PERIODIC SAFETY FACTOR ASSESSMENT
391-3-4-.10(4) and 40 C.F.R. § 257.73
PLANT BOWEN ASH POND (AP-1)
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). 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 completion of the previous assessment. *See* 40 C.F.R. § 257.73(f)(3); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b). The previous Periodic Hazard Potential Classification Assessment was placed in the Operating Record on October 15, 2021.

The CCR surface impoundment AP-1 is located on Georgia Power Company's Plant Bowen property in southern Bartow County, approximately 7 miles west-southwest of the city of Cartersville. The Notification of Intent to Initiate Closure was placed in the Operating Record on December 31, 2020, and closure has been designed to have no negative impact on the stability of the perimeter dams.

AP-1 was created by construction of an engineered perimeter dam which bounds the impoundment on the east, south and west sides, and approximately two-thirds of the north side. The remaining portions of the impoundment are contained by natural ground.

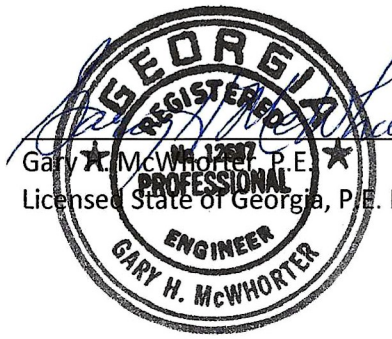
The northern 125 acres of the impoundment (North Stack Area) is a dry stack area with ash stacked above the crest of the dam. The North Stack Area is being excavated for beneficial use. The southern portion of the dam has been lowered and the recycle water pond and NPDES Discharge structure once located in the southern portion of the impoundment have been removed. CCR excavation and lined disposal cell construction are underway in the southern area of AP-1.

The engineered perimeter dam effectively isolates AP-1 from any external run-on and all runoff generated within AP-1 is managed internally.

During closure, water management within AP-1 during normal operations and under the peak discharge from the 1000-yr, 24-hr design storm is accomplished through active dewatering, stormwater, and contact water management. All contact water generated within AP-1 is collected in the excavation areas and intermediate collection ponds and routed via pumping to the contact water pond and is discharged via pumping to the facility's Wastewater Treatment System (WWTS), where it is managed and discharged in accordance with the facility's industrial discharge permit. Stormwater that does not contact CCR is routed by gravity through geomembrane-lined perimeter channels to the West Sump and discharged through pipes installed in the upper section of the west dam extending down the downstream slope to a detention pond constructed at the downstream toe. The stormwater is routed from the detention pond to Euharlee Creek. Under this water management system, no permanent maximum storage nor maximum surcharge pond levels are established, and AP-1 cannot impound water; therefore, AP-1 no longer functions as a CCR impoundment. Accordingly, the maximum storage pool, seismic, and maximum surcharge pool loading conditions specified in 40 C.F.R. § 257.73(e)(1) are no longer applicable or relevant to AP-1 and, therefore, the safety factor assessment requirement is considered satisfied.

The dams are constructed of silts and 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).



10/12/2020

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