

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 operation and closure of Huffaker Road (Plant Hammond) Private Industrial Landfill (referred to as Huffaker Road Landfill henceforth in this permit application).

Georgia Power Company (GPC) owns and operates the Huffaker Road Landfill in Floyd County, Georgia, approximately five miles northeast of Plant Hammond. The Huffaker Road Landfill currently operates under Solid Waste Handling Permit No. 057-022D (LI) issued by EPD on May 26, 2006, which has been amended with several minor modifications since the permit’s issuance. This permit covered the construction and operation of five (5) parcels (Parcels A, B, C, D, and E) on the Huffaker Road Landfill site to manage CCR produced at the nearby Plant Hammond coal-fired electric generating facility. Parcels A, B, and E have been constructed. Parcels A and B are geomembrane-lined facilities and currently receive CCR waste generated by Plant Hammond. Parcel E is not lined and is currently filled to approximately half of its volume and the CCR is stabilized with a temporary cover. Parcels C and D are included within the current Solid Waste Handling permit but have not been constructed. 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), Huffaker Road Landfill Parcels A, B and E meet the definition of an existing CCR landfill because it received CCR both before and after October 19, 2015. Per State CCR Rule 391-3-4.10(2)(a), Huffaker Road Landfill Parcels C and D are a lateral expansion of the existing CCR landfills because these cells are a horizontal expansion of the waste boundaries of an existing CCR landfill with construction commencing after October 19, 2015.

GPC will close Huffaker Road Landfill by capping all CCR in place (closure in place). The CCR will be stacked in phases and a cap system will be installed over the CCR once final grades are achieved. The stack will be graded at a maximum 3H:1V side slopes with benches approximately 20 feet in height. Additionally, the leachate collected from Parcels A, B, C, and D will be collected and treated during operation and following closure.

Following the closure of the unit, GPC will conduct post-closure care for a period of 30 years. This will include routine inspections of the unit, collection and treatment of leachate, 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 40 CFR 257, Subpart D, Appendix III and IV of the Federal CCR Rule.



Select documents from the current landfill permit are incorporated into this permit application. Within these select documents, CCR is also described as coal combustion byproducts (CCB), ash, or waste.

Plant Hammond Huffaker Road Landfill Permitting Requirements

This permit application addresses the operation and closure in place of Parcels A, B and E and the construction, operation, and closure of Parcels C and D. The permit application requirements of State CCR Rule 391-3-4-.10(9)(b), State CCR Rule 391-3-4-.10(9)(c)1. for a lateral expansion of a CCR landfill (Parcels C and D), and State CCR Rule 391-3-4-.10(9)(c)3. for an existing CCR landfill (Parcels A, B and E) are as follows:

Requirements for Parcels A, B, C, D, and E

- *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 in Part A of the permit application.

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

The property boundary survey and legal description are included in the Permit Drawings in Section 8 of Part A of the permit application.

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

Financial Assurance is addressed in the Closure Plan in Section 8 and in the Post-Closure Plan in Section 9 of Part A in the permit application and will be provided once EPD concurs with the closure estimates provided in the permit application.

- *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 in Part A of the permit application.

Additional Requirements for Parcels C & D

- *391-3-4-.10(9)(c)1.(i) - Technical data and report to comply with location restrictions in 40 CFR 257.60, 40 CFR 257.61, 40 CFR 257.62, 40 CFR 257.63, and 40 CFR 257.64.*

A Site Acceptability Report and Addendum 1 have been completed for Parcels C and D and are included in Section 1 in Part B of the permit application. The location restriction demonstrations will be completed prior to the initial receipt of CCR.

- *391-3-4-.10(9)(c)1.(ii) – Siting report that meets the criteria specified in “Criteria for Performing Site Acceptability Studies for Solid Waste Landfills in Georgia”, Circular 14, Appendix A. The report shall be prepared by a qualified groundwater scientist.*

A Site Acceptability Report and Addendum 1 have been completed for Parcels C and D and is included in Section 1 in Part B of the permit application.

- *391-3-4-.10(9)(c)1.(iii) – Plan and profile sheets of the disposal area. The plan and profile sheets shall include topographic maps at contour intervals of not more than five feet for the existing ground surface elevations, initial disposal area elevations, final disposal area elevations, and buffer.*

The plan and profile sheets for Parcels C and D are included in the Permit Drawings in Section 10 in Part A of the permit application.

- *391-3-4-.10(9)(c)1.(iv) – Design of a liner and leachate collection system as required by 40 CFR 257.70.*

The Engineering Report in Section 2 of Part B in the permit application includes the liner and leachate collection system design for Parcels C and D as required by State CCR Rule 391-3-4-.10(4)(a), which incorporates 40 CFR 257.70 of the Federal CCR Rule.

- *391-3-4-.10(9)(c)1.(v) – Quality assurance/quality control (QA/QC) plan for the construction of the liner system, leachate collection system, and the final cover system.*

This permit application includes a Construction Quality Assurance (CQA) Plan in Section 6 in Part A of the permit application for the liner system, leachate collection system, and final cover system for Parcels C and D.

- *391-3-4-.10(9)(c)1.(vi) – An operation plan that includes at a minimum:*

I. A fugitive dust plan in compliance with 40 CFR 257.80.

This plan has been completed for Parcels C and D and is addressed in Section 5 of Part A in the permit application.

II. A run-on and run-off control plan in compliance with 40 CFR 257.81.

Compliance information for Parcels C and D is included in Section 5 of Part A in the permit application.

III. Inspection requirements in compliance with 40 CFR 257.84.

Compliance information for Parcels C and D is included in Section 5 of Part A in the permit application.

IV. Identification of any uniquely associated wastes as listed in 40 CFR 261.4(b)(4), the estimated quantities generated by the facility, and a description of how these wastes will be managed.

Compliance information for Parcels C and D is included in Section 5 of Part A in the permit application.

V. Procedures for compliance with recordkeeping, notification, and posting of information to the internet as required by 40 CFR 257.105, 40 CFR 257.106, and 40 CFR 257.107.

Compliance information for Parcels C and D is included in Section 5 of Part A in the permit application.

VI. Procedures for updating all plans and assessments periodically as required by 40 CFR Part 257.

Compliance information for Parcels C and D is included in Section 5 in Part A of the permit application.

- *391-3-4-.10(9)(c)1.(vii) – A groundwater monitoring plan in accordance with Rule 391-3-4-.10(6).*

The Groundwater Monitoring Plan for Parcels C and D is included in Section 7 of Part A of the permit application.

- *391-3-4-.10(9)(c)1.(viii) – A closure and post-closure plan in accordance with Rule 391-3-4-.10(7).*

The Closure Plan and Post-Closure Care Plan for Parcels C and D are provided in Sections 8 and 9 in Part A of the permit application, respectively.

- *391-3-4-.10(9)(c)1.(ix) – Any additional information that may be required by the Division.*

Additional information required from EPD for Parcels C and D will be provided as requested.

Additional Requirements for Parcels A, B, & E

- *391-3-4-.10(9)(c)3.(i) - Location restriction demonstration requirements in 40 CFR 257.64.*

The location restriction demonstrations for Parcels A, B, and E have been completed and posted on the GPC website under Environmental Compliance. Supporting information is discussed in the Site Acceptability Report in Section 1 in Part B of the permit application.

- *391-3-4-.10(9)(c)3.(ii) - Description of how the CCR landfill's operating criteria requirements in 40 CFR 257.80, 40 CFR 257.81, and 40 CFR 257.84 are met.*

For Parcels A, B, and E, the dust control plan with associated annual reports, the run-on and run-off control plan, and inspections were prepared and posted in the GPC website under Environmental Compliance and compliance information is included in the Operation Plan in Section 5 of Part A of the permit application.

- *391-3-4-.10(9)(c)3.(iii) - Groundwater monitoring plan in accordance with 391-3-4-.10(6). Explanation of how groundwater monitoring and corrective action criteria required in 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 Parcels A, B, and E 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 7 in Part A of the permit application.

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

The Closure Plan and Post-Closure Care Plan for Parcels A, B and, E are provided in Sections 8 and 9 in Part A of the permit application, respectively.

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

The information required to be posted and applicable to Parcels A, B, and E is found in the GPC website under Environmental Compliance.

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): [34.2941 °N; 85.3027 °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

[Huffaker Road Landfill](#)

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

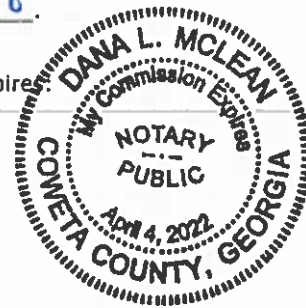
Authorized Official's Signature: *A. D. Mitchell*

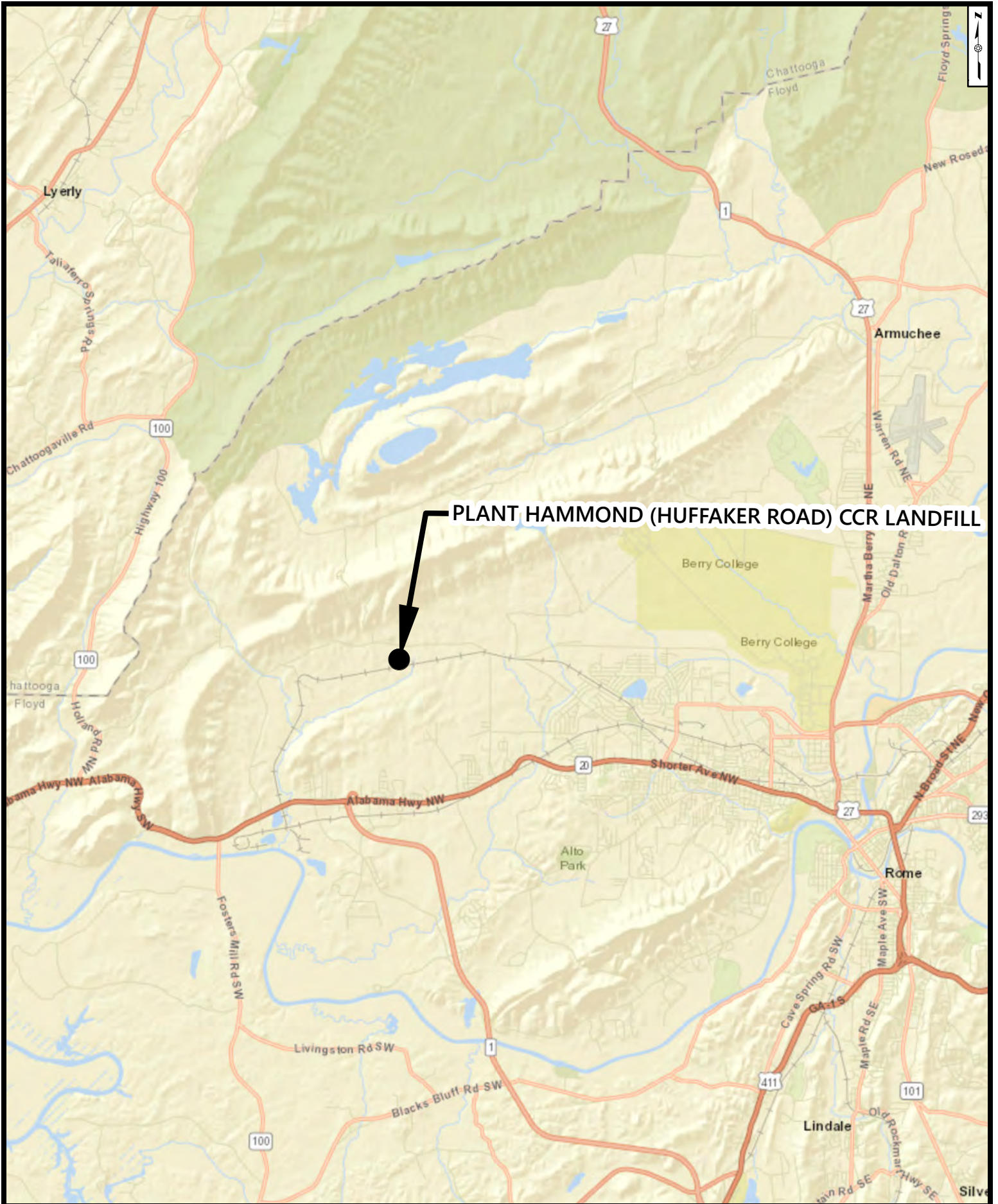
Date: *11/13/18*

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

Notary Public: *Dana L. McLean*

My commission expires





PLANT HAMMOND (HUFFAKER ROAD) CCR LANDFILL

Location Map

Georgia Power Company - Plant Hammond
CCR Landfill

Date: 11/2/2018



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)

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 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."

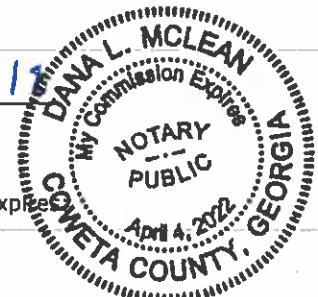
Signature: Aaron D. Mitchell

Date: 11/13/18

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

Notary Public: Dana L. McClean

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 – Huffaker Road Landfill

Permit Application – CCR Landfill

Dear Mr. Cown:

The Georgia Power Plant Hammond – Huffaker Road CCR Landfill located at 2131 Huffaker Road, Rome, Georgia complies 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

ADMINISTRATION
JAMIE McCORD, COUNTY MANAGER
GARY BURKHALTER, ASSISTANT COUNTY MANAGER