PERIODIC HAZARD POTENTIAL CLASSIFICATION ASSESSMENT 391-3-4-.10(4) AND 40 C.F.R. PART 257.73 PLANT HAMMOND ASH POND NO. 3 (AP-3) GEORGIA POWER COMPANY

The Federal CCR Rule (40 C.F.R. Part 257.73) and the Georgia CCR Rule (391-3-4-.10) require the owner or operator of an existing CCR surface impoundment to conduct initial and periodic hazard potential classification assessments. *See* 40 C.F.R. § 257.73(a)(2); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)¹. A direct final rule revision to a partial vacatur of the Final Rule became effective on October 4, 2016. This revision eliminated the exemption for inactive CCR surface impoundments and required such units to meet the same requirements as existing CCR surface impoundments. The owner or operator must classify the hazard potential of each CCR surface impoundment as either a high hazard potential CCR surface impoundment, a significant hazard potential CCR surface impoundment, or a low hazard potential CCR surface impoundment and document the basis of the classification. In addition, the Rules require a subsequent assessment be performed within 5 years of the previous assessment. *See* 40 C.F.R. § 257.73(f)(3); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)¹.

The CCR surface impoundment known as Plant Hammond AP-3 is located in Floyd County, Georgia, approximately 10 miles west of Rome on Plant Hammond property. AP-3 was formed by an engineered perimeter dike around all sides. Plant facilities (now retired) are located to the southwest of the impoundment. A church is located immediately west. The Coosa River is located approximately 1750 feet to the south of the impoundment. In the early 1980's, AP-3 was converted into a dry ash disposal area and in the early 1990's stopped receiving CCR materials.

AP-3 has now been closed in place by grading the CCR to promote positive stormwater drainage and constructing a cover system in accordance with §257.102(d). With this final cover system in place, AP-3 is no longer designed to, nor has the ability to, impound water; therefore, it no longer functions as a surface impoundment. On December 13, 2018, a Final CCR Surface Impoundment Closure Construction Certification Report was submitted to the Georgia Environmental Protection Division. In the unlikely event of an embankment failure, a Hazard Potential Classification of Low Hazard Potential has been assigned to Plant Hammond AP-3. A hazard classification was previously conducted in 2010 to meet EPA requirements. A Low Hazard classification was assigned to AP-3 at that time and accepted by EPA.

^[1] 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.

A failure of the perimeter embankment would result in no probable loss of human life due to the intermittent and transient nature of persons around AP-3. In the unlikely event of a failure, economic losses and environmental damage would be principally contained to Georgia Power Company property.

I hereby certify that the reassessment of the hazard potential classification for Plant Hammond AP-3 was conducted in accordance with 40 C.F.R. § 257.73(a)(2).

С. No. PE0017419 PROFESSION James C. Pegues, Licensed State of GA