



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

**LEGACY CCR SURFACE  
IMPOUNDMENT APPLICABILITY  
REPORT  
PLANT ARKWRIGHT ASH POND 3 (AP-3)**

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.



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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-3
Identification number:	GA Solid Waste Permit No. 011-025D(LI)
Site Location:	Approx. 0.3 miles east of US Hwy 23 Macon, GA 31211 32.9277, -83.7069
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-3 under the solid waste program. AP-3 is currently in post-closure care under Solid Waste Permit No. 011-025D(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.

This applicability report for AP-3 has been prepared to meet regulatory requirements of 40 CFR § 257.100(f)(1)(i-ii). AP-3 Landfill was not previously defined in or applicable to requirements of the 2015 federal CCR Rule, however, this CCR unit is subject to the federal regulations in the Legacy Rule. AP-3 is a “Legacy CCR Surface Impoundment” under 40 CFR § 257.53.

### **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-3 is located between Arkwright Road and Riverside Drive. A site location map for AP-3 is presented in Figure 1.

AP-3 was initially constructed as a surface impoundment. The Monofill east of AP-3 was approved by GA EPD in January of 1994 under the Solid Waste Handling Permit No. 011-025D(LI) as a private industrial landfill to accept only waste from Georgia Power. AP-3 and the Monofill are adjacent to one another and in 2008, GA EPD approved a horizontal expansion that combined AP-3 and the Monofill within a single permit boundary. The combined facility AP-3 and the Monofill, were closed in accordance with solid waste regulations specified in the Georgia Rules for Solid Waste Management, Chapter 391-3-4, in effect at the time of closure in 2010. A Closure Certificate was issued by the GA EPD on August 19, 2010 for the combined AP-3 and Monofill facility. Access to the site is controlled.

### **Closure Status**

While AP-3 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-3 and the Monofill currently have final cover systems and are maintained and inspected under the post-closure care requirements pursuant to the existing solid waste permit. 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 AP-3 and the Monofill. Georgia Power designated the AP-3 and the Monofill an inactive CCR landfill under the State CCR Rule in accordance with its designation under its existing Solid Waste Permit. The permit application is currently under review by GA EPD. As set forth in its permitting documents, Georgia Power intends to remove AP-3 and the Monofill 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.

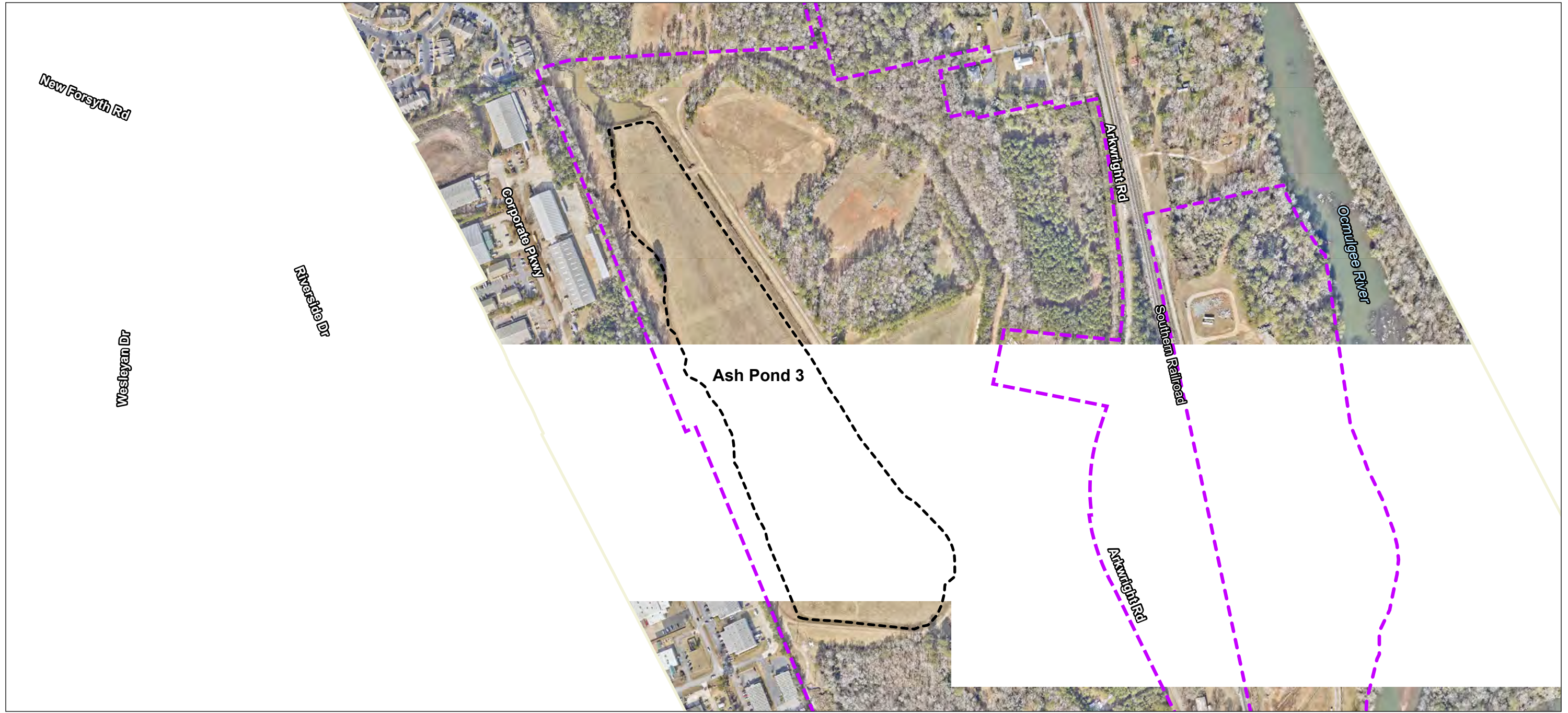
### **Groundwater Monitoring Program Status**

Groundwater monitoring has been implemented at AP-3 and the Monofill in accordance with the State CCR Rule that incorporates the 2015 federal CCR Rule by reference. The CCR background conditions were established between 2016 and 2018. AP-3 and the Monofill continue to complete semiannual monitoring and reporting in accordance with the State CCR Rule. Groundwater Monitoring Reports are submitted to GA EPD and posted on the Georgia Power CCR Website.

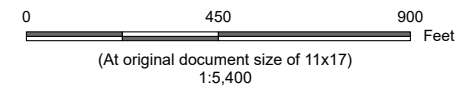
## **CCR Rule Compliance Data and Information Website**

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 3 (approximate location)
  - 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 3

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 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.