

INITIAL HAZARD POTENTIAL CLASSIFICATION
40 C.F.R. PART 257.73
ASH POND 3 (AP-3) AND ASH POND 4 (AP-4)
PLANT MCDONOUGH, GEORGIA POWER COMPANY

The United States Environmental Protection Agency's (EPA) "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257), §257.73(a)(2) and §257.100(e)(3)(v) require the owner or operator of an existing CCR surface impoundment to conduct an initial and periodic hazard potential classification assessment. 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 CFR §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.

CCR surface impoundments known as Ash Pond 3 (AP-3) and Ash Pond 4 (AP-4), owned, and operated by Georgia Power Company, are located at Plant McDonough-Atkinson (Plant McDonough) in Cobb County, Georgia.

AP-3 was formed by a side-hill embankment 31 feet high with an original pond area of 23 acres. Survey data indicates that the minimum elevation of the toe of the dike is approximately 815 ft and the maximum dike height is approximately 846 ft. AP-4 was formed by an 83-foot high earthen embankment, and survey data indicates that the minimum elevation of the toe of the dike is approximately 763 ft and the maximum dike elevation is approximately 846 ft. AP-3 and AP-4 are located in an urban area of land bounded on the east side by commercial and industrial sites, on the north and west side by industrial, commercial, and residential areas, and on the south side by plant infrastructure and the Chattahoochee River.

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. Closure design includes relocating CCR in the eastern portion of AP-4 to the western portion of AP-4 and AP-3, as well as lowering the eastern dam at AP-4.

Based on the potential impacts in the unlikely event of an embankment failure, a hazard potential classification of "High" has been assigned to AP-3 and AP-4 in its interim closure condition.

I certify that at the time of this submittal, AP-3 and AP-4 are assigned a hazard potential rating of "High" in accordance with 40 CFR §257.73(a).



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