

INITIAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT
40 C.F.R § 257.100(f)(2)(iii) and 40 C.F.R. § 257.73(a)(2)
PLANT ARKWRIGHT ASH POND 1 (AP-1)
GEORGIA POWER COMPANY

A rule amendment to the Federal CCR Rule became effective on November 8, 2024. *See* Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities; Legacy CCR Surface Impoundments, 89 Fed. Reg. 38950 (“Legacy Rule”). The Legacy Rule defines the term “legacy CCR surface impoundment” and establishes regulatory requirements for units that meet the definition of a legacy CCR surface impoundment. The Legacy Rule requires the owner or operator of a legacy CCR impoundment to conduct an initial hazard potential assessment and document the hazard potential of each CCR surface impoundment as either a high hazard potential CCR surface impoundment, a significant hazard potential CCR surface impoundment, or a low hazard potential CCR surface impoundment and document the basis of the classification. *See* 40 C.F.R. § 257.100(f)(2)(iii); 40 C.F.R. § 257.73(a)(2). In addition, the Rule requires a subsequent assessment be performed within 5 years of the previous assessment. *See* 40 C.F.R. § 257.73(f)(3).

The legacy CCR surface impoundment known as Plant Arkwright AP-1 is in Macon-Bibb County, Georgia, approximately 6.5 miles northwest of Macon on Georgia Power Company property. AP-1 was formed by constructing a perimeter dike along the southern portion of the site tied into higher ground on the north to form the southern portion of the surface impoundment. Additionally, a perimeter dike was constructed across the eastern edge of a valley in the far north end of the unit to form the northern portion of the surface impoundment. Plant Arkwright was retired in 2002 and decommissioned in 2003. Demolition of Plant Arkwright was completed in 2003. Publicly accessible structures are not located immediately around AP-1. AP-1 is bounded by the Ocmulgee River on the east and Beaverdam Creek on the south and west.

In 1990, a final closure cover system consisting of two (2) feet of soil was placed and graded to drain on the site. Re-grading and stabilization of the riverbank and creek bank occurred in two phases in 2004 and 2006. With the final cover system in place, AP-1 is no longer designed to, nor has the ability to impound water. On July 30, 2010, a Final CCR Surface Impoundment Closure Construction Certification Report was submitted and approved by the Georgia Environmental Protection Division.

AP-1 is closed, graded and capped such that it no longer impounds water. A failure of the AP-1 embankment would not result in probable loss of human life as buildings and structures are not located immediately downstream of AP-1. In the unlikely event of an embankment failure, economic losses and

environmental damage would likely occur due to the potential impact to waters of the United States, such as Beaverdam Creek or the Ocmulgee River. Due to this potential impact to Beaverdam Creek or the Ocmulgee River, it is Stantec's opinion that AP-1 be classified as a significant hazard potential CCR surface impoundment.

I hereby certify that the initial assessment of the hazard potential classification for Plant Arkwright AP-1 was conducted in accordance with 40 C.F.R. § 257.100(f)(2)(iii) and 40 C.F.R. § 257.73(a)(2).



Matthew Vaughan, P.E.

Licensed State of GA, P.E. No. 044791

