

INITIAL STRUCTURAL STABILITY ASSESSMENT
40 C.F.R § 257.100(f)(2)(iv) and 40 C.F.R. § 257.73(d)
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 structural stability assessment of the CCR unit and document whether the design, construction, operation and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded therein. See 40 C.F.R. § 257.100(f)(2)(iv); 40 C.F.R. § 257.73(d). 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 no longer receives CCR nor has the ability to impound water; therefore, it no longer meets the definition of a surface impoundment. Hence, the requirements of Rule 40 C.F.R. § 257.73(d) are not applicable for the CCR unit’s current condition.

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



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