Environmental Affairs
Bin 10221
241 Ralph McGill Boulevard NE
Atlanta, Georgia 30308-3374

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GEORGIA POWER
A SOUTHERN COMPANY

May 13, 2009

VIA E-MAIL TO: kinch.richard@epa.gov

Mr. Richard Kinch
U.S. Environmental Protection Agency
Two Potomac Yard
2733 South Crystal Drive, 5th Floor: N-5783
Washington, D.C. 20460

Re: Identification of Georgia Power's Information Subject to a Claim of Confidentiality

Dear Mr. Kinch:

By separate letters dated May 5, 2009 (the "May 5 letters"), the Environmental Protection Agency ("EPA") contacted three electric generating plants owned by Georgia Power, and we believe EPA will send similar letters to three other electric generating plants owned by Georgia Power. Specifically, these six plants are:

- Plant Bowen in Cartersville, Georgia
- Plant Branch in Milledgeville, Georgia
- Plant Scherer in Juliette, Georgia
- Plant Wansley in Roopville, Georgia
- Plant Kraft near Savannah, Georgia
- Plant McIntosh near Savannah, Georgia

This letter responds on behalf of all six plants.

EPA's letters follow an earlier exchange of correspondence. By letters dated March 9, 2009 (the "Information Requests"), EPA posed ten questions to each of the six power plants noted above. Georgia Power responded on behalf of all six plants via letters dated March 26 and April 6, 2009, including enclosures that responded to EPA's questions on a plant-specific basis. In contrast to your assertion in the May 5 letters that Georgia Power did not make any confidentiality claims, Georgia Power's letters of March 26 and April 6 included a claim of confidentiality with respect to some of the information

provided in Georgia Power's response for each plant. As Georgia Power stated in the letters,

> For each facility, Georgia Power has provided the responses which include confidential information in a separate appendix. Georgia Power asserts a claim of confidentiality for the information provided in all of these appendices and has marked them as confidential. Georgia Power provides the information marked as confidential on the condition that EPA not disclose the information publicly pursuant to the Freedom of Information Act or any other authority.

Despite the very clear language quoted above, the May 5 letters include the following statement: "Since your response to our March 9th letter did not assert such a claim of CBI [confidential business information], this letter is to inform you that the Agency will make the information provided in response to the March 9, 2009 request publicly available unless you assert such a claim." The premise of EPA's statement is incorrect. Georgia Power clearly identified and separated the responses for which it asserted a claim of confidentiality in our response dated March 26 and April 6, and we hereby reassert those claims. Accordingly, we request again that EPA handle Georgia Power's confidential information in accordance with the Freedom of Information Act, the Trade Secrets Act, and EPA's regulations and procedures. If there is any question about which information is subject to Georgia Power's claim of confidentiality, please contact me prior to any third-party disclosure of that information.

Georgia Power's letter of March 26, 2009, also requested that you direct all future correspondence on these matters to the attention of Charles H. Huling. Please direct all future correspondence regarding this and related matters to Charles H. Huling, Vice President, Environmental Affairs, Georgia Power Company, 241 Ralph McGill Blvd., N.E., 22nd Floor, Bin 10221, Atlanta, Georgia, 30308-3374.

Sincerely,

Tanya D. Blalock

Tanya D. Blalock
Environmental Affairs Manager
Georgia Power Company

TDB:

March 25, 2009

PLANT BOWEN
317 COVERED BRIDGE ROAD
CARTERSVILLE, GEORGIA 30120

Note: The text of EPA's questions is included below in *italics*. Georgia Power's responses are provided in plain text.

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

1. *Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.*

   The National Inventory of Dams (NID) classifies the Plant Bowen ash pond as being a Low Hazard structure. We are not aware of the basis for the NID rating. The Plant Bowen ash pond is under the jurisdiction of the Georgia Environmental Protection Division (EPD) Safe Dams Program. The Georgia Safe Dams Program has examined the Plant Bowen ash pond and has classified it as a Category II dam. '"Category II" means the classification where improper operation or dam failure would not result in probable loss of human life' (Rules of Georgia Department of Natural Resources Environmental Protection Division Chapter 391-3-8 Rules for Dam Safety, Section 391-3-8-.02). Category II dams are not inspected by the state, but may be periodically reviewed for reclassification.

2. *What year was each management unit commissioned and expanded?*

   The Plant Bowen ash pond was initially commissioned in 1968. Georgia EPD approved ash stacking plans in 1992 and in 2001, expanding the capacity of the ash pond.

3. *What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other", please specify the other types of materials that are temporarily or permanently contained in the unit(s).*

   The Bowen ash pond contains fly ash, bottom ash, boiler slag, flue gas emission control residuals, pyrites and low volume waste as defined under 40 CFR 423.11

4. *[(a)]Was the management unit(s) designed by a Professional Engineer? [(b)]Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? [(c)]Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?*

(a) Yes, this management unit was designed by a Professional Engineer.
(b) Yes, this management unit was constructed under the supervision of a Professional Engineer.
(c) Yes, inspection and monitoring of the safety of the management unit(s) is under the supervision of a Professional Engineer. See 5(b) below.

5. [Response provided in an appendix.]

6. [Response provided in an appendix.]

7. [Response provided in an appendix.]

8. [Response provided in an appendix.]

9. *Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).*

A sinkhole developed on July 28, 2002 in the Plant Bowen ash pond. Areas of ground water and ash/water mixture emerged below the ash pond dike. Some of the ash/water mixture reached Euharlee Creek, which is a tributary of the Etowah River. Subsequent evaluation established that 11 cubic yards of ash sediment reached creek. Georgia Environmental Protection Division (EPD) executed Consent Order No. EPD-WQ-4075 on November 26, 2002. The Consent Order included a $31,250 fine, ecological evaluation and clean-up of the creek, and enhancements to the ash pond management plan. Consent Order requirements were completed and a final report issued on June 1, 2004.

Following a rain event of approximately 1.25 inches in 45 minutes on September 9, 2008, a portion of the ash stack within the Plant Bowen ash pond eroded and flowed over the ash pond dike. Approximately 40 tons of ash left plant property and flowed to near by residential properties and approximately 2 tons of ash reached Euharlee Creek. With concurrence of Georgia EPD, EPA representatives and property owners, ash was removed within thirty days from residential areas. Georgia EPD executed Consent Order No. EPD-WQ-ERT-5033 on January 15, 2009, which requires payment of a $35,000 penalty and enhancement of the ash management plan. Consent Order requirements were completed and a final submission filed on March 11, 2009.

10. Please identify all current legal owner(s) and operator(s) at the facility.

Georgia Power is the legal owner and operator of this facility.

Georgia Power Responses to EPA Request for Information under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e)

DO NOT DISCLOSE

CONFIDENTIAL BUSINESS INFORMATION
Not Subject to Disclosure under the Freedom of Information Act

CONFIDENTIAL APPENDIX

March 25, 2009

PLANT BOWEN
317 COVERED BRIDGE ROAD
CARTERSVILLE, GEORGIA 30120

Note: The text of EPA's questions is included below in *italics*. Georgia Power's responses are provided in plain text.

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

5. *[a]When did the company last assess or evaluate the safety (i.e., structural integrity) of the management units(s)? [b]Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. [c]Identify actions taken or planned by facility personnel as a result of these assessments or evaluations.[d]If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. [e]If the company plans an assessment or evaluation in the future, when is it expected to occur?*

(a) The field work for the first quarter 2009 inspection was completed on March 18, 2009. The final evaluation of the inspection has not been completed. The previous Plant Bowen ash pond inspection was on December 15, 2008. This structure is inspected quarterly as part of a comprehensive corporate dam safety program conducted by Southern Company Generation Hydro Services. This dam safety program covers all of Georgia Power Company's ash pond dams, storage pond dams, and hydroelectric dams. Additionally, plant personnel check these dams on a frequent basis.

(b) The primary inspector for Plant Bowen is Ronald D. Wood, P.G. Mr. Wood holds a degree in geology from Georgia State University and has done graduate studies at LSU and UNC. He has over 30 years of experience in engineering geology, the majority of this related to dams. He has been a full-time dam safety professional for the last six years. The dam safety inspections completed by Mr. Wood are additionally reviewed by

two geotechnical engineers (Larry B. Wills, PE, and Joel L. Galt, PE, each with over 20 years experience working with dams).

(c) As a result of the inspection by Mr. Wood on December 15, 2008, the remote data acquisition system that collects and transmits piezometer data from the ash pond dam is being improved. The line-of-sight radio transmitters are being replaced with cell phone modules. The Plant Bowen staff has contracted with Geomation, Inc. to make these modifications. The work has been started and is scheduled to be completed by mid 2009.

Additionally, three areas in the ash pond identified in early December 2008 by plant personnel during a routine inspection have been repaired. Additional grouting worked is scheduled to be performed by Southern Company Civil Field Services and completed by the end of April 2009. This department has decades of experience in this type of work and the work is supervised by a professional engineer

(d) The Plant Bowen staff has contracted with Geomation, Inc. to make the modifications to the data acquisition system. Geomation, Inc. is an internationally recognized firm specializing in field data acquisition and control. They have been in business since 1982.

(e) The next inspection by Southern Company Generation Hydro Services of the Plant Bowen ash pond dike is scheduled for the second quarter of 2009.

6. *When did a State or Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.*

   The Plant Bowen ash pond is under the jurisdiction of the Georgia Environmental Protection Division (EPD) Safe Dams Program. The Georgia Safe Dams Program has examined the Plant Bowen ash pond and has classified it as a Category II dam. '"Category II" means the classification where improper operation or dam failure would not result in probable loss of human life.' (Rules of Georgia Department of Natural Resources Environmental Protection Division Chapter 391-3-8 Rules for Dam Safety, Section 391-3-8-.02). Category II dams are not inspected by the state, but may be periodically reviewed for reclassification.

7. *Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to*

deal with the issue or issues. Please provide any documentation that you have for these actions.

We are not aware of any state or federal assessment, evaluations, or inspections of the Plant Bowen ash pond conducted within the last year that have uncovered a safety issue with the ash pond dike structural integrity.

However, as described in response to question 9 of this information request, Georgia EPD ordered, in Consent Order EPD-WQ-ERT-5033, and Georgia Power agreed to submit a revised ash stacking plan to include best management practices implemented to ensure the integrity of the ash stack. A revised ash management plan was submitted on March 11, 2009. A copy of the consent order and response letter is included as Attachment I.

8. *What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of materials currently stored in each of the management unit(s). Please provide the date that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.*

Management Unit	Surface area (acres)	Total storage capacity (yd^3)	Volume of material currently stored in unit (yd^3)	Date current volume measurement taken	Maximum height of management unit (feet)
Bowen ash pond	245.3	5,931,000	3,652,411	February 2007	45

March 25, 2009

PLANT BRANCH
1100 MILLEDGEVILLE ROAD
MILLEDGEVILLE, GEORGIA 31061

Note: The text of EPA's questions is included below in *italics*. Georgia Power's responses are provided in plain text.

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

1. *Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.*

   The National Inventory of Dams (NID) does not list any of the ash pond dams at Plant Branch as far as we have been able to determine.

   Ash Pond dams 'A' and 'C' have not been classified to our knowledge.

   Ash pond dams 'B' and 'D' have been classified as 'Category II' by the Georgia EPD Safe Dams Program under the Georgia Safe Dams Act of 1978. '"Category II" means the classification where improper operation or dam failure would not expect to result in probable loss of human life.' This definition is from the Rules of Georgia Department of Natural Resources Environmental Protection Division Chapter 391-3-8 Rules for Dam Safety, Section 391-3-8-.02(e).

   Ash pond dam 'E' was classified as 'Category I' by the Georgia Soil and Water Conservation Committee under Georgia Safe Dams Act of 1978. '"Category I" means the classification where improper operation or dam failure would result in probable loss of human life. Situations constituting "probable loss of life" are those situations involving frequently occupied structures or facilities, including, but not limited to, residences, commercial and manufacturing facilities, schools, and churches.' This definition is from the Rules of Georgia Department of Natural Resources Environmental Protection Division Chapter 391-3-8 Rules for Dam Safety, Section 391-3-8-.02(d)

2. *What year was each management unit(s) commissioned and expanded?*

Ash pond 'A' was commissioned in 1965.
Ash pond 'B' was commissioned in 1967.
Ash pond 'C' was commissioned in 1971.
Ash pond 'D' was commissioned in 1980.
Ash pond 'E' was commissioned in 1982. Ash pond E capacity was expanded in 2004 with the raising of the dike elevation.

3. *What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other", please specify the other types of materials that are temporarily or permanently contained in the unit(s).*

Plant Branch ash ponds contain fly ash, bottom ash, boiler slag, pyrites, and other low volume waste as defined under 40CFR 423.11.

4. *[a]Was the management unit(s) designed by a Professional Engineer? [b]Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? [c]Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?*

Ash pond "A"

(a) Ash pond "A" was designed under the supervision of a Professional Engineer.
(b) To date we have been unable to locate information that would document that ash pond "A" was constructed under the supervision of a Professional Engineer.
(c) Ash pond "A" no longer receives ash, does not contain any free water and is not currently inspected.

Ash pond "B"

(a) Yes, ash pond "B" dam was designed by a Professional Engineer.
(b) Yes, ash pond "B" dam was constructed under the supervision of a Professional Engineer.
(c) Yes, ash pond "B" is currently inspected by a Professional Geologist, whose work is supervised by a Professional Engineer.

Ash pond "C"

(a) Yes, ash pond "C" dam was designed by a Professional Engineer.
(b) Yes, ash pond "C" dam was constructed under the supervision of a Professional Engineer.
(c) Yes, ash pond "C" is currently inspected by a Professional Geologist, whose work is supervised by a Professional Engineer.

Ash pond "D"

(a) Yes, ash pond "D" dam was designed by a Professional Engineer.
(b) Yes, ash pond "D" dam was constructed under the supervision of a Professional Engineer.
(c) Yes, ash pond "D" is currently inspected by a Professional Geologist, whose work is supervised by a Professional Engineer.

Ash pond "E"

(a) Yes, ash pond "E" dam was designed by a Professional Engineer.
(b) Yes, ash pond "E" dam was constructed under the supervision of a Professional Engineer.
(c) Yes, ash pond "E" is currently inspected by a Professional Geologist, whose work is supervised by a Professional Engineer.

5. [Response provided in an appendix.]

6. [Response provided in an appendix.]

7. [Response provided in an appendix.]

8. [Response provided in an appendix.]

9. *Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).*

   There was a discharge of ash slurry water on December 1, 2000 due to the mechanical failure of an isolation valve which caused water from ash pond "C" to be siphoned back and discharged through the cooling water intake/discharge tunnel into Lake Sinclair. Written notification was provided to Georgia EPD on December 08, 2000.

10. *Please identify all current legal owner(s) and operator(s) at the facility.*

    Georgia Power is the legal owner and operator of this facility.

Georgia Power Responses to EPA Request for Information under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e)

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CONFIDENTIAL APPENDIX

March 25, 2009

PLANT BRANCH
1100 MILLEDGEVILLE ROAD
MILLEDGEVILLE, GEORGIA 31061

Note: The text of EPA's questions is included below in *italics*. Georgia Power's responses are provided in plain text.

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

5. *[a]When did the company last assess or evaluate the safety (structural integrity) of the management units(s)? [b]Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. [c]Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. [d]If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. [e]If the company plans an assessment or evaluation in the future, when is it expected to occur?*

(a) Plant Branch ash pond dams C, D and E were last inspected on January 13, 2009. Plant Branch ash pond B dam was last inspected on March 17, 2009. These structures are inspected as part of a comprehensive dam safety program run by Southern Company Generation Hydro Services. This dam safety program covers all of Georgia Power Company's ash pond dams, storage pond dams, and hydroelectric dams. Additionally, plant personnel check these dams on a frequent basis.

(b) The inspector for Plant Branch is Ronald D. Wood, PG. Mr. Wood holds a bachelor's degree in geology. He has over 30 years of experience in engineering geology, the majority of this related to dams. He has been a full-time dam safety professional for the last six years. The dam safety inspections completed by Mr.

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Wood are additionally reviewed by two geotechnical engineers (Larry B. Wills, PE, and Joel L. Galt, PE, each with over 20 years experience working with dams).

(c) As a result of the most recent inspection, Plant Branch staff is having the grass and brush cleared from the upstream slopes of ash pond C and D dams. In addition, Plant staff has contacted SCS Civil Field Services to arrange for grouting of the void under the ditch liner at the toe of ash pond D and the grouting of the voids under the ditch liner at the toe of ash pond E, plus the sealing of the expansion joints in this ditch liner. This work is in progress and is anticipated to be completed by mid-April 2009.

(d) No special credentials are required for the grass and brush cutting. SCS Civil Field Services personnel have many years of experience conducting geotechnical investigations and grouting operations. These personnel are supervised by a Professional Engineer. All of this work is being done in consultation with Mr. Ronald D. Wood P.G.

(e) The next SCG Hydro Services inspection of the Plant Branch ash pond dams is scheduled for second quarter of 2009.

6. *When did a State or Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation.*

The Plant Branch ash pond dams 'B', 'C' and 'D' are under the jurisdiction of the Georgia Environmental Protection Division Safe Dams Program. The Safe Dams Program has classified Plant Branch ash pond dams 'B' and 'D' as Category II dams. Category II dams are not inspected by the state, but may be reviewed for reclassification. The Safe Dams Program has not inventoried Plant Branch ash pond 'C' dam. The Safe Dams Program has classified Plant Branch ash pond 'E' dam as a Category I dam.

Plant Branch ash pond 'E' dam last was inspected by a Georgia Environmental Protection Division Safe Dams Program official on January 13, 2009. We have not received an official response from Safe Dams for this inspection.

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7. *Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.*

   Plant Branch ash pond 'E' dam was inspected by a Georgia Environmental Protection Division Safe Dams Program official on January 13, 2009. We have not received an official response from Safe Dams for this inspection.

   The 2008 Safe Dams Inspection of pond 'E' dam was performed on April 3, 2008. Items identified during the inspection and recommended for action by the Safe Dams Inspector have all been addressed and satisfactorily completed by the Plant personnel. These were all maintenance items and not dam safety issues. Attachment I is a copy of the 2008 follow-up letter from Safe Dams with these items listed.

   Ash Pond Dams 'A', 'B', 'C' and 'D', to our knowledge, have not been inspected by Federal or State regulatory officials.

8. *What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of materials currently stored in each of the management unit(s). Please provide the date that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.*

   The following ash ponds are the only ash pond currently receiving ash:

Management Unit	Surface Area (acres)	Total Storage Capacity (yd^3)	Volume of Material Currently Stored (yd^3)	Date volume measurement taken	Maximum height of management unit (feet)
Ash Pond E	311	7,526,200	4,288,751	July 2007	73
Ash Pond B	75	1,210,000	1,140,000	February 2009	70

Additionally, Plant Branch has ash ponds which no longer receive ash. These do not meet the EPA information collection request criteria of "...surface impoundment or similar diked or bermed management unit(s) or management unit(s) designated as landfills which **receive** [emphasis added] liquid-borne material for the storage of

disposal of residuals...." Ash ponds C and D still receive some plant waste water that flows through the pond. Ash Pond A has been covered with earthen material and vegetated. However, we are providing the following information.

Management Unit	Surface Area (acres)	Total Storage Capacity (yd^3)	Volume of Material Currently Stored (yd^3)	Date volume measurement taken	Maximum height of management unit (feet)
Ash Pond A	0.9	21742	21742	February 2009	unknown
Ash Pond C	70	1,694,000	1,594,000	February 2009	83
Ash Pond D	45	1,089,000	1,083,000	February 2009	57

March 25, 2009

PLANT SCHERER
10986 HIGHWAY 87
JULIETTE, GEORGIA 31046

Note: The text of EPA's questions is included below in *italics*. Georgia Power's responses are provided in plain text.

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

1. *Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.*

   The Plant Scherer ash pond dam is not listed in the National Inventory of Dams. Additionally the Georgia Safe Dams Program has not classified the Plant Scherer ash pond dam to date. Based on this, this unit does not have a rating.

2. *What year was each management unit commissioned and expanded?*

   1980

3. *What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other", please specify the other types of materials that are temporarily or permanently contained in the unit(s).*

   The Scherer ash pond contains fly ash, bottom ash, boiler slag, pyrites, and other low volume waste as defined under 40CFR 423.11.

4. *[(a)]Was the management unit(s) designed by a Professional Engineer? [(b)]Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? [(c)]Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?*

   (a) Yes, this management unit was designed by a Professional Engineer.

(b) Yes, this management unit was constructed under the supervision of a Professional Engineer.
(c) Yes, inspection and monitoring of the safety of the management unit(s) is under the supervision of a Professional Engineer. See 5(b) below.

5. [Response provided in an appendix.]

6. [Response provided in an appendix.]

7. [Response provided in an appendix.]

8. [Response provided in an appendix.]

9. *Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).*

There have been no spills or unpermitted releases from the Plant Scherer ash pond within the last ten years.

10. *Please identify all current legal owner(s) and operator(s) at the facility.*

Current legal owners of the facility are:

Oglethorpe Power Corporation	30%,
Georgia Power	23%,
Florida Power & Light (FP&L)	19.1%,
Municipal Electric Authority of Georgia (MEAG)	15.1%,
Gulf Power	6.2%,
Jacksonville Electric Authority (JEA)	5.9%,
Dalton Utilities (DU)	0.7%.

Georgia Power is the current legal operator of the facility.

Georgia Power Responses to EPA Request for Information under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e)

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March 25, 2009

PLANT SCHERER
10986 HIGHWAY 87
JULIETTE, GEORGIA 31046

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5. *[a]When did the company last assess or evaluate the safety (structural integrity) of the management units(s)? [b]Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. [c]Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. [d]If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. [e]If the company plans an assessment or evaluation in the future, when is it expected to occur?*

(a) The Plant Scherer ash pond dam was inspected on March 3, 2009, but the evaluation based on this inspection has not been completed at this time. The previous inspection of the Plant Scherer ash pond dam was conducted on December 4, 2008. This structure is inspected quarterly as part of a comprehensive dam safety program run by Southern Company Generation Hydro Services located in the Georgia Power Company headquarters building. This dam safety program covers all of Georgia Power Company's ash pond dams, storage pond dams, and hydroelectric dams. Additionally, plant personnel check these dams on a frequent basis.

(b) The inspector for Plant Scherer is Hugh H. Armitage, PE. Mr. Armitage holds a Bachelors Degree in Civil Engineering and a Masters Degree in Geotechnical

Engineering. He has over 20 years of experience in civil and geotechnical engineering with a considerable portion of this being related to slope stability studies and the design, construction, and inspection of dams and earth-fill embankments. He has been a full-time dam safety professional with Southern Company for the last year. The dam safety inspection results by Mr. Armitage are reviewed by two geotechnical engineers (Larry B. Wills, PE and Joel L. Galt, PE, each with over 20 years experience working with dams).

(c) As a result of the most recent inspection Plant Scherer personnel have made plans to or have begun treating fire ant mounds on the slopes with insecticide, filling rodent burrows in the slopes, and treating bare spots with grass seed, mulch and fertilizer. Construction materials have been removed from the toe of the slope and work has been scheduled to repair the ruts on the crest of the dike. These repairs are considered ongoing maintenance items.

(d) None of this work requires particular credentials. All of this work is being carried out in consultation with Mr. Hugh Armitage, PE.

(e) The next inspection by Southern Company Generation Hydro Services of the Plant Scherer ash pond dam is scheduled for the second quarter of 2009.

6. *When did a State or Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation.*

   Please provide a copy of the most recent official inspection report or evaluation.

   There have been no State or Federal inspections of the Plant Kraft ash pond.

7. *Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.*

We are not aware of any state or federal assessment, evaluations, or inspections of the Plant Scherer ash pond conducted within the last year that have uncovered a safety issue with this management unit.

8. *What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of materials currently stored in each of the management unit(s). Please provide the date that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.*

Management Unit	Surface Area (acres)	Total Storage Capacity (yd^3)	Volume of material currently stored (yd^3)	Date current volume measurement was taken	Maximum height of management unit (feet)
Scherer Ash Pond	552.5	25,740,029	11,086,395	December 2008	100

SIH

March 25, 2009

PLANT WANSLEY
1377 LIBERTY CHURCH ROAD
CARROLTON, GEORGIA 330116

Note: The text of EPA's questions is included below in *italics*. Georgia Power's responses are provided in plain text.

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

1. *Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.*

   The National Inventory of Dams (NID) classifies the Plant Wansley ash pond dike as being a Low Hazard structure. The Plant Wansley ash pond dike is under the jurisdiction of the Georgia Environmental Protection Division (EPD) Safe Dams Program. The Georgia Safe Dams Program has examined the Plant Wansley ash pond dike and has classified it as a Category II dam. '"Category II" means the classification where improper operation or dam failure would not result in probable loss of human life.' (Rules of Georgia Department of Natural Resources Environmental Protection Division Chapter 391-3-8 Rules for Dam Safety, Section 391-3-8-.02). Category II dams are not inspected by the state, but may be periodically reviewed for reclassification.

2. *What year was each management unit commissioned and expanded?*

   The Wansley ash pond was commissioned in 1975. In 2006, Georgia EPD approved a stacking plan for the disposal of gypsum within the existing boundary of the ash pond, therefore expanding the pond capacity.

3. *What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other", please specify the other types of materials that are temporarily or permanently contained in the unit(s).*

   Plant Wansley ash pond contains fly ash, bottom ash, boiler slag, flue gas emission control residuals, pyrites and other low volume waste as defined under 40CFR 423.11

4. *[(a)]Was the management unit(s) designed by a Professional Engineer? [(b)]Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? [(c)]Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?*

(a) Yes, this management unit was designed by a Professional Engineer.
(b) Yes, this management unit was constructed under the supervision of a Professional Engineer.
(c) Yes, inspection and monitoring of the safety of the management unit(s) is under the supervision of a Professional Engineer. See 5(b) below.

5. [Response provided in an appendix.]

6. [Response provided in an appendix.]

7. [Response provided in an appendix.]

8. [Response provided in an appendix.]

9. *Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).*

There have been no spills or unpermitted releases from the Plant Wansley ash pond within the last ten years.

10. *Please identify all current legal owner(s) and operator(s) at the facility.*

Current legal owners are:	
Georgia Power	53.5 %
Oglethorpe Power Corporation,	30.0 %
Municipal Electric Authority of Georgia (MEAG)	15.1 %
Dalton Utilities (DU)	1.4 %

Georgia Power is the current legal operator.

Georgia Power Responses to EPA Request for Information under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e)

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CONFIDENTIAL APPENDIX

March 25, 2009

PLANT WANSLEY
1377 LIBERTY CHURCH ROAD
CARROLTON, GEORGIA 330116

Note: The text of EPA's questions is included below in *italics*. Georgia Power's responses are provided in plain text.

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

5. *[a]When did the company last assess or evaluate the safety (structural integrity) of the management units(s)? [b]Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. [c]Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. [d]If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. [e]If the company plans an assessment or evaluation in the future, when is it expected to occur?*

   (a) The Plant Wansley ash pond dike was last inspected on November 12, 2008. This structure is inspected quarterly as part of a comprehensive dam safety program run by Southern Company Generation Hydro Services. This dam safety program covers all of Georgia Power Company's ash pond dams, storage pond dams, and hydroelectric dams. Additionally, plant personnel check these dams on a frequent basis.

   (b) The inspector for Plant Wansley is Hugh H. Armitage, PE. Mr. Armitage holds a Bachelors Degree in Civil Engineering and a Master Degree in Geotechnical Engineering. He has over 20 years of experience in civil and geotechnical engineering with a considerable portion of this time being related to slope stability studies and the design, construction, and inspection of dams and

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earth-fill embankments. He has been a full-time dam safety professional with Southern Company for the last year. The dam safety inspection results by Mr. Armitage are reviewed by two geotechnical engineers (Larry B. Wills, PE and Joel L. Galt, PE each with over 20 years experience working with dams).

(c) There were no recommendations regarding the ash pond dike arising from the November 12, 2008 inspection. All recommendations from previous inspections regarding the ash pond dike have been completed.

(d) All recommendation implementations are done in consultation with Mr. Hugh Armitage, PE. The actions required for the previous inspection recommendations did not require any special credentials.

(e) The next inspection of the Plant Wansley ash pond dike is scheduled for March 30, 2009.

6. *When did a State or Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation.*

   Please provide a copy of the most recent official inspection report or evaluation.

   The Plant Wansley ash pond dike is under the jurisdiction of the Georgia Environmental Protection Division Safe Dams Program. The Georgia Safe Dams Program has examined the Plant Wansley ash pond dike and has classified it as a Category II dam. '"Category II" means the classification where improper operation or dam failure would not result in probable loss of human life.' Rules of Georgia Department of Natural Resources Environmental Protection Division Chapter 391-3-8 Rules for Dam Safety, Section 391-3-8-.02). Category II dams are not inspected by the state, but may be reviewed for reclassification.

7. *Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.*

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We are not aware of any state or federal assessment, evaluations, or inspections of the Plant Wansley ash pond dike conducted within the last year that have uncovered a safety issue with this management unit.

8. *What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of materials currently stored in each of the management unit(s). Please provide the date that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.*

Management Unit	Surface Area (acres)	Total Storage Capacity (yd^3)	Volume of material currently stored (yd^3)	Date current material volume measurement taken	Maximum height of management unit (feet)
Wansley Ash Pond	343	27,297,333	13,423,857	December 2008	110 feet

March 25, 2009

PLANT KRAFT
110 CROSSGATE ROAD
PORT WENTWORTH, GEORGIA 314077

Note: The text of EPA's questions is included below in *italics*. Georgia Power's responses are provided in plain text.

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

1. *Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.*

   The National Inventory of Dams (NID) does not list the Plant Kraft ash pond and is not identified in the Georgia Environmental Protection Division Safe Dams Program inventory. Based on this, this unit does not have a rating.

2. *What year(s) was the management unit(s) commissioned and expanded?*

   The ash pond was commissioned in 1958. The ash pond capacity was expanded in 1963. The ash pond capacity was subsequently reduced in 1977.

3. *What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other", please specify the other types of materials that are temporarily or permanently contained in the unit(s).*

   Fly ash, bottom ash, boiler slag, pyrites, and other low volume waste as defined in 40 CFR 423.11.

4. *[a]Was the management unit(s) designed by a Professional Engineer? [b]Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? [c]Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?*

(a) To date we have been unable to locate information that would document that the Plant Kraft ash pond was designed by a Professional Engineer.
(b) To date we have been unable to locate information that would document that the Plant Kraft ash pond was constructed under the supervision of a Professional Engineer.
(c) The inspection and monitoring of the safety of the Plant Kraft ash pond is under the supervision of a Professional Engineer. See 5(b) below.

5. [Response provided in an appendix.]

6. [Response provided in an appendix.]

7. [Response provided in an appendix.]

8. [Response provided in an appendix.]

9. *Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).*

   There have been no spills of ash from the Plant Kraft ash pond within the last ten years.

10. *Please identify all current legal owner(s) and operator(s) at the facility.*

    Georgia Power is the legal owner and operator of this facility.

Georgia Power Responses to EPA Request for Information under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e)

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CONFIDENTIAL APPENDIX

March 25, 2009

PLANT KRAFT
110 CROSSGATE ROAD
PORT WENTWORTH, GEORGIA 314077

Note: The text of EPA's questions is included below in *italics*. Georgia Power's responses are provided in plain text.

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

5. *[a]When did the company last assess or evaluate the safety (i.e., structural integrity) of the management units(s)? [b]Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. [c]Identify actions taken or planned by facility personnel as a result of these assessments or evaluations.[d]If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. [e]If the company plans an assessment or evaluation in the future, when is it expected to occur?*

(a) The Plant Kraft ash pond was last inspected on January 16, 2009. This structure will be inspected annually as part of a comprehensive dam safety program run by the Southern Company Generation Hydro Services group. This dam safety program covers all of Southern Company's ash pond dams, storage pond dams, and hydroelectric dams. Additionally, plant personnel check these dams on a frequent basis.

(b) The inspector for Plant Kraft is Joel L. Galt, PE. Mr. Galt holds a Bachelor of Civil Engineering and a Master of Science in Civil Engineering (Geotechnical). He has over 30 years of experience in geotechnical engineering, the majority of this related to dams. The dam safety inspection results by Mr. Galt are reviewed by another geotechnical engineer (Larry B. Wills PE, who has over 20 years experience working with dams).

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(c) On the last inspection no conditions were found that posed a threat to the safety of the ash pond. The ash pond dikes were generally well-maintained. There were a number of areas where the grass cover had been damaged. These areas require attention to prevent them from becoming eroded areas that will be more expensive to fix. The plant staff plans to treat most of the areas of damaged turf with grass seed, mulch and fertilizer. Some areas on the crest may be graveled rather than grassed. This work is expected to be completed this spring.

(d) No particular credentials are needed to perform the actions to be taken. All of this work will be done in consultation with Mr. Joel Galt, PE.

(e) The next inspection of the Plant Kraft ash pond dike is scheduled for the first quarter of 2010.

6. *When did a State or Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation.*

   Please provide a copy of the most recent official inspection report or evaluation.

   There have been no State or Federal inspections of the Plant Kraft ash pond.

7. *Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.*

   We are not aware of any state or federal assessment, evaluations, or inspections of the Plant Kraft ash pond conducted within the last year that have uncovered a safety issue with this management unit.

8. *What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of materials currently stored in each of the management unit(s). Please provide the date that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.*

Georgia Power Responses to EPA Request for Information under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e)

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Management Unit	Surface area (acres)	Total storage capacity (cubic yards)	Volume of material currently stored in unit (cubic yards)	Date current volume measurement taken	Maximum height of management unit (feet)
Kraft ash pond	8 acres	65,395 yd^3	32,636 yd^3	November 2008	6 feet