



**LINER DESIGN CRITERIA  
40 C.F.R. 257.100(e)(3)(i)  
PLANT HAMMOND ASH POND 3 (AP-3)  
GEORGIA POWER COMPANY**

The Environmental Protection Agency's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257 & Part 261) was published in the Federal Register on April 17, 2015. A direct final rule revision in response to a partial vacatur of the Final Rule became effective on October 4, 2016. This revision eliminated the exemption for inactive coal combustion residual (CCR) surface impoundments and required such units to meet the same requirements as existing CCR surface impoundments. An extended timeline was given to inactive CCR surface impoundments that had prepared Notification of Intent to Initiate Closure compliant with 40 C.F.R. §257.105(i)(1), 40 C.F.R. §257.106(i)(1) and 40 C.F.R. §257.107(i)(1). 40 C.F.R. §257.100(e)(3)(i) for inactive CCR surface impoundments requires the completion of documentation of liner type as set forth by 40 C.F.R. §257.71(a) and (b).

40 C.F.R. §257.71(a)(1) requires the owner or operator of an existing CCR surface impoundment to document from a qualified professional engineer whether or not the unit was constructed with (i) a minimum of 2 feet of compacted soil having a hydraulic conductivity of no more than  $1 \times 10^{-7}$  cm/sec, (ii) a composite liner meeting the requirements of §257.70(b), or (iii) an alternate composite liner meeting the requirements of §257.70(c).

AP-3, located on the Plant Hammond property west of Rome, Georgia, was not constructed with a liner that meets the aforementioned criteria.

I hereby attest that the documentation above is accurate based on current available information.

  
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