



**INITIAL SAFETY FACTOR ASSESSMENT  
40 C.F.R. 257.100(e)(3)(v)  
PLANT HAMMOND ASH POND 3 (AP-3)  
GEORGIA POWER COMPANY**

The Environmental Protection Agency's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257 & Part 261) was published in the Federal Register on April 17, 2015. A direct final rule revision in response to a partial vacatur of the Final Rule became effective on October 4, 2016. This revision eliminated the exemption for inactive coal combustion residual (CCR) surface impoundments and required such units to meet the same requirements as existing CCR surface impoundments. An extended timeline was given to inactive CCR surface impoundments that had prepared Notification of Intent to Initiate Closure compliant with 40 C.F.R. §257.105(i)(1), 40 C.F.R. §257.106(i)(1) and 40 C.F.R. §257.107(i)(1). 40 C.F.R. § 257.100(e)(3)(v) for inactive CCR surface impoundments requires an initial safety factor assessment to be completed as set forth by 40 C.F.R. § 257.73(e).

40 C.F.R. §257.73(e) requires the owner or operator of an existing CCR surface impoundment to conduct an initial and periodic safety factor assessments. The owner or operator of the CCR unit must conduct an assessment and document that the minimum safety factors outlined in 40 C.F.R. §257.73(e)(1)(i) through (iv) for the critical embankment section are achieved.

Capping of Hammond AP-3 has been completed, and AP-3 no longer impounds water and no longer receives waste. Cap construction activities completed on AP-3 have rendered the former surface impoundment incapable of receiving, discharging or impounding water; thus, AP-3 no longer functions as a surface impoundment thereby rendering the applicability of Rule 40 C.F.R. § 257.73(e) inconsistent with the CCR unit's current condition. Further, Georgia Power Company is also in the process of obtaining a solid waste permit for AP-3 under the Georgia Rules for Solid Waste Management, 391-3-4-.10. This closure method has eliminated the future impoundment of water, sediment, or slurry.

The Initial Safety Factor Assessment is not applicable since the unit has ceased receiving waste streams, no longer impounds free water, and no longer meets the definition of a CCR Surface Impoundment.

I hereby certify the documentation above is accurate based on current available information.

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Jonathan D. Keeling, PE  
Licensed, State of GA, PE No. 038169

