

## **APPENDIX D**



## ENVIRONMENTAL PROTECTION DIVISION

**Richard E. Dunn, Director**

**EPD Director's Office**  
2 Martin Luther King, Jr. Drive  
Suite 1456, East Tower  
Atlanta, Georgia 30334  
404-656-4713

MAR 31 2017  
**Received**

APR - 7 2017

### Environmental Affairs

Georgia Power Company  
c/o Mr. Aaron Mitchell  
Environmental Affairs Manager  
241 Ralph McGill Boulevard, BIN#10221  
Atlanta, Georgia 30308

Re: Release Notifications  
Plant Bowen, Plant Branch, Plant Hammond, Plant Kraft, Plant McDonough-Atkinson,  
Plant McIntosh, Plant McManus & Plant Yates

Dear Mr. Mitchell:

The Georgia Environmental Protection Division (EPD) has received your February 20, 2017 correspondence, along with the following Release Notifications (RN) that were submitted by Georgia Power Company (GPC) pursuant to Section 391-3-19-.04 of the Georgia Rules for Hazardous Site Response (Rules):

- October 28, 2016, HSRA Notification – Plant Bowen, 317 Covered Bridge Road, Cartersville, Bartow County, Parcel #s U001-0001-020 & U001-0001-024
- October 11, 2016, HSRA Notification – Plant Branch, 1100 Milledgeville Road, Milledgeville, Putnam County, Parcel #s 082-051, 083-021, 083-023, 086-001 & 086-002
- June 27, 2016, HSRA Notification – Plant Hammond, 5963 Alabama Highway SW, Rome, Floyd County, Parcel #E13Y053
- November 14, 2016, HSRA Notification – Plant Kraft, 155 Crossgate Road, Port Wentworth, Chatham County, Parcel #1-0727-01-001
- October 11, 2016, HSRA Notification – Plant McDonough-Atkinson, 5551 South Cobb Drive, Smyrna, Cobb County, Parcel #s 022-4049-001 & 033-4043-002
- June 27, 2016, HSRA Notification – Plant McIntosh, 981 Old Augusta Road, Rincon, Effingham County, Parcel #04800001PUO
- October 11, 2016, HSRA Notification & November 14, 2016 Supplemental Notification – Plant McManus, 1 Crispen Boulevard, Brunswick, Glynn County, Parcel #03-06321
- July 15, 2016, HSRA Notification – Plant Yates, 708 Dyer Road, Newnan, Coweta County, Parcel #s 022-4049-001 and 033-4043-002

The above referenced RNs were submitted as the result of detections of regulated substances in groundwater from monitoring locations associated with coal combustion residual (CCR) disposal units. The groundwater monitoring was required by the United States

Environmental Protection Agency "CCR Rule" (40 CFR 257, Subpart D). On November 22, 2016, the Georgia Rules for Solid Waste Management (SWM), Chapter 391-3-4, were amended to incorporate the Federal CCR Rule, thereby making the detections at the above referenced facilities subject to the SWM Rules (with the exception of Plant Kraft). Therefore, pursuant to the "Exclusions" listed in Section 391-3-19-.04(2)(i) of the Rules, the CCR monitoring results of those facilities are excluded from the notification requirements. Consequently, EPD will not evaluate those RNs in accordance with Section 391-3-19-.05 of the Rules, nor will the corresponding facilities be listed on the Hazardous Site Inventory (HSI) at this time.

Regarding the Plant Kraft property, EPD concurs with your request for this RN to remain under the regulatory oversight of the Response and Remediation Program. Considering that the Plant Kraft property is already listed on the HSI as site #10415, the November 14, 2016 RN and subsequent sampling will be managed as part of this HSI site. Therefore, EPD will not be completing a separate Reportable Quantities Screening Method determination for the Plant Kraft property at this time.

With the exception of the Plant Kraft RN, the original RNs listed above will be retained within the EPD SWM Program files. If you become aware of information not provided in the notifications that would alter EPD's determination concerning the conditions at the above referenced properties, please provide that information to EPD. If you have any questions or concerns, please contact Kevin Collins at (404) 657-8610.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Dunn", with a stylized flourish at the end.

Richard E. Dunn  
Director

C: William Cook, Program Manager, EPD SWM Program

File: EPD Solid Waste Management Program, Tradeport Office (w/ Release Notifications)  
242-0209 – Savannah Electric – Plant Kraft, HSI #10415 (Plant Kraft RN only)  
Non-HSI Files, counties listed above (letter only)

June 12, 2018

Mr. David Gibbons  
Georgia Power Company  
Environmental Affairs  
BIN 10221  
Atlanta, Georgia 30308

Plant Kraft Ash Pond 1 (AP-1)  
Certification of Coal Combustion Residuals (CCR) Removal

Mr. Gibbons,

This report is to certify the removal of all visually identifiable CCR, plus approximately six inches of residual soils beneath the CCR, from Ash Pond 1 (AP-1) at Plant Kraft. The excavation of CCR and the residual soil was performed under direct observation by Plant Kraft compliance personnel working under the supervision of a professional engineer registered in the state of Georgia.

The CCR removal from AP-1 began June 5, 2015 with the isolation of two cells within AP-1 and was completed August 22, 2016. Groundwater was encountered at various locations within AP-1 during excavation; however, visual observations of the removal of the CCR and subsequent soil continued in those areas by witnessing material within the bucket of the excavator. The residual soils were typically tan to yellow brown, light to medium gray clayey sands and white to light gray fine silty sands typical of the Coastal Plain of South Georgia. Due to the nature of the residual subgrade soils encountered during excavation, visual verification of the removal of the CCR was possible even in the select locations where groundwater was encountered.

Upon removal of the CCR and subgrade soils, the excavation was backfilled, graded and seeded to establish a vegetative cover. A topographic survey of the ash pond was then prepared and compared to historic documents detailing the extent of the pond during its operational life for additional verification of ash removal. The attached Figure 1 indicates the original layout of the serpentine cells of AP-1.



AP-1 is located along the northern property boundary of the plant site, abutting the existing fence line. The western extent is approximately 1120 ft. from the eastern corner of the fence and property line. Figure 2 indicates the subgrade topographic contours of AP-1 upon completion of excavation. Figure 3 indicates the limits of excavation relative to the existing fence line (property boundary) and the existing substation to the west. Excavation slopes of the in-place CCR were established within the limits of the pond as it existed on June 5, 2015. The remaining in-place CCR under the substation provides a beneficial use as structural fill to provide safe access and maintain the integrity of the substation yard. Figure 4 indicates the top of structural fill topographic contours within AP-1.

SCS Engineering personnel, Plant Kraft compliance personnel and Georgia Power Environmental Affairs personnel (GPC EA) performed periodic inspections of the excavation process, initial subgrade and final backfill conditions. Photographic documentation of the subgrade during and after the 6 – inch undercut was performed. Photographs representative of the CCR and subgrade removal are attached.



I hereby certify that, based on visual inspection by Plant Kraft Compliance personnel working under my direction, Georgia Power Environmental Affairs personnel, and SCS Environmental Services and Field Support personnel, all visible indications of CCR materials, plus approximately six inches of residual soils underneath the CCR materials from AP-1 at Plant Kraft have been removed.



Gary H. McWhorter P.E., GA #PE012687  
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Environmental Services and Field Support  
Land Strategy & CCR  
Southern Company Services, Inc.  
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Cell: 404-473-1036

FIGURE 1



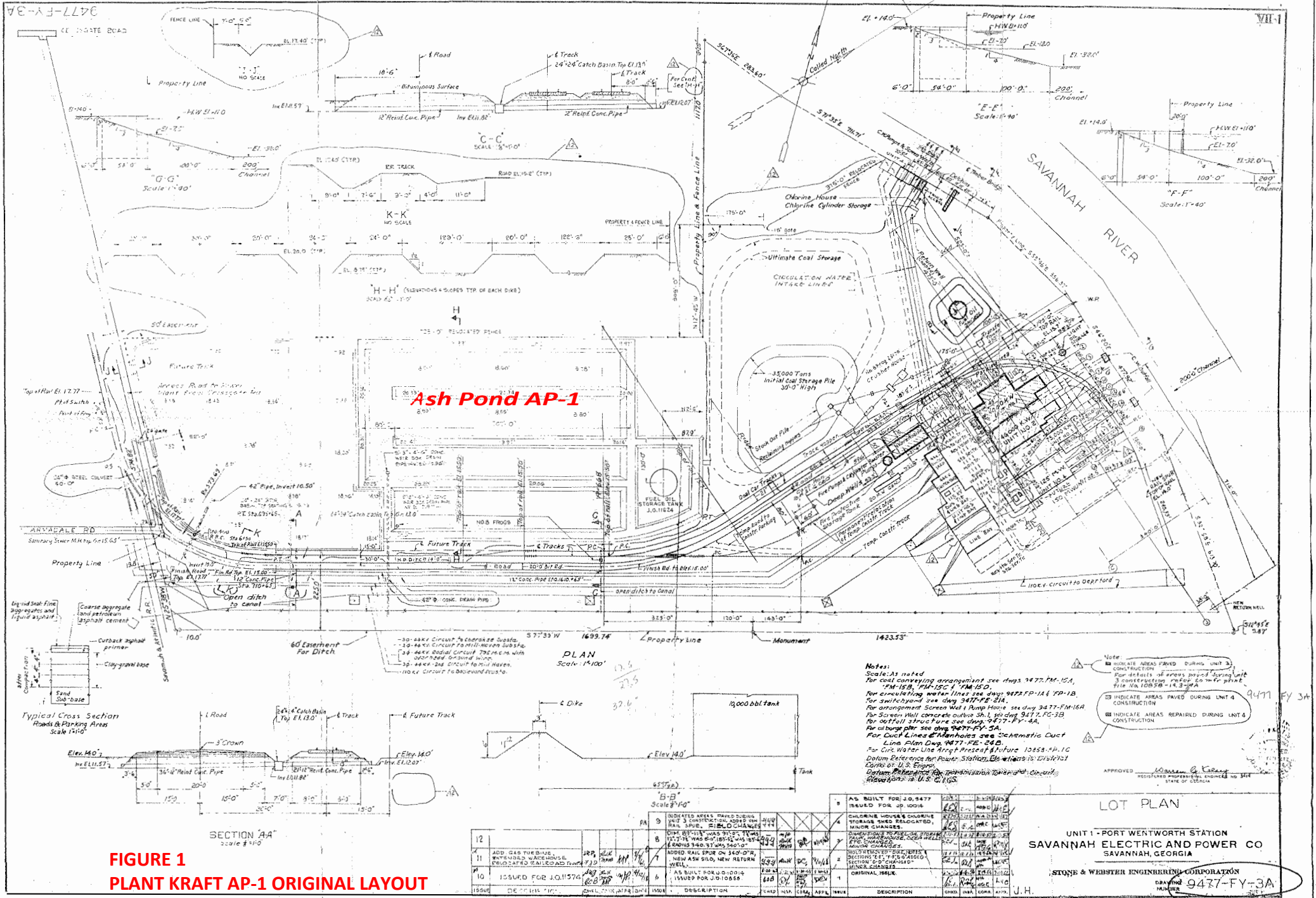
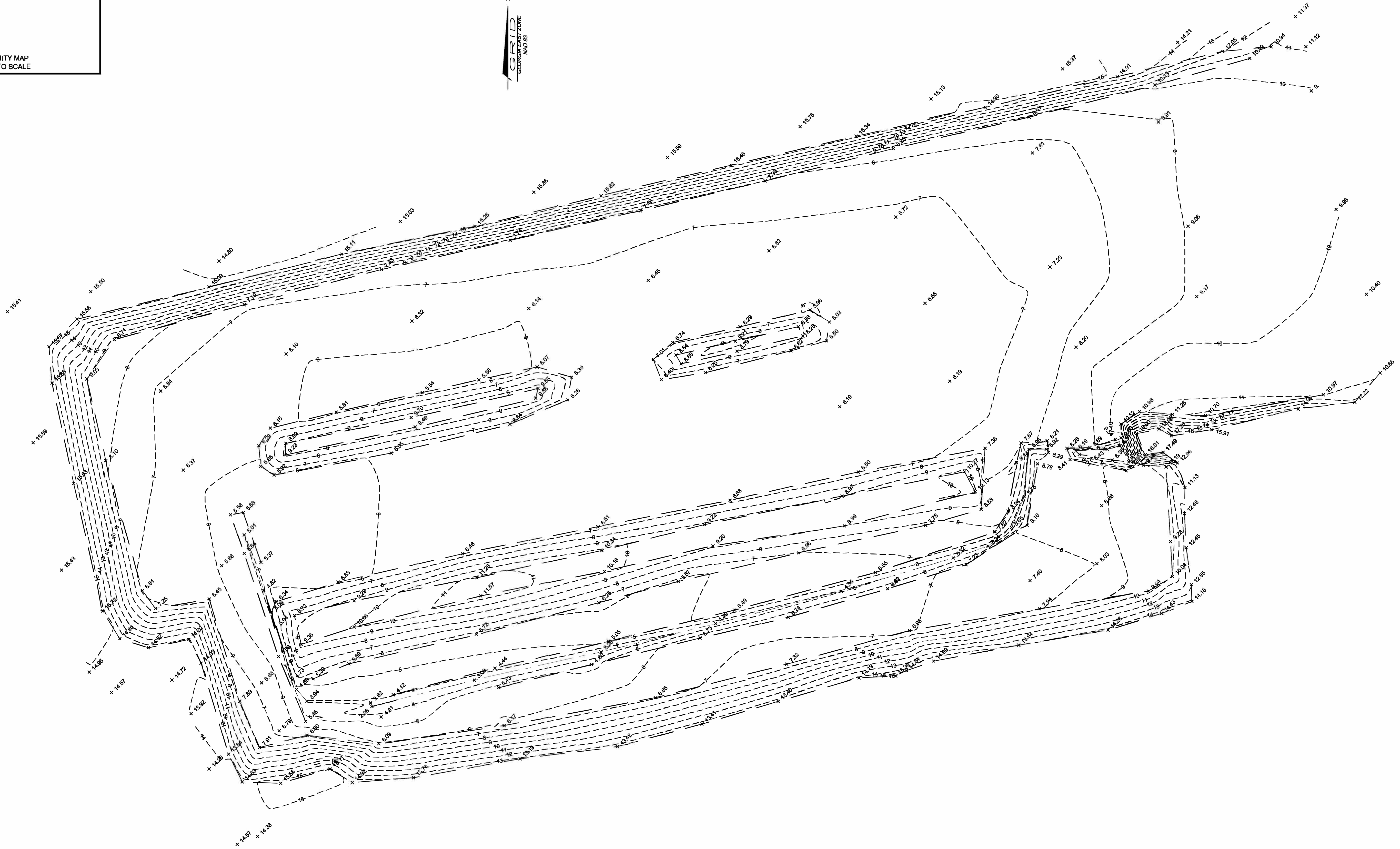




FIGURE 2

VICINITY MAP  
NOT TO SCALE



**FIGURE 2-PLANT KRAFT AP-1**  
**POST EXCAVATION TOPOGRAPHIC MAP**

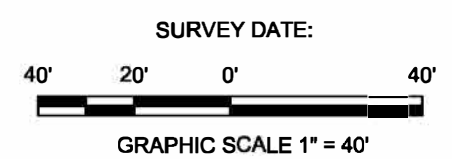
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DRAWING TITLE:

TOPOGRAPHIC  
Sheet

SCALE: 1" = 40'  
PROJECT NO: 160269  
DATE: 8/22/2016  
DRAWN BY: ENW  
CHECKED BY: ???  
SHEET NO:

1/1

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FIGURE 3



**EXCAVATION LIMITS**



**FIGURE 3 - PLANT KRAFT AP-1  
EXCAVATION LIMITS**



FIGURE 4



T:\18 Jun 2017 - 2:02pm utilities  
DRAWING PATH: G:\2017\170055\000.dwg, 170055\_Topo 6-2-2017.dwg

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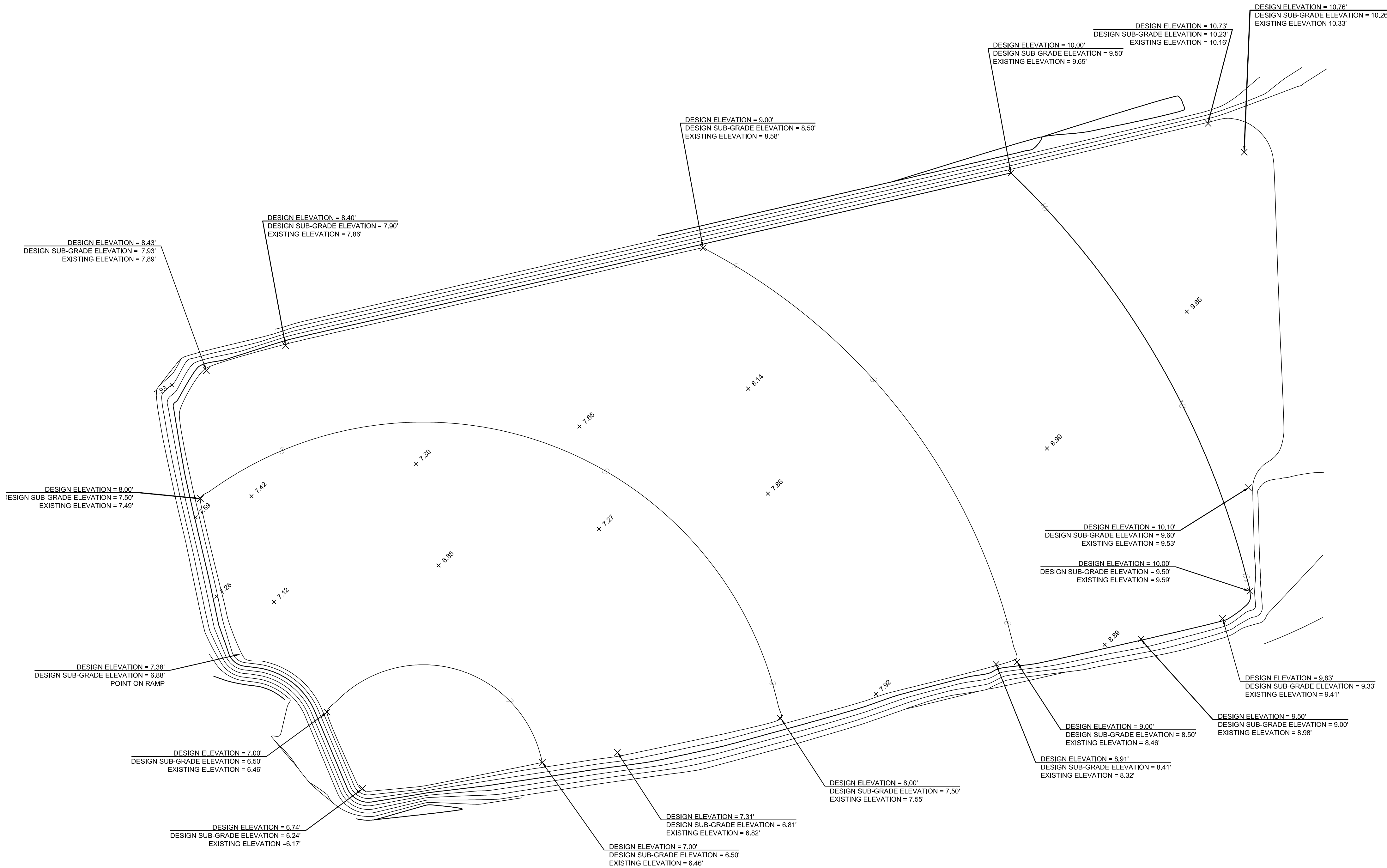
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REFERENCES:  
1.

**FIGURE 4 - PLANT KRAFT AP-1  
TOPOGRAPHIC MAP - TOP OF STRUCTURAL FILL**



50' 25' 0' 50'  
GRAPHIC SCALE 1" = 50'

A TOPOGRAPHIC EXHIBIT OF  
PLANT KRAFT ASH POND AREA  
FILL AREA 6/2/2017

DRAWING TITLE:

EXHIBIT

SCALE: 1" = 50'  
PROJECT NO: 170055  
DATE: 6/6/2017  
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VICINITY MAP  
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