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## **Delivered by email**

May 8, 2020

Dr. Jackie R. McMorris, County Manager

100 Cherokee St Marietta, GA 30090

## RE: Update on Georgia Power's Coal Ash Closure Activities and Groundwater Assessment Monitoring

Dear Dr. McMorris:

Thank you for speaking with our team on Tuesday, May 5. As discussed, Georgia Power is in the process of closing its ash ponds at Plant McDonough. As part of the closure process, Georgia Power has installed approximately 500 groundwater monitoring wells statewide, including more than 30 groundwater monitoring wells at Plant McDonough – sited by third-party professional geologists.

As discussed, Georgia Power is in the process of characterizing the nature and extent of certain regulated constituents based on groundwater assessment results collected under the federal and state rules regulating ash ponds<sup>1</sup>. Because these results indicated that groundwater on Georgia Power's property containing certain constituents may have migrated off-site and onto Cobb County Department of Transportation (DOT) right-of-way, we have coordinated with the county to install four groundwater monitoring wells in the Cobb DOT right-of-way along Plant Atkinson Road.

Georgia Power has completed sampling and laboratory analysis of the four wells and results indicate that concentrations of beryllium and cobalt decrease to below the relevant groundwater protection standard (GWPS) within the right-of-way. The GWPS for beryllium is 0.004 milligrams per liter (mg/L) and for cobalt it is 0.0322 mg/L, as determined by federal regulations.<sup>2</sup> Although there is not currently a GWPS for boron, concentrations of boron in the right-of-way are slightly above a standard proposed by the Environmental Protection Agency (EPA) and Georgia Power will work to continue to delineate boron.

<sup>&</sup>lt;sup>1</sup> 40 C.F.R. § 257.95(g)(2) and Ga. Comp. R. & Regs. 391-3-4-.10(6)(a)

<sup>&</sup>lt;sup>2</sup> Under the Federal CCR Rule, GWPSs are based on either the Maximum Contaminate Level (MCL) or site-specific background concentrations. MCLs are health-based standards set by the U.S. Environmental Protection Agency (EPA). For beryllium, the groundwater protection standard is based on the MCL and for cobalt it is based on site specific background.

The table below lists concentrations observed at the site and a map depicting these wells is attached.

	GWPS	B-90	B-91	B-92	B-93	B-95	B-96	B-97	B-98
Beryllium	0.004	NS	NS	0.023	0.0069	NS	NS	0.0019J	< 0.000074
<b>Boron</b> <sup>3</sup>	NA	5.6	6.4	3.9	3.3	4.4	3.8	NS	NS
Cobalt	0.0322	NS	NS	NS	0.066	NS	NS	NS	0.0036J

Notes:

Boron does not currently have a GWPS

NS-Sample was not collected for constituent

All values are in milligrams per liter (mg/L)

Bolded values exceed GWPS

J-Indicates detections between laboratory

reporting limit and method detection limit

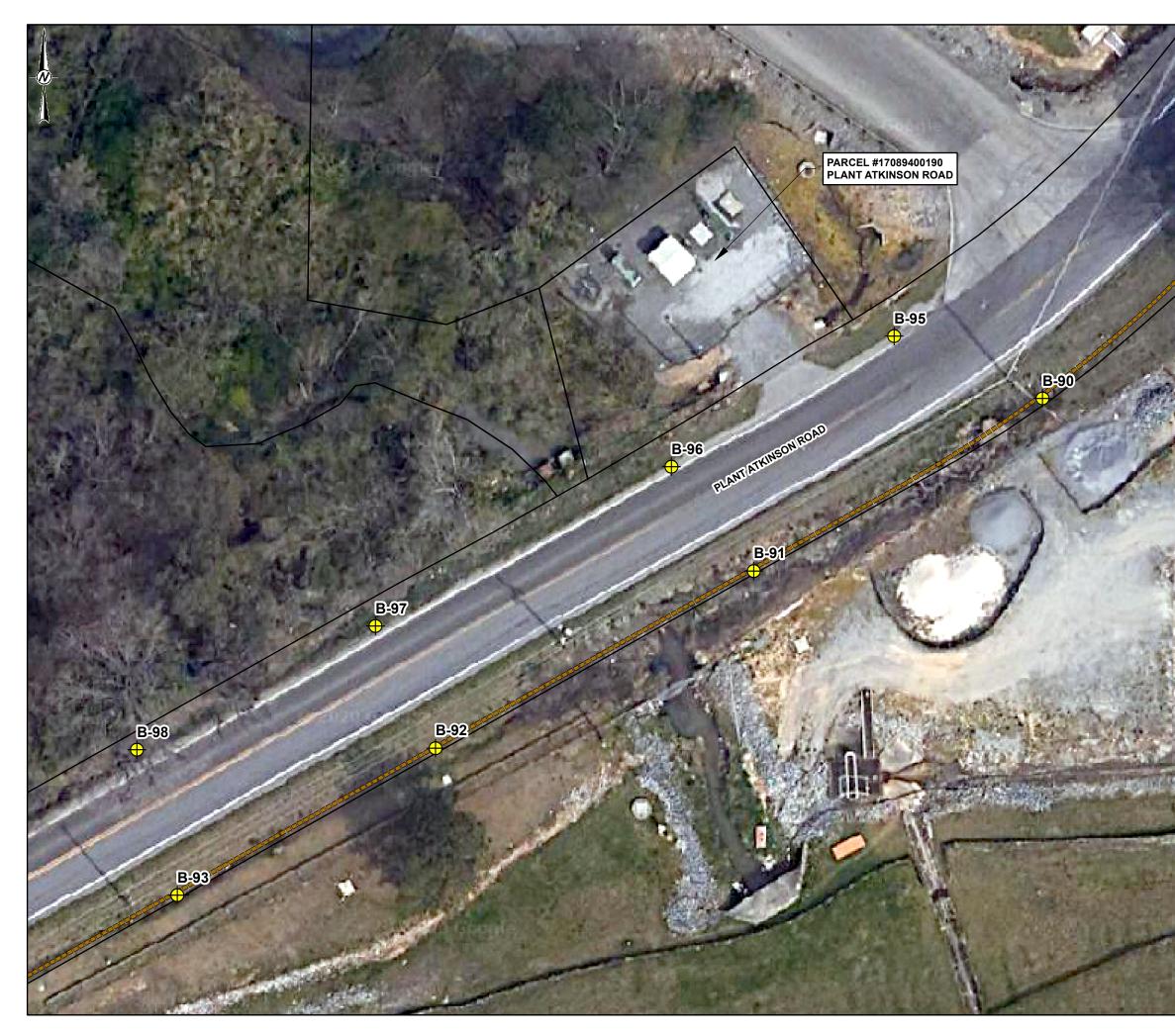
Please know that we are committed to following this process to ensure that our operations continue to meet all regulations. We value your input, and welcome continued discussions to address any questions or concerns.

Thank you for your time, attention, and assistance in helping us to complete necessary activities at Plant McDonough. Feel free to contact me at any time as we work through this process.

Sincerely,

Aaron D. Mitchell General Manager, Environmental Affairs 404-506-7757

<sup>&</sup>lt;sup>3</sup> Under the Federal CCR Rule, groundwater protection standards are not currently required to be calculated for boron. However, the U.S. EPA has a non-final proposal to calculate GWPS for boron of 4 mg/L.



LEGEND			
	RING WELL		
PIANT M	ICDONOUGH PI	ROPERTY BOU	
	OUNTY PARCEL	.5	
1			
4			
NOTES			
1. DB 2475, PG 28 2. DB 4168, PG 49		- "A"	
SKETCH FOR PUM GEORGIA,			BB COUNTY,
3. ALL LOCATIONS	AND BOUNDARI	ES ARE APPRO	XIMATE.
REFERENCE			
1. IMAGERY: ESRI			
2. COORDINATE SY WEST (U.S. FEET).	STEM: NAD 1983	STATE PLANE	GEORGIA
3. MONITORING WE			ROVIDED
	-		
4. APPROXIMATE PE SOUTHERN COMPA			D BY APHY 09-7-
2018.			
5. PARCEL/PROPER COUNTY TAX ASSES		N OBTAINED FF	ROM COBB
0 25	50		
1 IN= 25	5 FT		
CLIENT			
SOUTHERN COMPA PLANT MCDONOUG		NC.	Southern Company
PROJECT ADDITIONAL PIEZO	METERS		
			D BY APHY 09-7- ROM COBB
COBB COUNTY NEI	GHBOR NOTIFIC	CATION MAP	
CONSULTANT	YYYY-MM-DD	2020-5-1	
	PREPARED	BAS	
<b>GOLDER</b>	DESIGN	BAS	
PROJECT No.	APPROVED		