PERIODIC INFLOW DESIGN FLOOD CONTROL SYSTEM PLAN 391-3-4-.10(5) AND 40 C.F.R. PART 257.82 PLANT HAMMOND ASH POND 3 (AP-3) GEORGIA POWER COMPANY

The Federal CCR Rule and the Georgia CCR Rule (391-3-4-.10) require the owner or operator of an existing CCR surface impoundment to design, construct, operate and maintain an inflow design flood control system capable of adequately managing flow during and following the peak discharge of the specified inflow design flood. See 40 C.F.R. § 257.82(c); Ga. Comp. R. & Regs. r. 391.3-4-.10(5)(b). A direct final rule revision to a partial vacatur of the Final Rule became effective on October 4, 2016. This revision eliminated the exemption for inactive CCR surface impoundments and required such units to meet the same requirements as existing CCR surface impoundments. The owner or operator must prepare an inflow design flood system written plan documenting how the inflow design flood control system has been designed and constructed. In addition, the Rules require periodic inflow design flood control system plans within 5 years of development of the previous plan. See 40 C.F.R. § 257.82(c)(4); Ga. Comp. R. & Regs. r. 391.3-4-.10(5)(b).

The CCR surface impoundment known as Plant Hammond AP-3 is located in Floyd County, Georgia, approximately 10 miles west of Rome on Plant Hammond property. AP-3 was formed by an engineered perimeter dike around all sides. Plant facilities (now retired) are located to the southwest of the impoundment. A church is located immediately west. The Coosa River is located approximately 1750 feet to the south of the impoundment. In the early 1980's, AP-3 was converted into a dry ash disposal area and in the early 1990's stopped receiving CCR materials.

AP-3 has now been closed in place by grading the CCR to promote positive stormwater drainage and constructing a cover system in accordance with §257.102(d). With this final cover system in place, AP-3 is no longer designed to, nor has the ability to, impound water; therefore, it no longer functions as a surface impoundment. On December 13, 2018, a Final CCR Surface Impoundment Closure Construction Certification Report was submitted to the Georgia Environmental Protection Division.

Since AP-3 no longer has the ability to impound water, and the perimeter embankments prevent flow onto the closed unit from adjoining properties, there is no flow into the CCR unit during and following the inflow design flood, and no need to adequately manage flow from an inflow design flood, as required by § 257.82. Therefore, Inflow Design Flood calculations as required by § 257.82(c)(1) cannot be performed.

I hereby certify that the inflow design flood control system plan meets the requirements of 40 C.F.R. § 257.82.

James C. Pegu

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