

Delivered by email

October 25, 2021

Jim Hedges
Monroe County Manager
38 West Main Street
Forsyth, GA 31029RE: Update on Georgia Power's Coal Ash Closure Activities and Groundwater Assessment
Monitoring

Dear Mr. Hedges,

Thank you for allowing Georgia Power to access the four piezometers located within the Monroe County right-of-way for testing (identified as PZ-13S, PZ-14S, PZ-14I, and PZ-25S). Since we last spoke with Chairman Tapley and Ben Vaughn, Georgia Power has tested groundwater from the piezometers in the County right-of-way. As shown in the table below, cobalt was detected above the groundwater protection standard in one sample collected from one of the four piezometers.

In 2019, Georgia Power's third-party groundwater consultant completed a study of groundwater data and concluded that cobalt is naturally occurring in groundwater at Plant Scherer. That study, titled an "Alternate Source Demonstration" or "ASD," was submitted to the Georgia Environmental Protection Division (EPD) for review. EPD recently responded to the ASD, acknowledging that cobalt does naturally occur, but indicating that it could not approve the ASD at this time. EPD indicated that if additional alternate source information becomes available, Georgia Power may submit an updated ASD. At the request of Georgia EPD and as required by applicable regulations, Georgia Power is in the process of initiating assessment of corrective measures.

Under the federal and state rules regulating ash ponds, as part of the assessment of corrective measures, Georgia Power is required to characterize the nature and extent of cobalt in groundwater.¹ As a part of this effort, groundwater was sampled from the four piezometers located in the County's right-of-way. The groundwater protection standard (GWPS) for cobalt is 0.020 milligrams per liter (mg/L).² Results indicate that concentrations of cobalt decrease to below the GWPS within the Monroe County right-of-way south of Luther Smith Road, as can be seen on the attached map.

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

² Under the Federal CCR Rule, GWPSs are based on either the Maximum Contaminant Level (MCL), Regional Screening Level (RSL), or site-specific background concentrations. For cobalt at Plant Scherer, the GWPS is based on site specific background.

Previous data collected in the right-of-way was shared with the county in January 2021. The cobalt data collected in 2021 from PZ-25S ranges from below the GWPS at 0.012 mg/L to slightly above the GWPS at 0.022 mg/L. Based on data collected to date, the cobalt at PZ-25S does not extend beyond PZ-14S/I and is isolated to the narrow right-of-way within Georgia Power’s Plant Scherer property.

The table below lists concentrations observed at the site.

Cobalt	GWPS	PZ-13S	PZ-14S	PZ-14I	PZ-25S
April 2021	0.020	0.0070	0.00019 J	0.00023 J	0.012
August 2021		0.0060	0.00030 J	0.00016 J	0.022

Notes:

All values are in milligrams per liter (mg/L), bolded values exceed GWPS.

J-Indicates detections between laboratory reporting limit and method detection limit.

Data from the August 2021 sampling event was validated and finalized on September 23, 2021.

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.

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

Sincerely,

Aaron D. Mitchell



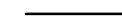

Attachments:

Figure 1 Monroe County Right-of-Way Sampling Results Map



MAP KEY

LEGEND

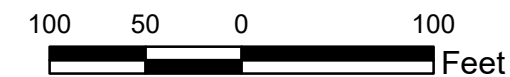
-  PLANT SCHERER PROPERTY BOUNDARY
-  MONROE COUNTY RIGHT-OF-WAY (APPROXIMATE)
-  MONROE COUNTY PARCELS
-  MONITORING WELL

NOTES

1. ALL LOCATIONS AND BOUNDARIES ARE APPROXIMATE.

REFERENCE

1. COORDINATE SYSTEM: NAD 1983 STATE PLAN GEORGIA WEST (U.S. FEET).
2. MONITORING WELL LOCATIONS PROVIDED BY JORDAN ENGINEERING INC., JULY 2020.
3. PARCEL/PROPERTY INFORMATION OBTAINED FROM MONROE COUNTY TAX ASSESSOR.
4. REFERENCE DWGS.: 10-505 H10045 R/W STUDY IN VICINITY OF LUTHER SMITH ROAD, PROVIDED BY GEORGIA POWER COMPANY.



CLIENT
GEORGIA POWER COMPANY



PROJECT
PLANT SCHERER

TITLE
MONROE COUNTY RIGHT-OF-WAY SAMPLING RESULTS MAP

CONSULTANT	YYYY-MM-DD	2021-10-25
 GOLDER	PREPARED	DJC
	DESIGN	BAS
	REVIEW	BAS
	APPROVED	DLP

PROJECT No. 166235021 CONTROL 1662350AH001-GIS.mxd Rev. 0 FIGURE 1