

INTRODUCTION

Overview

The Georgia Environmental Protection Division (EPD) adopted a new Solid Waste Regulation entitled “Rule 391-3-4-.10 Coal Combustion Residuals” (State CCR Rule). This rule, effective November 22, 2016, applies to owners and operators of new and existing coal combustion residuals (CCR) disposal facilities that dispose or otherwise engage in solid waste management of CCR generated from the combustion of coal at electric utilities and independent power producers. The State CCR Rule incorporates by reference the provisions contained in the United States Environmental Protection Agency (USEPA) Title 40 of the Code of Federal Regulations (CFR) §257 (40 CFR §257) (Federal CCR Rule). Section (9) of the State CCR Rules requires all CCR units in Georgia to obtain a solid waste handling permit. Pursuant to these requirements, Georgia Power Company (GPC) has prepared this permit application for the closure of Plant Hammond Ash Pond 1 (AP-1).

GPC owns and operates a four-unit coal fired power plant in Floyd County, Georgia on Plant Hammond property, approximately one mile west of Rome, Georgia. AP-1 was commissioned in 1952, and historically received CCR from generating activities. AP-1 currently receives discharges from the plant and other ash ponds at the site. Per State CCR Rule 391-3-4.10(2)(a), which incorporates the definitions of the different CCR units under the Federal CCR Rule (40 CFR § 257.53), AP-1 meets the definition of an existing CCR surface impoundment because it received CCR both before and after October 19, 2015.

GPC will close AP-1 by removing all CCR from AP-1 (closure-by-removal). The impoundment will be dewatered as required to facilitate excavation of CCR for removal. Upon removal of the CCR, the final sitework restoration will promote positive drainage of stormwater.

Following the CCR removal in AP-1, GPC will conduct post-CCR-removal groundwater monitoring for five (5) years to confirm that groundwater monitoring concentrations do not exceed the groundwater protection standards established in State CCR Rule 391-3-4-.10(6)(b) which reference the constituents listed in 40 CFR 257, Subpart D, Appendix III and IV of the Federal CCR Rule.

Plant Hammond AP-1 Permitting Requirements

This permit application addresses the closure-by-removal of this facility as well as the permit application requirements of State CCR Rule 391-3-4-.10(9)(b) and State CCR Rule 391-3-4-.10(9)(c)5. for an existing CCR surface impoundment as follows:

- *391-3-4-.10(9)(b)1. - A completed form designated by EPD.*
The completed form is included in Section 2 of Part A of the permit application.
- *391-3-4-.10(9)(b)2. - Written verification that the site conforms to all local zoning or land use ordinances.*
Zoning Confirmation is included in Section 4 of Part A of the permit application.
- *391-3-4-.10(9)(b)3. - Property boundary survey and legal description.*

The property boundary survey is included in the Closure Drawings in Section 8 and the legal description is presented in the Closure Plan in Section 7 of Part A of the permit application.

- *391-3-4-.10(9)(b)4. - Financial assurance mechanism meeting the criteria in Rule 391-3-4-.13.*
In compliance with applicable securities laws and regulations, GPC will provide specific cost estimates for closure during the permit application review process as estimates are developed and finalized. It is anticipated these estimates will be available to EPD in the first half of 2019. GPC will provide a demonstration of financial assurance upon approval of closure care cost estimates by EPD.
- *391-3-4-.10(9)(b)5. - A qualified professional engineer's certification that all application requirements have been met.*
The professional engineer's certification is included in Section 3 of Part A of the permit application.
- *391-3-4-.10(9)(c)5.(i) - Location restriction demonstrations required by 40 CFR 257.60, 40 CFR 257.61, 40 CFR 257.62, 40 CFR 257.63, and 40 CFR 257.64.*
The location restriction demonstrations have been completed and posted on the GPC website under Environmental Compliance and are discussed in the Location Restrictions Report in Section 1 of Part B of the permit application.
- *391-3-4-.10(9)(c)5.(ii) - Description of the CCR surface impoundment's design criteria required by 40 CFR 257.71 and 40 CFR 257.73.*
The Plant Hammond AP-1 surface impoundment is an existing unlined CCR surface impoundment and will be closed in accordance with State CCR Rule 391-3-4-.10(7)(b) which incorporates the closure requirements in 40 CFR 257.101(a)(1). The other design criteria under 40 CFR 257.73 have also been addressed as follows:
 - ✓ A permanent identification marker as set forth by § 257.73(a)(1). was installed on August 6, 2015.
 - ✓ The Emergency Action Plan as set forth by 40 CFR 257.73(a)(3). was prepared and posted on the GPC website under Environmental Compliance and is included in the CCR Website Postings in Section 4 of Part B of the permit application.
 - ✓ The history of construction as set forth by 40 CFR 257.73(b) and (c) was prepared and posted on the GPC website under Environmental Compliance and is included in the CCR Website Postings in Section 4 of Part B of the permit application.
 - ✓ Initial hazard potential classification, structural stability, and safety factor assessments as set forth by 40 CFR 257.73(a)(2), (b), (d), (e), and (f), were prepared and posted on the GPC website under Environmental Compliance and are included in the CCR Website Postings in Section 4 of Part B of this permit application.
 - ✓ The initial safety factor assessment required in 40 CFR 257.73 was prepared and posted in the GPC website under Environmental Compliance and is included in the CCR Website Postings in Section 4 of Part B of this permit application.

- *391-3-4-.10(9)(c)5.(iii) - Description of how the CCR surface impoundment's operating criteria required by 40 CFR 257.80, 40 CFR 257.82, and 40 CFR 257.83 are met.*

The dust control plan with associated annual reports, the hydrologic and hydraulic capacity requirements, inflow design flood control system, and inspections have been posted on the GPC website under Environmental Compliance for the current conditions and operations of the site. Compliance information is also discussed in the Closure Plan in Section 7 of Part A of the permit application. Hydrologic and hydraulic capacity requirements for the proposed closed condition are included in the Engineering Report in Section 3 of Part B of the permit application. Select operating criteria documents are provided in the CCR Website Postings in Section 4 of Part B of this permit application.
- *391-3-4-.10(9)(c)5.(iv) - Groundwater monitoring plan in accordance with Rule 391-3-4-.10(6). Explanation of how groundwater monitoring and corrective action criteria required by 40 CFR 257.90, 40 CFR 257.91, 40 CFR 257.93, 40 CFR 257.94, 40 CFR 257.95, 40 CFR 257.96, 40 CFR 257.97, and 40 CFR 257.98 are met.*

A Groundwater Monitoring Plan has been prepared for AP-1 in accordance with 40 CFR 257.90, 40 CFR 257.91, and 40 CFR 257.93 through 40 CFR 257.98 and is included in Section 6 of Part A of the permit application.
- *391-3-4-.10(9)(c)5.(v) - Explanation of how closure and post-closure care requirements found in 40 CFR 257.101, 40 CFR.257.102, 40 CFR 257.103, and 40 CFR 257.104 will be met.*

This permit application includes a narrative description (Closure Plan) for the closure-by-removal of CCR for AP-1 in Section 7 of Part A of the permit application. In accordance with State CCR Rule 391-3-4-.10(7)(g), which incorporates the post-closure requirements of 40 CFR 257.104(a)(2) of the Federal CCR Rule, CCR units being closed by removal of CCR are exempted from post-closure care requirements. Therefore, a Post-Closure Plan for AP-1 is not required and is not included in the permit application.
- *391-3-4-.10(9)(c)5.(vi) - Website address for information required to be posted by 40 CFR 257.105, 40 CFR 257.106, and 40 CFR 257.107.*

The information required to be posted and applicable to AP-1 is found on the GPC website under Environmental Compliance.

Send completed application to:
Environmental Protection Division, Solid Waste Management Program
4244 International Parkway, Suite 104
Atlanta, GA 30354-3902

County:
Facility Name:

CCR Unit - Application for Solid Waste Handling Permit

(Please type or print)

I. APPLICANT INFORMATION

Owner's Name or Registered Corporation Name: [Georgia Power Company](#)

Facility Address: [5963 Alabama Hwy. SW](#)

Phone: [404-506-6505](#)

City: [Rome](#)

State: [GA](#)

ZIP Code: [30165](#)

Authorized Official: [Aaron D. Mitchell](#)

Title: [General Manager – Environmental Affairs](#)

Mailing Address: [241 Ralph McGill Blvd NE](#)

Phone: [404-506-6505](#)

City: [Atlanta](#)

State: [GA](#)

ZIP Code: [30308](#)

Email Address: gpcenv@southernco.com

Facility CCR Website(s):
(<https://www.georgiapower.com/CCRRuleCompliance>)

II. PROPERTY DETAILS: Complete below and attach a street or highway map indicating the site/facility location. Application must be accompanied by written zoning confirmation.

County: [Floyd](#)

City: [Rome](#)

Co-ordinates (in decimal degrees, near facility center): [34.2530°N; 85.3421°W](#)

Property for Processing/Disposal is: Owned Leased (please complete owner details below)

Property Owner (if leased):

Address:

Phone:

City:

State:

Zip:

III. APPLICATION TYPE:

New Permit

Major Modification to Existing Permit

Transfer of Permit

Other

IV. CCR UNITS: List all CCR units covered under this application

[Ash Pond 1 \(AP-1\)](#)

V. OWNERS: List all owners of the facility (defined as holding a 5% or greater share). All owners listed below must complete the Supplemental Form for O.C.G.A. 12-8-23.1(a)(3)(B)

Georgia Power Company

VI. SIGNATURE

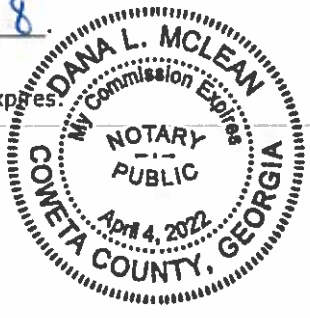
Authorized Official's Signature: *[Handwritten Signature]*

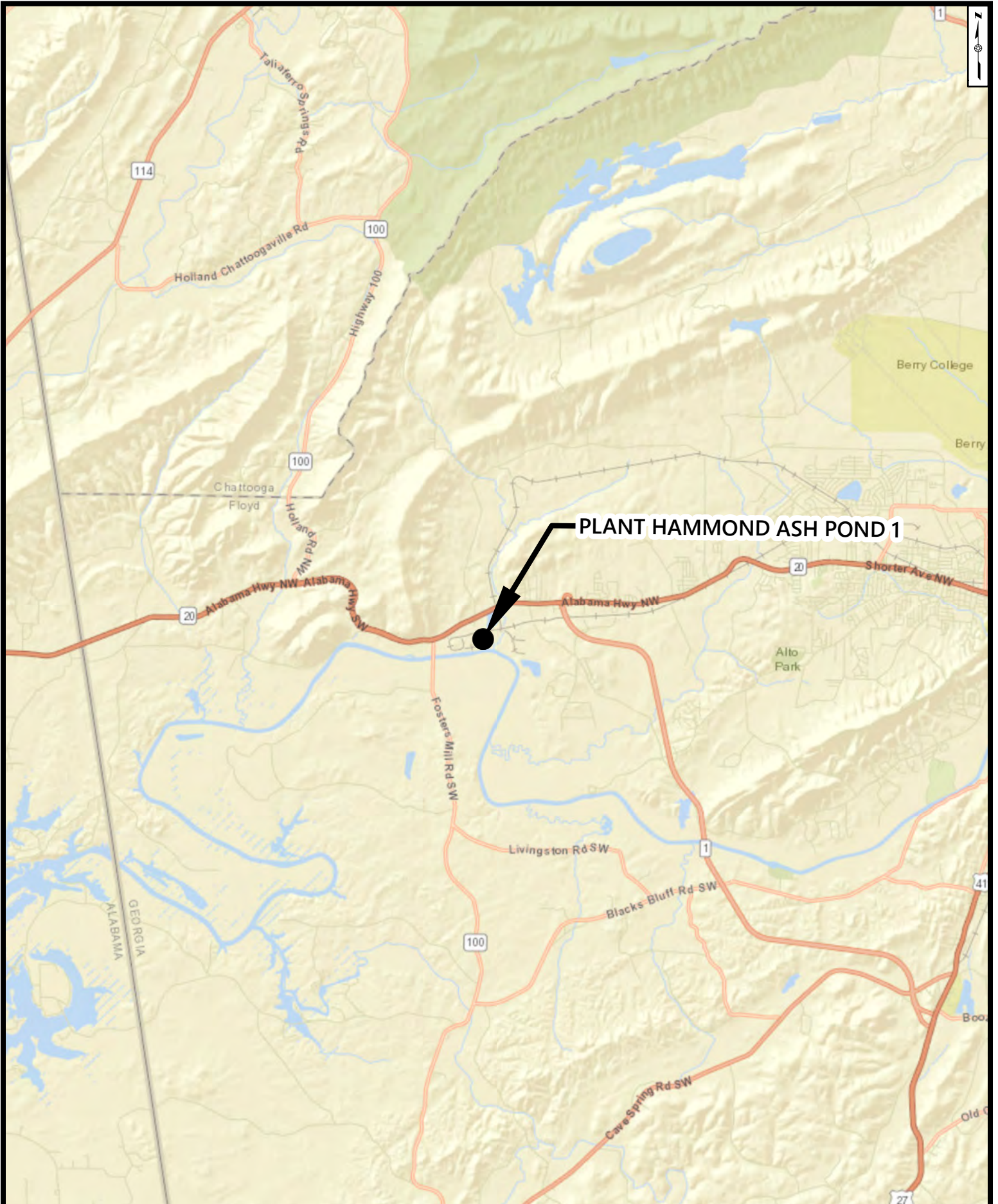
Date: *11/13/18*

Sworn to and subscribed before me this 13 day of November, 2018.

Notary Public: *Dana L. McClean*

My commission expires





Location Map

Georgia Power Company - Plant Hammond
CCR Surface Impoundment Ash Pond 1



Date: 10/31/2018



Send with completed application to:
 Environmental Protection Division, Solid Waste Management Program
 4244 International Parkway, Suite 104
 Atlanta, GA 30354-3902

County:

Facility:

Solid Waste Handling Permit Supplemental Form for O.C.G.A. 12-8-23.1(a)(3)(B)

(Please type or print)

I. INFORMATION: This form must be completed by each owner, or an authorized official of a corporation, holding a 5% or greater ownership share. This form must be notarized.

Name of Facility Applying for Solid Waste Handling Permit: Plant Hammond

Owner's Name or Registered Corporation Name: Georgia Power Company

Authorized Official: Aaron D. Mitchell

Title: General Manager – Environmental Affairs

Mailing Address: 241 Ralph McGill Boulevard

Phone: (404) 506 - 6505

City: Atlanta

State: GA

ZIP Code: 30308

Email Address: gpcenv@southernco.com

A.	Yes	No
(1) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association intentionally misrepresented or concealed any material fact in the application submitted to the director?	<input type="checkbox"/>	X
(2) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association obtained or attempted to obtain the permit by misrepresentation or concealment?	<input type="checkbox"/>	X
(3) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association been convicted by final judgment, and all appeals have been exhausted, in the State of Georgia or any federal court of any felony involving moral turpitude within three years immediately preceding the application for a permit?	<input type="checkbox"/>	X
(4) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association been convicted of any violations of any environmental laws punishable as a felony in any state or federal court within five years preceding the application for a permit?	<input type="checkbox"/>	X
(5) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association knowingly, willfully, and consistently violated the prohibitions specified in Code Section 12-8-30.7?	<input type="checkbox"/>	X
(6) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association been adjudicated in contempt of any court order enforcing any federal environmental laws or any environmental laws of the State of Georgia within five years preceding the application for a permit?	<input type="checkbox"/>	X

B. On a separate sheet, please provide detailed explanations for each question above answered "yes."

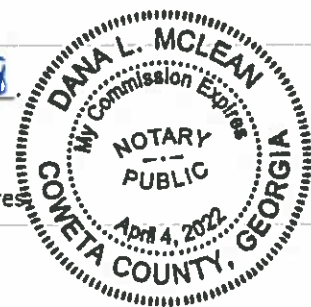
Signature: Aaron D. Mitchell

Date: 11/13/18

Sworn to and subscribed before me this 13 day of November, 2018.

Notary Public: Dana L. McClean

My commission expires



November 2018

Mr. Richard Dunn, Director
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive, Suite 1456
Atlanta, GA 30334-9000

**Re: Professional Engineer Certification
Georgia EPD Rule 391-3-4.10(9)(b)5.**

Dear Mr. Dunn:

Stantec Consulting Services Inc. is an engineering firm employing professional engineers in good standing in accordance with State statutes, and the firm has experience in the design and construction of similar facilities. Jon A. Sparkman, P.E., with Stantec Consulting Services Inc. is the Engineer of Record for this permit application. He is registered as a professional engineer in the state of Georgia and has more than 24 years of experience in Engineering.

"I certify under penalty of law that this document and attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I do hereby certify that the application requirements of the Georgia Environmental Protection Division Solid Waste Rule 391-3-4-.10 for Management of Coal Combustion Residuals have been met."

ATTEST:

Stantec Consulting Services Inc.

Engineering Firm

Jon A. Sparkman

Name of Professional Engineer

Jon A. Sparkman

Signature

11-16-18

Date



Stantec Consulting Services Inc.
1110 Market Street, Suite 214A, Chattanooga, TN 37402
Phone (423) 800-5350, Fax (423) 800-5351



OFFICE OF THE COUNTY MANAGER

TWELVE EAST 4TH AVENUE, SUITE 209 • ROME, GEORGIA 30161
PHONE: 706.291.5110 • FAX: 706.291.5248 • www.romefloyd.com

January 29, 2018

Mr. Jeffrey W. Cown
Branch Chief
Georgia Environmental Protection Division
2 Martin Luther King, Jr. Drive
Suite 1054, East Floyd Tower
Atlanta, GA 30334-9000

Re: GA Power – Plant Hammond

Permit Application – CCR Surface Impoundments

Dear Mr. Cown:

The Georgia Power CCR Surface Impoundments (AP-1, AP-2, AP-3, and AP-4) located at Plant Hammond, 5963 Alabama Highway SW, Rome, Georgia comply with local zoning and land use ordinances.

Sincerely,

Jamie A. McCord
County Manager
Floyd County

BOARD OF COMMISSIONERS
RHONDA WALLACE, CHAIR
SCOTTY HANCOCK, VICE-CHAIR
WRIGHT BAGBY
ALLISON WATTERS
LARRY MAXEY

ADMINISTRATION
JAMIE McCORD, COUNTY MANAGER
GARY BURKHALTER, ASSISTANT COUNTY MANAGER