



PERIODIC HAZARD POTENTIAL CLASSIFICATION ASSESSMENT
391-3-4-.10(4) AND 40 C.F.R. PART 257.73(a)
PLANT MCDONOUGH ASH POND 1 (AP-1)
GEORGIA POWER COMPANY

The Federal CCR Rule 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 the CCR unit. 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. Hazard potential classification means 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. Pursuant to 40 C.F.R. Part 257.73, a CCR unit is classified with one of the following hazard classifications:

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

The CCR surface impoundment known as Ash Pond 1 (AP-1), owned, and operated by Georgia Power Company, is located at Plant McDonough-Atkinson (Plant McDonough) in Cobb County, Georgia. AP-1 no longer receives CCR or other waste streams and no longer functions as a CCR surface impoundment and is in the process of obtaining a solid waste permit under the Georgia Rules for Solid Waste Management, 391-3-4-.10. Installation of the final cover system for Plant McDonough AP-1 was substantially completed Q1 2017, and AP-1 is undergoing additional closure construction in the near term in accordance with 40 C.F.R. § 257.102(d), including the installation of a fully encompassing subsurface barrier wall and adjacent associated closure system upgrades.

AP-1 is formed by engineered perimeter embankments along the west, south, and east of the Unit. Engineering evaluations performed for AP-1 to evaluate the hazard classification in the unlikely event of an embankment failure indicate that structural failure or mis-operation of the unit would result in no probable loss of human life and low economic and/or environmental losses, with any losses limited to the Owner's property. Therefore, a Hazard Potential classification of Low Hazard has been assigned to AP-1.

^[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.

I certify that the hazard potential classification for AP-1 was conducted in accordance with 40 C.F.R. § 257.73(a)(2).



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