



Prepared by
Georgia Power Company
241 Ralph McGill Blvd NE
Atlanta, Georgia 30308

**LEGACY CCR SURFACE
IMPOUNDMENT APPLICABILITY
REPORT**

PLANT ARKWRIGHT ASH POND 1 (AP-1)

November 8, 2024

CERTIFICATION STATEMENT

Pursuant to § 257.100(f)(1)(ii)(A), I hereby certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Jennifer McNelly
Vice President, Environmental Affairs
Georgia Power Company

November 8, 2024

Date

LEGACY CCR SURFACE IMPOUNDMENT APPLICABILITY REPORT

Legacy CCR Surface Impoundment Contact Information

Facility Name:	Plant Arkwright
Legacy CCR Surface Impoundment:	AP-1
Identification number:	GA Solid Waste Permit No. 011-030D(LI)
Site Location:	East of 5155 Arkwright Rd Macon, GA 31210 32.9194, -83.6983
Owner:	Georgia Power Company
Owner Address:	241 Ralph McGill Blvd NE, Atlanta, GA 30308
Owner e-mail address:	Gpcenv2@southernco.com
Owner phone number:	404-506-4750

Introduction

On April 17, 2015, the United States Environmental Protection Agency (EPA) published in the Federal Register requirements regarding the management and disposal of CCR titled “40 CFR Parts 257 and 261: Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule” (i.e., 2015 federal CCR Rule). The 2015 federal CCR Rule, which became effective on October 19, 2015, established requirements regarding the design, operation, closure, post-closure care, monitoring, and corrective action for inactive, existing, and new CCR surface impoundments and existing and new CCR landfills.

In November 2016, the Georgia Environmental Protection Division (GA EPD) adopted amendments to the state’s Rules for Solid Waste Management that incorporated the 2015 federal CCR Rule (GA EPD 391-3-4-.10, i.e., the State CCR Rule). On January 10, 2020, EPA issued notice of approval for Georgia’s CCR permit program, and on February 10, 2020, the GA EPD was authorized by EPA to operate a partial CCR state permit program in lieu of the federal CCR program. The State CCR Rule regulates certain CCR units that were not included by EPA in the final 2015 federal CCR Rule. These CCR units are subject to the requirements of the State CCR Rule, which include obtaining a solid waste permit and routine groundwater monitoring and reporting. Georgia Power submitted a CCR permit application to the GA EPD in November 2018. The CCR permit application is currently under review. GA EPD regulates closed AP-1 under the solid waste program. AP-1 is currently in post-closure care under Closure Certificate No. 011-030D(LI). Once the CCR permit is issued, it will replace the previous solid waste permit.

On May 8, 2024, EPA published in the Federal Register a final rule entitled, “Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Legacy CCR Surface Impoundments” (i.e., Legacy Rule). The Legacy Rule establishes regulatory requirements for inactive CCR surface impoundments at inactive facilities that meet the definition of “legacy CCR surface impoundment” as defined in 40 CFR § 257.53.

Because there is no information indicating AP-1 “contained both CCR and liquids on or after October 19, 2015,” AP-1 does not meet the definition of “legacy CCR surface impoundment” as set forth in 40 CFR § 257.53. Site investigations show CCR materials in AP-1 are approximately 6 to 16 feet above the potentiometric surface. As discussed further herein and in the CCR permit application, Georgia Power intends to close AP-1 in compliance with the standards in 40 CFR § 257.102(c) for closures by removal. Based on ongoing conversations with GA EPD, Georgia Power conservatively submits this applicability report because of historical operation of AP-1 as a surface impoundment prior to plant closure. While Georgia Power intends to comply with the requirements for legacy CCR surface impoundments for AP-1, Georgia Power reserves the right to reassess the status of AP-1 under the Legacy Rule as more information is obtained through the Facility Evaluation Report process. See 40 CFR § 257.100(f)(1)(i-ii).

Site Description and Background

Plant Arkwright (Site) is located in Bibb County, Georgia, approximately 6 miles northwest of Macon, Georgia. When in operation, the coal-fired power plant consisted of four 40-megawatt units. Commercial operation of the plant began in 1941 and was retired in 2002 and decommissioned in 2003. The former coal-fired plant buildings have been demolished; however, an administrative building remains. The current use of the property is limited to the closure construction activities associated with the remaining CCR units in addition to the substation and transmission infrastructure currently operated on site. AP-1 is situated along the western bank of the Ocmulgee River and the eastern bank of Beaverdam Creek. A site location map for AP-1 is presented in Figure 1.

AP-1 was constructed as a surface impoundment prior to 1958 and was closed with two feet of soil cover and vegetation in 1990, in accordance with the Georgia Solid Waste Rules in effect at that time. AP-1 was issued a Closure Certificate by GA EPD on July 30, 2010, under Closure Certificate No. 011-030D(LI) and is currently in post-closure care. Access to the site is controlled.

Closure Status

While AP-1 has been previously exempt from federal regulatory requirements, prior to November 8, 2024, it has been regulated under other applicable requirements, including Georgia’s Solid Waste Management Rules and Regulations. AP-1 currently has a final cover system and is maintained and inspected under the post-closure care requirements pursuant to the existing Post Closure Plan. In accordance with the State CCR Rule, Georgia Power submitted a CCR permit application to the GA EPD in November 2018 for the removal of CCR from AP-1. Georgia Power designated AP-1 an inactive CCR landfill under the State CCR Rule in accordance with its designation under its existing Closure Certificate. The CCR permit application is currently under review by the GA EPD. As set forth in its permitting documents, Georgia Power intends to remove AP-1 in accordance with 40 CFR § 257.102(c) and corresponding State Rule 391-3-4-.10(7)(b) and relocate the CCR to a permitted landfill and/or sell it for beneficial use by others.

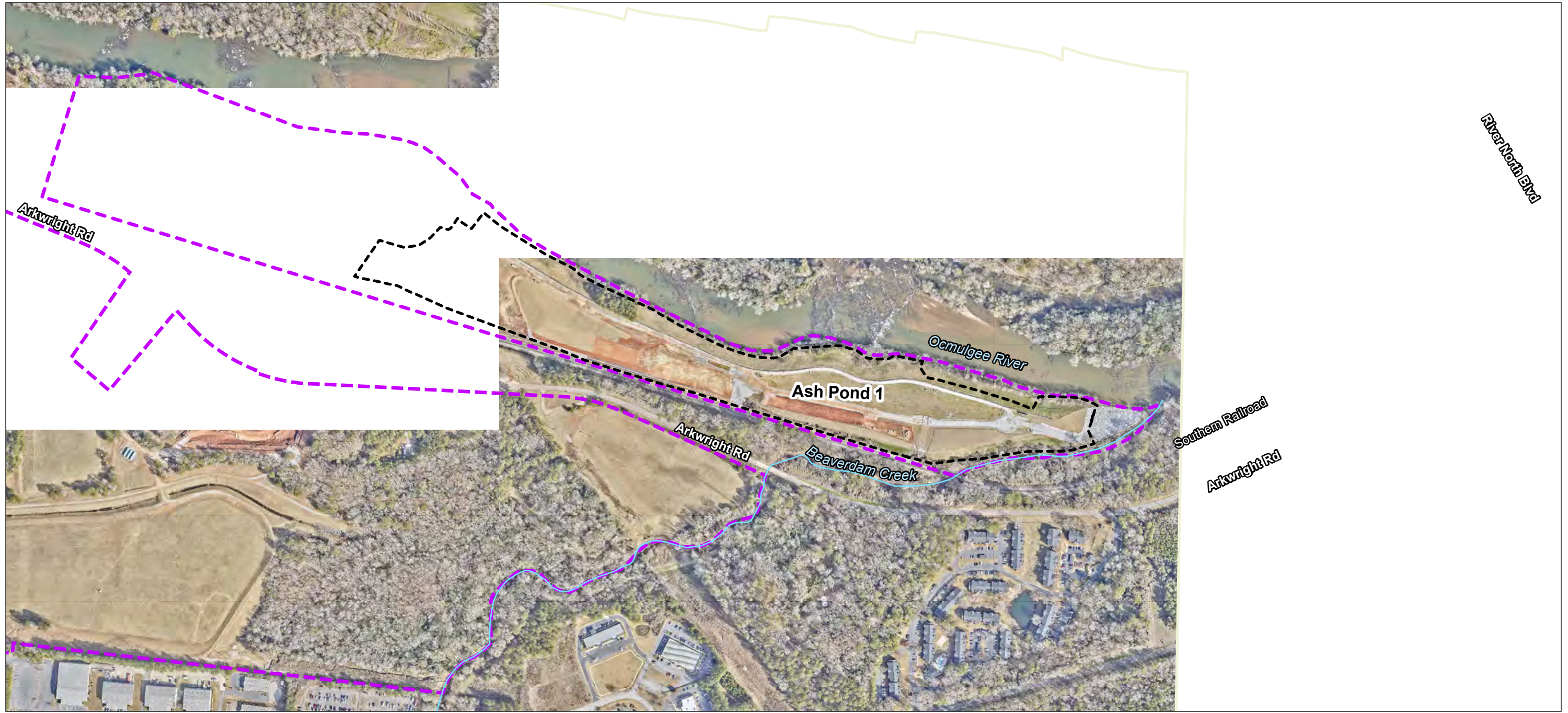
Groundwater Monitoring Program Status

Groundwater monitoring has been implemented at AP-1 in accordance with an interim Groundwater Monitoring Plan, as requested by GA EPD on March 23, 2021. AP-1 continues to complete semiannual monitoring and reporting, and Groundwater Monitoring Reports are submitted to GA EPD and posted on the Georgia Power CCR Website.

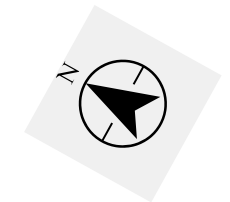
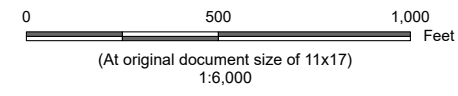
CCR Rule Compliance Data and Information Website

More information can be found at the Georgia Power CCR website located at: <https://www.georgiapower.com/company/environmental-compliance/plant-list/plant-arkwright.html>

Attachment: Plant Arkwright Site Figure



- Legend**
- Approximate Property Boundary
 - Ash Pond 1 (approximate location)
 - Beaverdam Creek
 - Limit of Client Imagery (dated 1/22/2024)



Project Location
Macon, Georgia

Prepared by DMB on 10/30/2024
TR by JK on 10/30/2024
IR by JK on 10/30/2024

Client/Project
Georgia Power
Plant Arkwright Ash Pond 1

175569434

Figure No.
1

Title
Applicability Report

Notes

1. Coordinate System: NAD 1983 StatePlane Georgia West FIPS 1002 Feet
2. Data Sources: Ash Pond Boundary, Beaverdam Creek, and Property Boundary locations provided by Southern Company Services, Wood Environment & Infrastructure Solutions, and Stantec.
3. Background: Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community. Plant imagery provided by client and is dated 1/22/2024.