


# CCR SURFACE IMPOUNDMENT EMERGENCY ACTION PLAN

Georgia Power Company  
Plant Hammond  
Ash Pond AP-1  
State ID: 057-037-04326  
NID: GA04307  
Floyd County, GA

I hereby certify that this Emergency Action Plan has been prepared in accordance with the requirements of the Georgia CCR Rule (391-3-4-.10) and the United States Environmental Protection Agency Coal Combustion Residual (CCR) Rule (40 C.F.R. Part 257.73).

  
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**REVISION #:** 3

## REVISION RECORD

In accordance with the Georgia Rule 391-3-4-.10(4)(b)<sup>1</sup> and 40 C.F.R. Part 257.73(a)(3), this Emergency Action Plan (EAP) must be amended whenever there is a change in conditions that would substantially affect the EAP in effect. Additionally, the EAP must be evaluated, at a minimum, every five years to ensure the information is accurate. As necessary, this EAP must be updated and a revised EAP placed in the facility's operating record as required by the Georgia Rule 391-3-4-.10(8) and 40 C.F.R. Part 257.105(f)(6).

<b>Revision Number</b>	<b>Date</b>	<b>Sections Affected/Reason</b>
0	April 17, 2017	Creation of Initial EAP
1	May 22, 2018	Response Notification Flowchart Revisions
2	April 15, 2019	Response Notification Flowchart Revisions
3	04/15/2022	As part of the periodic assessment review, modified text to incorporate applicable GA EPD CCR Rule 391-3-4-.10 requirements and to update various sections to reflect current closure related activities and plant status

<sup>[1]</sup> In a typographical error, 391.3-4.10(4)(b) references the "structural integrity criteria in 40 CFR 247.73," when the reference to such criteria should be 40 CFR 257.73.

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Data Recording Sheet

Post Incident Reporting Form

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## ACRONYMS AND ABBREVIATIONS

AP-1	Plant Hammond Ash Pond 1
AP-2	Plant Hammond Ash Pond 2
CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
EAP	Emergency Action Plan
EMA	Emergency Management Agency
EPA	Environmental Protection Agency
FRP	Fiberglass Reinforced Pipe
FERC	Federal Energy Regulatory Commission
GDOT	Georgia Department of Transportation
GEMA	Georgia Emergency Management Agency
GEOP	Georgia Emergency Operations Plan
GPC	Georgia Power Company
H:V	Horizontal:Vertical
HDPE	High-Density Polyethylene
ID	Inside Diameter
SCS	Southern Company Services
T&PS	SCS Technical & Project Solutions

## DEFINITIONS

**Adverse Consequences.** Negative impacts that may result from the failure of a dam. The primary concerns are loss of life, economic loss (including property damage), lifeline disruption and environmental impact.

**Category I Dam.** State of Georgia Safe Dams Program designation for Hazard Potential indicating that improper operation or failure would result in a probable loss of human life.

**Category II Dam.** State of Georgia Safe Dams Program designation for Hazard Potential indicating that improper operation or failure would not be expected to result in a probable loss of human life.

**Coal Combustion Residuals (CCR).** Fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers.

**CCR Surface Impoundment.** A natural topographic depression, man-made excavation, or diked area which is designed to hold an accumulation of CCR and liquids, and the unit treats, stores, or disposes of CCR.

**Dam/Dike/Embankment.** Berm or ridge of either natural or man-made materials used to prevent the movement of liquids, sludges, solids or other materials.

**Dam Failure.** A catastrophic type of failure characterized by the sudden, rapid and uncontrolled release of impounded water or the likelihood of such an uncontrolled release. It is recognized that there are lesser degrees of failure and that any malfunction or abnormality outside the design assumptions and parameters that adversely affect a dam's primary function of impounding water is properly considered a failure. These lesser degrees of failure can progressively lead to or heighten the risk of catastrophic failure. They are, however, normally amenable to corrective action.

**Imminent Failure (Condition A Emergency).** Failure of a dam/dike/embankment is imminent or has occurred.

**Potential Failure (Condition B Emergency).** A potential failure condition of a dam/dike/embankment is a developing condition, but adequate time is available to properly evaluate the problem and implement corrective actions that may alleviate or prevent failure.

**Non-Failure Condition.** A condition that will not, by itself, lead to a failure, but that requires investigation and the notification of internal and/or external personnel.

**Emergency.** A condition that develops unexpectedly, endangers the structural integrity of the dam, and requires immediate action. An emergency can lead to Adverse Consequences in the event of Imminent Failure.

**Filter.** One or more layers of granular material graded so as to allow seepage through or within the layers while preventing the migration of material from adjacent zones.

**Hazard Potential Classification.** The possible adverse incremental consequences that result from the release of water or stored contents due to failure of the diked CCR surface impoundment or mis-operation of the diked CCR surface impoundment or its appurtenances. The hazard potential classifications include high hazard potential CCR impoundment, significant hazard potential CCR surface impoundment and low hazard CCR surface impoundment, which terms mean:

*High hazard potential CCR surface impoundment* means a diked surface impoundment where failure or mis-operation will probably cause loss of human life.

*Low hazard potential CCR surface impoundment* means a diked surface impoundment where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the surface impoundment owner's property.

*Significant hazard potential CCR surface impoundment* means a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities or impact other concerns.

**Inundation Map.** A graphic representation of the inundation zone that shows the potential impact area due to a breach of the Ash Pond. The inundation maps in this procedure are based on a specific computer-modeled dam breach scenario; therefore, the boundaries depicted are estimates for that particular model. *The models are considered conservative but larger floods could potentially occur.* Please refer to Appendix B.

**Inundation Zone.** Area subject to flooding in the event of increased flows due to a dam/dike/embankment failure.

**Piping.** The progressive development of internal erosion of the dam/dike/embankment or foundation material by seepage.

**Probable Maximum Flood.** The flood that may be expected from the most severe combination of critical meteorologic and hydrologic conditions that are reasonably possible in the drainage basin.

**Sunny Day Failure.** A night or day failure that occurs during fair weather or when weather-related flooding is not occurring.

## **1.0 STATEMENT OF PURPOSE**

This Emergency Action Plan (EAP) has been prepared for the Plant Hammond Ash Pond 1 (AP-1) to meet the requirements the Georgia Rule 391-3-4-.10(4)(b) and 40 C.F.R. Part 257.73(a)(3). Part 257.73(a)(3). The EAP identifies potential safety emergency conditions at AP-1 and specifies actions to be followed to minimize potential loss of life and property damage if such conditions exist.

This EAP will provide responding personnel with:

- Pertinent information and description related to AP-1;
- Definition of events or circumstances that represent a safety emergency;
- Procedures that will be followed to detect a safety emergency;
- Notification procedures in the event of a safety emergency;
- Information to assist in decision making;
- A list of responsible persons and their respective responsibilities;
- Provisions for an annual face-to-face meeting with local emergency responders;
- Contact information for emergency agencies and other emergency responders;
- Contact information for additional resources and outside agencies; and
- A map that delineates the downstream area that could be affected in the event of a failure.



## 2.0 FACILITY DESCRIPTION

Plant Hammond once operated as a coal-fired power plant located near Coosa, Floyd County, Georgia but has been retired and is no longer operational. An overview of Plant Hammond (at time of operation) and the surrounding area is shown in Appendix A – Figure 1. This EAP covers emergency response procedures for AP-1, which once served as a CCR storage facility and a co-treatment facility, receiving return water flows from Ash Pond 2 (AP-2) and a limited amount of stormwater runoff from the plant. The Notification of Intent to Initiate Closure of AP-1 was placed in the Operating Record in Q3 2020, and the unit no longer receives the aforementioned low volume waste streams from the plant but does receive periodic flows from AP-2. Dewatering of AP-1 is underway, with the water level currently several feet below what normal operating level was.

AP-1 is approximately 35 acres in size at its normal pool elevation of 584 feet (Appendix A – Figure 2). AP-1 has earthen embankments (also referred to as dam/dike) on its east and south sides and is incised into the existing ground on its north and west sides. The dam/dikes have a maximum height of approximately 15 feet. The upstream face of the dam/dike is covered with a riprap erosion protection blanket, which extends approximately 10 feet down the slope. The crest surface is composed of grass and a gravel access drive. Downstream slopes are covered with grass. Outlets are located at the southern and southwestern portion of AP-1 and consist of:

1. The principal spillway consists of piping that discharges directly to the wastewater treatment facility located southwest of AP-1. During current closure related activities, this principal spillway is deemed inactive.
2. The auxiliary spillway for AP-1 consists of a 3'-8" by 3'-8" interior dimension reinforced concrete riser structure approximately 18 feet tall. The riser structure has an open top at approximate elevation 589 ft. There are sixteen 3-foot by 1-foot rectangular openings in the riser structure walls, with two of the sidewalls having eight openings each. The riser structure is connected to a 36-inch diameter reinforced concrete pipe (RCP). Downstream of the riser structure, a sluice gate structure is in line with the 36-inch diameter RCP and remains open during normal operating conditions. Downstream of the sluice gate structure is a manhole, with inlet invert at elevation 566.1 feet. The outlet invert in the manhole is at elevation 564.2 feet. The pipe that outlets from the manhole is a 36-inch diameter HDPE pipe, which discharges at a downstream invert of 563.1 feet into a small pool, which is connected to the Coosa River via three 72-inch diameter conduits of unknown material having estimated upstream invert elevations of 545 feet. The normal water surface elevation in the pool is at or around elevation 567 feet.

AP-1 dam/dike is classified as a Category II structure by the Georgia Department of Natural Resources – Environmental Protection Division – Safe Dams Program (Georgia Safe Dams Program) and has been assigned a Significant Hazard Potential classification under Georgia Rule 391-3-4-.10(4) and 40 C.F.R. Part 257.73 of the Environmental Protection Agency's (EPA's) Coal Combustion Residuals (CCR) Rule. These classifications, by definition, indicate that there is no probable loss of human life in the event of a dam/dike failure or misoperation of the facility, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns. There are no structures, other dams, or roads that could be impacted by the failure of the AP-1 dam/dike. The railroad tracks located to the east of Plant Hammond would be affected by the failure of the AP-1 dam/dike. The limits of potential flooding in the event of failure of the

AP-1 dam/dike can be seen on the Inundation Maps, which are included as Appendix B. The provided inundation maps were developed based on the results of routing the breach wave downstream using the computer software, HEC-RAS. HEC-RAS is a general application one-dimensional hydraulic model that can perform unsteady flow routing through an open channel system that may also include culverts, bridges, levees, tributaries, storage areas, and other dams. Unsteady flow analyses allow for flow conditions that vary temporally and spatially such as a dam breach simulation. Breach parameters such as failure time, breach width, and breach side slopes were selected from industry accepted empirical formulas. Water surface elevation data was extracted from the hydraulic model and plotted on best available LiDAR topographic information for the downstream areas.

The provided Inundation Maps were developed using computer simulation models. Normal river/lake levels and the flow from simulated dam breaches were superimposed over topographical maps to identify areas subject to flooding. ***These flood extents are provided for planning purposes only; actual flooding can vary due to actual conditions present at the time of the failure.***

## 3.0 DETECTION, EVALUATION, AND CLASSIFICATION PROCEDURES FOR EMERGENCIES

### 3.1 Inspection Schedule and Condition Detection/Evaluation

Trained personnel from Plant Hammond inspect the AP-1 dam/dikes on a regular basis to pre-emptively detect conditions, in a timely manner that could indicate a potential issue so that it can be addressed. Trained Environmental Compliance personnel perform weekly inspections; and SCS T&PS Dam Safety (Dam Safety) personnel perform semi-annual inspections.

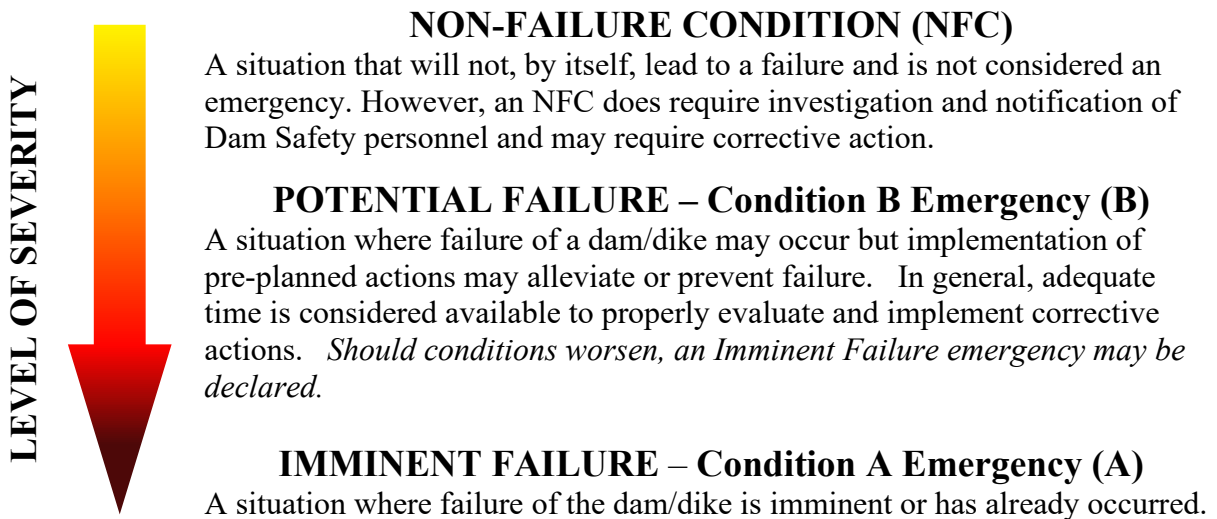
Piezometers are installed along the crest of the eastern embankment of AP-1. The piezometers are read on a regular basis by plant personnel, and the results are reported to Dam Safety for evaluation.

Personnel conducting inspections of the dams/dikes are trained on an annual basis by engineers from Dam Safety on the appropriate surveillance and monitoring requirements.

Any issues discovered during an inspection are reported to Dam Safety as prescribed in the Safety Procedure for Dams and Dikes at Fossil Generation Plants (GEN10004 REV 1). The Dam Safety Engineer(s) working with plant personnel will recommend a corrective course of action, as needed.

### 3.2 Condition Severity Classifications

AP-1 dam/dike emergencies will be classified based on the type of event, severity of the situation, and the time required to take corrective measures. This procedure covers the following severity classifications:



### 3.3 Guidance for Determining the Condition Severity Level

The following table details potential situations that could occur at the AP-1 dam/dike. *The Condition Level indicated in the right-most column corresponds with the Condition Severity Classifications in Section 3.2 above.*

<b>Event</b>	<b>Situation</b>	<b>Condition Level</b>
Embankment Overtopping	Impoundment level is 1 foot below the top of the dam/dike	B
	Water from the impoundment is flowing over the top of the dam/dike	A
Seepage	New seepage areas in or near the dam/dike	NFC
	New seepage areas with cloudy discharge or increasing flow rate	B
	Seepage with discharge greater than 10 gallons per minute	A
Sinkholes	Observation of new sinkhole in impoundment area or on embankment	B
	Rapidly enlarging sinkhole	A
Embankment Cracking	New cracks in the embankment greater than ¼-inch wide without seepage	NFC
	Cracks in the embankment with seepage	B
Embankment Movement	Visual movement/slippage of the embankment slope	NFC
	Sudden or rapidly proceeding slides of the embankment slopes	A
Instruments	Instrumentation readings beyond predetermined values	NFC
Earthquake	Measurable earthquake felt or reported on or within 50 miles of the dam/dike	NFC
	Earthquake resulting in visible damage to the dam/dike or appurtenances	B
	Earthquake resulting in uncontrolled release of water from the dam/dike	A
Security Threat	Verified bomb threat that, if carried out, could result in damage to the dam/dike	B
	Detonated bomb that has resulted in damage to the dam/dike or appurtenances	A
Sabotage / Vandalism	Damage to dam/dike or appurtenances that could adversely impact the functioning of the dam/dike	NFC
	Modification to the dam/dike or appurtenances that could adversely impact the functioning of the dam/dike	NFC
	Damage to dam/dike or appurtenances that has resulted in seepage flow	B
	Damage to dam/dike or appurtenances that has resulted in uncontrolled water release	A

## 4.0 INCIDENT RESPONSE

The following situations and conditions should be evaluated when performing condition severity detections and evaluations.

**Overtopping.** The AP-1 impoundment has a relatively small watershed area. The contributing drainage area to AP-1 is approximately 0.054 mi<sup>2</sup> and consists primarily of the dam and impoundment. AP-1 can safely store and pass the 1000-year, 24-hour storm event.

**Seepage.** Failures due to piping and/or internal erosion resulting from seepage would be detected in the early stages during the regular inspections conducted by plant personnel. Inspectors are trained to look for evidence of seepage. In addition, piezometer readings will reveal changes in subsurface water pressure. Inspection reports, including piezometer readings, are transmitted to trained dam safety engineers for evaluation. Therefore, the conditions that could lead to failures of this type would likely be discovered and corrected, making an actual failure a remote possibility.

**Slope Instability.** Slope instability would be demonstrated by sloughing of dam/dike slopes, which would be detected by Environmental Compliance personnel during their daily observations and weekly inspections. The conditions that could potentially lead to a failure of this type would also be detected in advance and corrected making an actual failure a remote possibility.

In the event that conditions are detected that could potentially lead to a dam/dike failure, the flowcharts in Appendices C (Incident Response) and D (Response Notification) will be used to respond to the situation and alert applicable personnel and emergency agencies. In that situation, local emergency management agencies (EMAs) would respond and begin warnings and evacuations as soon as possible following the declaration of a safety emergency.

### 4.1 Access to the Site

GPC and emergency personnel are able to access the AP-1 dam/dike from the main portion of Plant Hammond by paved or gravel-surfaced roadways. Figures 1 and 2 show the location of AP-1 on Plant property.

### 4.2 Response during Periods of Darkness

Personnel and equipment are able to access the site at any time. Response times would not vary significantly from daylight conditions.

### 4.3 Response during Weekends and Holidays

Personnel and equipment will be able to access the site at any time. The response times of certain personnel may be affected, but 24-hour contact information is included in the EAP for responsible personnel.

#### **4.4 Response during Adverse Weather**

The dam/dike is accessed by paved and gravel-surfaced roads and is accessible during periods of adverse weather. If severe flooding causes road closures of off-site access roads such as Hwy 20 and 100, response times may be adversely affected.

## **5.0 RESPONSIBLE PERSONS AND RESPONSIBILITIES**

Designated personnel have been trained in the use of these response procedures and are aware of their responsibilities in making the procedures effective. The chain of command and the individual responsibilities for plant personnel, public officials, and agencies are outlined below.

### **5.1 Generation Support Manager**

The Generation Support Manager is ultimately responsible for the content, effectiveness, and implementation of the response procedures. The Generation Support Manager normally serves as the Incident Commander or designates this person. *The Generation Support Manager has the authority and responsibility to direct all on-site activities.*

The Generation Support Manager or his designee will assess the conditions, direct the corrective and protective measures necessary to mitigate the condition(s), and, if necessary, declare an emergency condition. The Generation Support Manager or his designee will also declare the termination of an emergency condition. Once outside agencies are notified, the Generation Support Manager or his designee is responsible for keeping the EMAs informed of any changes in conditions. See Incident Commander responsibilities for further details.

### **5.2 Compliance & Support Manager**

The Compliance & Support Manager is the 24-hour point of contact for all plant emergencies. If the Generation Support Manager is unavailable and the Compliance & Support Manager is on-site, he/she will assume the duties and responsibilities of the Incident Commander until properly relieved by the Generation Support Manager or other designee.

### **5.3 Incident Commander**

The Generation Support Manager or Compliance & Support Manager or their designee is the Incident Commander. If neither is available, the Plant Environmental Compliance Lead will assume the duties and responsibilities of the Incident Commander until properly relieved by the Generation Support Manager.

The Incident Commander is responsible for:

1. Verifying that an emergency condition exists.
2. Assessing and declaring the emergency condition.
3. Consulting with Dam Safety to evaluate conditions and determine remediation actions.
4. Emergency Actions
  - a. If necessary, implement actions to lower the water level in the impoundment in consultation with Dam Safety.
  - b. Call-out of personnel necessary to perform the work required on plant site during the emergency.

5. Ensure the notification process as outlined in the Response Notification Flowchart (Appendix D) is completed in an expedient manner.
6. Other responsibilities include:
  - a. Establishing lines of communication from the plant to the local and state EMAs.
  - b. Ensuring emergency sources of power are available for the operation of essential equipment such as emergency lighting.
  - c. Ensuring the availability of heavy equipment and trained operators to aid in the mitigation effort.

## **5.4 Plant Security Department**

The Plant Security Department is responsible for securing company property and controlling access to company facilities. The Plant Security Department will also perform emergency notifications to Plant Environmental Compliance, the Georgia System Operator, and outside agencies as shown on Response Notification Flowchart (Appendix D). This consists of local and state EMAs. **These notifications are mandatory when an emergency condition has been declared by the Generation Support Manager.**

## **5.5 Plant Environmental Compliance**

Environmental Compliance personnel are responsible for assessing conditions, contacting the Generation Support Manager, obtaining assistance from Dam Safety, and for providing technical updates to the Incident Commander. Compliance personnel can also request assistance from GPC Environmental and Natural Resources, if conditions warrant.

## **5.6 Georgia System Operator**

The Georgia System Operator contacts the National Weather Service to inform them of conditions at the plant that may lead to potential flooding downstream.

## **5.7 Dam Safety**

Dam Safety is responsible for coordinating and providing the technical support necessary to mitigate the emergency condition and for notifying the Hydro General Manager of the emergency condition. The Dam Safety Manager shall notify the GPC Supply Chain Management and the Georgia Safe Dams Program Manager as shown on the Response Notification Flowchart (Appendix D).

## **5.8 GPC Personnel**

### **Environmental Affairs**

GPC Environmental Affairs is responsible for coordinating long-term environmental response (after the initial response) and to remediate environmental issues and provide the technical support necessary for any remediation needs. Environmental Affairs is also responsible for all communications with environmental regulatory agencies for appropriate reporting of releases to the environment and for securing variances to existing permits, if needed.



If necessary, Environmental Affairs will also help secure approved remediation contractors for the specific emergency condition that may exist. They will also provide additional support, such as emergency manpower, material, equipment, and expertise to assist in mitigation efforts, if needed

### **Corporate Communications**

GPC Corporate Communications is responsible for coordinating the GPC media response and will schedule news briefings and prepare news releases, as required. GPC Corporate Communications will also work with local and State Public Information Officers to ensure that timely, accurate, and consistent information is made available to media outlets.

### **Corporate Security**

GPC Corporate Security is responsible for supporting Plant Security personnel and contracting with local law enforcement for additional security personnel as needed.

### **Supply Chain Management**

Supply Chain Management is responsible for obtaining additional equipment and materials necessary to mitigate the emergency condition and begin the recovery process.

## **5.9 Emergency Agencies**

Local EMAs are responsible for planning and implementing evacuation and sheltering plans as well as directing search, rescue, and recovery efforts. If additional resources are required, the local agencies can contact the Georgia Emergency Management Agency (GEMA) for assistance.

The local EMAs are the point of contact between plant personnel and local jurisdictions. The EMAs are responsible for the direction and control of emergency operations at the local level and keeping local government officials informed of the status of emergency operations.

GEMA generally becomes involved in an emergency situation if the local agencies are not capable of handling the situation or if assistance is requested by a local agency or by the Governor. Refer to the "Georgia Emergency Operations Plan" (GEOP) for an explanation of specific functions. GEMA has responsibilities similar to the local EMAs but is also responsible for mobilizing state military support as well as State Disaster Center operations.

## **5.10 Law Enforcement**

Local Law Enforcement agencies are notified by the appropriate EMA. GEMA notifies the State Patrol as well as the Georgia Department of Transportation (GDOT). Law Enforcement is responsible for traffic control and can assist with evacuation, mitigation, and rescue activities.

## 6.0 NOTIFICATION PROCEDURES

Communication during an emergency event will primarily be by company phone. In the event of system failure, Southern Linc radios and cell phones would be utilized as an alternate method of communication. These numbers are listed on the Response Notification Flowchart located in Appendix D.

Local and state EMA will be notified in the event of an emergency, and these agencies will be responsible for notifying the public. In the event of an imminent failure, local and state EMA's will be notified to immediately begin evacuation procedures. GPC Corporate Communications will provide information for media outlets and will be responsible for communicating relevant information to the public.

### 6.1 Incident Response Flowchart for Imminent Failure and Potential Failure Emergencies

This Procedure and the following Incident Response Flowchart (below in text and in Appendix C in visual) for Imminent Failure and Potential Failure Emergencies shall be posted at appropriate locations at Plant Hammond. Personnel responsible for executing corrective and/or emergency actions shall be thoroughly familiar with their responsibilities under this EAP.

- A. When a Condition B or Condition A situation is detected, notify plant personnel in accordance with the Incident Response Flowchart (below and in Appendix C). Plant Environmental Compliance should contact Dam Safety immediately for technical consultation. Dam Safety will provide the evaluation of the conditions and provide a determination if there is an immediate threat to the dam/dike. If there is an immediate threat of dam/dike or dike failure, declare an **Imminent Failure Emergency** and proceed to Step I.
- B. If no immediate threat is detected, determine if the problem detected could possibly lead to failure of the dam/dike. If there is a potential for failure but corrective measures may be taken to moderate or alleviate failure, declare a **Potential Failure Emergency (Condition B)** and proceed to Step C.
- C. If a **Potential Failure Emergency** has been declared, notify personnel and agencies listed on the Response Notification Flowchart (Appendix D). Document all communications using the appropriate forms contained in Appendix E. Once outside agencies have been notified of an issue or potential problem, plant management is responsible for keeping local EMAs informed of any change in conditions.
- D. Begin corrective measures to attempt to alleviate or prevent failure.
- E. Evaluate the effectiveness of the corrective measures. If the corrective actions are successful, update all personnel/agencies previously contacted of the status of the improved conditions and document relevant communications using the forms provided in Appendix E. At this time, the Incident Commander will end the emergency condition. Dam Safety will be responsible for preparing the after-action report.

- F. If the corrective measures are not effective, Dam Safety will determine if there is time to take additional corrective measures.
- G. If there is not time to take additional corrective measures and failure is imminent, declare an **Imminent Failure Emergency** (Condition A) and proceed to Step I.
- H. If there is time to implement additional corrective measures, return to Step E. Additional support can be requested from Civil Field Services or outside contractors, as needed.
- I. If an **Imminent Failure Emergency** has been declared by the Generation Support Manager or his designee, ensure that all personnel have been moved to a safe area and perform notifications per the Response Notification Flowchart (Appendix D). Document all communications using the appropriate forms contained in Appendix E. Once outside agencies have been notified of a problem or potential problem, the Generation Support Manager or his designee is responsible for keeping local EMAs informed of any change in conditions. Dam Safety will be responsible for preparing the after-action report.

## 6.2 Additional Considerations

All emergency phone calls should be recorded on the *Emergency Notification Log Sheet* contained in Appendix E.

All other communication shall be documented using the *Data Recording Sheet* located in Appendix E.

After an Imminent Failure (Condition A Emergency) has occurred Dam Safety should complete a Post Incident Report using the form located in Appendix E.

**Once an emergency has been declared, a consistent message shall be developed and communicated to personnel on the Response Notification Flowchart.**

## **7.0 RESOURCES AVAILABLE TO SUPPORT EMERGENCY RESPONSE EFFORTS**

### **7.1 Alternative Sources of Power**

There are no electrically-powered gates or other equipment used for operating the dam/dike. Power is available at multiple locations near the surface impoundment and emergency generators are available for use, if needed, during emergency operations.

### **7.2 Emergency Materials and Equipment**

#### Materials

The following materials are stockpiled on site

- #10 washed sand (GDOT 10NS)
- # 89 stone
- # 57 stone
- Rip rap (GDOT Type 3)

These materials are protected by silt fencing or safety fencing and are labeled “**For Emergency Use Only**”. Appendix F contains the instructions for how to construct an emergency reverse filter.

#### Equipment

Equipment necessary to take corrective actions is maintained by site personnel and contractors. This could include, but is not limited, to the following equipment:

- Portable light stands
- Rubber tire loaders
- Tracked heavy equipment
- Skid Steer Loaders
- Dump Trucks

Other equipment such as additional emergency lighting or power can be obtained from both plant inventory and/or from local equipment rental companies.

### **7.3 Reducing Flows into the Reservoir**

Plant process flows are no longer directed to AP-1. The only water that enters AP-1 is precipitation that falls directly into it, and a limited amount of stormwater runoff. Therefore, reduction of flows into the pond is no longer feasible (as it once was when the pond served as a water treatment pond.)

### **7.4 Lowering Water Level**

As the surface impoundment is currently undergoing closure construction, the water level has been lowered significantly below previous operating levels. The need (and ability) to lower the water level in AP-1 is limited. However, large portable pumps can be mobilized for lowering water levels should the need arise. Based in current relationships with rental companies as well as existing closure contractors, portable, diesel pumps with capacities ranging from 7,500 to 15,000 GPM can

be mobilized to AP-1 within 48-hours or less of notification. If the EAP has not been activated and emergency lowering is required, the Generation Support Manager should be contacted to coordinate support.

## **8.0 PROVISIONS FOR ANNUAL COORDINATION MEETING**

An annual face-to-face meeting will be held with representatives of Plant Hammond, GPC, and the emergency response agencies described in this plan. These emergency response agencies may include:

- Floyd County Emergency Management Agency
- Georgia Environmental Protection Division – Safe Dams Program

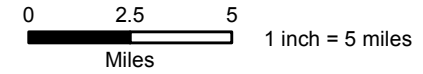
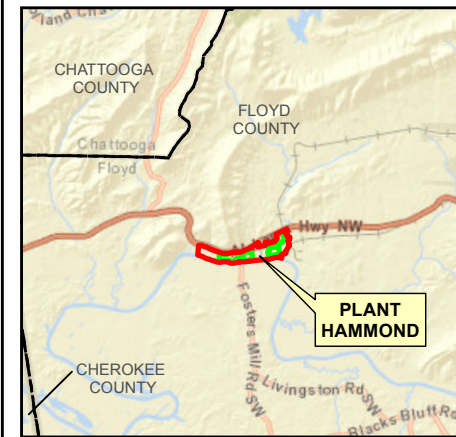
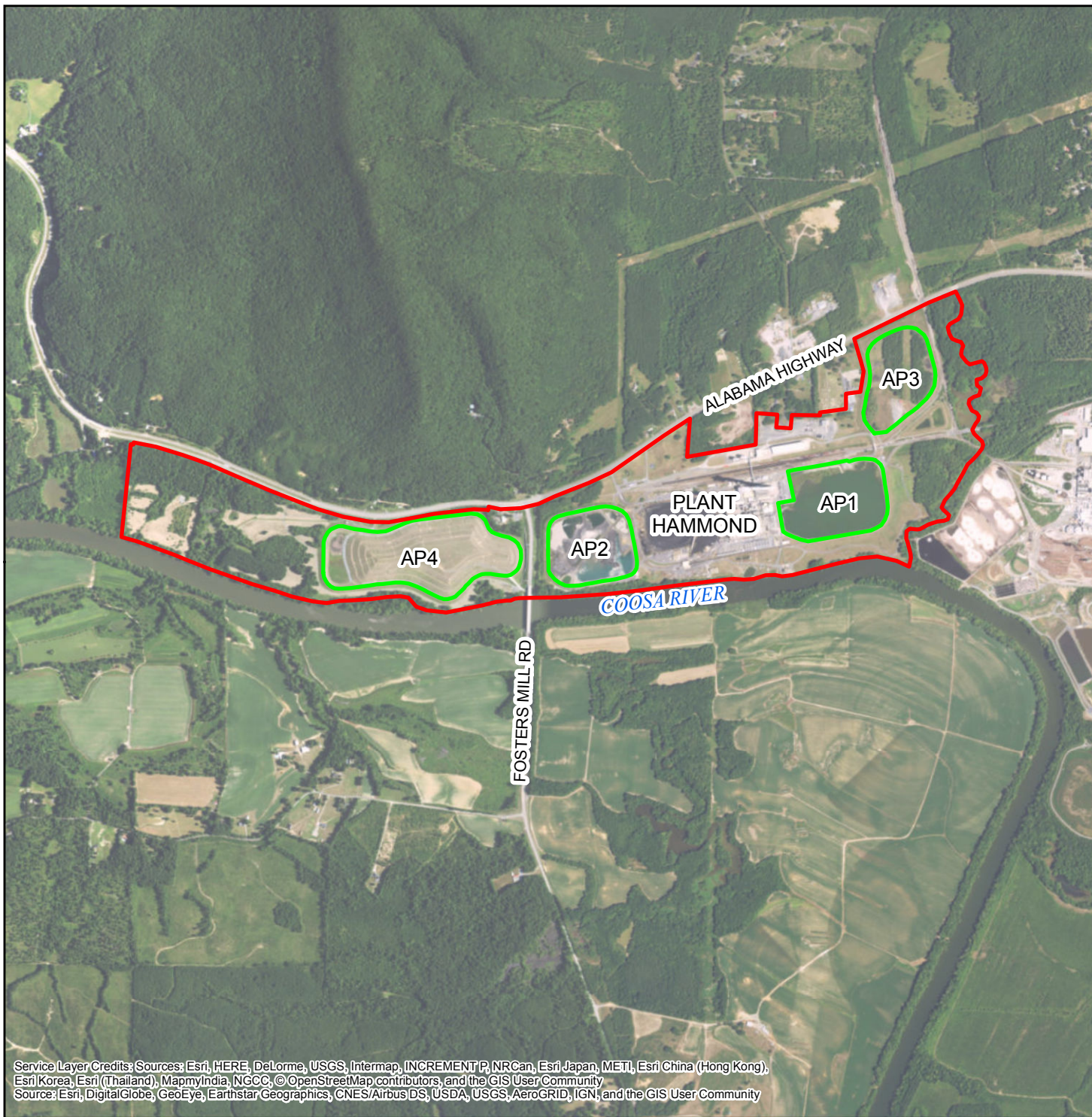
The County EMA organizations may, at their discretion, invite other response agencies, such as the sheriff's department, fire department, or GEMA to participate in the annual meeting as well.

## **APPENDIX A**

---

**Plant Hammond Site Location Map – Figure 1**

**Ash Pond 1 Overview – Figure 2**



**LEGEND**

- Plant Boundary
- Ash Pond Boundary

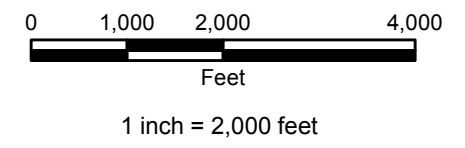
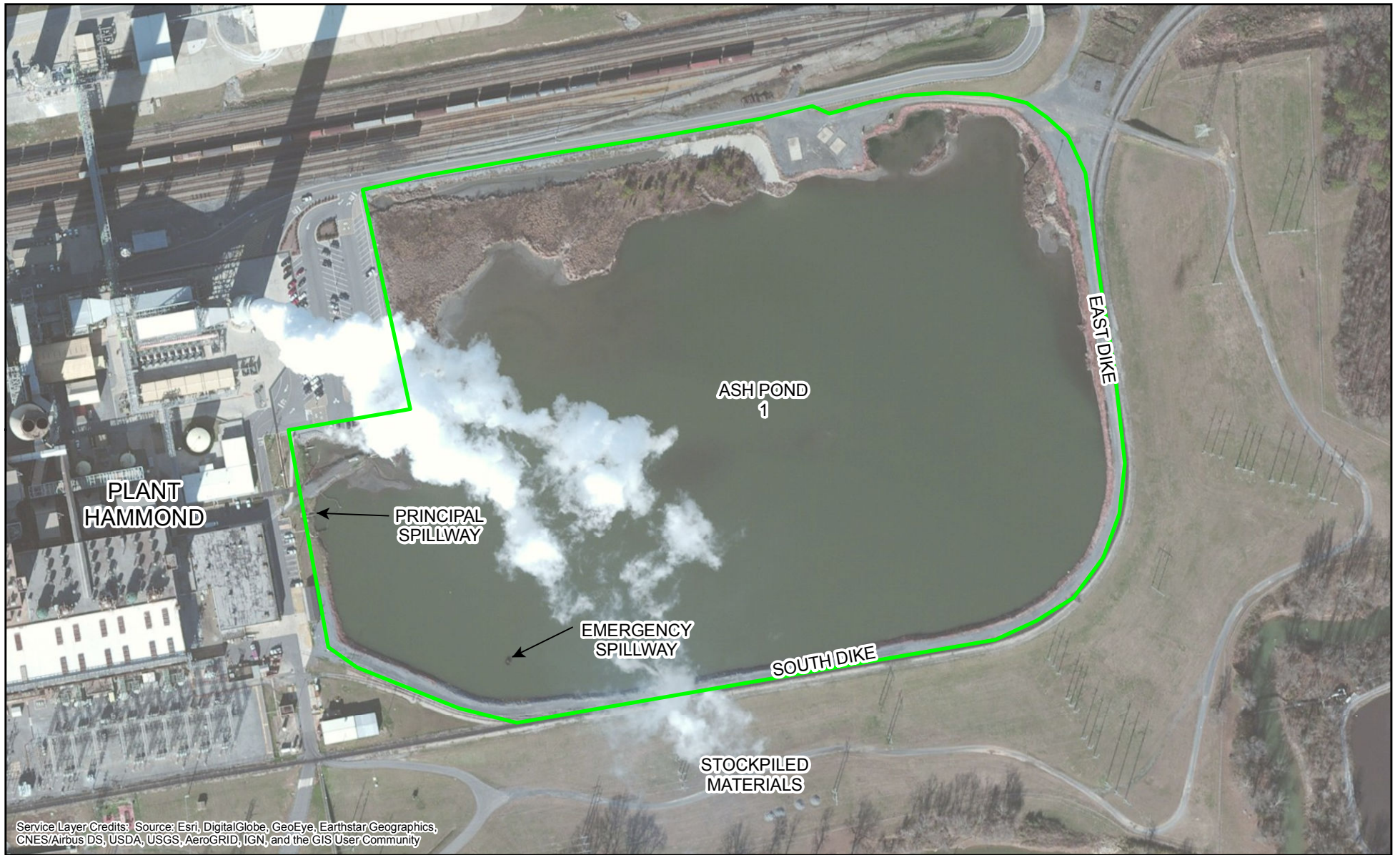


FIGURE 1  
PLANT HAMMOND LOCATION MAP  
FLOYD COUNTY, GEORGIA

**Southern Company Services  
FOR  
Georgia Power  
Company**

Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community  
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

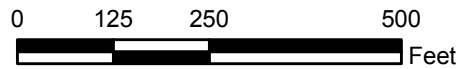




Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**LEGEND**

 Approximate Ash Pond Boundary



1 inch = 250 feet

**FIGURE 2**  
**ASH POND 1 OVERVIEW**  
**PLANT HAMMOND**  
**FLOYD COUNTY, GEORGIA**

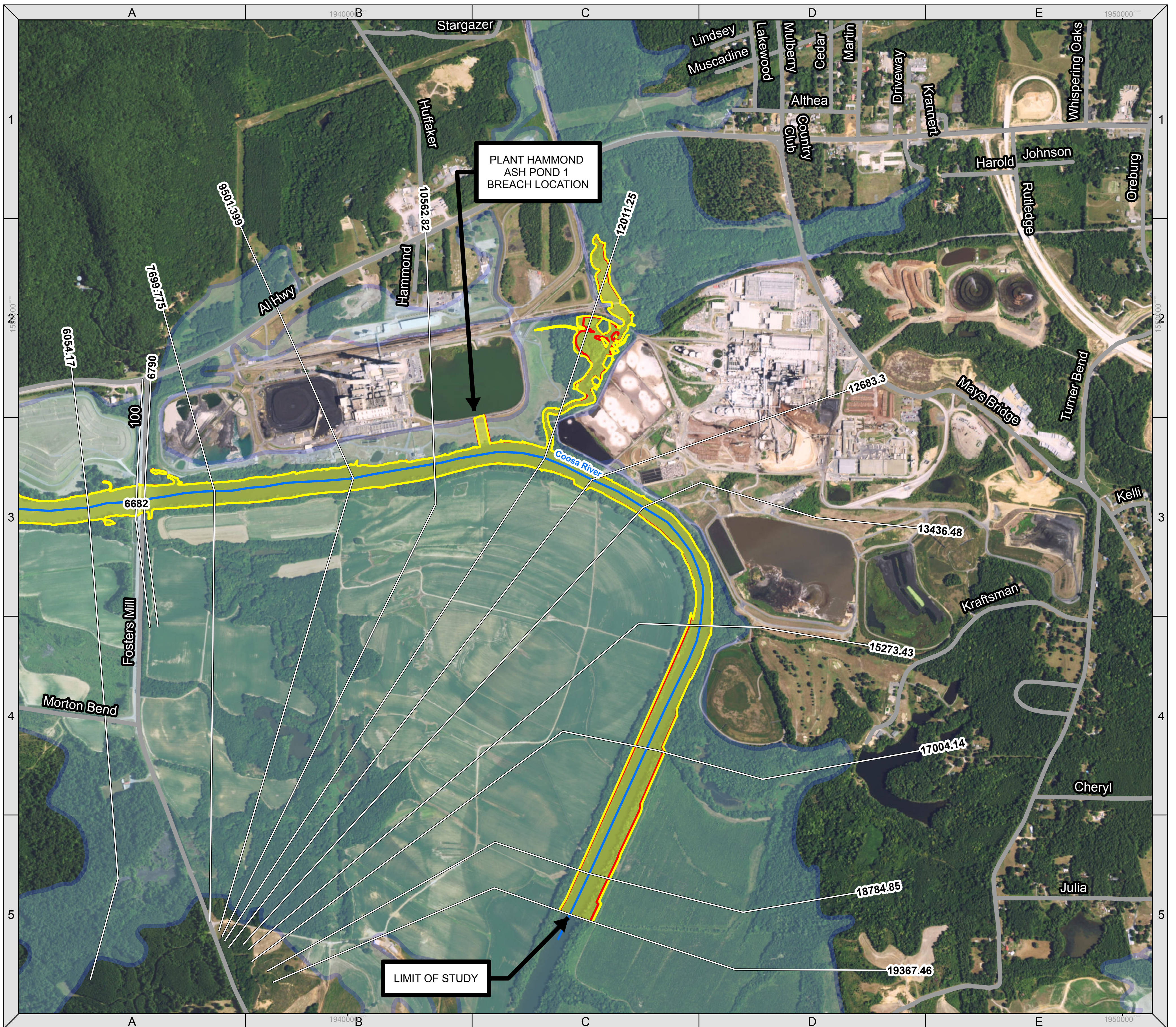
**Southern Company Services**  
**FOR**  
**Georgia Power Company**

# **APPENDIX B**

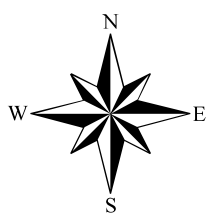
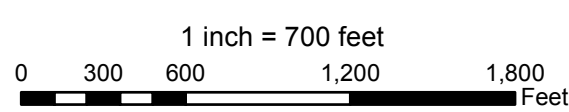
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## **Inundation Maps**

# PLANT HAMMOND ASH POND 1 DAM DAM BREACH INUNDATION MAP



River Station	Normal Water Surface Elevation (ft)	Sunny Day Flow at Max WS Elevation (cfs)	Sunny Day Max WS Elevation (ft)	Sunny Day Change in Water Surface Elevation (ft)	Design Storm Flow at Max WS Elevation (cfs)	Design Storm Max WS Elevation (ft)	Design Storm Change in Water Surface Elevation (ft)
<b>COOSA RIVER ROUTING</b>							
19367.46	560.7	300	566.8	6.1	300	566.3	5.6
18784.85	560.6	300	566.8	6.2	300	566.3	5.7
17004.14	560.5	297.3	566.7	6.2	299.6	566.2	5.6
15273.43	560.4	288.3	566.6	6.2	298.9	566	5.6
13436.48	560.3	280.4	566.6	6.3	298.1	566	5.7
12683.3	560.2	263.2	566.6	6.4	297.1	566	5.8
12011.25	560.1	218.4	566.5	6.4	294.7	565.9	5.8
10562.82	560	514.5	565.4	5.4	286.4	565.7	5.7
9501.4	560	489.6	565.4	5.4	539.2	565.7	5.7
7699.78	559.9	482.2	565.3	5.4	528	565.7	5.8
6790	559.9	476.7	565.3	5.4	523.1	565.6	5.8
6736	Bridge						
6682	559.9	475.2	565.3	5.4	523.1	565.6	5.8
6054.17	559.8	474.1	565.3	5.5	519.9	565.6	5.8
5018.98	559.7	472.5	565.3	5.5	517.8	565.6	5.9
3260.34	559.6	471.7	565.2	5.6	517.4	565.6	5.9
2859.99	559.5	471.6	565.2	5.7	517.5	565.5	6
1162.61	559.4	471.3	565.1	5.7	517.1	565.4	6







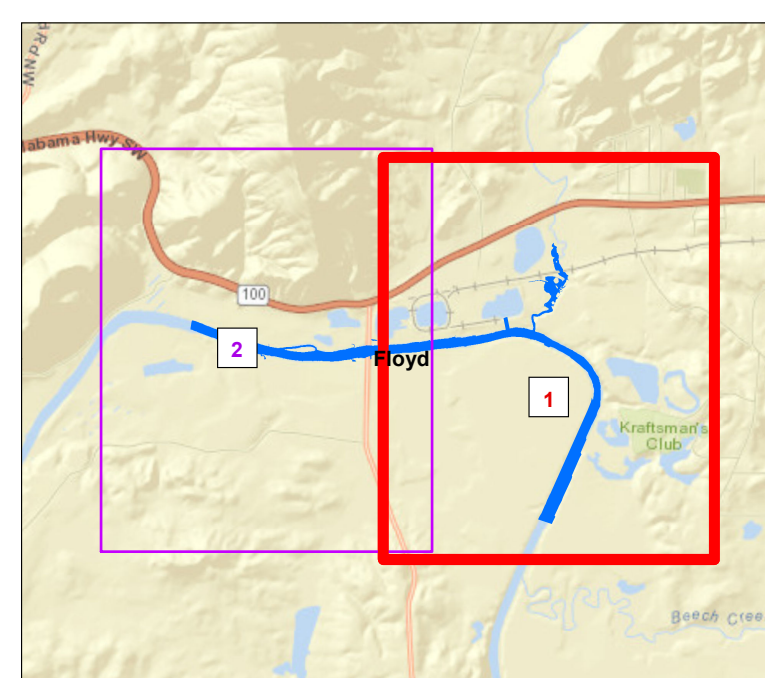
Projection  
NAD 1983 StatePlane Georgia West FIPS 1002 Feet

NOTES  
1. THE INUNDATION AREAS DEPICTED ARE THOSE RESULTING FROM THE HYPOTHETICAL FAILURE OF PLANT HAMMOND ASH POND 1 DAM. THE FOLLOWING SCENARIOS ARE SHOWN HEREIN:  
A. SUNNY DAY CONDITIONS WITH BREACH OF PLANT HAMMOND ASH POND 1 DAM.  
B. DESIGN FLOOD WITH BREACH OF PLANT HAMMOND ASH POND 1 DAM.

CREDITS  
SOURCES: ESRI, HERE, DELORME, USGS, INTERMAP, INCREMENT P CORP., NRCAN, ESRI JAPAN, METI, ESRI CHINA (HONG KONG), ESRI (THAILAND), MAPMYINDIA, © OPENSTREETMAP CONTRIBUTORS, AND THE GIS USER COMMUNITY.  
SOURCE: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEX, GETMAPPING, AEROGRIID, IGP, SWISSOTOPO, AND THE GIS USER COMMUNITY

## Legend

-  Sunny Day with Breach
-  Design Storm with Breach
-  100yr Floodplain
-  Stream Centerline



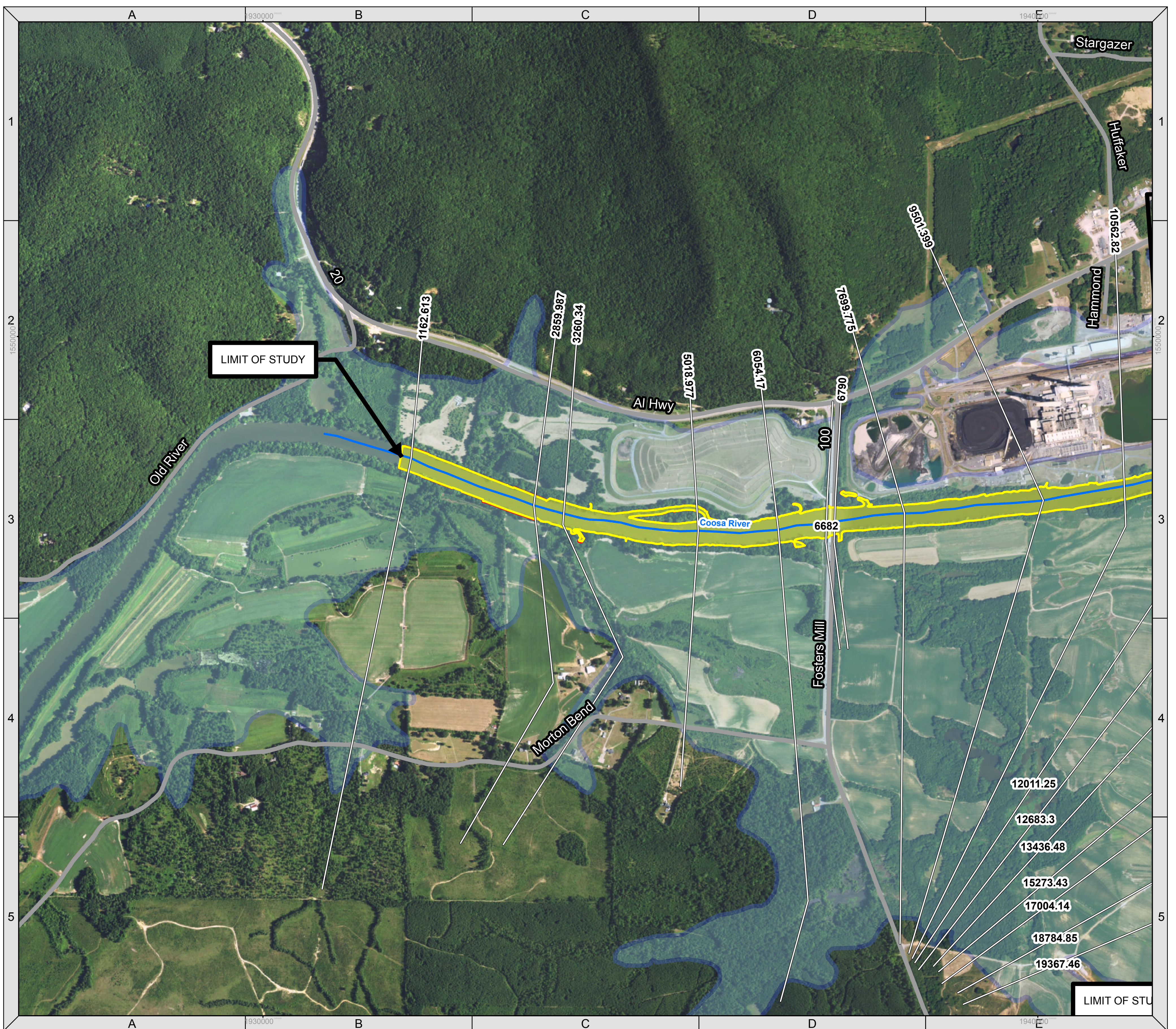
## Plant Hammond Ash Pond 1 Inundation Map



Page 1 of 2

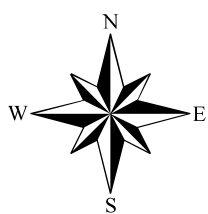
Issue Date: SEPTEMBER 20, 2016

# PLANT HAMMOND ASH POND 1 DAM DAM BREACH INUNDATION MAP



River Station	Normal Water Surface Elevation (ft)	Sunny Day Flow at Max WS Elevation (cfs)	Sunny Day Max WS Elevation (ft)	Sunny Day Change in Water Surface Elevation (ft)	Design Storm Flow at Max WS Elevation (cfs)	Design Storm Max WS Elevation (ft)	Design Storm Change in Water Surface Elevation (ft)
<b>COOSA RIVER ROUTING</b>							
19367.46	560.7	300	566.8	6.1	300	566.3	5.6
18784.85	560.6	300	566.8	6.2	300	566.3	5.7
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9501.4	560	489.6	565.4	5.4	539.2	565.7	5.7
7699.78	559.9	482.2	565.3	5.4	528	565.7	5.8
6790	559.9	476.7	565.3	5.4	523.1	565.6	5.8
6736	Bridge						
6682	559.9	475.2	565.3	5.4	523.1	565.6	5.8
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3260.34	559.6	471.7	565.2	5.6	517.4	565.6	5.9
2859.99	559.5	471.6	565.2	5.7	517.5	565.5	6
1162.61	559.4	471.3	565.1	5.7	517.1	565.4	6

1 inch = 700 feet  
0 300 600 1,200 1,800 Feet

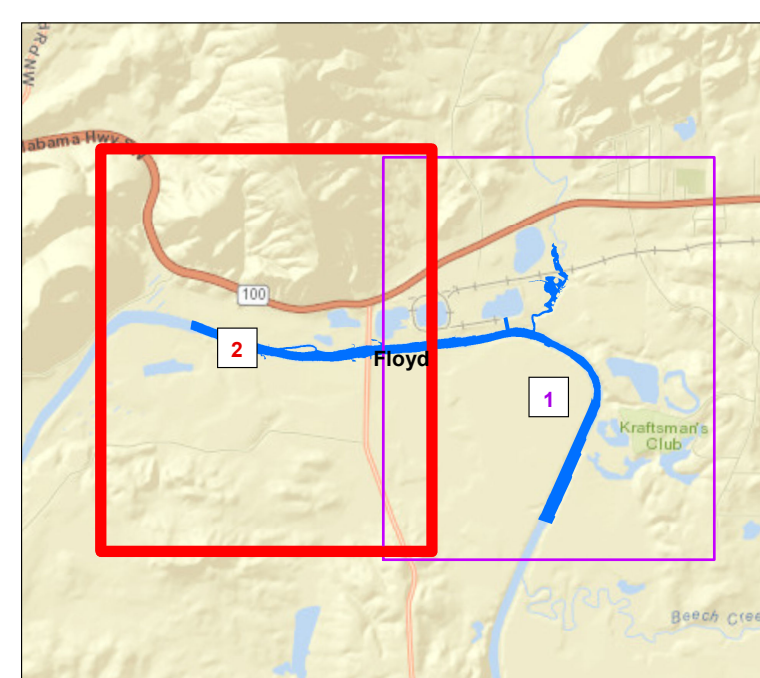


Projection  
NAD 1983 StatePlane Georgia West FIPS 1002 Feet

NOTES  
1. THE INUNDATION AREAS DEPICTED ARE THOSE RESULTING FROM THE HYPOTHETICAL FAILURE OF PLANT HAMMOND ASH POND 1 DAM. THE FOLLOWING SCENARIOS ARE SHOWN HEREIN:  
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SOURCE: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEX, GETMAPPING, AEROGRIID, IGP, SWISSSTOPO, AND THE GIS USER COMMUNITY

## Legend

- Sunny Day with Breach
- Design Storm with Breach
- 100yr Floodplain
- Stream Centerline



## Plant Hammond Ash Pond 1 Inundation Map



Page 2 of 2

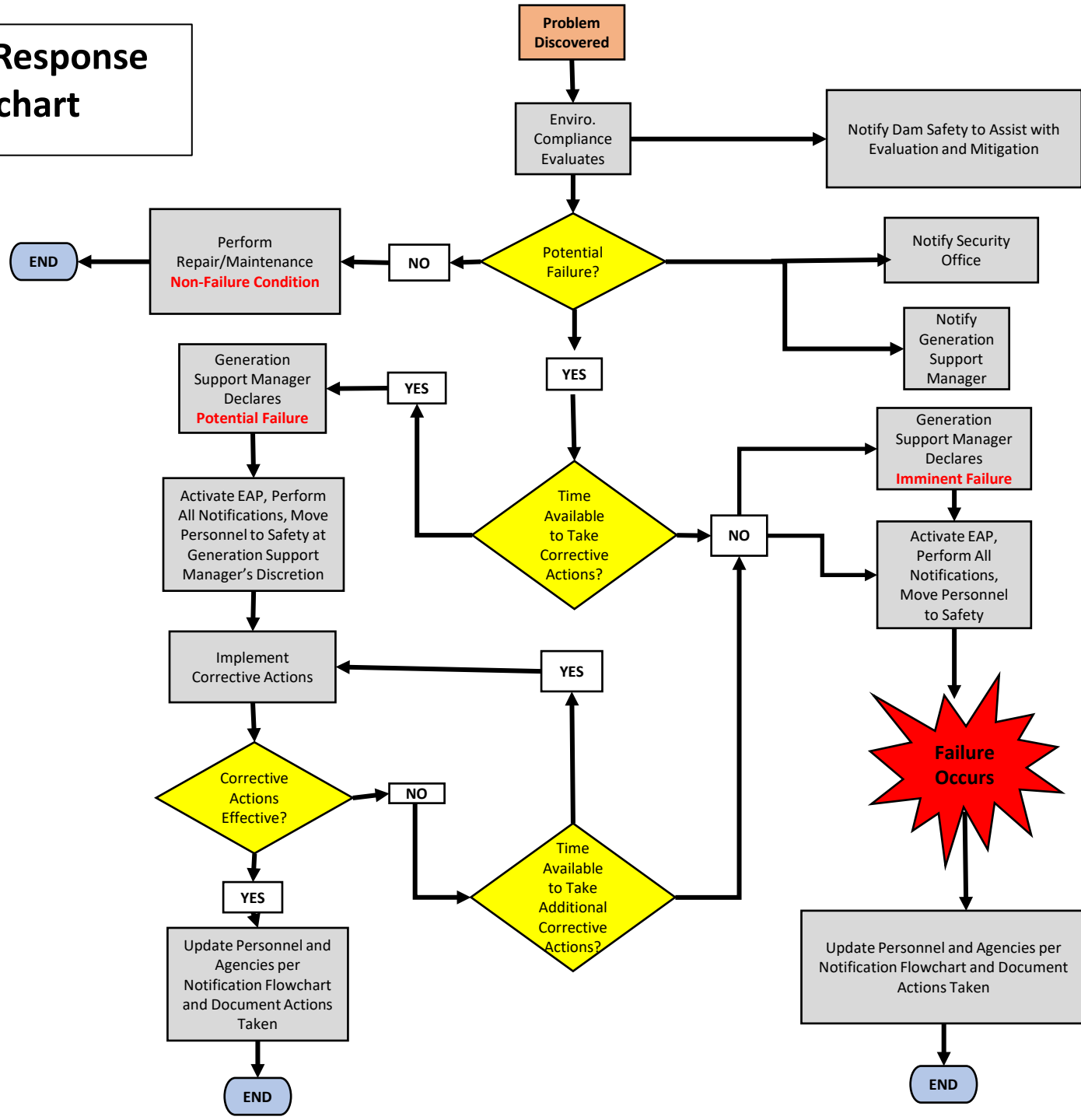
Issue Date: SEPTEMBER 20, 2016

# **APPENDIX C**

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## **Incident Response Flowchart**

# Incident Response Flowchart



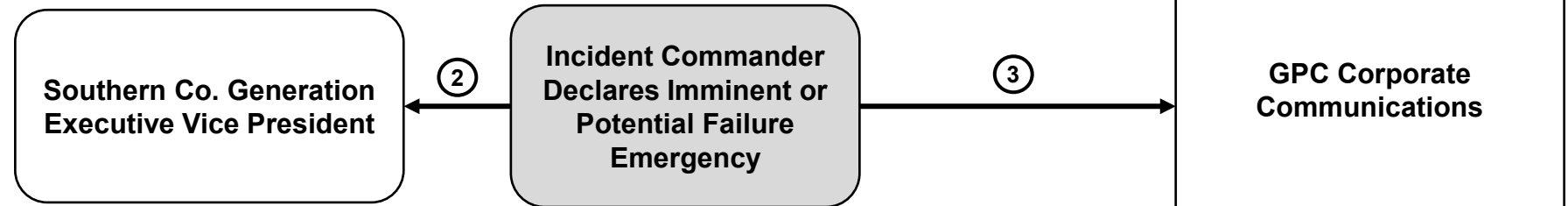
# **APPENDIX D**

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## **Response Notification Flowchart**

# Response Notification Flowchart

Imminent Failure or Potential Failure Emergencies



**National Weather Service  
Peachtree City, GA**  
(770) 486-1133  
Ext 241 or 242  
  
Alternate:  
Birmingham, AL  
(205) 621-5650

**Georgia  
System  
Operator**

**Plant Hammond Security  
Office**

**Plant Hammond Enviro.  
Compliance**

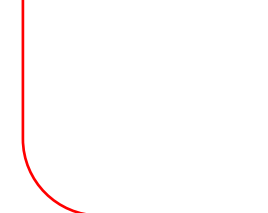
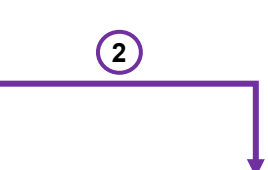
**GPC Enviro. Affairs**

**Civil Support  
(through Enviro. Affairs)**

**Floyd County EMA**  
  
Rome Center:  
(706) 236-4541  
  
Dial 911

**GEMA 24-Hour Line**  
(800) 879-4362  
  
Alternates:  
(404) 635-7000

**Dam Safety Referral  
Line**  
(205) 992-6601  
  
**Dam Safety**  
  
**See Next Page for  
Notifications by Dam  
Safety**

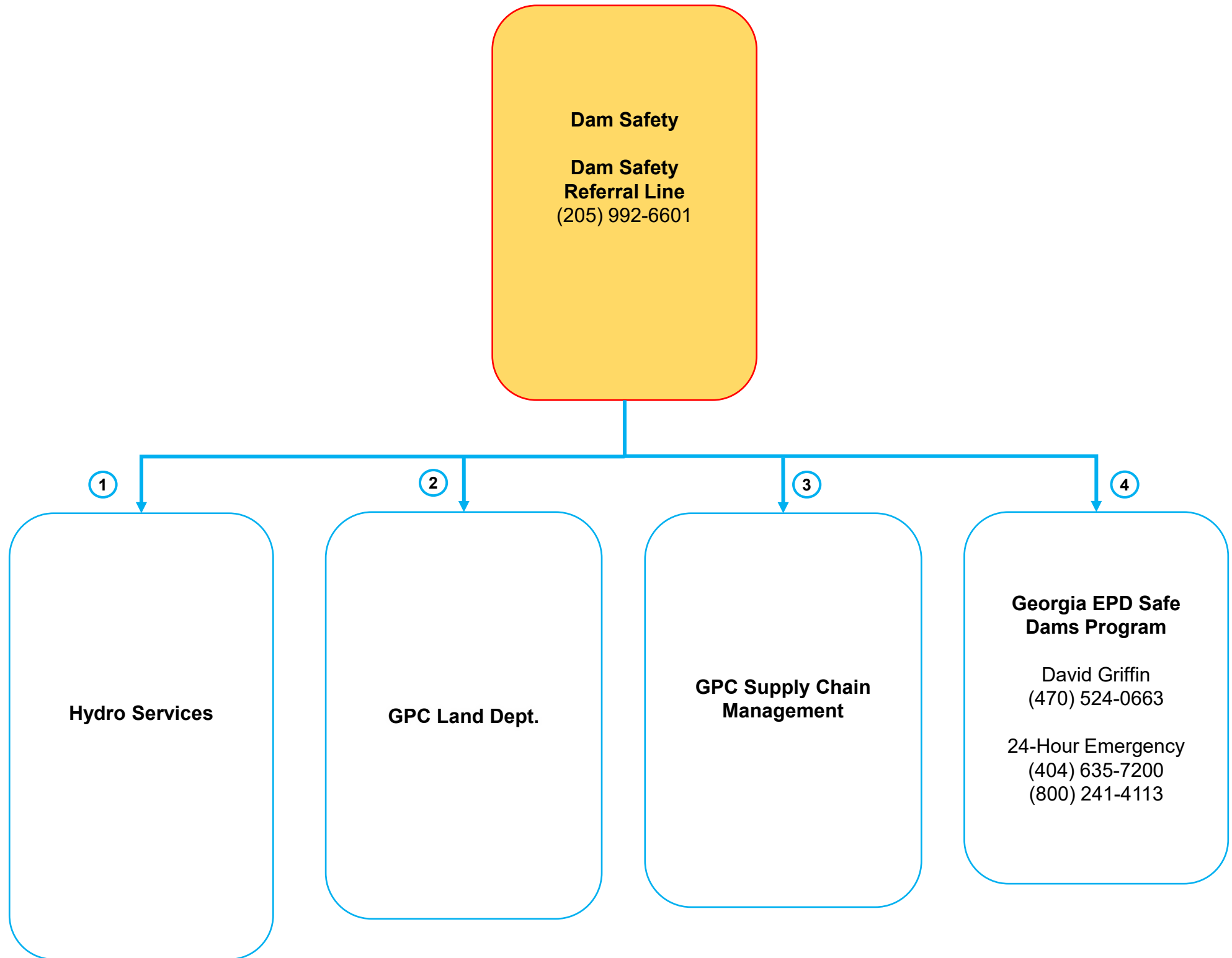




# Response Notification Flowchart

Imminent Failure or Potential Failure Emergencies

*Fossil Dam Safety Notifications*



## **APPENDIX E**

---

**Emergency Notification Log Sheet  
Data Recording Sheet  
Post Incident Reporting Form**

# EMERGENCY ACTION PLAN

## EMERGENCY NOTIFICATION LOG SHEET

The Emergency Notification Log Sheet is for use in an event of an emergency to document notifications. *Please refer to the Response Notification Flowchart for name and numbers of agencies / personnel to be contacted.* **All notifications must be documented.**

**TO BE USED BY PLANT MANAGER / INCIDENT COMMANDER:**

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Security Office					
SCS SVP / SPO					
GPC Corporate Communications					

**TO BE USED BY SECURITY OFFICE:**

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Environmental Compliance					
Georgia System Operator					
Floyd County EMA					

# EMERGENCY ACTION PLAN

## EMERGENCY NOTIFICATION LOG SHEET

The Emergency Notification Log Sheet is for use in an event of an emergency to document notifications. *Please refer to the Response Notification Flowchart for name and numbers of agencies / personnel to be contacted.* **All notifications must be documented.**

**TO BE USED BY ENVIRONMENTAL COMPLIANCE:**

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Dam Safety					
GPC Enviro. Affairs					

**TO BE USED BY GEORGIA SYSTEM OPERATOR:**

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
National Weather Service					

**TO BE USED BY GPC ENVIRONMENTAL AFFAIRS:**

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Civil Support					

# EMERGENCY ACTION PLAN

## EMERGENCY NOTIFICATION LOG SHEET

The Emergency Notification Log Sheet is for use in an event of an emergency to document notifications. *Please refer to the Response Notification Flowchart for name and numbers of agencies / personnel to be contacted.* **All notifications must be documented.**

**TO BE USED BY SCS E&CS DAM SAFETY:**

Agency Notified	Date	Time	Person Contacted	Contacted By	Comments
Hydro Sevices					
GPC Land Department					
GPC Supply Chain Management					
Georgia EPD Safe Dams Program					

# EMERGENCY ACTION PLAN DATA RECORDING SHEET

The Data Recording Sheet will be used to record important information relating to dam safety emergency.

**Team Member(s):** \_\_\_\_\_

**Date of Incident:** \_\_\_\_\_

**Time of Incident:** \_\_\_\_\_

**Type of Emergency:** \_\_\_\_\_

**Emergency Coordinator:** \_\_\_\_\_

**Description of Events:\*** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**What is Being Done:\*** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\*Attach additional pages as necessary.

**For incoming questions, refer all calls to:**

Media Inquiries: Georgia Power Company Corporate Communications

EMA Inquiries: Plant Manager/Emergency Coordinator

Environmental Agency Inquiries: GPC Environmental Affairs

# Emergency Action Plan Post Incident Reporting Form

Dam name: Plant Hammond AP-1

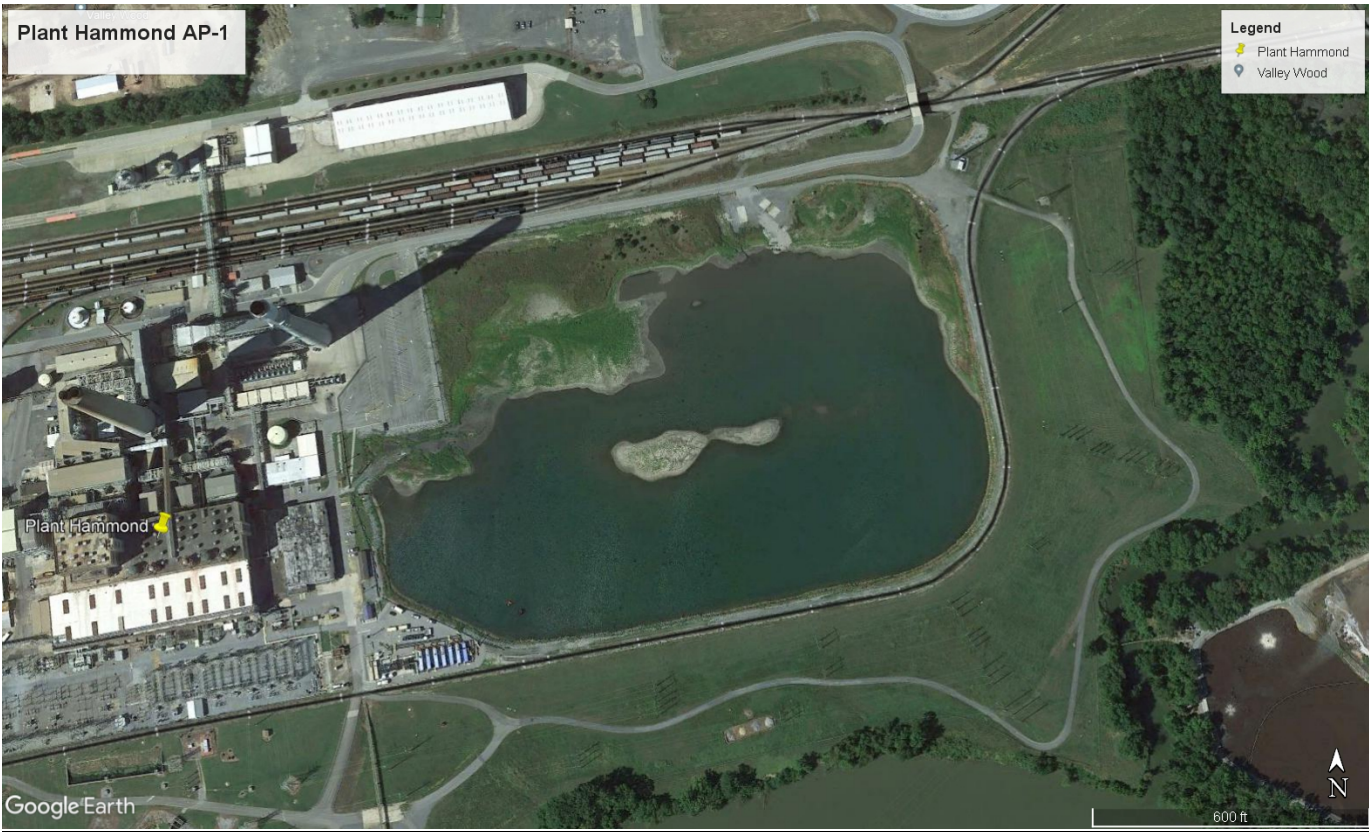
NID ID#: GA-04307

Report Prepared By: \_\_\_\_\_

Date \_\_\_\_\_

## Emergency Description

## Site Map



## Location

**Potential Causes**

--

**Weather Conditions**

--

**Current Dam Condition**

--



## **APPENDIX F**

---

### **Instructions for the Construction of an Emergency Reverse Filter**

## EMERGENCY REVERSE FILTER CONSTRUCTION

The purpose of the reverse filter is to slow down the flow of water in order to reduce the ability of the water to carry soil particles. The size of the soil particle that a flow of water can carry is a function of the 3<sup>rd</sup> power of the velocity of the flow. The slower the velocity, the less soil the water can carry. The other function of the filter is to trap soil particles before they exit.

The usual components of a reverse filter are as follows:

- ) GDOT washed #10 sand (10NS)
- ) # 89 stone
- ) # 57 stone
- ) GDOT Type 3 rip rap

These materials should be stockpiled in a location where they can easily and quickly be moved to the seepage site. Two truckloads of each type of material should be stored in a convenient location that is out of the way. It is best if they are located so that a backhoe or front end loader can pick them up and transfer them directly to the seepage site. Transport schemes that require multiple vehicles and multiple operators are usually impossible to implement at night or on weekends. The stockpiles should be labeled “Emergency Filter Stockpile – Emergency Use Only” to keep them from being appropriated for other purposes by those unaware of their purpose.

To build a reverse filter over a boil or area of concentrated seepage, follow the directions below. A cross section of the reverse filter construction is provided on the next page.

- 1) Clear loose material from around the site.
- 2) Place 6” of #10 washed sand over the area of concern, and extend it for at least 12” beyond the seepage limits.
- 3) Place 6” of #89 stone over the sand, and extend it for at least 6” beyond the sand.
- 4) Place 6” of #57 stone over the sand, and extend it for at least 6” beyond the #89 stone.
- 5) If necessary to stabilize the #57 stone, place rip rap on top of the #57 stone. Conditions that may make the rip rap necessary are anticipated surface flows that might wash away the filter or increasing seepage flows that may try to shift the lighter filter materials.

If the flow is too fast for the sand to remain in place, a layer of #57 stone or GDOT Type 3 rip rap may be placed over the boil to slow the flow down. This is followed by a layer of #89 stone, then the sand, and then the #89, #57 and rip rap in succession.

Sometimes a seep will pop out on the edge of a newly applied filter. In this case, it is generally necessary to apply the granular filter as a blanket to the general area rather than as a spot treatment. The layers are as described above but will cover a larger area.

**Filter fabric or geotextile is not acceptable as a substitute for the sand. The fabric tends to smear and clog if applied in a wet situation.**

# CROSS SECTION OF A REVERSE FILTER OVER A SEEP OR BOIL

