

**PERIODIC SAFETY FACTOR ASSESSMENT**  
**391-3-4-.10(4) and 40 C.F.R. PART 257.73**  
**PLANT HAMMOND ASH POND 3 (AP-3)**  
**GEORGIA POWER COMPANY**

The Federal CCR Rule, and, for Existing Surface Impoundments where applicable, the Georgia CCR Rule (391-3-4-.10) require the owner or operator of a CCR surface impoundment to conduct initial and periodic safety factor assessments. *See* 40 C.F.R. § 257.73(e); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)<sup>1</sup>. 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 conduct an assessment of the CCR unit and document that the minimum safety factors outlined in § 257.73(e)(1)(i) through (iv) for the critical embankment section are achieved. In addition, the Rules require a subsequent assessment be performed within 5 years of the previous assessment. *See* 40 C.F.R. § 257.73(f)(3); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)<sup>1</sup>.

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 40 C.F.R. § 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 EPD.

As AP-3 is no longer designed to, nor has the ability to, impound water, factor of safety analyses for long term maximum storage pool (static) and maximum surcharge pool (static) can no longer be performed. Stability analyses performed prior to closure using a more conservative seismic coefficient (0.17g vs.

<sup>[1]</sup> In a typographical error, 391.3-4.10(4)(b) references the "structural integrity criteria in 40 CFR 247.73," when the reference to such criteria should be 40 CFR 257.73.

0.07g) indicated the factor of safety for seismic loading conditions was 1.4. Given AP-3 has now undergone closure in place and the closure construction did not significantly change the configuration of the perimeter embankments, no additional analysis is warranted.

The embankment is constructed of sandy clays that are not susceptible to liquefaction. Therefore, a minimum liquefaction safety factor determination was not required.

I hereby certify that the safety factor assessment was conducted in accordance with 40 C.F.R. § 257.73 (e)(1).

  
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