

INITIAL SAFETY FACTOR ASSESSMENT
40 C.F.R § 257.100(f)(2)(iv) and 40 C.F.R. § 257.73(e)
PLANT MITCHELL ASH POND 2 (AP-2)
GEORGIA POWER COMPANY

A rule amendment to the Federal Coal Combustion Residuals (CCR) Rule (40 C.F.R. Part 257) 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 and periodic safety factor assessments for each CCR unit and document whether the calculated factors of safety for each unit achieve the minimum safety factors specified in 40 C.F.R. § 257.73(e)(1)(i) through (iv) for the critical section of the dam. In addition, the Rules require a subsequent assessment to be performed within 5 years of the previous assessment [See 40 C.F.R. § 257.73(f)(3)].

The Notification of Intent to Initiate Closure of Plant Mitchell Ash Pond 2 (AP-2) was placed in the Operating Record in October 2019, and AP-2 has undergone CCR removal in accordance with 40 C.F.R. § 257.102(c). The embankment has been removed, and AP-2 is no longer designed to, nor has the ability to, impound water; therefore, it no longer meets the definition of a surface impoundment. As a result, stability analysis for the critical cross section of the embankment under the long-term maximum storage pool (static) and maximum surcharge pool (static) loading conditions is not applicable. Furthermore, as there is no CCR stored in AP-2, stability analysis for seismic loading conditions and liquefaction susceptibility are not required under the requirements of 40 C.F.R. § 257.73(e).

I hereby certify that the safety factor assessment was conducted in accordance with 40 C.F.R. § 257.100(f)(2)(iv) and 40 C.F.R. § 257.73.



Ramil Garcia Mijares, Ph.D., P.E.
Licensed State of GA, PE No. PE042944