

1. INTRODUCTION

In November 2016, the Georgia Environmental Protection Division (EPD) adopted amendments to the State's Rules for Solid Waste Management. These amendments incorporated 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).

Pursuant to these amendments, Georgia Power Company (GPC) is applying to the EPD for a Solid Waste Handling Permit for the closure of Ash Pond 1 (AP-1), located at Plant Scherer in Juliette, Monroe County, Georgia. AECOM Technical Services, Inc. (AECOM) has developed this permit application for an "existing surface impoundment" in compliance with the Georgia Rules for Solid Waste Management, Chapter 391-3-4-.10 Coal Combustion Residuals (CCR). This permit application has been prepared to support the closure strategy for Plant Scherer's AP-1.

1.1 Site Background Information

Plant Scherer is located in Juliette, Georgia which is situated at the northeast edge of Monroe County and approximately 30 miles north of Macon and 60 miles southeast of Atlanta. Plant Scherer is located in a rural area and bordered by mainly agricultural and residential properties. Plant Scherer occupies approximately 12,000 acres and is situated on the north banks of the 3,600-acre Lake Juliette, a manmade lake constructed in conjunction with the plant in the early 1980s. Plant Scherer is a four-unit, coal-fired power generation facility with a capacity of 3,600 megawatts.

The four coal-fired units at Plant Scherer include flue gas desulfurization (FGD) equipment ("scrubbers"), selective catalytic reduction systems (SCRs), and baghouses. Coal Combustion Residuals, or CCRs (bottom and fly ash) and other process water generated by the plant are stored in AP-1, a 550-acre ash pond situated on-site, northwest of the main plant. The present inventory of CCR in AP-1 is approximately 16 million cubic yards.

AP-1 was commissioned in 1980 and has been in operation since the plant became commercially operational in 1982. AP-1 has two discharge structures; one is a "morning-glory" standpipe that serves as the principal spillway that normally passes decanted flows to the settling pond (referred herein as the recycle pond), and a second emergency spillway that also discharges to the recycle pond during elevated (storm related) pool levels. AP-1 is operated in conjunction and in series with the recycle pond in a water recirculating mode in which clarified effluent from the AP-1 discharges by gravity to the recycle pond, which then serves as the source of water used by the plant for operations. The recycling pond has a permitted emergency overflow discharge (Outfall 07) to Lake Juliette under the plant's NPDES permit GAD00612796.

The AP-1 perimeter embankment functions as a cross-valley dam. This embankment dike includes a continuous embankment situated on the north and east sides of AP-1 and the AP-1 south dike, situated on the south side of AP-1 and bordering Plant Scherer. The AP-1 dike has a maximum height of

approximately 100 feet and the AP-1 southern dike has a maximum height of approximately 30 feet. The minimum crest elevation of the embankment dike is El. 504.1 ft, and the upstream slopes are covered with a grout-filled erosion protection blanket that spans from El. 485 feet to the crest. The crest of the dike is surfaced with grass and a gravel access drive. Downstream slopes are covered with grass, and both upstream and downstream slopes are at a 3H:1V (horizontal to vertical) orientation. The AP-1 dike is regulated by the Georgia Department of Natural Resources Safe Dams Program, and is categorized as “Category 1 High Hazard”, with an assigned State ID 102-032-04236.

Figure A below is a location map and aerial view of Plant Scherer pointing out the various site features described above, and its proximity to Lake Juliette to the south.

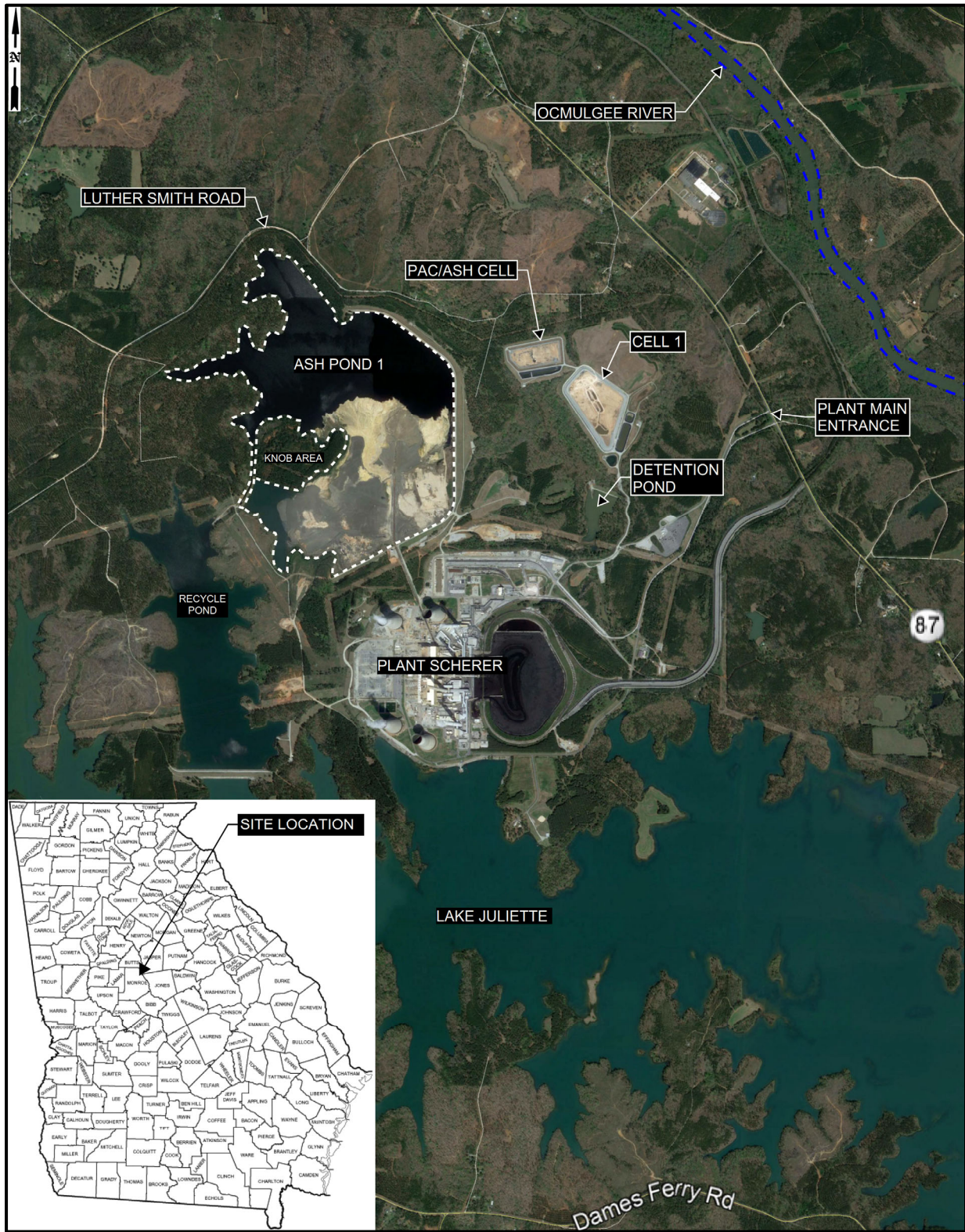


Figure A: Plant Scherer Location Map

1.2 Permitting Requirements

This permit application addresses the closure of the Plant Scherer AP-1 as well as the permit application requirements of Rule 391-3-4-.10(9)(b) and Rule 391-3-4-.10(9)(c)5 for an existing 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 and legal description is included in the Closure Drawings included in Section 9 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, Georgia Power will provide specific cost estimates for closure and post-closure care during the permit application review process as estimates are developed and finalized. Georgia Power 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)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 Georgia Power website under Environmental Compliance and are included in Section 3 of Part B of this Permit Application.
- *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.*
AP-1 is an existing unlined CCR surface impoundment and will be consolidated and closed in place in accordance with 391-3-4-.10(7)(b) which incorporates the closure requirements in 40 CFR 257.101(b)(1). The following documents have been prepared, placed in the facility's operating record, posted online, and are included in Section 3 of Part B of this permit application:

- ✓ Liner design criteria as set forth by § 257.71 was prepared and is included in Section 3 of Part B of this Permit Application.
 - ✓ A permanent identification marker as set forth by § 257.73(a)(1).
 - ✓ The Emergency Action Plan as set forth by § 257.73(a)(3). was prepared and is included in Section 3 of Part B of this Permit Application.
 - ✓ The history of construction as set forth by § 257.73(b) and (c). was prepared and is included in Section 3 of Part B of this Permit Application.
 - ✓ Initial hazard potential classification, structural stability, and safety factor assessments as set forth by § 257.73(a)(2), (b), (d), (e), and (f), were prepared and are included in Section 3 of Part B of this Permit Application. Assessments for these design criteria will be performed every five years and placed in the facility's operating record and posted on the Georgia Power Environmental Compliance website.
- 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 dust control plan and inspection requirements applicable during the closure of AP-1 are included in the Closure Plan in Part A of the permit application. The hydrologic and hydraulic capacity requirements (inflow design flood control system) was prepared and posted on the Georgia Power website under Environmental Compliance and is included in Part B of this permit application. Amendments to the inflow design flood control system will be placed in the operating record whenever there is a change in conditions that would substantially affect the written plan; however periodic revisions of the inflow design flood control system will be completed every five years.
 - 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 the AP-1 surface impoundment 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.*

This permit application includes a Closure Plan as Section 7 of Part A, providing a narrative description of the consolidation and in-place closure of AP-1. Additionally, a written Post-Closure Plan for AP-1 is included in Section 8 of Part A of this permit application.
 - 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 required to be posted and applicable to AP-1 is found in the Georgia Power website under Environmental Compliance.

Part A - Section 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

Facility Address: 10986 Highway 87

Phone: (404) 506-6505

City: Juliette

State: GA

ZIP Code: 31046

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): 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: Monroe County

City: Juliette

Co-ordinates (in decimal degrees, near facility center): Latitude: 33.075438, Longitude: -83.811815

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 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)

Georgia Power Company

*While there are multiple co-owners, Georgia Power, is the Applicant and sole operator of the Plant Scherer Ash Pond 1.

Based on Georgia Power's understanding of the applicable law, only Georgia Power is submitting information required in this application.

VI. SIGNATURE

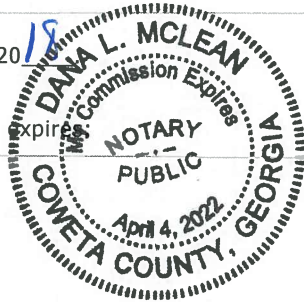
Authorized Official's Signature: *A. S. Mitchell*

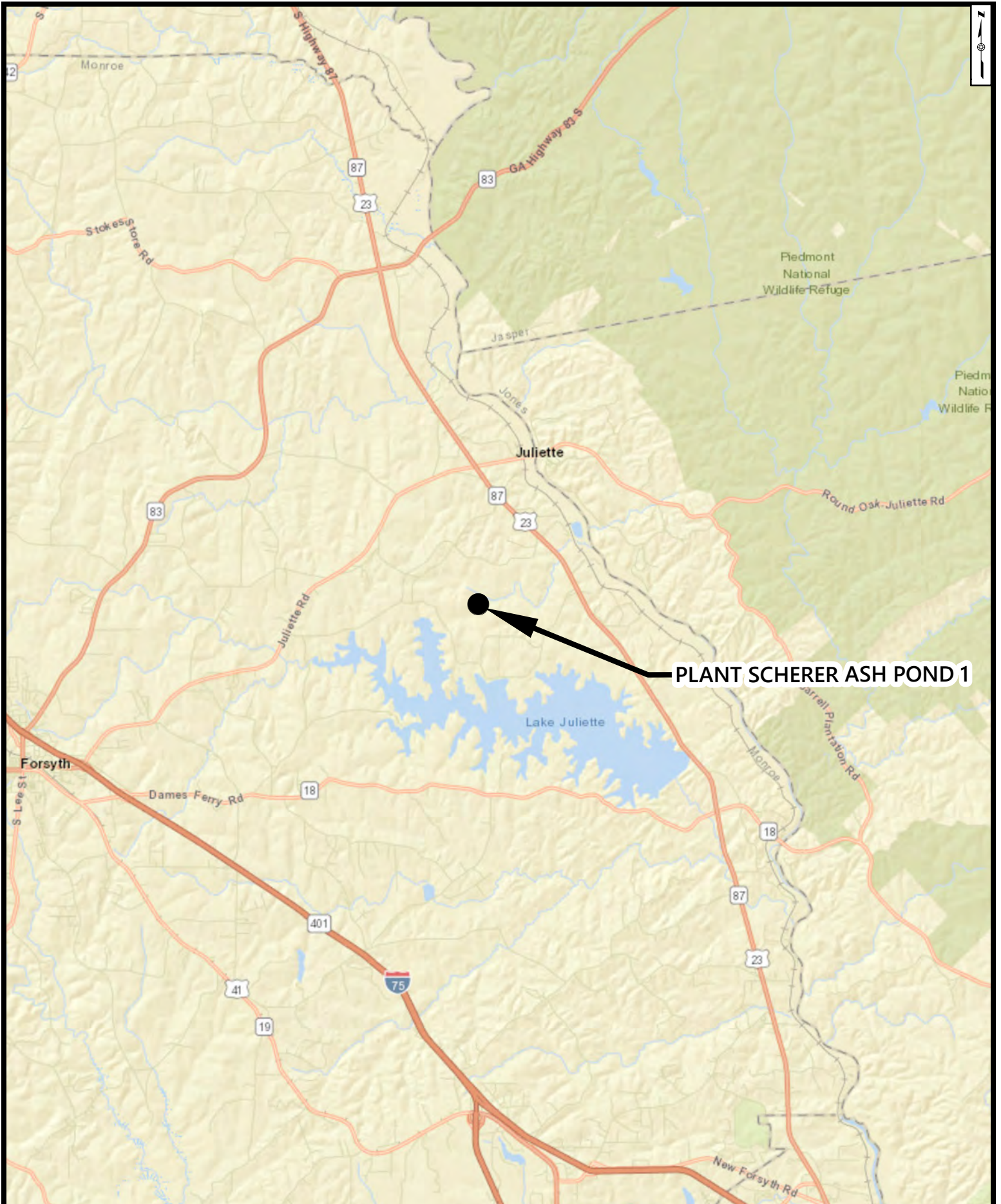
Date: *11/13/18*

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

Notary Public: *Dana L. McLean*

My commission expires





PLANT SCHERER ASH POND 1

Location Map



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

Date: 11/1/2018



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 Scherer Ash Pond 1

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."

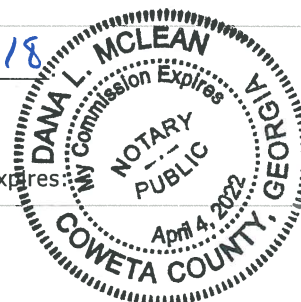
Signature: *Aaron D. Mitchell*

Date: *11/13/18*

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

Notary Public: *Dana L. McLean*

My commission expires:



Part A - Section 3

Professional Engineer Certification

October 5, 2021

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:

AECOM Technical Services, Inc. (AECOM), 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. Douglas W. Carr, with AECOM is the Engineer of Record for this permit application. He is registered in the state of Georgia and has more than 25 years of experience in Engineering.

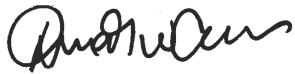
"I certify under penalty of law that this document and attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the 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:

AECOM Technical Services, Inc.
Engineering Firm

Douglas W. Carr, P.E.
Name of Professional Engineer


Signature

October 5, 2021
Date

Part A - Section 4

Local Zoning or Land Use Confirmation

**Monroe County
Board of Commissioners**

Anita S. Buice, County Manager
Ira Watts, Jr., Road Superintendent



Gregory V. Tapley, Chairman
John Ambrose, Vice Chairman
Larry C. Evans, District 1
Edward B. Rowland, District 2
George Emami, District 4

38 West Main Street - P.O. Box 189 – Forsyth, Georgia 31029 – Phone (478) 994-7000 – Fax (478) 994-7294
www.monroecountygeorgia.com

February 21, 2018

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

**Re: GA Power – Plant Scherer
Permit Application – CCR Surface Impoundment**

Dear Mr. Cown:

The Georgia Power CCR Surface Impoundment located at Plant Scherer, 10986 Highway 87, Juliette, Georgia also known on record with Monroe County Tax Assessors as Map 098, Parcel 001, complies with local zoning and land use ordinances.

Sincerely,

A handwritten signature in blue ink, appearing to read "Anita Buice".

Anita Buice
Monroe County Planning and Zoning Commission