

INTRODUCTION

Overview

The Georgia Environmental Protection Division (EPD) adopted a new Solid Waste Regulation entitled “Rule 391-3-4-.10 Coal Combustion Residuals” (State CCR Rule). This rule, effective November 22, 2016, applies to owners and operators of new and existing coal combustion residuals (CCR) disposal facilities that dispose or otherwise engage in solid waste management of CCR generated from the combustion of coal at electric utilities and independent power producers. The State CCR Rule incorporates by reference the provisions contained in the United States Environmental Protection Agency (USEPA) Title 40 of the Code of Federal Regulations (CFR) §257 (40 CFR §257) (Federal CCR Rule). Section (9) of the State CCR Rules requires all CCR units in Georgia to obtain a solid waste handling permit. Pursuant to these requirements, Georgia Power Company (GPC) has prepared this permit application for the closure of Plant Hammond Ash Pond 3 (AP-3).

GPC owns and operates a four-unit coal fired power plant in Floyd County, Georgia on Plant Hammond property, approximately one mile west of Rome, Georgia. AP-3 was commissioned in 1977, and historically received CCR from generating activities. AP-3 currently is covered with a geomembrane cap system and no longer receives waste. Per State CCR Rule 391-3-4.10(2)(a), which incorporates the definitions of the different CCR units under the Federal CCR Rule (40 CFR § 257.53), AP-3 meets the definition of an inactive CCR surface impoundment because it ceased receiving CCR before October 19, 2015 and still contained both CCR and liquids after October 19, 2015.

GPC began to comply with the requirements of the Federal CCR Rule for closure of inactive impoundments prior to the amendment of the Georgia Rules to include CCR under Solid Waste Management regulations. For AP-3, this consisted of initiating closure activities under the “3-year closure provision” provided in 40 CFR §257.100(b)(5), which was part of the Federal CCR Rule published in April 2015 but was removed from the final Federal CCR Rule published in August 2016. The final Federal CCR Rule published on August 5, 2016 also amended timeframes for location demonstrations, design and operating criteria, groundwater monitoring and corrective action, closure, and post-closure care for inactive surface impoundments. These amended timeframes apply to AP-3 because GPC met the deadlines listed in 40 CFR 257.100(e)(i)-(iii) by notifying EPD of the intent to initiate closure of AP-3 on December 7, 2015, i.e. prior to the Federal CCR Rule deadline of December 17, 2015. While the closure activities at AP-3 were initiated before Georgia adopted rules for the management of CCR (November 22, 2016), GPC conducted these activities in accordance with the requirements of State CCR Rule 391-3-4-.10.

GPC completed AP-3 closure-in-place in the second quarter of 2018 in accordance with State CCR Rule 391-3-4-.10(7)(b), which incorporates the requirements of the Federal CCR Rule 40 CFR §257.102(d). Closure of AP-3 included dewatering and grading the CCR within AP-3 to promote positive stormwater drainage and installing a geomembrane cover system.

Following closure of the unit, GPC will conduct post-closure care for a period of 30 years. This will include routine inspections of the unit and groundwater monitoring in accordance with the groundwater protection standards established in State CCR Rule 391-3-4-.10(6)(b), which reference the constituents listed in Federal CCR Rule 40 C.F.R. 257, Subpart D, Appendix III and IV.

Currently there is no planned post-closure use for the AP-3 after closure; however, the facility is being considered for solar panel installation in the future. Any future use of the property after closure will not disturb the integrity of the final cover, liner, or any other component of the containment system. Prior to any future use, EPD approval is required. Calculations are presented as an addendum to the Engineering Report in Section 3 of Part B of the permit application for the potential solar panel installation.

Plant Hammond AP-3 Permitting Requirements

This permit application addresses the closure-in-place of this facility as well as the permit application requirements of State CCR Rule 391-3-4-.10(9)(b) and State CCR Rule 391-3-4-.10(9)(c)6. for an inactive CCR surface impoundment as follows:

- *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 the 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 the permit application.

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

The property boundary survey is included in the Closure Drawings in Section 9 and the legal description is presented in the Closure Plan in Section 7 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 and post-closure care during the permit application review process as estimates are developed and finalized. It is anticipated these estimates will be available to EPD in the first half of 2019. GPC will provide a demonstration of financial assurance upon approval of closure and post-closure care cost estimates by 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 the permit application.

- *391-3-4-.10(9)(c)6.(i) – Technical data and report showing compliance with 40 CFR 257.100.*

The location restrictions are addressed in Section 1 of Part B of the permit application. The design criteria have been prepared and posted in the GPC website under Environmental Compliance and are included in the CCR Website Postings in Section 4 of Part B of the permit application. The operating criteria have been prepared and posted in the GPC website under Environmental Compliance, are included in the CCR Website Postings in Section 4 of Part B of the permit application and are discussed in the Closure Plan in Section 7 of Part A of the permit application. A Groundwater Monitoring Plan has been prepared and is included in Section 6 of Part A of the permit application. An initial Closure Plan and Post-Closure Plan have been prepared and posted in the GPC website

under Environmental Compliance. The Closure Plan and Post-Closure Plan for the State CCR Rule are included in Section 7 and Section 8 of Part A of the permit application, respectively.

- *391-3-4-.10(9)(c)6.(ii) – Technical report of geological and hydrogeological units within the disposal site.*
The Hydrogeologic Assessment Report has been prepared and included in Section 2 of Part B of the permit application.
- *391-3-4-.10(9)(c)6.(iii) – Potentiometric surface map of the water table.*
This map is provided in the Groundwater Monitoring Plan in Section 6 of Part A in the permit application.
- *391-3-4-.10(9)(c)6.(iv) – Siting report which includes identification of wetlands, floodplains, and seismic impact zones.*
The identification of wetlands and seismic impact zones are addressed in the Location Restrictions Report in Section 1 of Part B in the permit application. Floodplains are addressed in the Initial Structural Stability Assessment posted on the GPC website under Environmental Compliance and also included in the CCR Website Postings in Section 4 of Part B in the permit application.
- *391-3-4-.10(9)(c)6.(v) – Written closure plan that includes at a minimum:*
 - I. Narrative describing how the CCR unit will be closed including the elimination of free liquids and stabilization of remaining waste or by closure through removal of CCR.*
AP-3 is capped-in-place and the initial written Closure Plan and initial Post-Closure Plan have been prepared in accordance with State CCR Rule 391-3-4-.10(7)(a) and posted in the GPC website under Environmental Compliance. The Closure Plan for the State CCR Rule is included in Section 7 of Part A in the permit application. The Post-Closure Plan for the State CCR Rule is included in Section 8 of Part A in the permit application.
 - II. Identification of any pipes, utilities, or other penetrations through or beneath the impoundment. The inspection frequency and method of evaluation should be provided.*
Compliance information is located in the Closure Plan in Section 7 of Part A in the permit application.
 - III. Final cover analysis.*
The final cover analysis is located in the Engineering Report in Section 3 of Part B in the permit application.
- *391-3-4-.10(9)(c)6.(vi) – Stability analysis that, at a minimum, includes the following:*
 - I. On-site or local soil conditions that may result in significant differential settling.*
The Location Restriction Report and Hydrogeologic Assessment Report are addressed in Section 1 and Section 2 of Part B in the permit application, respectively.

II. On-site or local geologic or geomorphologic features.

The Location Restriction Report and Hydrogeologic Assessment Report are addressed in Section 1 and Section 2 of Part B in the permit application, respectively.

III. On-site or local human-made features or events, both surface and subsurface.

The Location Restriction Report and Hydrogeologic Assessment Report are addressed in Section 1 and Section 2 of Part B in the permit application, respectively. The Closure Drawings depict the human-made features and are included in Section 9 of the permit application.

- *391-3-4-.10(9)(c)6.(vi) – Groundwater monitoring plan in accordance with Rule 391-3-4-.10(6).*
The Groundwater Monitoring Plan is included in Section 6 of Part A of the permit application.
- *391-3-4-.10(9)(c)6.(vii) – Closure through removal of CCR is subject only to (v)(I) above and is not subject to the financial assurance requirements of Rule 391-3-4-.13.*
This permit application is for closure-in-place of AP-3; therefore, this does not apply and financial assurance will be provided upon approval of post-closure cost estimates by EPD.

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](#)

Facility Address: [5963 Alabama Hwy. SW](#)

Phone: [404-506-6505](#)

City: [Rome](#)

State: [GA](#)

ZIP Code: [30165](#)

Authorized Official: [Aaron D. Mitchell](#)

Title: [General Manager – Environmental Affairs](#)

Mailing Address: [241 Ralph McGill Blvd NE](#)

Phone: [404-506-6505](#)

City: [Atlanta](#)

State: [GA](#)

ZIP Code: [30308](#)

Email Address: gpcenv@southernco.com

Facility CCR Website(s):

(<https://www.georgiapower.com/CCRRuleCompliance>)

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: [Floyd](#)

City: [Rome](#)

Co-ordinates (in decimal degrees, near facility center): [34.2579°N; 85.3386°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

[Ash Pond 3 \(AP-3\)](#)

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)

Georgia Power Company

VI. SIGNATURE

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

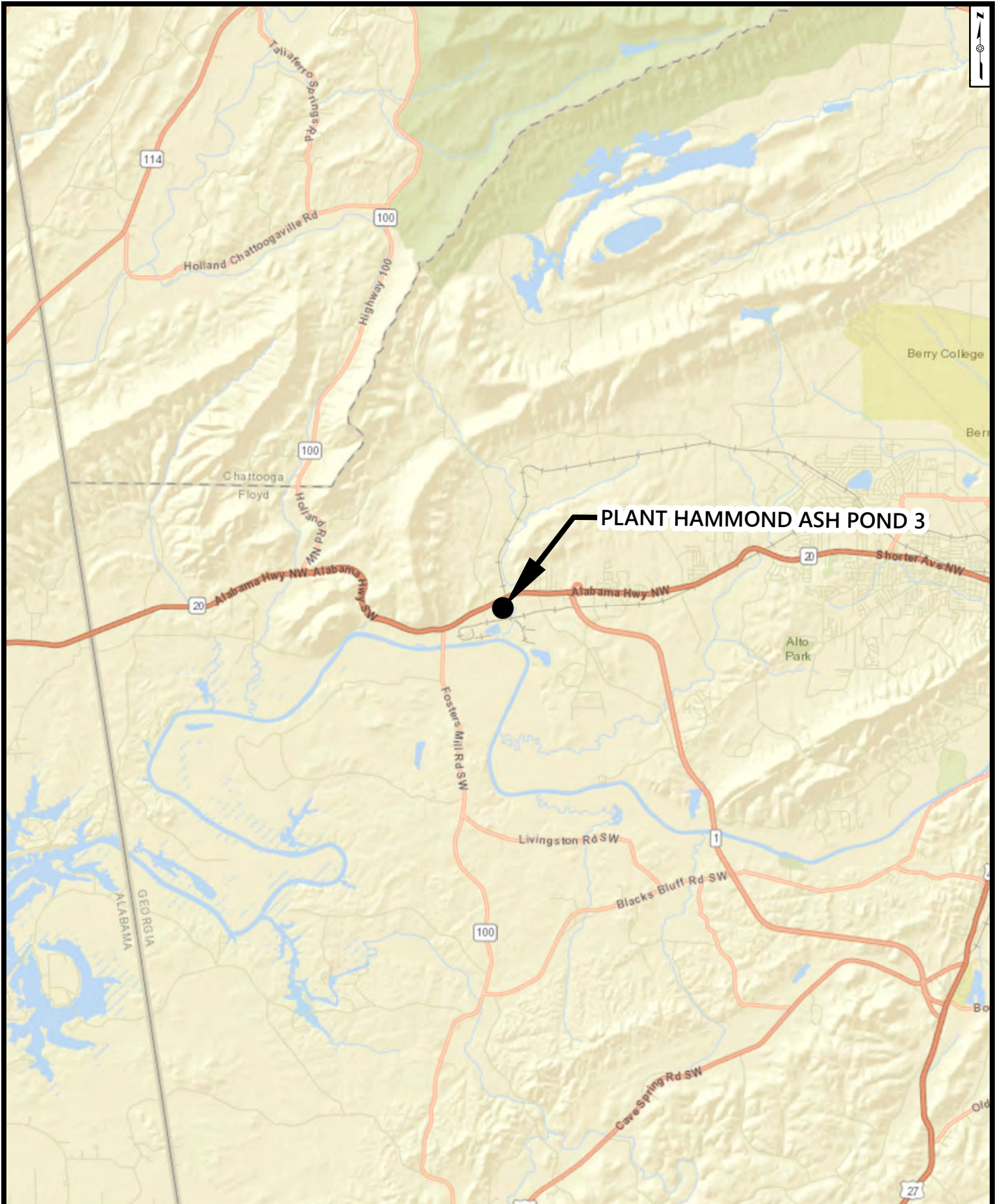
Date: *11/13/18*

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

Notary Public: *Dana L. McClean*

My commission expires:





PLANT HAMMOND ASH POND 3

Location Map



Georgia Power Company - Plant Hammond
CCR Surface Impoundment Ash Pond 3

Date: 10/31/2018



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)

1. 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 Hammond

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

Authorized Official: Aaron D. Mitchell

Title: General Manager – 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"/>	X
(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"/>	X
(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"/>	X
(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"/>	X
(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"/>	X
(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"/>	X

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

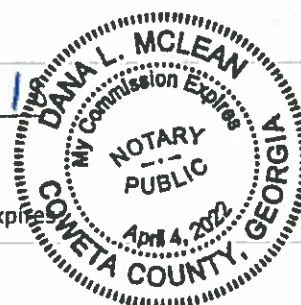
Signature: Aaron D. Mitchell

Date: 11/13/18

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

Notary Public: Dana L. McLean

My commission expires



November 2018

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

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

Dear Mr. Dunn:

Stantec Consulting Services Inc. 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 similar facilities. Jon A. Sparkman, P.E., with Stantec Consulting Services Inc. 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 24 years of experience in Engineering.

"I certify under penalty of law that this document and 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 Solid Waste Rule 391-3-4-.10 for Management of Coal Combustion Residuals have been met."

ATTEST:

Stantec Consulting Services Inc.
Engineering Firm

Jon A. Sparkman
Name of Professional Engineer

Jon A Sparkman
Signature

11-16-18
Date



Stantec Consulting Services Inc.
1110 Market Street, Suite 214A, Chattanooga, TN 37402
Phone (423) 800-5350, Fax (423) 800-5351



OFFICE OF THE COUNTY MANAGER

TWELVE EAST 4TH AVENUE, SUITE 209 • ROME, GEORGIA 30161
PHONE: 706.291.5110 • FAX: 706.291.5248 • www.romefloyd.com

January 29, 2018

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

Re: GA Power – Plant Hammond

Permit Application – CCR Surface Impoundments

Dear Mr. Cown:

The Georgia Power CCR Surface Impoundments (AP-1, AP-2, AP-3, and AP-4) located at Plant Hammond, 5963 Alabama Highway SW, Rome, Georgia comply with local zoning and land use ordinances.

Sincerely,

Jamie A. McCord
County Manager
Floyd County

BOARD OF COMMISSIONERS
RHONDA WALLACE, CHAIR
SCOTTY HANCOCK, VICE-CHAIR
WRIGHT BAGBY
ALLISON WATTERS
LARRY MAXEY

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JAMIE McCORD, COUNTY MANAGER
GARY BURKHALTER, ASSISTANT COUNTY MANAGER