-4-.10(6). Explanation of how groundwater monitoring and corrective action criteria required by 40 CFR 257.90, 40 CFR 257.91, 40 CFR 257.93, 40 CFR 257.94, 40 CFR 257.95, 40 CFR 257.96, 40 CFR 257.97, and 40 CFR 257.98 are met.*

A groundwater monitoring plan has been prepared for Plant Wansley’s AP-1 in accordance with 40 CFR §257.90, 40 CFR §257.91, and 40 CFR §257.93 through 40 CFR §257.98 and is included in Section 6 of Part A of this permit application.

- *391-3-4-.10(9)(c)5.(v) - Explanation of how closure and post-closure care requirements found in 40 CFR 257.101, 40 CFR.257.102, 40 CFR 257.103, and 40 CFR 257.104 will be met.*

The Initial Closure and Post-Closure Plan for AP-1 were prepared and posted on the GPC website. The updated Closure Plan is included in Section 7 of Part A of this permit application. A Post-Closure Plan is not required as AP-1 will be Closure by Removal.

- *Rule 391-3-4-.10(9)(c)5.(vi) - Website address for information required to be posted by 40 CFR 257.105, 40 CFR 257.106, and 40 CFR 257.107.*

The information that is required to be posted for Plant Wansley AP-1 is found on the GPC website and noted above in this Introduction.

2. APPLICATION FORM

Send completed application to:
Environmental Protection Division, Solid Waste Management Program
4244 International Parkway, Suite 104
Atlanta, GA 30354-3902

County: _____

Facility Name: _____

CCR Unit - Application for Solid Waste Handling Permit

(Please type or print)

I. APPLICANT INFORMATION

Owner's Name or Registered Corporation Name: Georgia Power Company – Plant Wansley

Facility Address: 1371 Liberty Church Road

Phone: (404) 506-6505

City: Carrollton

State: GA

ZIP Code: 30116

Authorized Official: Aaron D. Mitchell

Title: General Manger – Environmental Affairs

Mailing Address: 241 Ralph McGill Boulevard

Phone: (404) 506-6505

City: Atlanta

State: GA

ZIP Code: 20208

Email Address: gpcenv@southernco.com

Facility CCR Website(s): www.georgiapower.com

II. PROPERTY DETAILS: Complete below **and attach** a street or highway map indicating the site/facility location. Application must be accompanied by written zoning confirmation.

County: Heard and Carroll Counties

City: Carrollton

Co-ordinates (in decimal degrees, near facility center): 33.41400000 N 85.05000000 W

Property for Processing/Disposal is: Owned Leased (please complete owner details below)

Property Owner (if leased):

Address:

Phone:

City:

State:

Zip:

III. APPLICATION TYPE:

New Permit Major Modification to Existing Permit Transfer of Permit

Other

IV. CCR UNITS: List all CCR units covered under this application

Plant Wansley Ash Pond 1 (AP-1)

V. OWNERS: List all owners of the facility (defined as holding a 5% or greater share). All owners listed below must complete the Supplemental Form for O.C.G.A. 12-8-23.1(a)(3)(B)

While there are multiple co-owners, Georgia Power Company is the Applicant, an owner, and the sole operator of the facility.

Based on Georgia Power's understanding of the applicable law, only Georgia Power is submitting the Supplemental Form.

VI. SIGNATURE

Authorized Official's Signature: *A. D. Mitchell*

Date: *11/13/18*

Sworn to and subscribed before me this 13 day of November, 2018.

Notary Public: *Dana L. McClean*

My commission expires:



Send with completed application to:
 Environmental Protection Division, Solid Waste Management Program
 4244 International Parkway, Suite 104
 Atlanta, GA 30354-3902

County: _____

Facility: _____

Solid Waste Handling Permit Supplemental Form for O.C.G.A. 12-8-23.1(a)(3)(B)

(Please type or print)

I. INFORMATION: This form must be completed by each owner, or an authorized official of a corporation, holding a 5% or greater ownership share. This form must be notarized.

Name of Facility Applying for Solid Waste Handling Permit: Plant Wansley AP-1

Owner's Name or Registered Corporation Name: Georgia Power Company

Authorized Official: Aaron D. Mitchell

Title: General Manger – Environmental Affairs

Mailing Address: 241 Ralph McGill Boulevard

Phone: (404) 506-6505

City: Atlanta

State: GA

ZIP Code: 30308

Email Address: gpcenv@southernco.com

A.	Yes	No
(1) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association intentionally misrepresented or concealed any material fact in the application submitted to the director?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association obtained or attempted to obtain the permit by misrepresentation or concealment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association been convicted by final judgment, and all appeals have been exhausted, in the State of Georgia or any federal court of any felony involving moral turpitude within three years immediately preceding the application for a permit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association been convicted of any violations of any environmental laws punishable as a felony in any state or federal court within five years preceding the application for a permit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(5) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association knowingly, willfully, and consistently violated the prohibitions specified in Code Section 12-8-30.7?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(6) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association been adjudicated in contempt of any court order enforcing any federal environmental laws or any environmental laws of the State of Georgia within five years preceding the application for a permit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

B. On a separate sheet, please provide detailed explanations for each question above answered "yes."

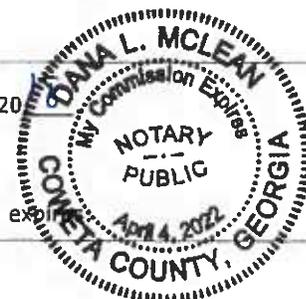
Signature: *Aaron D. Mitchell*

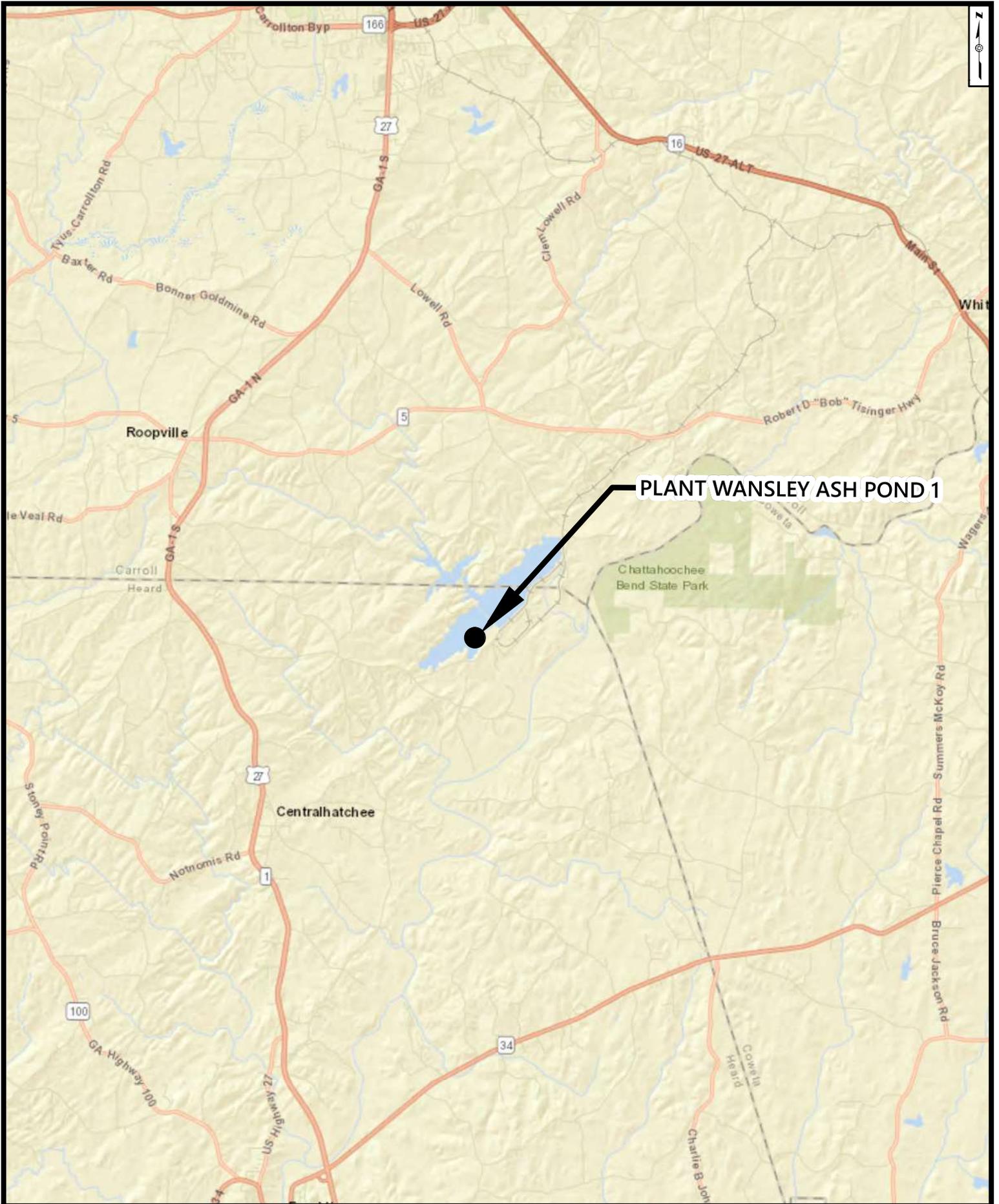
Date: *11/13/18*

Sworn to and subscribed before me this 13 day of November, 2018

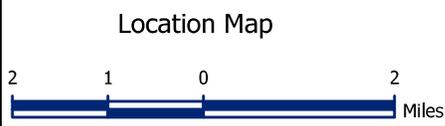
Notary Public: *Dana L. McLean*

My commission expires





PLANT WANSLEY ASH POND 1



Georgia Power Company - Plant Wansley
CCR Surface Impoundment Ash Pond 1

Date: 11/2/2018



3. PROFESSIONAL ENGINEER CERTIFICATION

March 10, 2023

Mr. Richard Dunn
Director
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive
Suite 1456
Atlanta, GA 30334-9000

**Re: Professional Engineer Certification
Rule 391-3-4.10(9)(b)5**

Dear Mr. Dunn:

Geosyntec Consultants, Inc. (Geosyntec) is an engineering firm employing professional engineers in good standing in accordance with State statutes, and the firm has experience in the design and construction of solid waste disposal facilities. Jeremy Gasser, P.E., Principal with Geosyntec, is the Engineer of Record for this permit application. He is registered as a Professional Engineer in the State of Georgia and has more than 10 years of experience in engineering.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I do hereby certify that the application requirements of the Georgia Environmental Protection Division Rule 391-3-4-.10 for Management of Coal Combustion Residuals have been met."

ATTEST:

Geosyntec Consultants, Inc.

Engineering Firm

Jeremy Gasser, P.E.

Name of Professional Engineer



Signature

March 10, 2023

Date



4. LOCAL ZONING OR LAND USE CONFIRMATION

LEE BOONE
Chairman

HEARD COUNTY COMMISSION
P.O. Box 40
215 East Court Square, Room 15
Franklin, Georgia 30217

BOARD OF
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October 04, 2017

**Mr. Jeffrey W. Cown, Branch Chief
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive, SE
Suite 1054, East Floyd Tower
Atlanta, Georgia 30334-9000**

Re: Georgia Power Permit Application-CCR Surface Impoundment

Dear Mr. Cown,

The Georgia Power CCR Surface Impoundment located at Plant Wansley, in Heard County, Georgia complies with local zoning and land use ordinances.

Sincerely,



**Lee Boone, Chairman
Heard County Board of Commissioners**

cc: O. N. Slappy (Nick)