

PERIODIC STRUCTURAL STABILITY ASSESSMENT
391-3-4-.10(4) AND 40 C.F.R. Part 257.73
PLANT HAMMOND ASH POND 3 (AP-3)
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 structural stability assessments. See 40 C.F.R. § 257.73(d); 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 conduct an assessment of the CCR unit and document whether the design, construction, operation and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded therein. 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 liquids; 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 EPD.

Available construction documentation includes reports of field density testing performed on the AP-3 dikes. The dike materials were compacted to 100 percent of the standard Proctor maximum dry density.

^[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.


Additionally, Standard Penetration Test results from historical borings advanced in the perimeter dike indicated a general consistency of stiff to very stiff. This consistency indicates the dikes were constructed using mechanical compaction methods.

Vegetated slopes of the dike are properly maintained to a manageable height that allows for routine visual inspections.

The spillway pipes were removed as part of closure construction. Stormwater drainage is now conveyed through a series of riprap lined ditches around the unit and discharged at three locations from the perimeter of the unit. The stormwater drainage system was designed to manage the flow from a 25-yr, 24-hr storm event.

A portion of the downstream slope in the north corner of the AP-3 embankment is subject to inundation from the 100-yr flood of the Coosa River. The downstream slopes are well vegetated and have not been impacted from past flood events. The FEMA base flood elevation is EL 586 feet. The AP-3 closure configuration top of dike ranges from EL 600 feet to EL 608 feet. Approximately 5 feet of the exterior slope would be inundated by the 100-yr flood event. The north corner of AP-3 is approximately 3,000 feet from the floodway of the Coosa River. As such, AP-3 is not subject to significant erosion velocities from the floodway of the Coosa River.

I hereby certify that the structural stability assessment was conducted in accordance with 40 C.F.R. § 257.73(d).


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