

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 (AP-3)
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-3 is located in Macon-Bibb County, Georgia, approximately 10 miles west of Rome on Georgia Power Company property. AP-3 was formed by constructing an approximately 30-foot tall embankment across an existing valley. Plant Arkwright was retired in 2002 and decommissioned in 2003. Demolition of Plant Arkwright was completed in 2003. A wetland and woodland area, that drains to Beaverdam Creek, is located immediately downstream of the southern AP-3 embankment. Buildings are located to the west of Georgia Power property and AP-3.

In 2009, AP-3 was closed by constructing an engineered cap consisting of a geosynthetic clay liner overlain by a geocomposite drainage medium, eighteen (18) inches of soil cover and vegetation in accordance with Georgia Solid Waste Rules 391.3-4. With this final cover system in place, AP-3 is no longer designed to, nor has the ability to, impound water. On August 19, 2010, a Final CCR Surface Impoundment Closure Construction Certification Report was submitted and approved by the Georgia Environmental Protection Division.

AP-3 is closed, graded, and capped such that it no longer impounds water. Therefore, a typical breach analysis is not appropriate. A more plausible failure scenario is a slope failure of the embankment forming the southern edge of the CCR unit. Localized sliding or slumping of the dike could occur, but it is not envisioned that this would result in a massive outward flow (flow failure) wherein a large amount of CCR

material would be released. If the embankment were to fail, it could potentially result in some release of the impounded CCR. However, this would likely be primarily confined to the wooded area downstream. The buildings to the west of Georgia Power property and AP-3 are separated from AP-3 by a section of ground backfilled approximately 2 ft to 4 ft above AP-3's top deck elevation and are not anticipated to be within the impacted area if the embankment were to fail. As there are no known habitable structures within the anticipated area impacted if the embankment were to fail, there is no potential for probable loss of life. However, there may be a potential environmental impact to the wetlands and Beaverdam Creek. Therefore, it is Stantec's opinion that AP-3 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-3 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

