



**PERIODIC HAZARD POTENTIAL CLASSIFICATION ASSESSMENT**  
**391-3-4-.10(4) AND 40 C.F.R. PART 257.73(a)**  
**PLANT MCDONOUGH ASH POND 4 (AP-4)**  
**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)<sup>1</sup>. 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)<sup>1</sup>. Hazard potential classification means the possible adverse incremental consequences that result from the release of water or stored contents due to failure or mis-operation of the diked CCR surface impoundment or its appurtenances. Pursuant to 40 C.F.R. § 257.73(a), 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 4 (AP-4), owned, and operated by Georgia Power Company, is located at Plant McDonough-Atkinson (Plant McDonough) in Cobb County, Georgia. AP-4 no longer receives CCR or other waste streams and no longer functions as a CCR surface impoundment. At the time of this submittal, AP-3 and AP-4 are being consolidated and closed in place as combined unit AP-3/4 in accordance with §257.102(d) and are in the process of obtaining a solid waste permit under the Georgia Rules for Solid Waste Management, 391-3-4-.10. The closure plan includes lowering of the AP-4 dam. Historically, the Plant McDonough Dam Hazards have been classified separately; these evaluations maintain the separate classification distinctions for the CCR Units. AP-4 was formed by an originally 83-foot high earthen embankment, and survey data indicates that the minimum elevation of the toe of the dam is approximately 763 ft, the maximum dam elevation is approximately 846 ft, and the current minimum dam crest elevation is 795 ft. AP-4 is located in an urban area of land bounded on the west side by adjacent CCR Unit AP-3, on the east side by commercial and industrial sites, on the north side by industrial, commercial, and residential areas, and on the south side by plant infrastructure and the Chattahoochee River.

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<sup>[1]</sup> 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.

Based on the potential impacts in the unlikely event of an embankment failure, a hazard potential classification of High Hazard has been assigned to AP-4 in its interim closure condition.

I certify that the hazard potential classification for AP-4 was conducted in accordance with 40 C.F.R. § 257.73(a)(2).



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