

US EPA ARCHIVE DOCUMENT

Assessment of Dam Safety Coal Combustion Surface Impoundments Draft Report

Georgia Power
Company

Plant Bowen

Cartersville, Georgia



Prepared for

Lockheed Martin

2890 Woodridge Ave #209
Edison, New Jersey 08837

July 6, 2009

CHA Project No. 20085.1000.1510



I acknowledge that the management units referenced herein:

- Plant Bowen Ash Pond

Has been assessed on May 26, 2009 and May 27, 2009.

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1.0 INTRODUCTION & PROJECT DESCRIPTION

1.1 Introduction

CHA was contracted by Lockheed Martin to perform site assessments of selected coal combustion surface impoundments (Project #0-381 Coal Combustion Surface Impoundments/Dam Safety Inspections). As part of this contract, CHA was assigned to perform a site assessment of Georgia Power Company Plant Bowen, which is located in Cartersville, Georgia as shown on Figure 1 – Project Location Map.

CHA made a site visit on May 26 and 27, 2009 to perform visual observations and to inventory coal combustion surface impoundments at the facility, inspect the containment dikes, and to collect relevant information regarding the site assessment.

CHA engineers, Malcolm Hargraves, P.E. and Katherine Adnams, P.E., were accompanied during the site visit by the following individuals:

| Company or Organization | Name and Title |
|---------------------------------|---|
| Environmental Protection Agency | Javier Garcia |
| Georgia Power | Tanya Blalock, Environmental Affairs Manager |
| Georgia Power Company | Kenneth Duquette, Compliance Team Manager |
| Georgia Power Company | Nik Budney, Bowen Plant Compliance Manager |
| Georgia Safe Dams | Carey Anderson, Environmental Engineer |
| Southern Company | Gary McWhorter, P.E., Environmental Engineering |
| Southern Company | Hollister Hill |
| Southern Company | Ron Wood, P.G., Hydro Services |
| Southern Company | Will McIntyre |

1.2 Project Background

The Plant Bowen ash pond is under the jurisdiction of the Georgia Department of Natural Resources Environmental Protection Division (EPD) Safe Dams Program. According to the Natural Inventory of Dams (NID) the Georgia State ID No. for the ash pond is 008-031-04136. According to the Georgia Safe Dams program, the ash pond has been categorized as a "Category II" dam, meaning improper operation or dam failure would not be expected to result in probable loss of human life. Category II facilities are exempt from much of the Georgia dam safety regulations thereby leaving the design, operation, and maintenance standards up to the owner's discretion for best management practices. According to Georgia Safe Dams personnel, as a Category II dam the facility is not held to any state recognized design standards.

The State of Georgia issued Permit No. GA0001449 to the Georgia Power Company authorizing discharge under the National Pollutant Discharge Elimination System to the Euharlee Creek and Etowah River (Coosa River Basin) in accordance with effluent limitations, monitoring requirements and other conditions set forth in the permit. The permit became effective on November 9, 2009 and will expire on June 30, 2012.

On August 1, 2002 Georgia Power provided a written report to the Georgia Department of Natural Resources Environmental Protection Division (EPD) of an ash pond sink hole and unpermitted ash discharge to the Euharlee Creek on July 28, 2002. As a result of the incident the EPD pursued enforcement action and a consent order was issued. The order required Georgia Power Company to perform the following tasks as summarized below:

1. Pay a fine to the Georgia Department of Natural Resources;
2. Conduct a study of the ecological impact of the discharge into Euharlee Creek and recommend remedial action;
3. Submit a dredging plan if proposed as part of the recommended redial actions;
4. Submit a report on the actions taken to fill the existing sinkhole and to grout fissures under the dike;

-
5. Conduct a geological engineering assessment of the ash pond stability and recommend corrective actions to prevent future sinkhole development;
 6. Submit a revised ash water management plan which covers measures to reduce hydraulic loading in the northern section of the pond, including compacted clay lined ash sedimentation cells, lined runoff ditches, and dry handling of the stacked ash in the northern cell;
 7. Comply with any corrective action plans approved by EPD;
 8. Submit an interim progress on the completion of the corrective action plans; and
 9. Submit a final report on the completion of the corrective action plans.

On September 16, 2008 Georgia Power provided a written report to the EPD of an ash release to Euharlee Creek on September 9, 2008 during a significant rain event. A consent order was issued by the EPD, requiring that Georgia Power Company perform the following tasks as summarized below:

1. Pay a fine to the Georgia Department of Natural Resources;
2. Submit a revised ash stack management plan to include, at a minimum, a description of the Best Management Practices that will be implemented in order to ensure the integrity of the ash stack piles, with particular focus given to the maintenance and management of the runoff ditches and perimeter of the ash stack piles. The plan was to include a description of the inspection and records keeping procedures to be implemented, as they relate to the operation and maintenance of the ash stack piles.

Georgia Power has provided CHA with copies of correspondences, reports and plans pertaining to the tasks outlined above. A list of these items is provided in Section 1.6 – Bibliography. As part of our assessment, information and data from these reports and plans were compared with existing site conditions observed during our site visit.

1.3 Site Description and Location

The Plant Bowen management units are shown on Figure 2 – Plant Bowen Site Plan. The main impoundment was created by construction of the main dike, which bounds the impoundment on the south and west sides, and the north dike, which bounds the impoundment on about two thirds of the north side. The remaining portions of the impoundment are contained by natural ground. The main and north dikes were originally constructed in 1968 creating a storage area of about 258 acres. In 1992 and again in 2001 Georgia Power developed Ash Stacking Plans to expand the capacity of the facility and transition from wet process disposal to dry disposal. These stacking plans were approved by Georgia Environmental Protection Division (GA EPD). Figures 3 and 4 show cross sections of the main and north dikes, respectively.

This transition to dry disposal was an engineered plan to reduce the impacts of fluctuating water levels in the impoundment from impacting the underlying karst topography, which is more thoroughly discussed in Section 1.5 below. The result of this change in operations is an impoundment with only about 60 acres containing liquid and these areas have been lined with geosynthetic clay liners (GCL) or HDPE liners, and/or clay soil liners. The remaining 198 acres of the main impoundment contains the dry-stacked ash. The areas where liquid is contained is comprised of two ash dewatering cells, two gypsum settling ponds, and a water recycle pond. Figures 5, 6, and 7 show cross sections of the dikes at the water recycle pond, ash dewatering cells, and gypsum settling ponds, respectively.

The Bowen Power Plant's recycle water portion of the unit, which contains the largest volume of liquid, is about 2 miles upstream of Euharlee, Georgia by the stream channel. The perimeter ditch drains to the Euharlee Creek, which subsequently discharges into the Etowah River.

A map of the region indicating the location of the Plant Bowen ash pond identifying schools, hospitals, or other critical infrastructure located within approximately 5 miles down gradient of the ash pond is provided as Figure 8.

1.3.1 Other Impoundments

In addition to the coal combustion waste (CCW) disposal area, CHA also observed and/or was made aware of other impoundments at the Plant Bowen site. The largest of these impoundments occupies roughly 62 acres and contains water pumped from the Etowah River for use as cooling water in the Plant. Other much smaller impoundments capture and control storm water runoff in the coal pile area and the waste gypsum coal combustion by-product storage facility located to the east of the steam plant and cooling water pond. These impoundments store water intermittently, do not contain CCW and therefore, were not inspected as part of this project. The locations of these areas are shown on Figure 2 – Plant Bowen Site Plan.

1.4 Previously Identified Safety Issues

There have been three previously identified dam safety issues at Plant Bowen. Two of the three incidents resulted in release of CCW from the main impoundment in the last 7 years. In July 2002 a release of ash occurred due to the opening of karst features beneath the impoundment, and in September 2008 a release of ash occurred due to rainfall triggered sloughing of the dry stacked ash which flowed over the main dike. In December 2008 a sinkhole developed at the north dike however no CCW was released. These incidents are discussed in more detail in Sections 1.4.1, 1.4.2 and 1.4.3.

1.4.1 2002 Release and Karst Topography

In July 2002 a sinkhole developed in the main impoundment. Groundwater and CCW/water mixtures emerged downstream of the main dike through groundwater monitoring piezometers. As reported by Georgia Power, about 11 cubic yards of ash reached the Euharlee Creek. The Georgia EPD executed a Consent Order to which Georgia Power complied and completed requirements of the Consent Order with a final report issued June 1, 2004. This Consent Order report contains the results of subsurface explorations, and stability analyses of the main and north dikes.

One of the primary conclusions of the Consent Order report was that the sinkhole and subsequent ash release was related to a geologic feature of the site called karst topography, rather than a failure of the constructed dike. In this case, impounded waste ash and water was conveyed beneath the dike through solution cavities in the weathered bedrock regime. A more complete discussion on the local geology and karst topography is contained in Section 1.5.

1.4.2 2008 Release and Revised Stacking Plan

On September 9, 2008 the Bowen Plant received about 1.25 inches of rain in 45 minutes. This heavy rainfall resulted in a portion of the ash stack to erode and flow over the north end of the main dike. Although this event resulted in a release of ash from the site, this event was not related to the safety of the dike system creating the impoundment.

1.4.3 2008 Sinkhole at North Dike

In December 2008 a sinkhole developed in the drainage swale between the ash stack and the north dike, and two sinkholes (presumably connected) developed about 50 feet downstream of the north dike as a result of the karst underlying the site. Several days prior to the development of the sinkholes, piezometer readings in this area showed a rise in the groundwater elevation.

When the sinkholes developed, reportedly some cracks and settlement occurred in the north dike. Therefore, in addition to sealing the sinkholes, a portion of the north dike was excavated and reconstructed. The north dike did not impound water beyond what may have been present in the drainage swale at the time of this incident (nor is it expected to impound water based on current site operating procedures). The sinkholes were excavated to the surface of the bedrock and a graded filter was placed to backfill the depressions.

1.5 Site Geology

A summary of the regional geology was prepared by Southern Company Services, Inc. as part of the *Report Prepared in Response to Consent Order No. EPD-WQ-4075* dated December 2002. Section 3.3 – Regional Geology of the report states that “The Plant Bowen ash pond lies within the Valley and Ridge physiographic province about three to four miles north of the Cartersville Fault. The Cartersville Fault separates the late Precambrian-aged metamorphic rocks to the east and south from the Cambrian-aged sedimentary rocks to the north and west. The ash pond lies within an area mapped primarily as Knox Group undifferentiated. The Knox Group produces a characteristic orange to red clayey residuum, often cherty, that ranges in thickness from ten to a hundred feet or more.”

The report summarizes several site-specific subsurface explorations programs that have been conducted in the vicinity of the ash pond since the 1967 plant siting work, including investigations that were performed after the sinkhole development in July 2002. The investigations described in the report include;

- Literature Review (Regional Geology)
- Aerial Photography (Lineament) Studies
- Geophysical Surveys (Resistivity, Self Potential and Electromagnetic)
- Drilling, Sampling, Cone Penetrometer Testing, and Related Laboratory Analysis

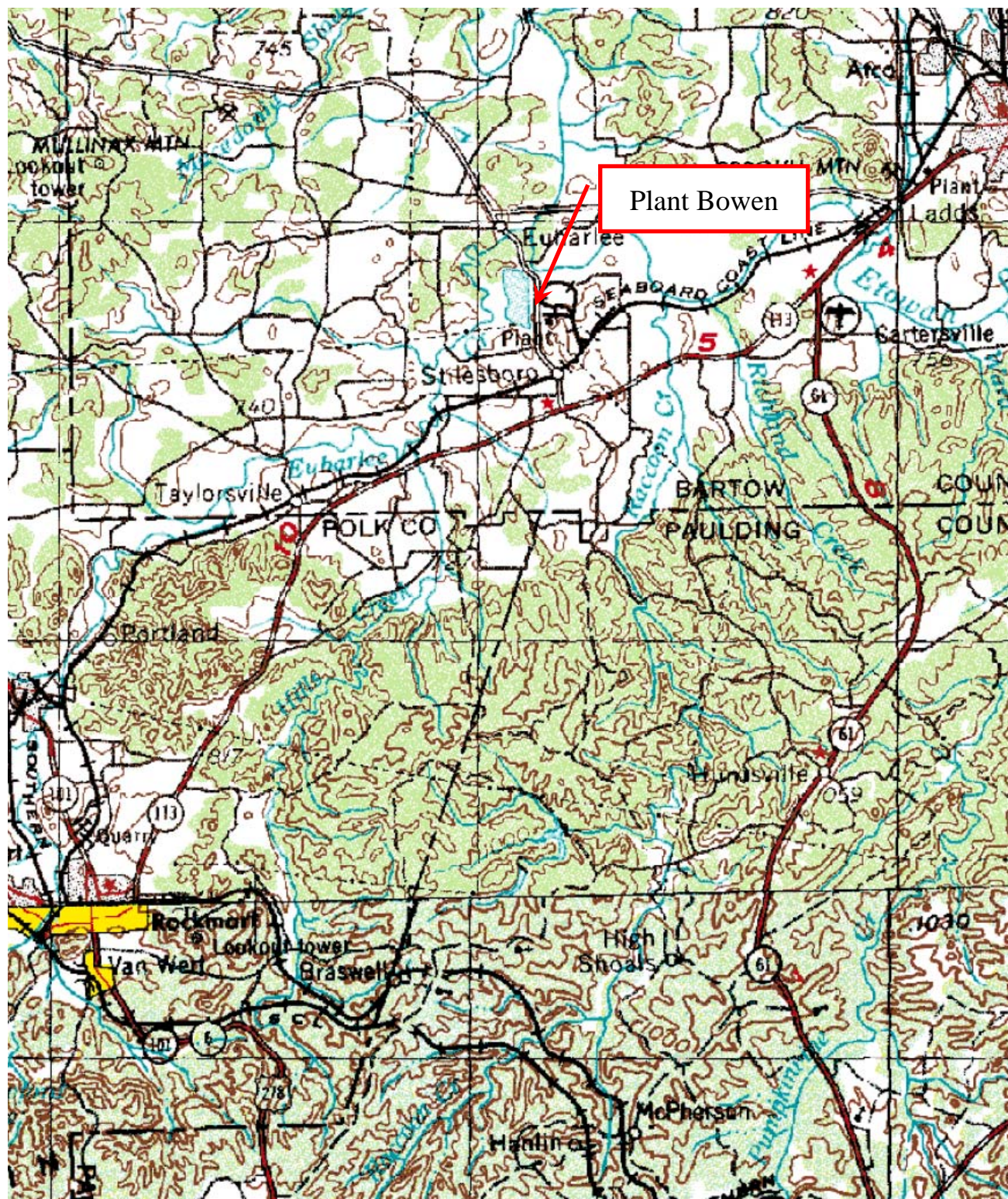
Based on the investigations the report provides a description of the soil and rock (Section 3.7). The soils underlying the ash pond and embankment are residual, formed from the in-place weathering of the underlying dolomite and limestone. The soils were noted as varying from a fine, sandy clayey silt to silty clay. Permeability of the material was reported as varying from about 1×10^{-6} to 1×10^{-8} cm/sec. Thickness was also found to vary from about 19 feet to 127 feet at the Plant Bowen site.

The report states that the carbonate rocks beneath the ash pond are typical of the Knox Group and that as part of various Plant Bowen studies, karst-controlling features such as lineaments and sinkholes were mapped across the site.

1.6 Bibliography

CHA reviewed the following documents provided by Georgia Power in preparing this report.

- Hill, Heather and Franke, Richard M. *Plant Bowen Ash Pond Dike Slope Stability Analysis Report*, Southern Company Services, Inc., December 2003.
- McWhorter, Gary H., Franke, Richard M. et.al. *Georgia Power Company Plant Bowen Final Consent Order EPD-WQ-4075*, Southern Company Services, Inc., May 28, 2004.
- Galt, Joel. *Plant Bowen Dam Safety Surveillance Quarterly Reports*, Southern Company Services, Inc (5/2004 to 4/2009).
- Various *Quarterly Reports on Dam Safety Surveillance* from 2004 to 2009, Southern Company Services, Inc.
- Engineering and Construction Services Calculation - Ash Dewatering Cells Stability, June 25, 2009, Southern Company Services, Inc.
- Gypsum Dewatering Cells Typical Dike Sections, Drawing E23847, October 1, 2007, Southern Company Services, Inc.
- Engineering and Construction Services Calculation - Ash Pond Flood Evaluation, June 30, 2009, Southern Company Services, Inc.



Scale: 1" = 2 miles

Project No.:
20085.1000.1510

Figure 1
Project Location Map

Georgia Power Company
Plant Bowen
Cartersville, Bartow County, Georgia

File: K:\20085\CADD\ACAD\FIGURES\1000 BOWEN PLANT\BOWEN PLANS-MAPS.DWG Saved: 7/6/2009 2:35:49 PM Plotted: 7/6/2009 2:44:23 PM User: Filkins, Rebecca



IMAGE REFERENCE: PLANT BOWEN BOW-API 0036



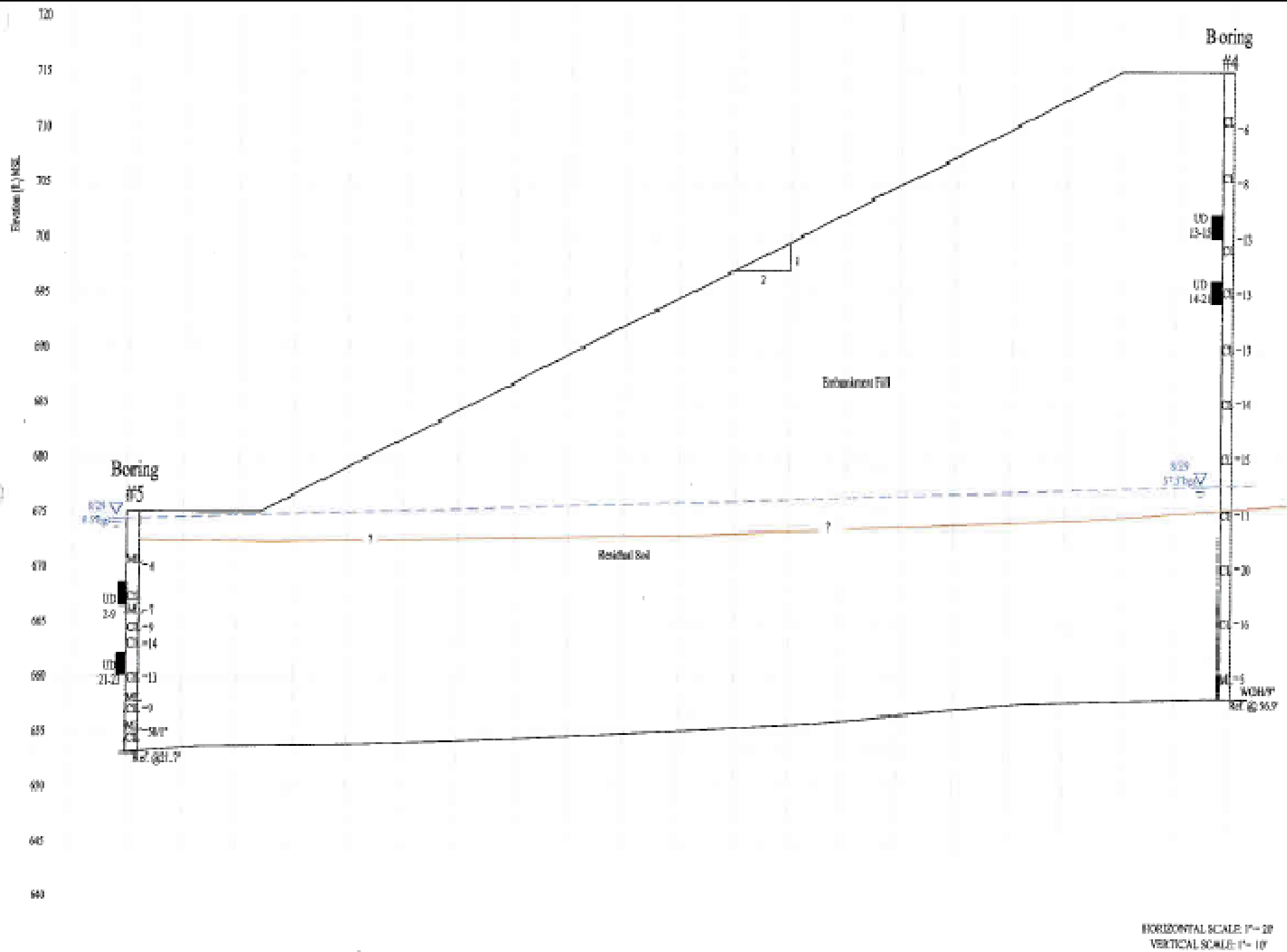
PLANT SITE PLAN
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000

DATE: JULY 2009

FIGURE 2

File: K:\20085\CADD\FIGURES\GEO\1000 BOWEN PLANT\BOWEN XSECTS1.DWG Saved: 6/26/2009 1:03:52 PM Plotted: 7/6/2009 12:11:17 PM User: Filkins, Rebecca



CONFIDENTIAL BUSINESS INFORMATION

HORIZONTAL SCALE: 1" = 20'
VERTICAL SCALE: 1" = 10'

Southern Company Services, Inc.

Figure 5
Plant Bowen
Dike Stability Study
SECTION D-D'
South Horseshoe

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IMAGE REFERENCE: STABILITY ANALYSIS, FIGURE 5,
PLANT BOWEN DIKE STABILITY STUDY, SECTION D-D',
SOUTH HORSESHOE



CROSS SECTION OF MAIN DIKE
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000

DATE: JULY 2009

FIGURE 3

File: K:\20085\CADD\ACAD\FIGURES\GEO\1000 BOWEN PLANT\BOWEN XSECTS2.DWG Saved: 7/6/2009 9:51:29 AM Plotted: 7/6/2009 10:24:53 AM User: Filkins, Rebecca

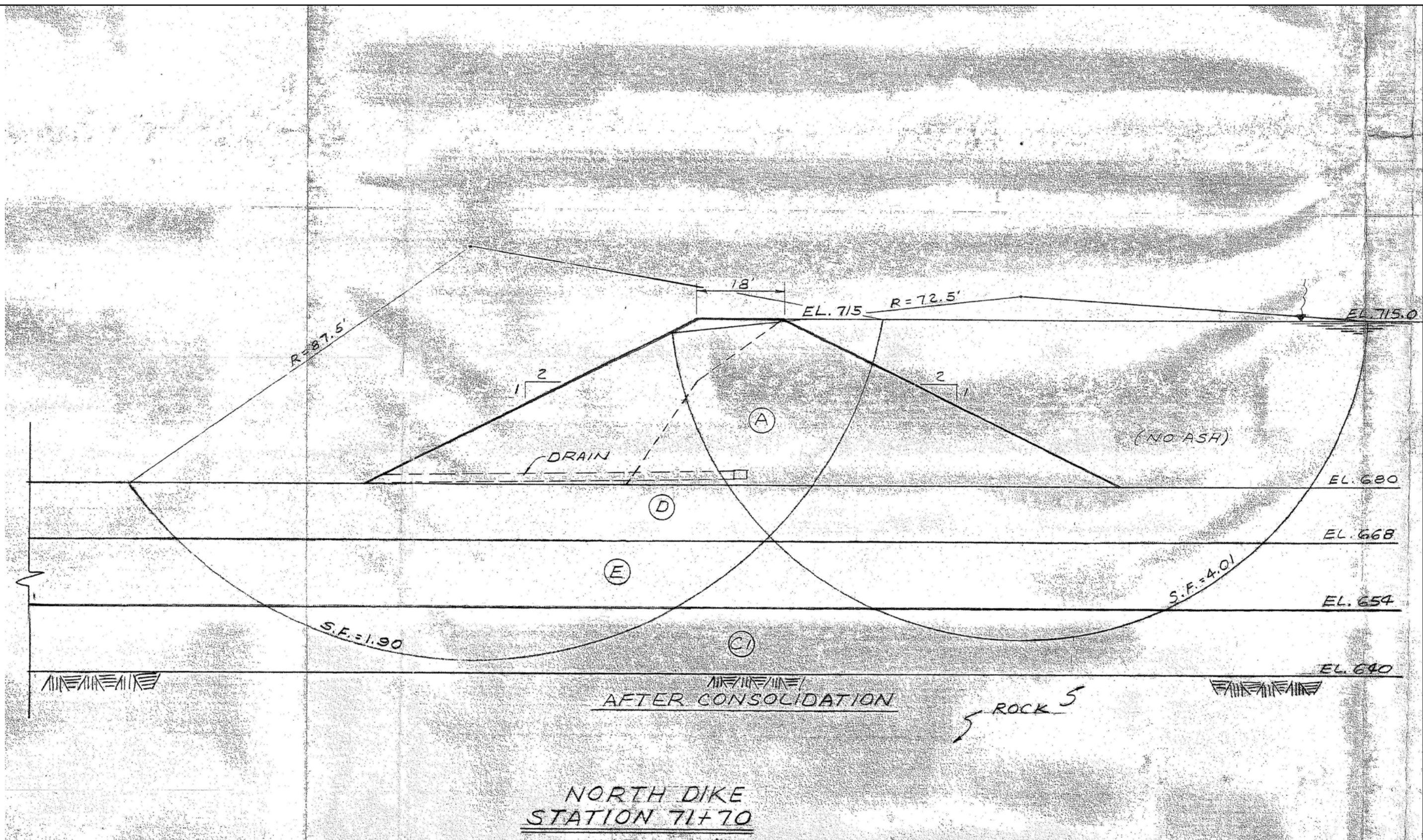


IMAGE REFERENCE: SHEET H-1163 STABILITY ANALYSIS ASH POND DIKES 1969

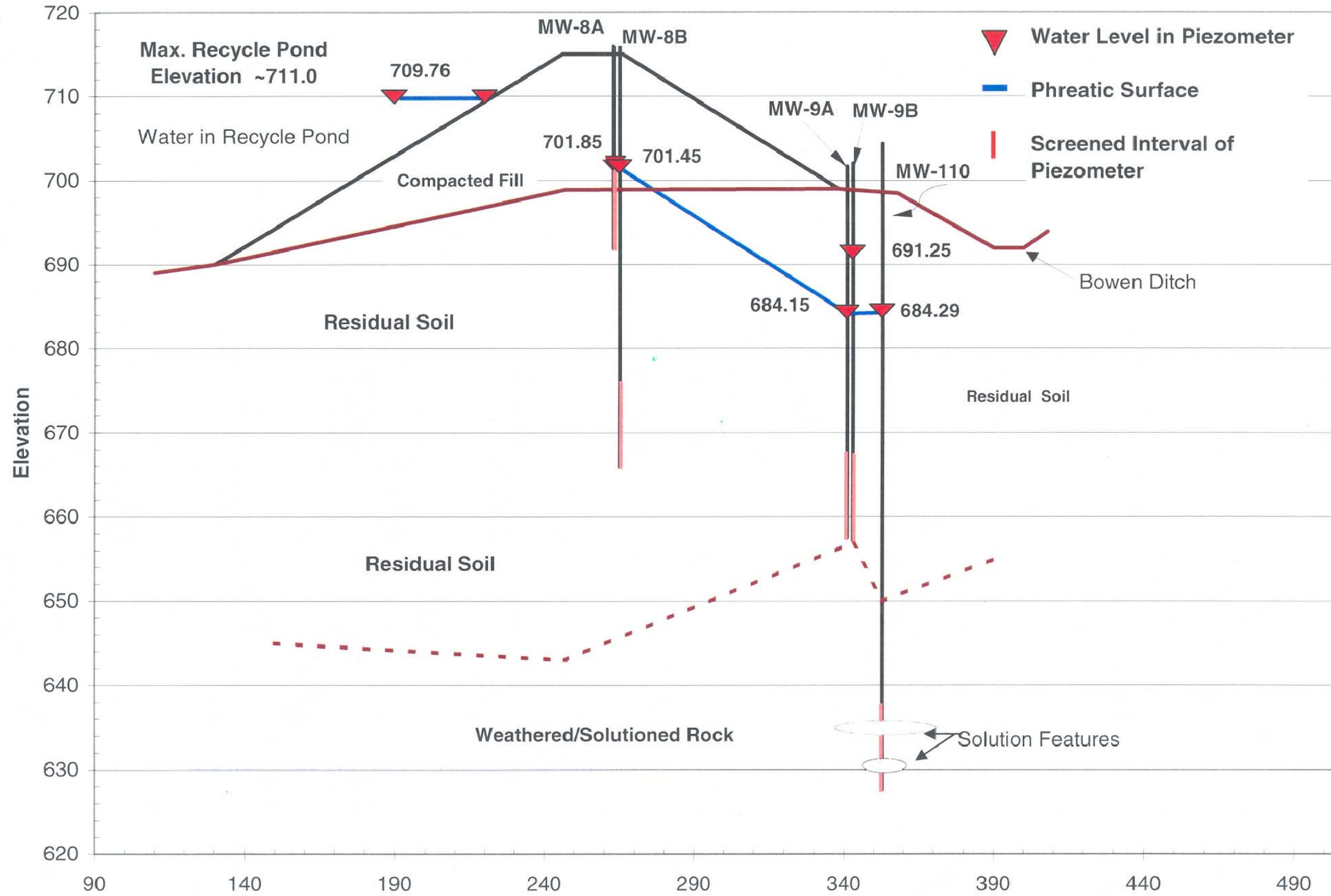


CROSS SECTION OF NORTH DIKE
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000
DATE: JULY 2009
FIGURE 4

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Plant Bowen
TYPICAL SECTION
 Date: 05/18/2009



C:\Documents and Settings\ghmcwhor\Local Settings\Temporary Internet Files\Bowen Ash Pond Dike Sections (2).xls

NOTE: THE SLOPE TO THE EAST IS BERM CONSTRUCTED ON NATURAL SLOPE WITHOUT A BENCH

IMAGE REFERENCE: BOW-API 0065



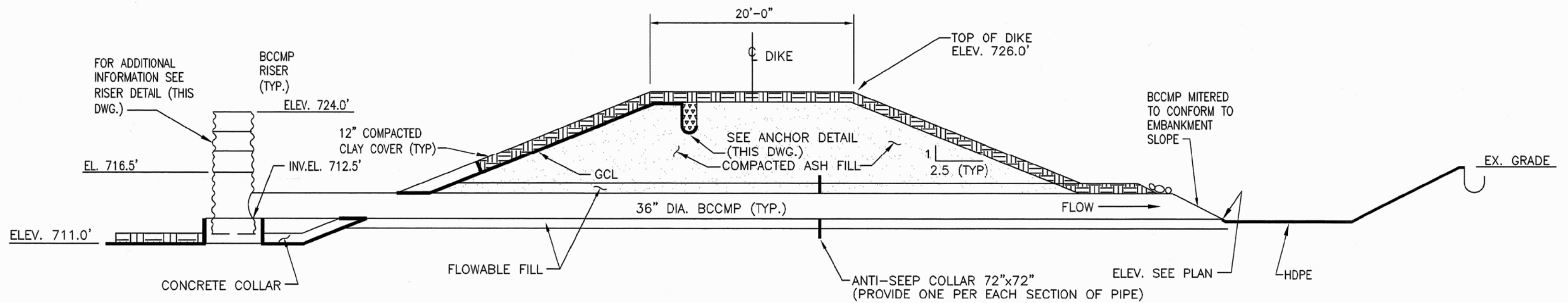
CROSS SECTION OF WATER RECYCLE POND
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000

DATE: JULY 2009


FIGURE 5

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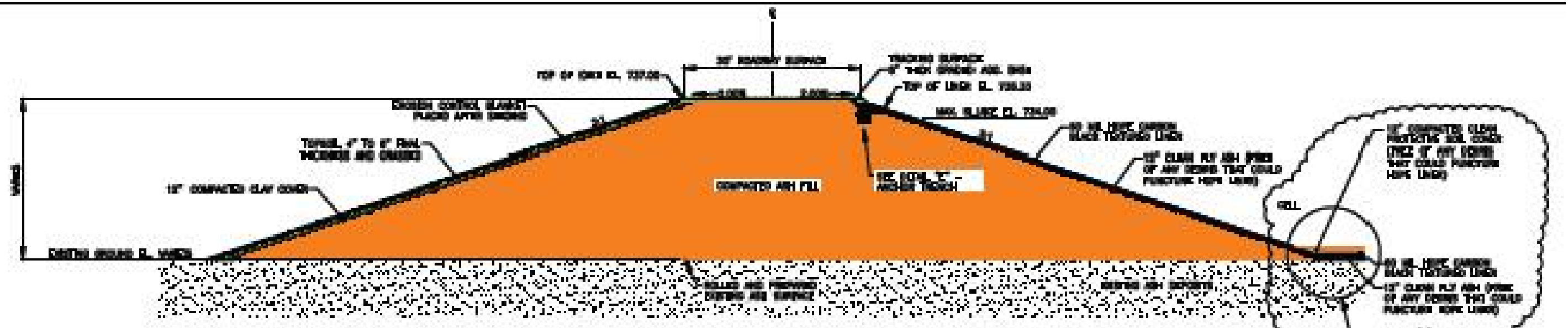


SECTION A-A (CELL A)

IMAGE REFERENCE: PLANT BOWEN UNITS 1-4 ASH POND DEWATERING CELLS GRADING AND DRAINAGE PLAN, SHEET 2, JUNE 2003

| | | |
|---|--|---------------------------|
|  | CROSS SECTION OF ASH POND DEWATERING CELLS PLANT BOWEN GEORGIA POWER COMPANY CARTERSVILLE, GEORGIA | PROJECT NO. 20085.1000 |
| | | DATE: JULY 2009 |
| | | FIGURE 6 |

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**SECTION A-A (E23845 AND E23846)
TYPICAL DIKE SECTION**



**SECTION C-C (E23845)
TYPICAL DIKE SECTION**

IMAGE REFERENCE: PLANT BOWEN UNITS 1-4, FGD PROJECT, GYPSUM DEWATERING CELLS, TYPICAL DIKE SECTIONS, SHEET 1

| | | |
|---|---|---------------------------|
|  | GYPSUM DEWATERING CELLS TYPICAL DIKE SECTIONS PLANT BOWEN GEORGIA POWER COMPANY CARTERSVILLE, GEORGIA | PROJECT NO. 20085.1000 |
| | | DATE: JULY 2009 |
| | | FIGURE 7 |

File: K:\20085\CADD\ACAD\FIGURES\GEO\1000 BOWEN PLANT\BOWEN PLANS-MAPS.DWG Saved: 7/6/2009 2:35:49 PM Plotted: 7/6/2009 3:00:45 PM User: Filkins, Rebecca



IMAGE REFERENCE: GOOGLE EARTH



CRITICAL INFRASTRUCTURE MAP
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000

DATE: JULY 2009

FIGURE 8

2.0 FIELD ASSESSMENT

2.1 Visual Observations

CHA performed visual observations of the main and north dikes following the general procedures and considerations contained in FEMA's Federal Guidelines for Dam Safety (April 2004), and FERC Part 12 Subpart D to make observations concerning settlement, movement, erosion, seepage, leakage, cracking, and deterioration. A Coal Combustion Dam Inspection Checklist Form, prepared by the US Environmental Protection Agency, was completed on-site during the site visit for the ash pond. A copy of the completed form was submitted via email to a Lockheed Martin representative approximately three days following the site visit to Plant Bowen. A copy of this completed form is included at the end of Section 2.5. A photo log of photos taken during the site visit and a Site Photo Location Map, Figure 9, are also located at the end of Section 2.5.

CHA's visual observations were made on May 26 and 27, 2009. The weather was cloudy with severe afternoon thunderstorms and temperatures between 64 and 82 degrees Fahrenheit. Prior to and during the days we made our visual observations, the following approximate rainfall amounts occurred (as reported by www.weather.com).

Table 1 - Approximate Precipitation Prior to Site Visit

| Date of Site Visit - May 26, 2009 & May 27, 2009 | | |
|---|---------------------------------|-------------------------------|
| Day | Date | Precipitation (inches) |
| Tuesday | 5/19/09 | 0.00 |
| Wednesday | 5/20/09 | 0.00 |
| Thursday | 5/21/09 | 0.05 |
| Friday | 5/22/09 | 0.00 |
| Saturday | 5/23/09 | 0.05 |
| Sunday | 5/24/09 | 0.00 |
| Monday | 5/25/09 | 0.03 |
| Tuesday | 5/26/09 | 0.94 |
| Wednesday | 5/27/09 | 0.06 |
| Total | Week Prior to Site Visit | 1.13 |
| Total | Month of May | 7.71 |

It should also be noted that localized, isolated thunderstorm activity was evident at the plant Monday mid-afternoon after the initial field walkthrough.

2.2 Embankments and Crest

The main dike is approximately 7,725 feet long, and the north dike is approximately 1,650 feet long. Two wet ash disposal ponds are contained within the main impoundment and consist of an exterior berm approximately 3,050 feet long, and a separator dike between the two ponds approximately 850 feet long. Also included in the main impoundment are two gypsum settling ponds with berms about 2,300 to 2,500 feet long each. The wet ash and gypsum ponds are lined with geosynthetic liners, and if a breach of one of those were to occur, the release would be contained within the main impoundment. Therefore, CHA performed only a cursory review of these structures.

2.2.1 Main Dike

In general, the main dike does not show signs of changes in horizontal alignment from the proposed alignment. According to Georgia Power personnel, the crest is regraded as needed to fill in tire ruts thereby reducing ponding of storm water on the crest. The embankment is uniform and well covered with appropriate grass cover, which was freshly mowed during our site visit. The main dike was constructed with a downstream slope of 2H:1V.

The southern portion of the main dike along the recycle pond consists of a 5- to 10-foot high dike constructed on top of a 15 to 20 foot high natural cut slope. The natural slope throughout this area has several locations where surficial slides have occurred as shown in Photos 1, 2, 5 and 6. Southern Company personnel who perform quarterly inspections at the dam indicated these features have been there for at least 6 to 10 years during which time the current staff responsible for quarterly inspections have been assigned to this project, and during this time the features have remained unchanged. One feature, as shown in Photo 7, appeared more recent because of relatively new erosion control matting. Southern Company personnel indicated this area had

been reseeded several times without adequate vegetation growth, so the erosion matting was placed as an additional attempt to establish good grass growth.

In the area where the recycle pond ends and the main dike curves to the north, formerly sluiced or placed ash is level with the crest of the dam as shown in Photos 15, 16, 18, and 20. The design width of the crest was 15 feet. This condition continues along the entire length of the main dike from the southwest curve to the north abutment. Although obscuring the upstream slope of the constructed dike and the upstream edge of the main dike crest, CHA did not observe conditions of concern along the crest of the main dike.

2.2.2 North Dike

In general, the north dike does not show signs of changes in horizontal alignment. According to Georgia Power personnel, the crest is re-graded as needed to fill in tire ruts thereby reducing ponding of storm water on the crest. The embankment is uniform and well covered with appropriate grass cover, which was freshly mowed during our site visit. The north dike was constructed with a downstream slope of 2H:1V.

The western portion of the north dike is adjacent to the active dry stack area as shown in Photos 24 and 25. These photos also show the configuration of the drainage swale between the north dike and the ash stack. Georgia Power personnel indicated the drainage swale in this area is one of the last areas of water conveying portions of the impoundment to be regraded and lined as part of the work to reduce the facility's impact on the karst topography below. This swale is expected to be lined in 2009 or 2010.

2.3 Outlet Control Structure and Discharge Channel

The only outlet control structure in the main impoundment is in the southeast portion of the impoundment, which is used as a recycle pond. The outlet in this area discharges through a sampling flume into a discharge channel in natural ground (photo 1). The discharge channel

flows west until it intersects the Euharlee Creek. This channel is relatively clear, although portions of the channel are being choked by soil previously sloughed from the adjacent natural slope as shown in photos 4 through 7.

2.4 Monitoring Instrumentation

There are 68 piezometers installed along the main impoundment dikes, recycle pond, and dewatering cell dikes at Plant Bowen. These piezometers are located in the embankments, existing ash, and in the bedrock underlying the site. Because of the karst at the site, selected piezometers are read by plant personnel on a daily basis, and all piezometers are read by plant personnel at least weekly. A new remote reading system is being installed to allow reading of all piezometers on a daily basis.

Figure 10 shows the piezometer layout at the site. Summaries and a review of this data are included in Section 3.4.1.



| | |
|-------------------|---|
| Site Name: | Date: |
| Unit Name: | Operator's Name: |
| Unit I.D.: | Hazard Potential Classification: High Significant Low |
| Inspector's Name: | |

Check the appropriate box below. Provide comments when appropriate. If not applicable or not available, record "N/A". Any unusual conditions or construction practices that should be noted in the comments section. For large diked embankments, separate checklists may be used for different embankment areas. If separate forms are used, identify approximate area that the form applies to in comments.

| | | <u>Yes</u> | <u>No</u> | | | <u>Yes</u> | <u>No</u> |
|--|--|------------|-----------|---|--|------------|-----------|
| 1. Frequency of Company's Dam Inspections? | | | | 18. Sloughing or bulging on slopes? | | | |
| 2. Pool elevation (operator records)? | | | | 19. Major erosion or slope deterioration? | | | |
| 3. Decant inlet elevation (operator records)? | | | | 20. Decant Pipes: | | | |
| 4. Open channel spillway elevation (operator records)? | | | | Is water entering inlet, but not exiting outlet? | | | |
| 5. Lowest dam crest elevation (operator records)? | | | | Is water exiting outlet, but not entering inlet? | | | |
| 6. If instrumentation is present, are readings recorded (operator records)? | | | | Is water exiting outlet flowing clear? | | | |
| 7. Is the embankment currently under construction? | | | | 21. Seepage (specify location, if seepage carries fines, and approximate seepage rate below): | | | |
| 8. Foundation preparation (remove vegetation, stumps, topsoil in area where embankment fill will be placed)? | | | | From underdrain? | | | |
| 9. Trees growing on embankment? (If so, indicate largest diameter below) | | | | At isolated points on embankment slopes? | | | |
| 10. Cracks or scarps on crest? | | | | At natural hillside in the embankment area? | | | |
| 11. Is there significant settlement along the crest? | | | | Over widespread areas? | | | |
| 12. Are decant trashracks clear and in place? | | | | From downstream foundation area? | | | |
| 13. Depressions or sinkholes in tailings surface or whirlpool in the pool area? | | | | "Boils" beneath stream or ponded water? | | | |
| 14. Clogged spillways, groin or diversion ditches? | | | | Around the outside of the decant pipe? | | | |
| 15. Are spillway or ditch linings deteriorated? | | | | 22. Surface movements in valley bottom or on hillside? | | | |
| 16. Are outlets of decant or underdrains blocked? | | | | 23. Water against downstream toe? | | | |
| 17. Cracks or scarps on slopes? | | | | 24. Were Photos taken during the dam inspection? | | | |

Major adverse changes in these items could cause instability and should be reported for further evaluation. Adverse conditions noted in these items should normally be described (extent, location, volume, etc.) in the space below and on the back of this sheet.

| <u>Inspection Issue #</u> | <u>Comments</u> |
|---------------------------|-----------------|
| | |
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| | |

US EPA ARCHIVE DOCUMENT



Coal Combustion Waste (CCW) Impoundment Inspection

Impoundment NPDES Permit # _____ INSPECTOR _____
Date _____

Impoundment Name _____
Impoundment Company _____
EPA Region _____
State Agency (Field Office) Addresss _____

Name of Impoundment _____
(Report each impoundment on a separate form under the same Impoundment NPDES Permit number)

New _____ Update _____

| | | |
|--|-------|-------|
| | Yes | No |
| Is impoundment currently under construction? | _____ | _____ |
| Is water or ccw currently being pumped into the impoundment? | _____ | _____ |

IMPOUNDMENT FUNCTION: _____

Nearest Downstream Town : Name _____

Distance from the impoundment _____

Impoundment

Location: Longitude _____ Degrees _____ Minutes _____ Seconds
 Latitude _____ Degrees _____ Minutes _____ Seconds
 State _____ County _____

Does a state agency regulate this impoundment? YES _____ NO _____

If So Which State Agency? _____

US EPA ARCHIVE DOCUMENT

HAZARD POTENTIAL (In the event the impoundment should fail, the following would occur):

_____ **LESS THAN LOW HAZARD POTENTIAL:** Failure or misoperation of the dam results in no probable loss of human life or economic or environmental losses.

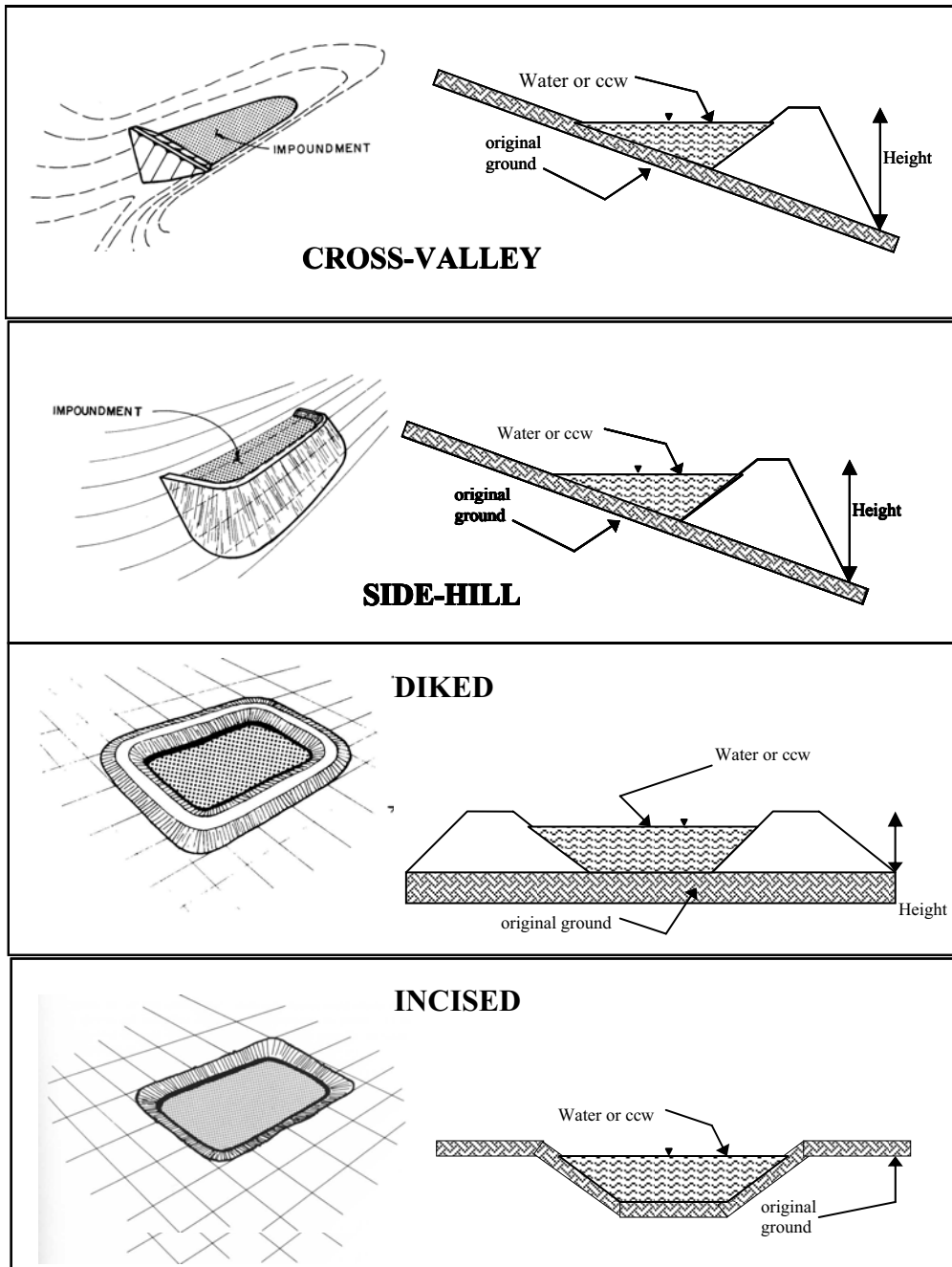
_____ **LOW HAZARD POTENTIAL:** Dams assigned the low hazard potential classification are those where failure or misoperation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the owner's property.

_____ **SIGNIFICANT HAZARD POTENTIAL:** Dams assigned the significant hazard potential classification are those dams where failure or misoperation results in no probable loss of human life but can cause economic loss, environmental damage, disruption of lifeline facilities, or can impact other concerns. Significant hazard potential classification dams are often located in predominantly rural or agricultural areas but could be located in areas with population and significant infrastructure.

_____ **HIGH HAZARD POTENTIAL:** Dams assigned the high hazard potential classification are those where failure or misoperation will probably cause loss of human life.

DESCRIBE REASONING FOR HAZARD RATING CHOSEN:

CONFIGURATION:



Cross-Valley
 Side-Hill
 Diked
 Incised (form completion optional)
 Combination Incised/Diked

Embankment Height _____ feet Embankment Material _____
 Pool Area _____ acres Liner _____
 Current Freeboard _____ feet Liner Permeability _____

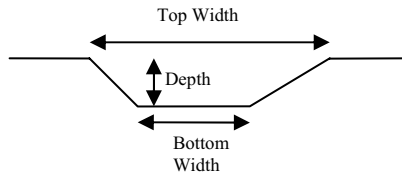
TYPE OF OUTLET (Mark all that apply)

 Open Channel Spillway

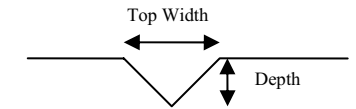
- Trapezoidal
- Triangular
- Rectangular
- Irregular

- depth
- bottom (or average) width
- top width

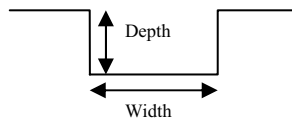
TRAPEZOIDAL



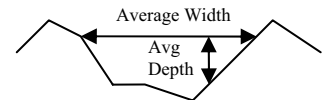
TRIANGULAR



RECTANGULAR



IRREGULAR

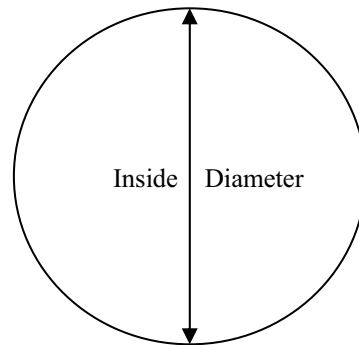


 Outlet

- inside diameter

Material

- corrugated metal
- welded steel
- concrete
- plastic (hdpe, pvc, etc.)
- other (specify) _____



Is water flowing through the outlet? YES _____ NO _____

 No Outlet

 Other Type of Outlet (specify) _____

The Impoundment was Designed By _____

Has there ever been any measures undertaken to monitor/lower
Phreatic water table levels based on past seepages or breaches
at this site?

YES _____NO _____

If so, which method (e.g., piezometers, gw pumping,...)? _____

If so Please Describe : _____

Horizontal lines for text entry, providing a structured area for describing the monitoring methods used.

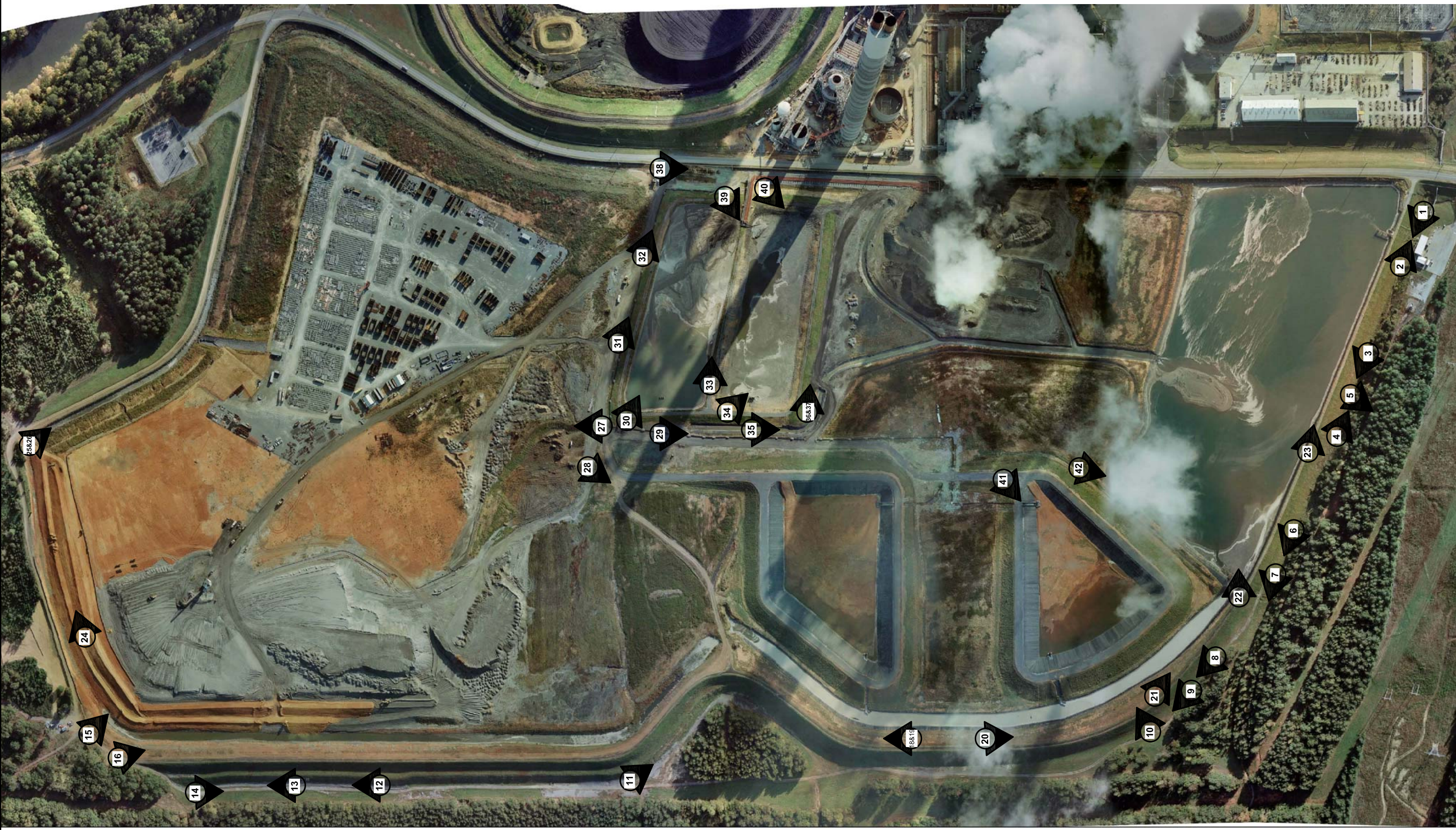


IMAGE REFERENCE:
ASH POND AERIAL
OCTOBER 2008
DRAWING BOW-API 0044



SITE PHOTO LOCATION MAP
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000

DATE: JULY 2009

FIGURE 9

1



South end of main dike at NPDES Sampling flume, looking west. The majority of the slope shown is a natural cut slope, 5 to 10 foot high embankment constructed to blend into slope in this area.

2



South end of main dike at NPDES sampling flume, looking east. Scarp in natural cut slope, reportedly unchanged in 6 to 10 years per Georgia Power Engineer responsible for inspections.



**GEORGIA POWER
BOWEN STEAM PLANT
ASH DISPOSAL POND
CATERSVILLE, GA**

3



South end of the main dike, looking west. Note transition between natural cut slope and raised dike.

4



Perimeter ditch at south end of main dike, looking east. Another area of slough in natural cut slope has choked the channel and has reportedly remained unchanged in 6 to 10 years per Georgia Power Engineer responsible for inspections.



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5



Perimeter ditch at south end of main dike looking west, 180 degree view of previous photo.

6



Continuing west on south end of main dike, another slough area in the natural cut slope, reportedly unchanged in 6 to 10 years per Georgia Power engineer responsible for inspections.



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7



Continuing west on south end of main dike, another slough area in the natural slope reportedly unchanged in 6 to 10 years per Georgia Power engineer responsible for inspections. This area reportedly has had a difficult time re-establishing grass growth so more recent efforts included placing erosion matting.

8



South portion of the embankment near the end of the reclaimed water portion of the impoundment (looking west). Reclaim Pond is lined. Note set up for remote monitoring of piezometers (not operational as of our visit).



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9



South end of the west portion of the Dike.

10



South end of the west portion of the Dike. Toe drain outlets are marked with concrete posts. Toe drain outlets located about every 200 feet. No flow noticed, and Georgia Power indicates they have not seen water flowing in the toe drain.



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ASH DISPOSAL POND
CATERSVILLE, GA**

11



Embankment at the “Horseshoe” (looking south). Note the gravel at the toe which was placed during the grouting program to seal karst features below the embankment.

12



North end of main embankment (looking north). Note the gravel at the toe which was placed during the grouting program to seal karst features below the embankment.



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13



Stone cover at North end of main embankment placed during the grouting program to seal karst features below the embankment. The white numbered concrete posts mark toe drain locations.

14



North end of main embankment (looking south).



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ASH DISPOSAL POND
CATERSVILLE, GA**

15



Main Embankment Crest looking south. Note dry ash stack area in the left of the photo, original embankment crest width 15 feet. Drainage swale is located between the dam and the dry stacked ash pile.

16



Drainage swale between dam and dry stacked ash piles.



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BOWEN STEAM PLANT
ASH DISPOSAL POND
CATERSVILLE, GA**

17



Surficial drainage system draining storm water runoff from ash stacks to the drainage swale.

18



Embankment at the "Horseshoe" looking north. Note original embankment crest width was 15 feet. Dry stacked ash placed uniform to dam crest.



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BOWEN STEAM PLANT
ASH DISPOSAL POND
CATERSVILLE, GA**

19



Embankment at the "Horseshoe" looking north. Gray coloring at toe of embankment is gravel placed during the grouting program to seal karst features below the embankment.

20



Embankment looking from the "Horseshoe" looking south.



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BOWEN STEAM PLANT
ASH DISPOSAL POND
CATERSVILLE, GA**

21



Reclaim Pond and south end of the embankment crest looking east. Note the Reclaim Pond is lined with and HDPE liner.

22



Drainage Swale noted in Photos 15, 16, and 17 discharges into the Reclaim Pond. Note the drainage swale is also HDPE lined. Behind the swale in this photo is one of two gypsum ponds.



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ASH DISPOSAL POND
CATERSVILLE, GA**

23



Crest of south end of main embankment looking east.

24



Upstream side of North Dike looking east. Dry Stack ash piles in the right of the photo. Drainage swale in this area is unlined, but lining is planned for the 2009 construction season.



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ASH DISPOSAL POND
CATERSVILLE, GA**

25



Overview of north dike, looking east.

26



West end of north dike, looking east.



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BOWEN STEAM PLANT
ASH DISPOSAL POND
CATERSVILLE, GA**

27



Within the main impoundment looking north toward the dry stack area.

28



Within the main impoundment looking south. To the left of photo are the wet ash ponds (2) and to the right of the photo are the gypsum ponds (2).



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BOWEN STEAM PLANT
ASH DISPOSAL POND
CATERSVILLE, GA**

29



The west embankment of the wet ash ponds. Note short height and 3H:1V slope.

30



North wet ash pond looking east.



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BOWEN STEAM PLANT
ASH DISPOSAL POND
CATERSVILLE, GA**

31



North embankment of wet ash ponds.

32



North embankment of wet ash ponds, looking east.



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BOWEN STEAM PLANT
ASH DISPOSAL POND
CATERSVILLE, GA**

33



Separator dike between two wet ash ponds.

34



South wet ash pond looking east.



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BOWEN STEAM PLANT
ASH DISPOSAL POND
CATERSVILLE, GA**

35



West embankment of south wet ash pond, looking south.

36



South embankment of wet ash ponds, looking East. Note the lined drainage swale in right of photo discharges into the reclaim pond.



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BOWEN STEAM PLANT
ASH DISPOSAL POND
CATERSVILLE, GA**

37



Upstream slope of south embankment of wet ash ponds, looking east. Note the red clay liner which overlays a liner.

38



East slope of wet ash ponds, looking south.



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ASH DISPOSAL POND
CATERSVILLE, GA**

39



Sluiceway into the north wet ash pond.

40



East slope of wet ash ponds looking south.



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ASH DISPOSAL POND
CATERSVILLE, GA**

41



Lined gypsum pond.

42



Emergency overflow and outlet sluice (via buried outlet pipe) from the gypsum pond into the drainage swale running to the reclaim pond.



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BOWEN STEAM PLANT
ASH DISPOSAL POND
CATERSVILLE, GA**

3.0 DATA EVALUATION

3.1 Design Assumptions

Design drawings from 1969 show that the dikes were generally homogenous structures comprising low permeability compacted fill supported above the natural soil, with a height ranging from 35 feet for the north dike to 45 feet for the west dike. The upstream and downstream slopes had 2:1 grades, which was fairly typical of that time period. Most critically, relative to the current condition in the pond, the dikes were to impound liquid borne, completely saturated, coal combustion waste (CCW). The required free board on the dikes would have been based on hydraulic and hydrology analyses for the impoundment. This historical information was not available at the time this report was written and current operating procedures at the site include only a small area of liquid borne CCW and the remaining portions of the site contain ash placed under hydraulic conditions, and stacks of dry ash.

3.2 Hydrology and Hydraulics

Georgia EPD classifies the Bowen Ash Pond as a Category II dam based on their criteria that a failure at this impoundment would not be likely to result in a loss of life. As a Category II facility, Georgia regulations exempt the dam from the dam safety regulations.

Despite being exempt from the dam safety regulations, Southern Company provided CHA with an evaluation of the drainage from the Ash Pond site (including the dry stack area, wet process ponds, and gypsum ponds) during a 10-year, 24-hour storm event. The volume of runoff from this storm can be completely stored in the Recycle Pond. This storage ability was based on the normal operating pool elevation of the Recycle Pond.

In addition, there are two methods of discharge from the Recycle Pond. The first discharges to the Etowah River through the NPDES permitted outlet. The second is a former discharge

point that is still in place, and discharges to the Euharlee Creek. According to Southern Company this outlet requires manual operation.

In comparison, the same facility in a Category I condition would be required to safely pass or store 50% of the probable maximum flood (PMF).

3.3 Structural Adequacy & Stability

The Georgia Department of Natural Resources Environmental Protection Division outlines rules and regulations for dam safety in Standards for the Design and Evaluation of Dams (391-3-8-.09). The regulations state that all dams must be stable under all conditions of construction and/or operation of the impoundment. Analyses using the methods, guidelines and procedures of the agencies listed in the regulations yielding the minimum safety factors shown in Table 2 for earthen embankments can be considered as acceptable stability.

Table 2 - Minimum Safety Factors Required

| Load Case | Required Minimum Factor of Safety |
|---|-----------------------------------|
| End of Construction | 1.3 |
| Steady State Seepage | 1.5 |
| Steady State Seepage with Seismic Loading | 1.1 |
| Rapid Drawdown (Upstream) | 1.3 |
| Submerged Toe with Rapid Drawdown | 1.3 |

CHA reviewed the available 1969 design documents, 2003 slope study documents for the main and north dikes, and June 2009 stability analyses for the ash dewatering cell and gypsum settling pond dikes to ascertain how the dike structures were modeled and the apparent factor of safety against a global failure that would cause a breach and allow a release of liquid borne waste.

3.3.1 Main and North Dikes

In both the 1969 and 2003 analyses the main and north dikes were modeled as a homogenous clay embankment on a layered soil foundation. The 1969 design modeled the dike foundations

with four separate soil strata, one of which exhibited fairly weak strength characteristics in an undrained or short term loading condition. Laboratory testing of this weak stratum indicated that a strength gain would likely be realized when allowed to consolidate, resulting in more favorable strength characteristics in a steady state condition. The following table summarizes the soil parameters used during the original design to examine global stability.

Table 3 - 1969 Soil Strength Parameters

| Soil Stratum | Unit Weight (pcf) | Friction Angle (ϕ) | Cohesion (psf) | Description |
|----------------|-------------------|---------------------------|----------------|---------------------------------|
| A | 122 | 10° | 1,000 | Embankment |
| B | 128 | 23° | 500 | Natural Subgrade |
| C | 115 | 6° | 250 | Natural Subgrade |
| C ₁ | 115 | 18° | 500 | Natural Subgrade (consolidated) |
| D | 120 | 18° | 1,500 | Natural Subgrade |
| E | 120 | 7° | 1,000 | Natural Subgrade |

Two of the four strata were modeled below the west dike location while three of the four strata were modeled beneath the north dike. A stability cross-section of the north dike structure (Sta. 71+70) assuming steady-state conditions and a full hydrostatic head at Elevation 715 is shown in Figure 4.

Following the July 2002 sinkhole event, a slope stability study was undertaken, focusing primarily on the west dike structure. That study examined five load cases that included steady state, hydrostatic uplift from within karst solution cavities, earthquake, hydrostatic uplift a short time after an earthquake with earthquake reduced soil strengths, and post-remediation that involved compaction grouting. In a manner similar to the original 1969 design, the 2003 slope stability study modeled the dike sections with a homogeneous clay embankment over a soil foundation, but modeled the soil foundation with two layers, one of which reflected a weak soil

stratum, and modeled the impounded ash. After an extensive soil exploration program utilizing soil borings, in-situ cone penetrometer testing and laboratory testing, the following parameters were used for a steady state analysis as summarized in the following table.

Table 4 - 2003 Soil Strength Parameters (Steady State)

| Description | Unit Weight (pcf) | Friction Angle (ϕ) | Cohesion (psf) |
|--------------------|-------------------|---------------------------|----------------|
| Embankment | | 31° | 350 |
| Firm Residual Soil | 128 | 30° | 218 |
| Weak Residual Soil | 115 | 20° | 100 |
| Ash | 85 | 0° | 0 |

The earthquake analysis in the 2003 study examined two seismic events, one with a 10% probability of exceedance (PE) in 50 years which would result in a peak ground acceleration (PGA) of 0.06 g, and another with a 2% PE in 50 years resulting in a PGA of 0.15g. Half of the PGA was assumed to manifest itself as a horizontal acceleration in the dikes, so a value of 0.075g was used in the pseudo-static analysis. In addition to the seismic forces, the 2003 study also modeled the dikes under two strength cases. One case used all of the available soil strength and the other case used a soil strength degradation as result of dynamic cyclical loading to 80 percent of the ultimate strength in the embankment fill and residual soil. Due to the saturated condition of the ash, it was given no shear strength value, a conservative assumption. The worst case scenario involving the maximum force and strength degradation is highlighted in this report. Soil strength parameters used for the earthquake analysis are summarized in the following table:

Table 5 - 2003 Soil Strength Parameters (Earthquake)

| Description | Unit Weight (pcf.) | Friction Angle (ϕ) | Cohesion (psf) |
|--------------------|--------------------|---------------------------|----------------|
| Embankment | 122 | 2.5° | 280 |
| Firm Residual Soil | 124 | 24° | 175 |
| Weak Residual Soil | 117 | 20° | 100 |
| Ash | 85 | 15° | 0 |

Figures 11 and 12 show the typical geometry of the stability models analyzed in the 2003 stability report and Figure 13-1 through 13-3 and Figures 14-1 through 14-3 highlight the results of the analyses. Computed steady state safety factors in these locations ranged from 1.4 to 1.5

and the seismic safety factors ranged from 0.99 to 1.1. Table 6 summarizes the results of stability analyses performed on the main and north dikes.

Table 6- Safety Factors – Ash Pond

| Load Case | USACOE Minimum Factor of Safety Guidelines | 1969 Design Documents | | 2003 Slope Study (min. of sections analyzed) |
|---|---|--------------------------|------------|--|
| | | North Dike | Main Dike | |
| Steady State Seepage <ul style="list-style-type: none"> ▪ Downstream Slope ▪ Upstream Slope | 1.5 | 1.9 2.7 | 1.7 4.0 | 1.4 |
| Steady State Seepage with Seismic Loading | 1.0 | NP | NP | 0.99 (2% in 50yr) 1.1 (10% in 50yr) |
| Rapid Drawdown (Upstream) | 1.3 | NP | NP | NP |
| Under Wash/Uplift from Karst Feature | -- | NP | NP | 0.97 |
| Post Seismic Condition with Development of Karst Feature | -- | NP | NP | 0.95 |

NP: Not performed

3.3.2 Wet Ash and Gypsum Dikes

Since the 2003 slope stability report was completed, Plant Bowen has completed its change to a dry stack operation, greatly reducing the wet CCW processing area to two small dewatering cells and two gypsum settling ponds. These are diked, GCL or HDPE lined basins constructed from compacted bottom ash and capped with natural soil. The ash dewatering cells are constructed with a 20-foot wide crest, 2.5:1 slopes, and are about 14 feet in height.

Southern Company provided CHA with analyses for the dewatering cells, and the resulting factors of safety for steady state and seismic conditions are summarized in Table 7. Rapid drawdown is not required for these because the dikes are lined with geosynthetic liners. Therefore, there are not hydrostatic pressures within the embankment.

CHA performed a sensitivity analysis of these structures with slightly lower embankment and immediately underlying ash strength properties based on our review of properties used at multiple ash ponds under steady state and seismic conditions. The results of CHA’s analyses are also listed in Table 7 and show factors of safety meeting industry accepted standards.

Table 7- Safety Factors – Dewatering Cells

| Load Case | USACOE Minimum Factor of Safety Guidelines | Southern Company Analysis | | CHA Stability Analysis | |
|--|--|------------------------------|-----------------------------|---------------------------|-------------------|
| | | Downstream Slope | Upstream Slope | Downstream Slope | Upstream Slope |
| End of Construction | 1.3 | | | | |
| Steady State Seepage | 1.5 | 1.8 (shallow) 2.7 (deep) | 2.5 (deep) | 1.9 | 4.6 (shallow) |
| Steady State Seepage with Seismic Loading | 1.0 | 1.1 (shallow) 1.6 (deep) | 1.1 (shallow) 1.4 (deep) | 1.5 | |
| Rapid Drawdown (Upstream) | 1.3 | N/A | N/A | N/A | N/A |

Figures 15-1 through 15-3 illustrate the construction and stability cross sections for the dewatering cells. Although the gypsum cells are slightly higher (about 23 feet), their side slopes are 3H:1V. Based on CHA analyses, the factors of safety for the gypsum cells is similar to that of the ash dewatering cells.

Based upon a review of the 2003 slope stability analysis data, the completed compaction grouting program under the west dike to strengthen foundation soils, the change from a wet to dry process disposal operation that continues to lower the overall piezometric levels in the pond, and a slope stability analysis of the present liquid CCW basins, the dikes appear structurally adequate.

3.4 Operations & Maintenance

Southern Company has performed engineering analyses on the main and north dikes since the 2002 release of CCW through karst below the site. Although the karst below the site was known about during original design and construction, and minor, non-release developing sinkholes as a result of the karst have occurred throughout the life of the site, the 2002 event resulted in continued efforts to isolate water associated with the Power Plant operations from impacting the groundwater and the karst.

Georgia Power began transitioning to dry ash stacking instead of sluicing wet ash into the main impoundment in 1992. Between 1992 and 2002, about 6 to 12 inches of water was maintained on the surface of the ash for dust control purposes. Following the 2002 release of ash through karst below the main dike, Georgia Power changed their process of dust control to include placing moist (but not saturated) CCW, limiting the exposed area of ash, using temporary cover soil, and temporarily sealing exposed areas with a smooth drum roller. This was part of a stacking plan prepared in coordination with GA EPD.

The ash stacking plan was further modified in 2008 following an erosion triggered event in which heavy rain fall cause erosion and sloughing of an ash slope to inundate the drainage swale and flow over the top of the embankment.

In addition to the day to day CCW disposal operations, plant personnel have been informed of the underlying karst condition that continues to result in periodic maintenance needs and to be on the look out for developing sinkholes. Daily piezometer readings are reviewed by Southern Company personnel assigned to this project. In December 2008, a new sinkhole developed in which several piezometers in the area of the site showed an increase in water levels a few days prior to the expression of the sinkholes at the ground surface.

3.4.1 Piezometers

Plant Bowen personnel read selected piezometers around the impoundment on a daily basis and read all piezometers at least weekly. The data is transmitted to Southern Company for interpretation. Georgia Power is working on installing a new remote reading system so all piezometers will be able to be read daily.

Figures 16A-1 through 16-9 shows the piezometer readings for approximately the last ten years. Southern Engineering personnel indicated that prior to the December 2008 sinkhole, piezometric levels at MW-101 and MW-102 increased about three days before the sinkholes became visible at the ground surface.

3.4.2 Inspections

Plant Bowen personnel make daily to weekly inspections of the embankment. Southern Company personnel make quarterly inspections. Quarterly inspection reports from 2004 through 2009 were shared with CHA.

File: k:\20085\CADD\ACAD\FIGURES\1000 BOWEN PLANT\BOWEN PLANS-MAPS.DWG Saved: 7/6/2009 2:35:49 PM Plotted: 7/6/2009 2:39:11 PM User: Filkins, Rebecca

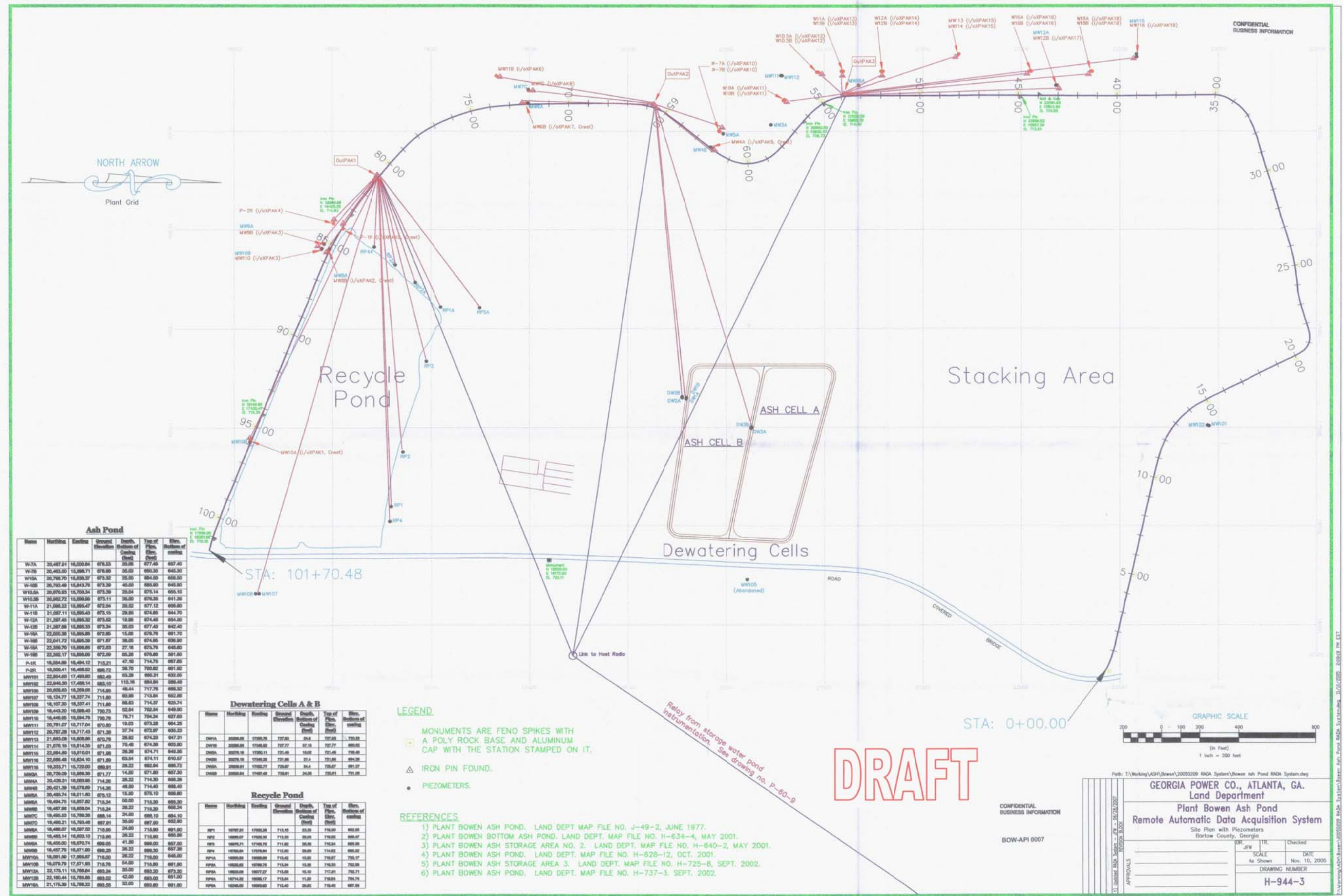



IMAGE REFERENCE: PLANT BOWEN ASH POND REMOTE AUTOMATIC DATA ACQUISITION SYSTEM SITE PLAN WITH PIEZOMETERS DRAWING NUMBER H-944-3 NOVEMBER 10, 2005



Drawing Copyright © 2007 CHA

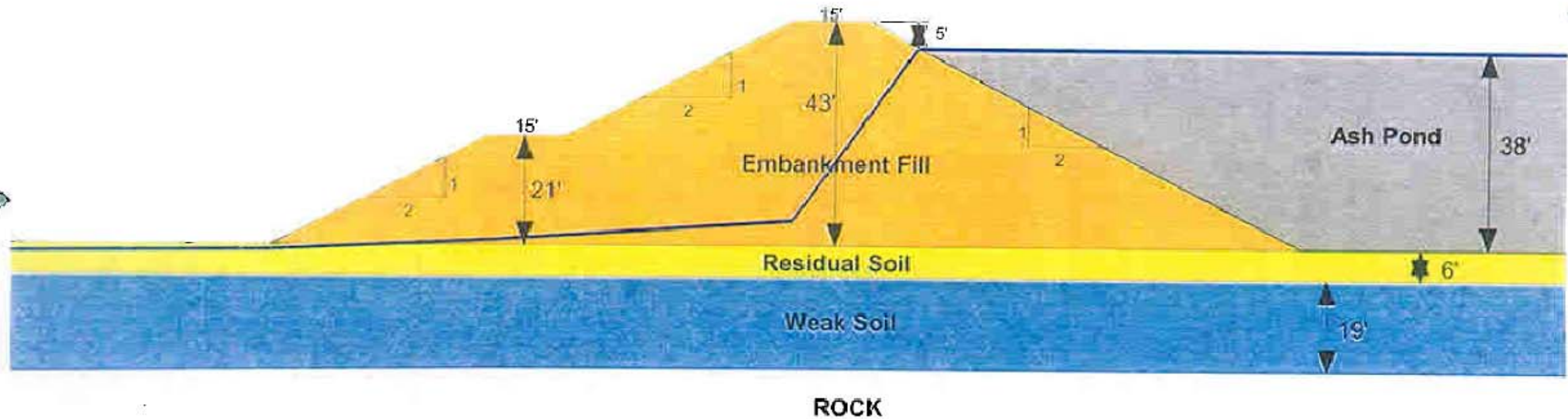
PIEZOMETER LAYOUT PLAN
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000

DATE: JULY 2009

FIGURE 10

Bowen Ash Pond Dike Stability Analysis Section 1-2-3



Embankment Fill
 Unit Weight: 122
 Cohesion: 350
 Phi: 31

Residual
 Unit Weight: 124
 Cohesion: 218
 Phi: 30

Weak Residual
 Unit Weight: 117
 Cohesion: 100
 Phi: 20

Ash
 Unit Weight: 85
 Cohesion: 0
 Phi: 15

*File Name: B-1,2,3 Case A.siz
 Analysis Method: Bishop (with Ordinary & Janbu)
 Direction of Slip Movement: Right to Left
 Slip Surface Option: Grid and Radius
 P.W.P. Option: Piezometric lines with Ru
 Tension Crack Option: (none)
 Seismic Coefficient: (none)*

CONFIDENTIAL BUSINESS INFO

IMAGE REFERENCE: STABILITY ANALYSIS OUTPUTS 3,
 PAGE 1



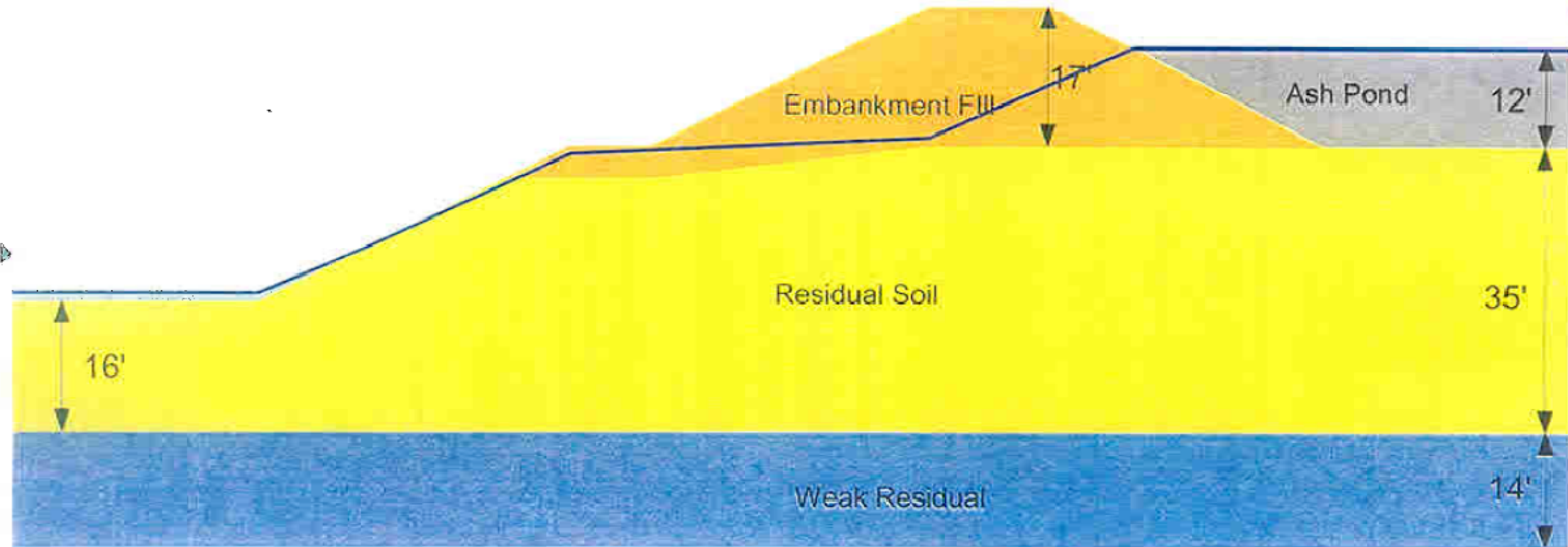
CROSS SECTION OF MAIN DIKE
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

PROJECT NO.
 20085.1000

DATE: JULY 2009

FIGURE 11

Bowen Ash Pond Dike Stability Analysis Section 8-9



COMPLEMENTAL BUSINESS INFORMATION

Embankment Fill
Unit Weight:122
Cohesion:350
Phi:31

Residual
Unit Weight:124
Cohesion:218
Phi:30

Weak Residual
Unit Weight:117
Cohesion:100
Phi:20

Ash
Unit Weight:85
Cohesion:0
Phi:15

File Name: B-8,9 Case A.siz
Analysis Method: Bishop (with Ordinary & Janbu)
Direction of Slip Movement: Right to Left
Slip Surface Option: Grid and Radius
P.W.P. Option: Piezometric lines with Flu
Tension Crack Option: (none)
Seismic Coefficient: (none)

IMAGE REFERENCE: STABILITY ANALYSIS OUTPUTS 3,
PAGE 29



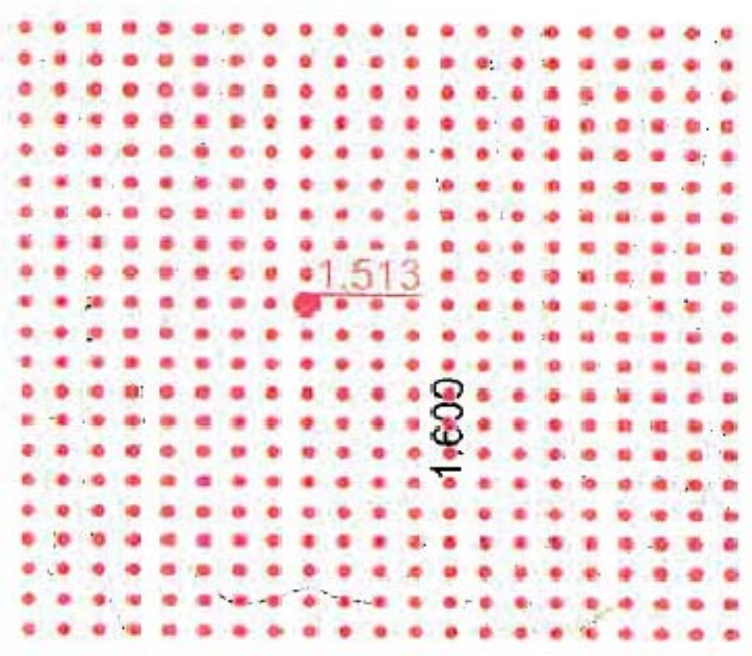
**CROSS SECTION OF MAIN DIKE AT
RECYCLE POND**
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000

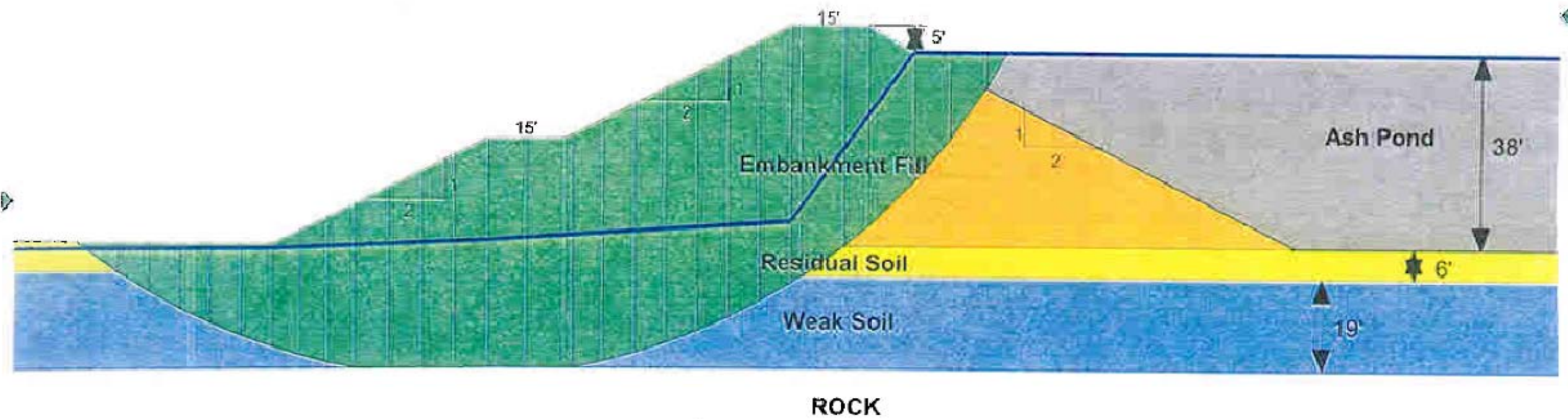
DATE: JULY 2009

FIGURE 12

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Bowen Ash Pond Dike Stability Analysis Section 1-2-3 Case A-1



COMMERICAL BUSINESS INFORMATION

Embankment Fill
Unit Weight:122
Cohesion:350
Phi:31

Residual
Unit Weight:124
Cohesion:218
Phi:30

Weak Residual
Unit Weight:117
Cohesion:100
Phi:20

Ash
Unit Weight:85
Cohesion:0
Phi:15

File Name: B-1,2,3 Case A-1.siz
Analysis Method: Bishop
Direction of Slip Movement: Right to Left
Slip Surface Option: Grid and Radius
P.W.P. Option: Piezometric lines with Ru
Tension Crack Option: (none)
Seismic Coefficient: (none)

IMAGE REFERENCE: STABILITY ANALYSIS OUTPUTS 3,
PAGE 2



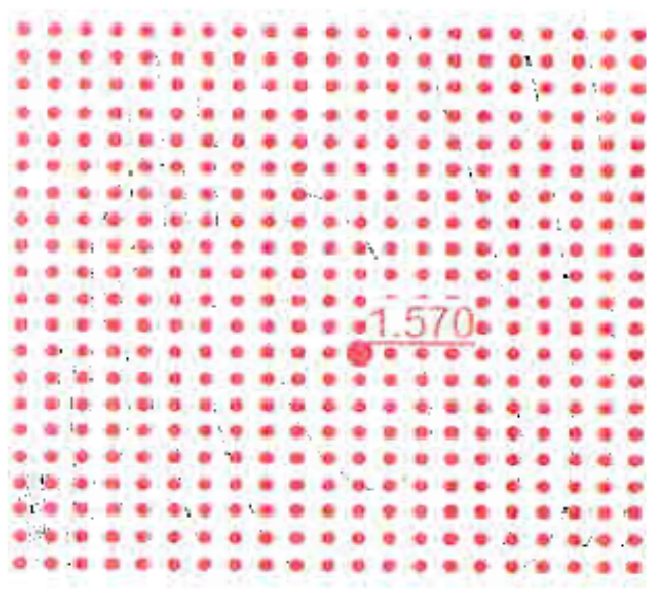
CROSS SECTION OF MAIN DIKE
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000

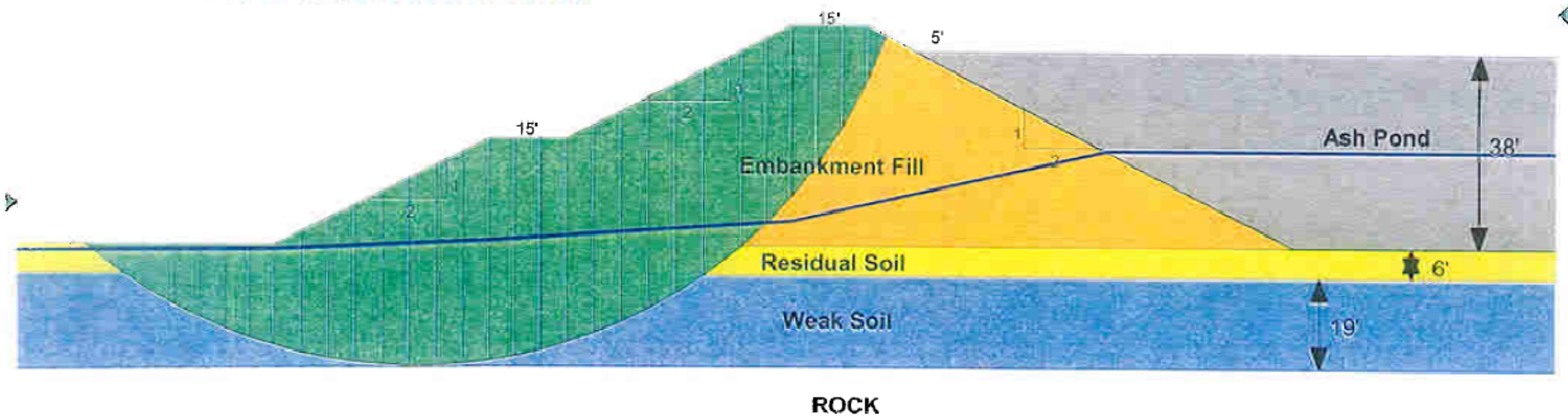
DATE: JULY 2009

FIGURE 13-1

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Bowen Ash Pond Dike Stability Analysis Section 1-2-3 Case A-1b



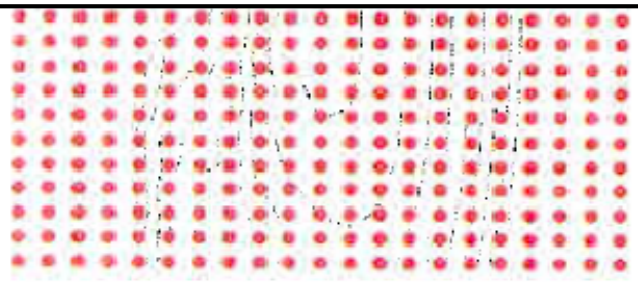
CONFIDENTIAL BUSINESS INFORMATION

| | | | |
|---|--|---|--|
| Embankment Fill Unit Weight:122 Cohesion:350 Phi:31 | Residual Unit Weight:124 Cohesion:218 Phi:30 | Weak Residual Unit Weight:117 Cohesion:100 Phi:20 | Ash Unit Weight:85 Cohesion:0 Phi:15 |
|---|--|---|--|

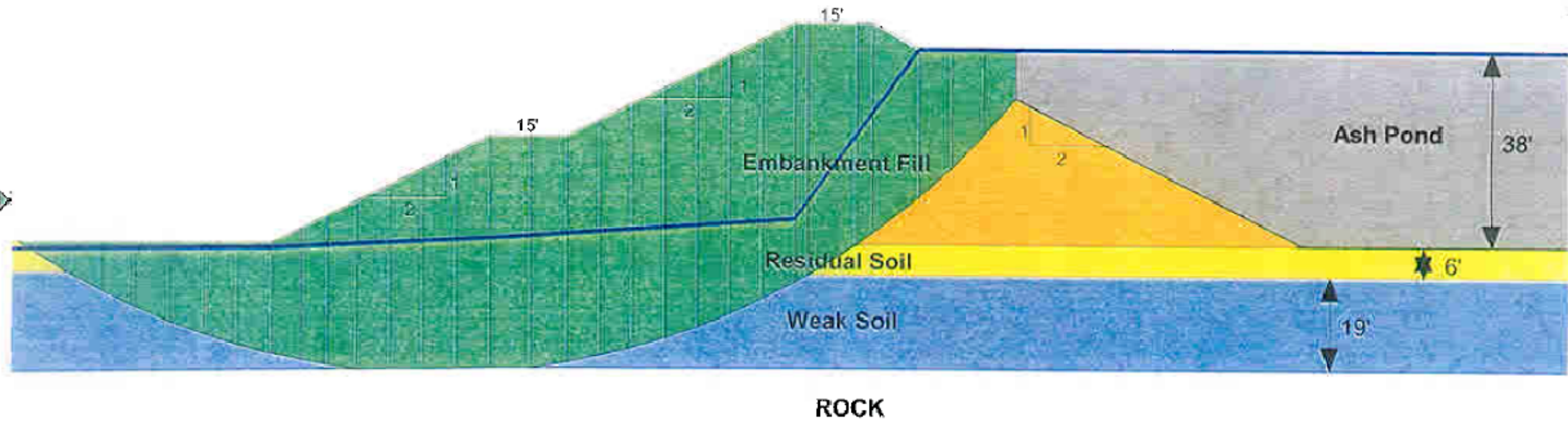
File Name: B-1,2,3 Case A-1b.siz
 Analysis Method: Bishop
 Direction of Slip Movement: Right to Left
 Slip Surface Option: Grid and Radius
 P.W.P. Option: Piezometric lines with Ru
 Tension Crack Option: (none)
 Seismic Coefficient: (none)

IMAGE REFERENCE: STABILITY ANALYSIS OUTPUTS 3,
PAGE 4

| | | |
|--|--|---------------------------|
| | CROSS SECTION OF MAIN DIKE PLANT BOWEN GEORGIA POWER COMPANY CARTERSVILLE, GEORGIA | PROJECT NO. 20085.1000 |
| | DATE: JULY 2009 | |
| | FIGURE 13-2 | |



Bowen Ash Pond Dike Stability Analysis Section 1-2-3 Case C-1 kH = 0.075g



CONFIDENTIAL BUSINESS INFORMATION

Embankment Fill
Unit Weight:122
Cohesion:280
Phi:25

Residual
Unit Weight:124
Cohesion:175
Phi:24

Weak Residual
Unit Weight:117
Cohesion:100
Phi:20

Ash
Unit Weight:85
Cohesion:0
Phi:0

File Name: B-1,2,3 Case C-1.siz
Analysis Method: Bishop
Direction of Slip Movement: Right to Left
Slip Surface Option: Grid and Radius
P.W.P. Option: Piezometric lines with Ru
Tension Crack Option: (none)
Seismic Coefficient: Horizontal

IMAGE REFERENCE: STABILITY ANALYSIS OUTPUTS 3,
PAGE 8

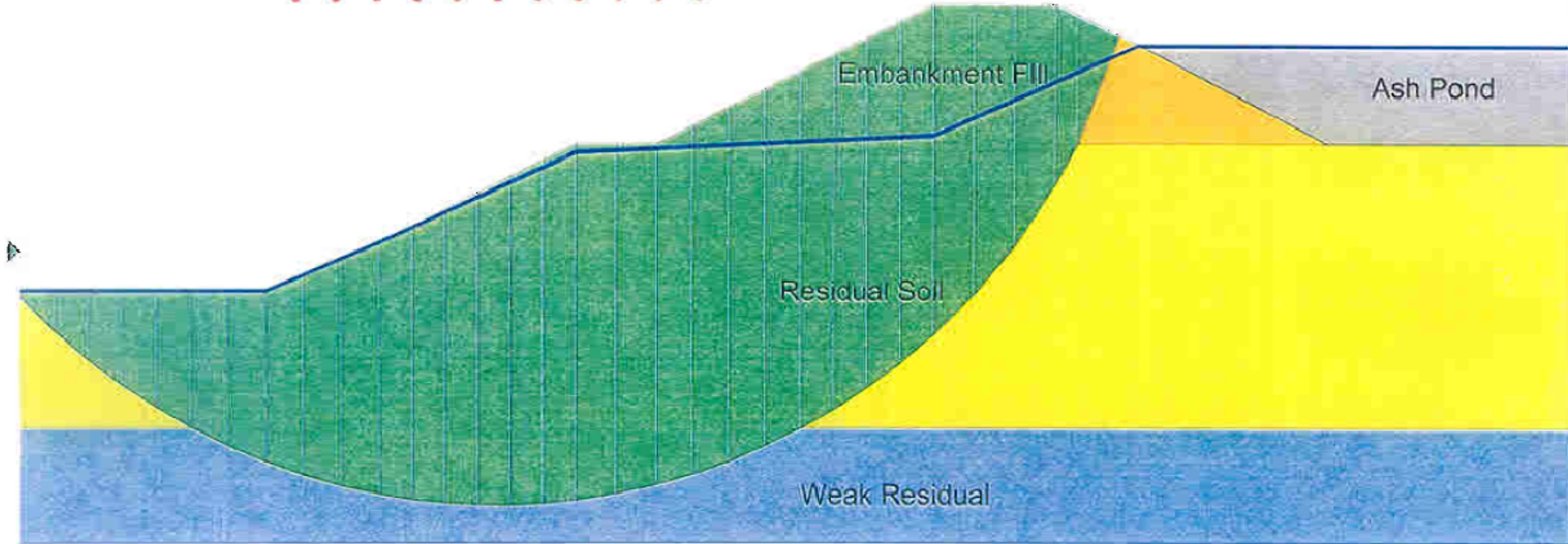
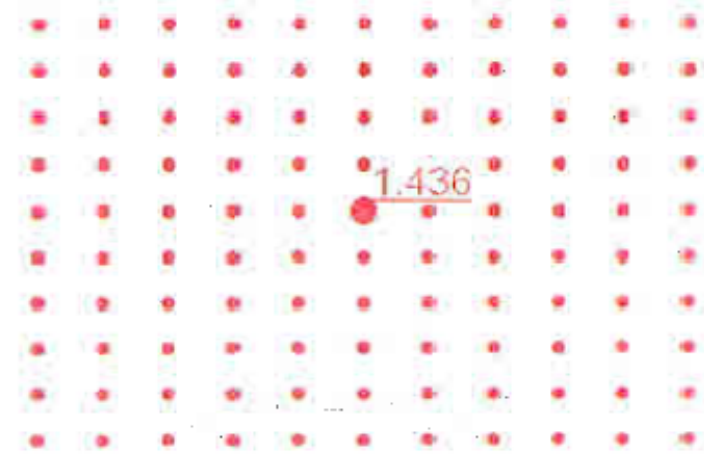


CROSS SECTION OF MAIN DIKE
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000
DATE: JULY 2009
FIGURE 13-3

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Bowen Ash Pond Dike Stability Analysis Section 8-9 Case A-1



ROCK

Embankment Fill
Unit Weight:122
Cohesion:350
Phi:31

Residual
Unit Weight:124
Cohesion:218
Phi:30

Weak Residual
Unit Weight:117
Cohesion:100
Phi:20

Ash
Unit Weight:85
Cohesion:0
Phi:15

File Name: B-8,9 Case A-1.siz
Analysis Method: Bishop
Direction of Slip Movement: Right to Left
Slip Surface Option: Grid and Radius
P.W.P. Option: Piezometric lines with Ru
Tension Crack Option: (none)
Seismic Coefficient: (none)

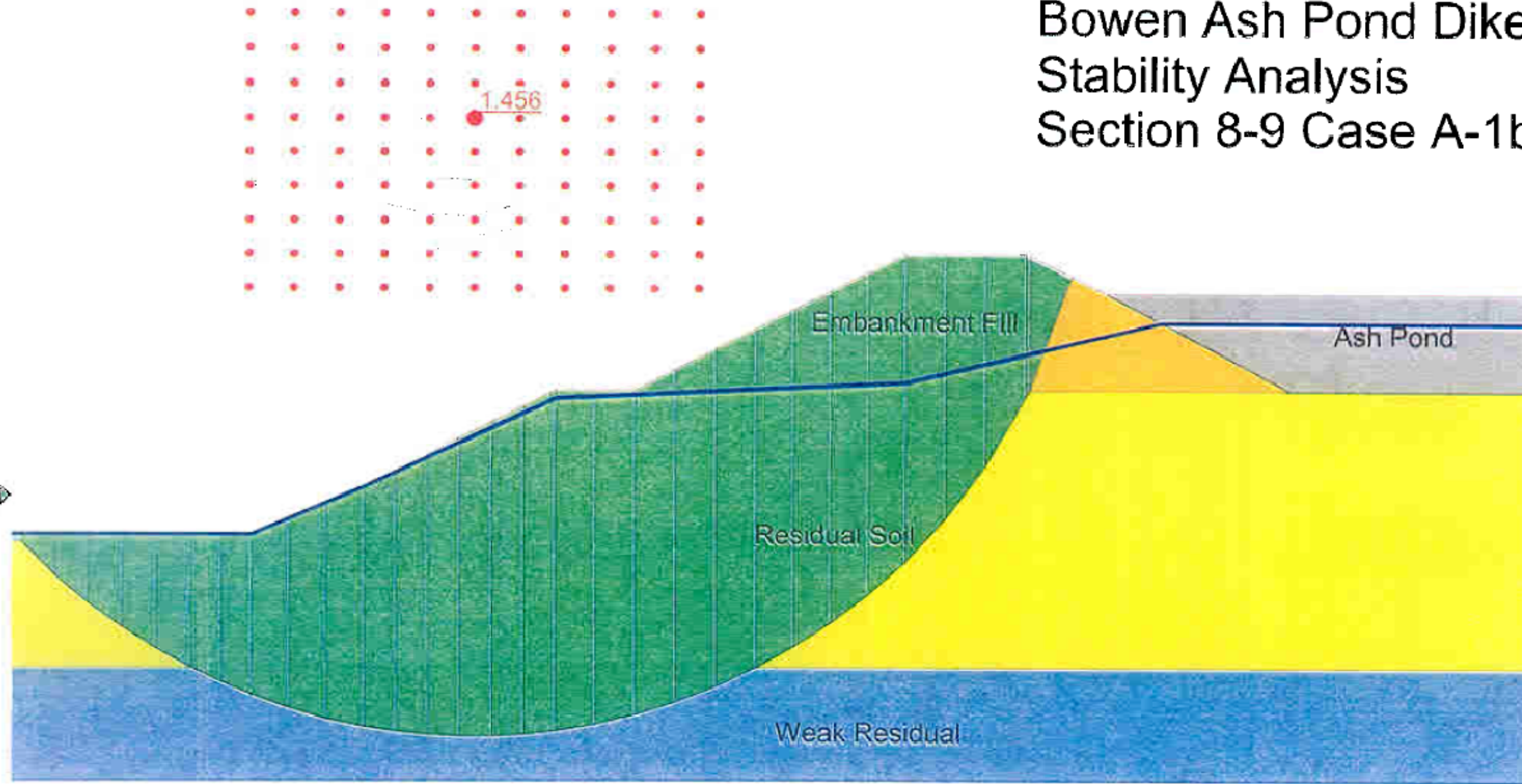
IMAGE REFERENCE: STABILITY ANALYSIS OUTPUTS 3,
PAGE 30



**CROSS SECTION OF MAIN DIKE AT
RECYCLE POND**
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000
DATE: JULY 2009
FIGURE 14-1

Bowen Ash Pond Dike Stability Analysis Section 8-9 Case A-1b



CONFIDENTIAL BUSINESS INFORMATION

Embankment Fill
Unit Weight:122
Cohesion:350
Phi:31

Residual
Unit Weight:124
Cohesion:218
Phi:30

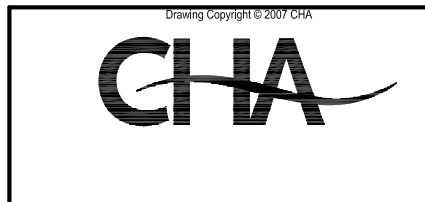
Weak Residual
Unit Weight:117
Cohesion:100
Phi:20

Ash
Unit Weight:85
Cohesion:0
Phi:15

File Name: B-8,9 Case A-1b.siz
Analysis Method: Bishop
Direction of Slip Movement: Right to Left
Slip Surface Option: Grid and Radius
P.W.P. Option: Piezometric lines with Ru
Tension Crack Option: (none)
Seismic Coefficient: (none)

ROCK

IMAGE REFERENCE: STABILITY ANALYSIS OUTPUTS 3,
PAGE 34

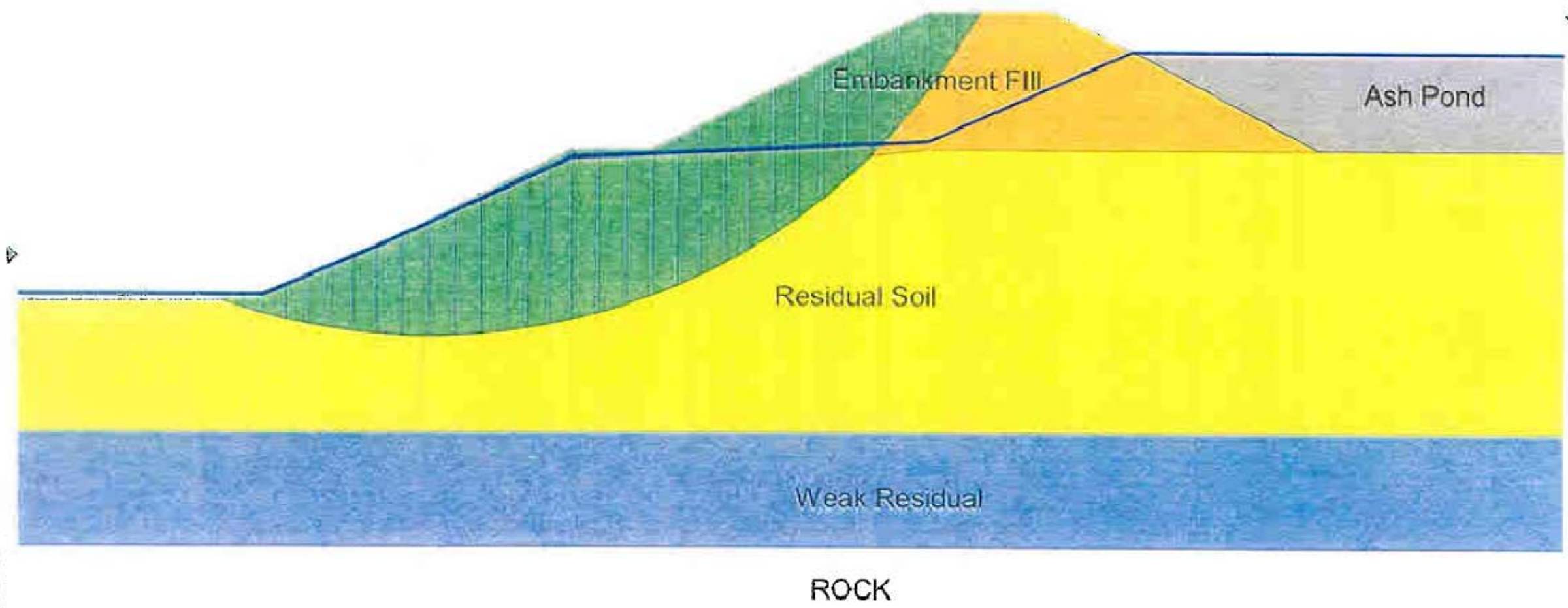
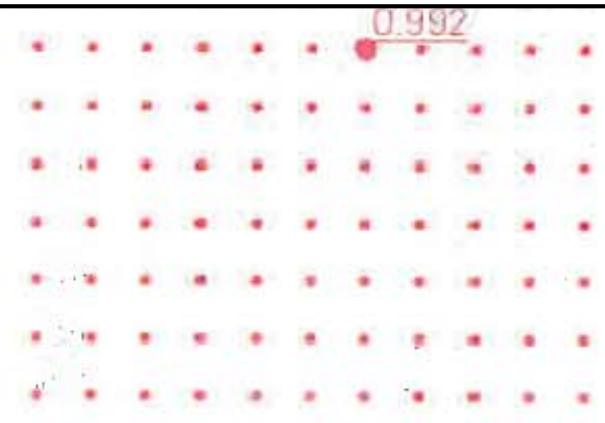


**CROSS SECTION OF MAIN DIKE AT
RECYCLE POND**
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000
DATE: JULY 2009
FIGURE 14-2

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Bowen Ash Pond Dike Stability Analysis Section 8-9 Case C-1 kH = 0.075g



Embankment Fill
Unit Weight:122
Cohesion:280
Phi:25

Residual
Unit Weight:124
Cohesion:175
Phi:24

Weak Residual
Unit Weight:117
Cohesion:100
Phi:20

Ash
Unit Weight:85
Cohesion:0
Phi:0

File Name: B-8,9 Case C-1 shallow.stz
Analysis Method: Bishop
Direction of Slip Movement: Right to Left
Slip Surface Option: Grid and Radius
P.W.P. Option: Piezometric lines with Ru
Tension Crack Option: (none)
Seismic Coefficient: Horizontal

IMAGE REFERENCE: STABILITY ANALYSIS OUTPUTS 2,
PAGE 1



**CROSS SECTION OF MAIN DIKE AT
RECYCLE POND**
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000
DATE: JULY 2009
FIGURE 14-3

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Georgia Power Company
 Plant Bowen
 Cartersville, GA
 CHA Project No. 20085.1000.1510
 June 2009

Ash Pond Dewatering Cells
 Seismic Analysis (pseudo-static)
 Normal Operating Storage Volume (El. 724.0')
 Section A-A' (Drawing No. E14680, 06/24/03 by Southern Company Services, Inc.)
 Factor of Safety = 1.52

Analysis Methods Used: Bishop Simplified

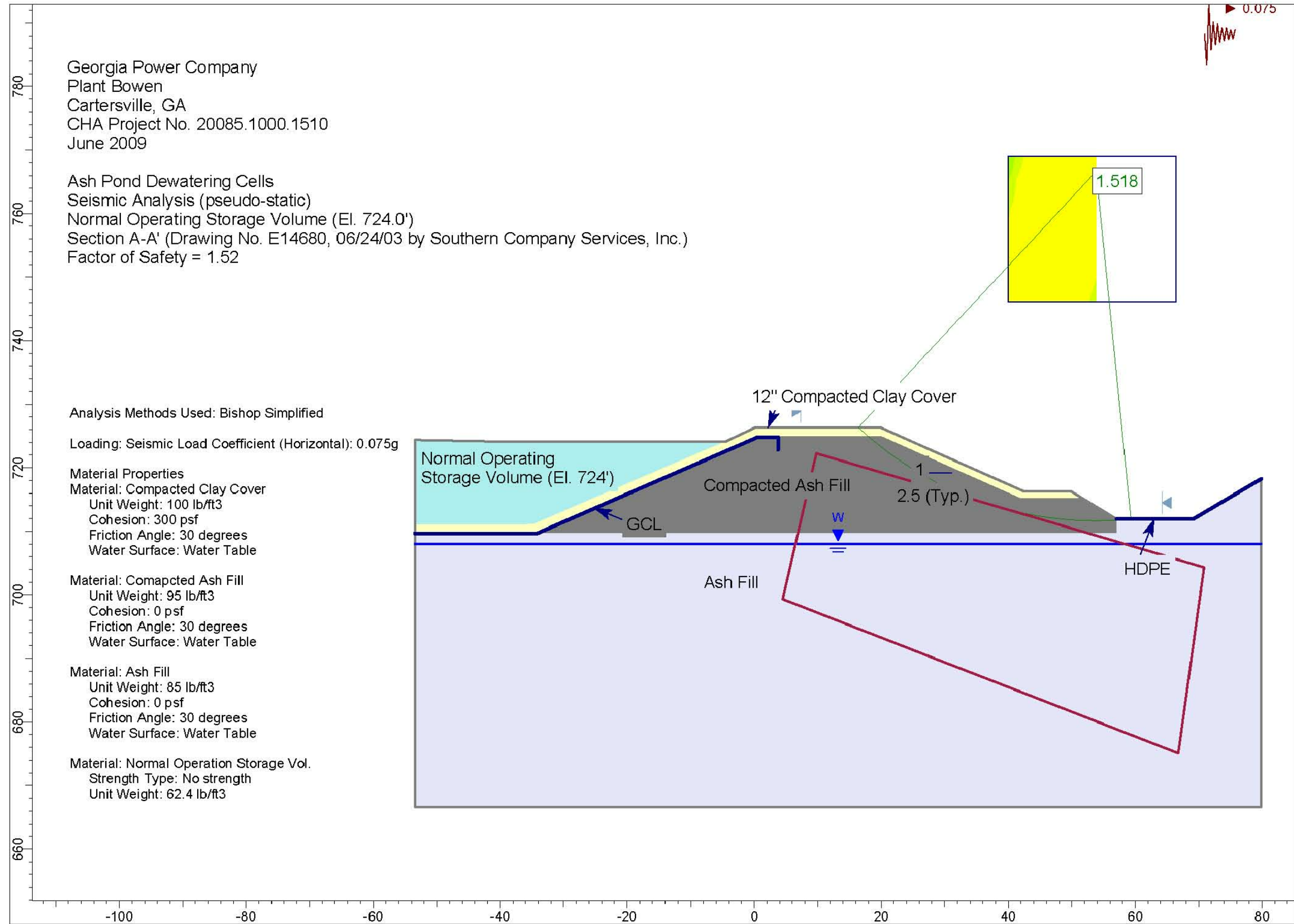
Loading: Seismic Load Coefficient (Horizontal): 0.075g

Material Properties
 Material: Compacted Clay Cover
 Unit Weight: 100 lb/ft³
 Cohesion: 300 psf
 Friction Angle: 30 degrees
 Water Surface: Water Table

Material: Compacted Ash Fill
 Unit Weight: 95 lb/ft³
 Cohesion: 0 psf
 Friction Angle: 30 degrees
 Water Surface: Water Table

Material: Ash Fill
 Unit Weight: 85 lb/ft³
 Cohesion: 0 psf
 Friction Angle: 30 degrees
 Water Surface: Water Table

Material: Normal Operation Storage Vol.
 Strength Type: No strength
 Unit Weight: 62.4 lb/ft³



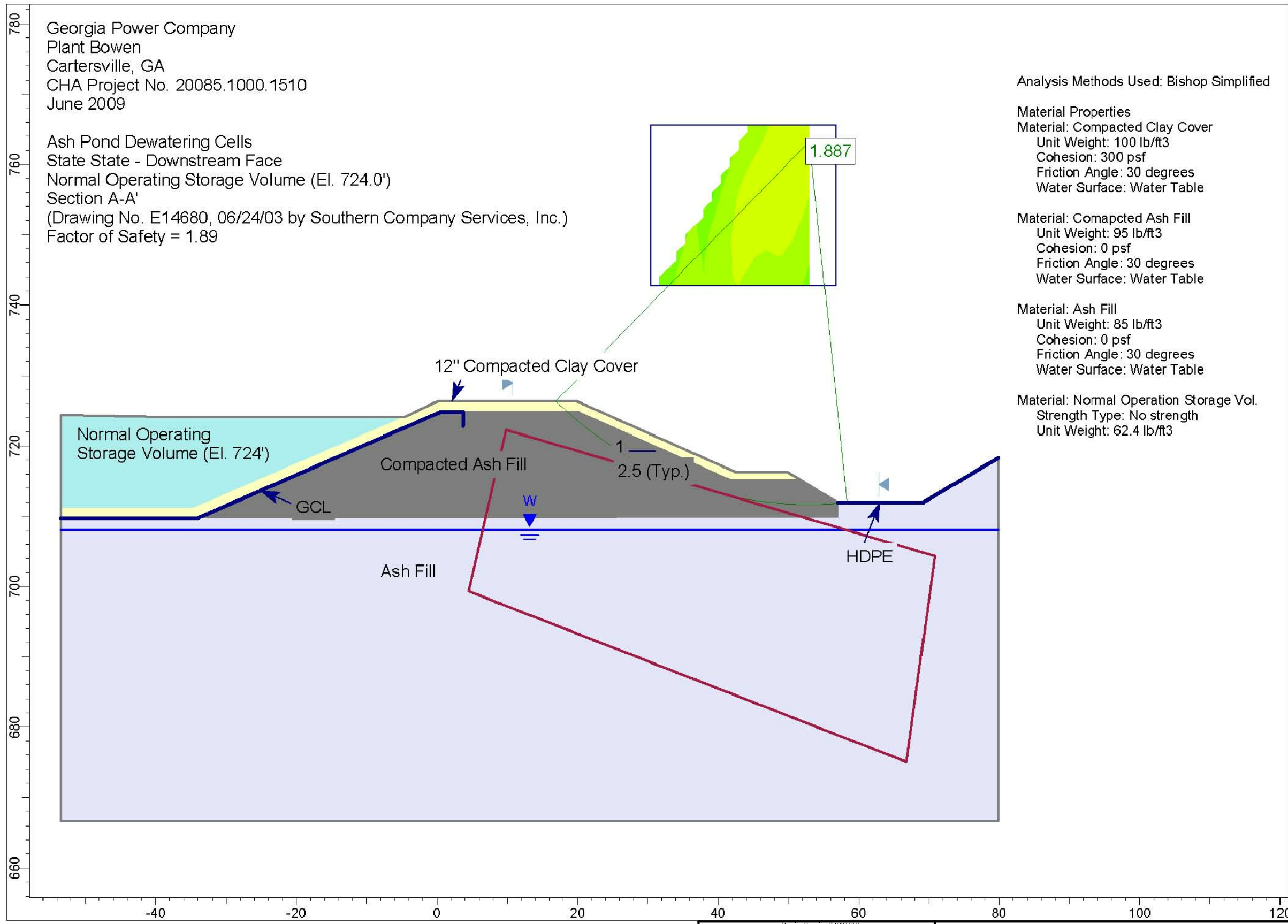
STABILITY ANALYSIS
ASH POND DEWATERING CELLS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

PROJECT NO.
 20085.1000

DATE: JULY 2009

FIGURE 15-1

File: K:\20085\CADD\ACAD\FIGURES\GEO\1000 BOWEN PLANT\BOWEN XSECTS2.DWG Saved: 7/6/2009 9:51:29 AM Plotted: 7/6/2009 11:00:14 AM User: Filkins, Rebecca



Georgia Power Company
 Plant Bowen
 Cartersville, GA
 CHA Project No. 20085.1000.1510
 June 2009

Ash Pond Dewatering Cells
 State State - Downstream Face
 Normal Operating Storage Volume (El. 724.0')
 Section A-A'
 (Drawing No. E14680, 06/24/03 by Southern Company Services, Inc.)
 Factor of Safety = 1.89

Analysis Methods Used: Bishop Simplified

Material Properties
 Material: Compacted Clay Cover
 Unit Weight: 100 lb/ft³
 Cohesion: 300 psf
 Friction Angle: 30 degrees
 Water Surface: Water Table

Material: Comapcted Ash Fill
 Unit Weight: 95 lb/ft³
 Cohesion: 0 psf
 Friction Angle: 30 degrees
 Water Surface: Water Table

Material: Ash Fill
 Unit Weight: 85 lb/ft³
 Cohesion: 0 psf
 Friction Angle: 30 degrees
 Water Surface: Water Table

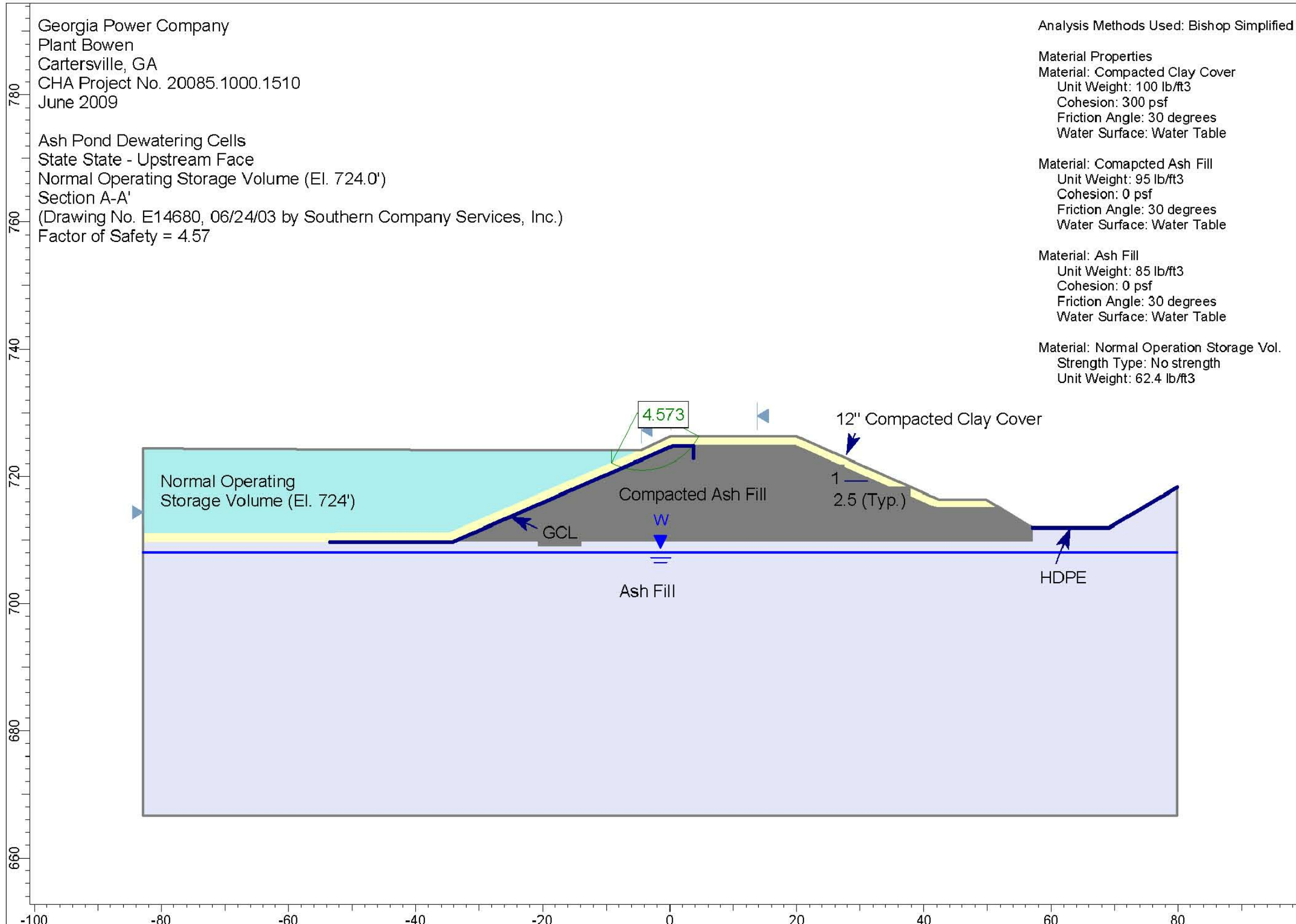
Material: Normal Operation Storage Vol.
 Strength Type: No strength
 Unit Weight: 62.4 lb/ft³



STABILITY ANALYSIS
ASH POND DEWATERING CELLS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

PROJECT NO.
 20085.1000
 DATE: JULY 2009
 FIGURE 15-2

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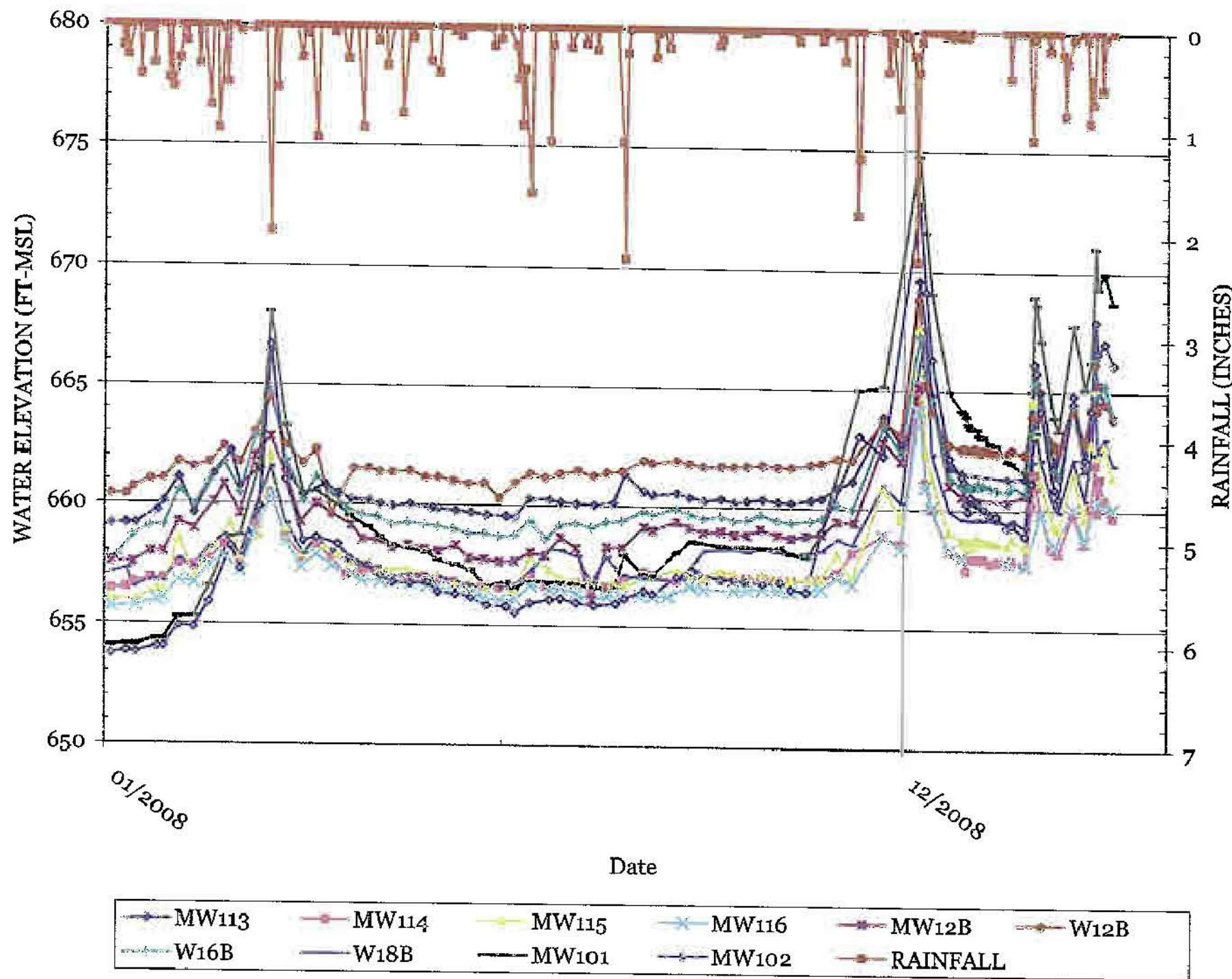
STABILITY ANALYSIS
ASH POND DEWATERING CELLS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

PROJECT NO.
20085.1000

DATE: JULY 2009

FIGURE 15-3

Bowen Ash Pond Piezometers at NW End in Rock



APNWPZB.XLS

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4/17/2009

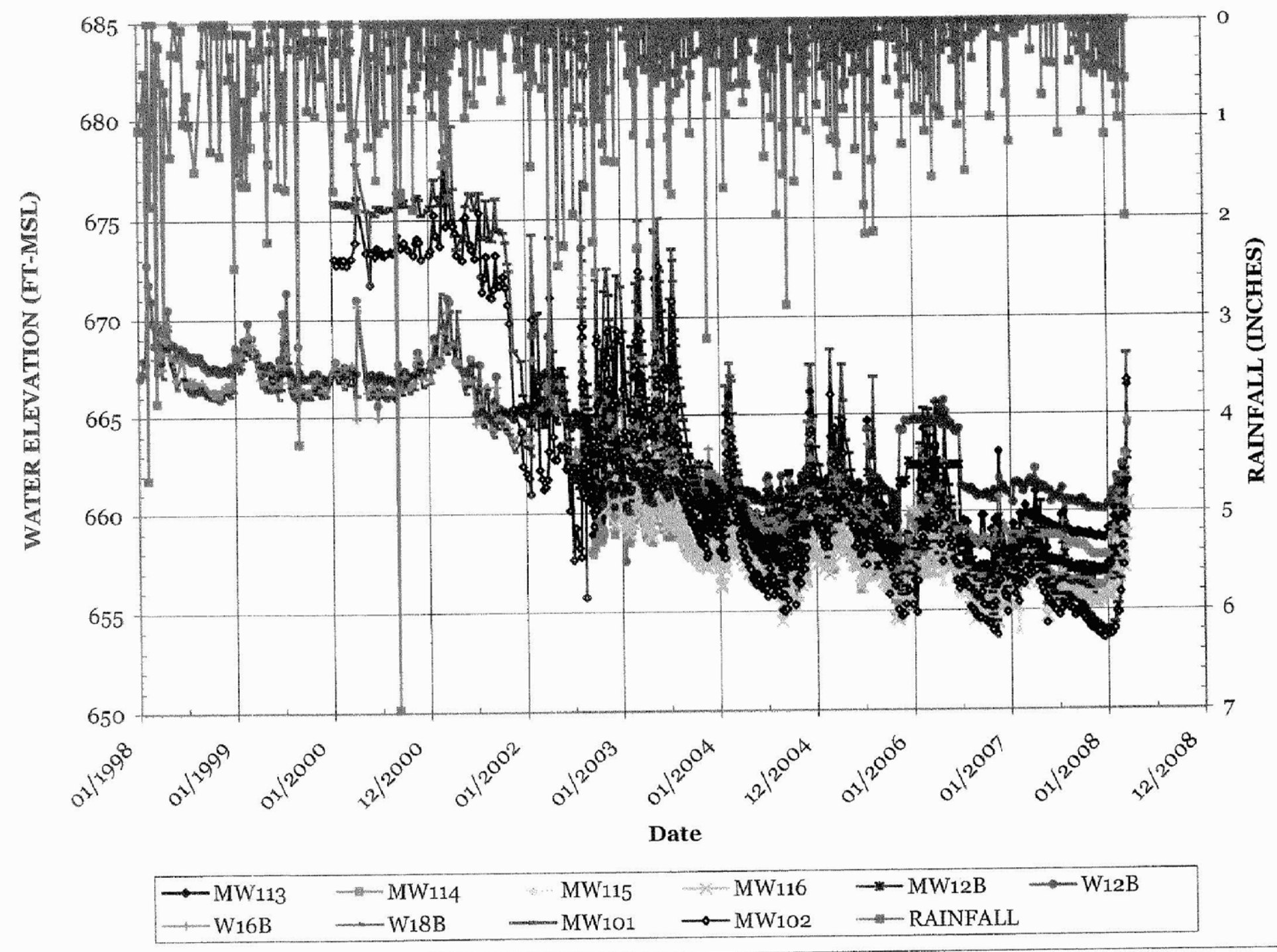


PIEZOMETER READINGS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

PROJECT NO.
 20085.1000
 DATE: JULY 2009
 FIGURE 16-1A

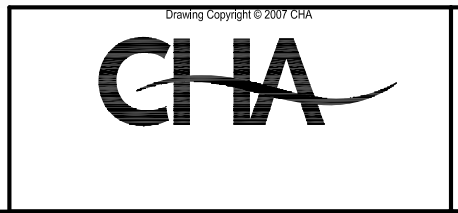
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Bowen Ash Pond Piezometers/OW at NW End in Rock



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5/5/2008



PIEZOMETER READINGS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

PROJECT NO.
 20085.1000

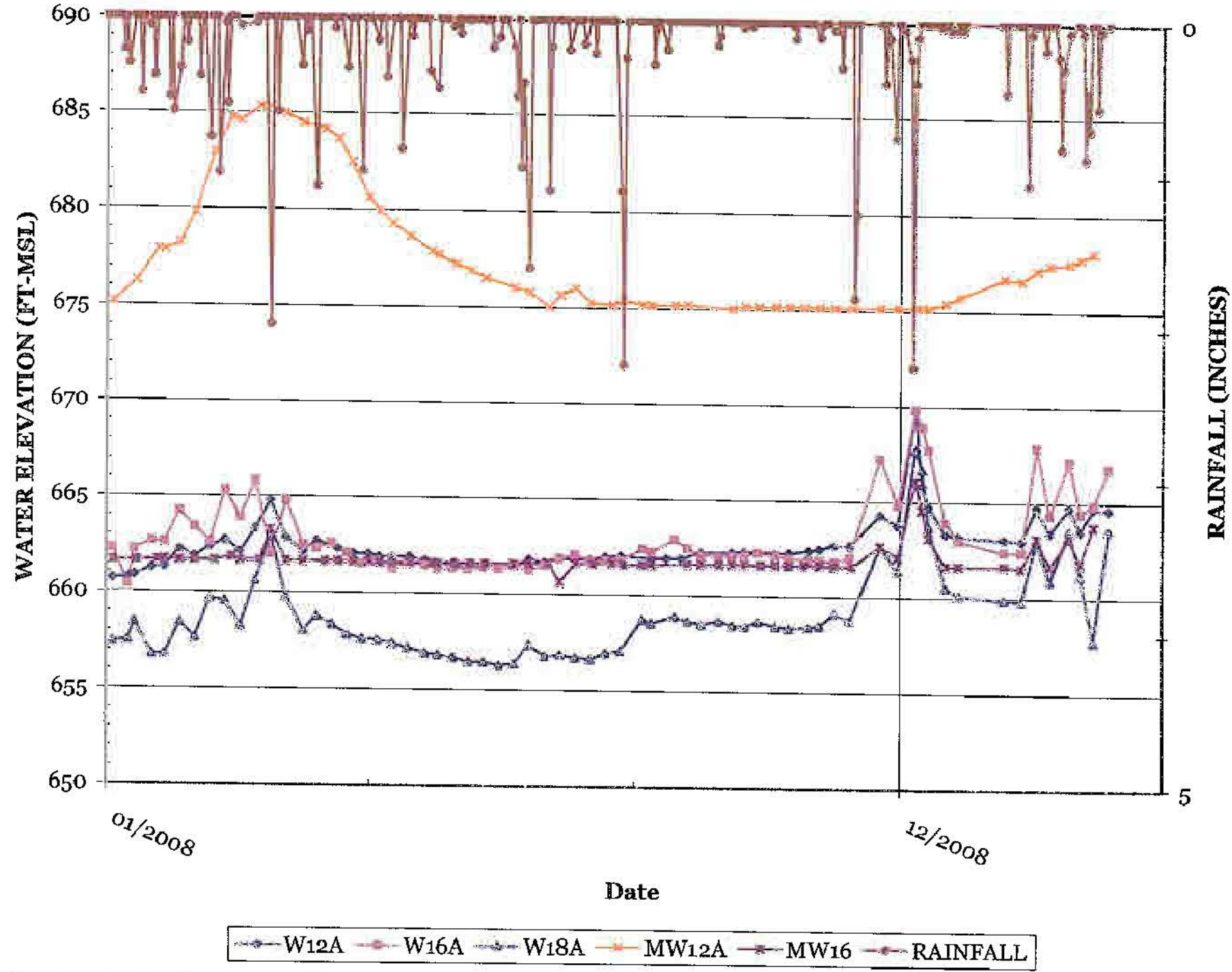
DATE: JULY 2009

FIGURE 16-1B

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CONFIDENTIAL BUSINESS INFORMATION

Bowen Ash Pond Piezometers at NW End at Soil/Rock Interface



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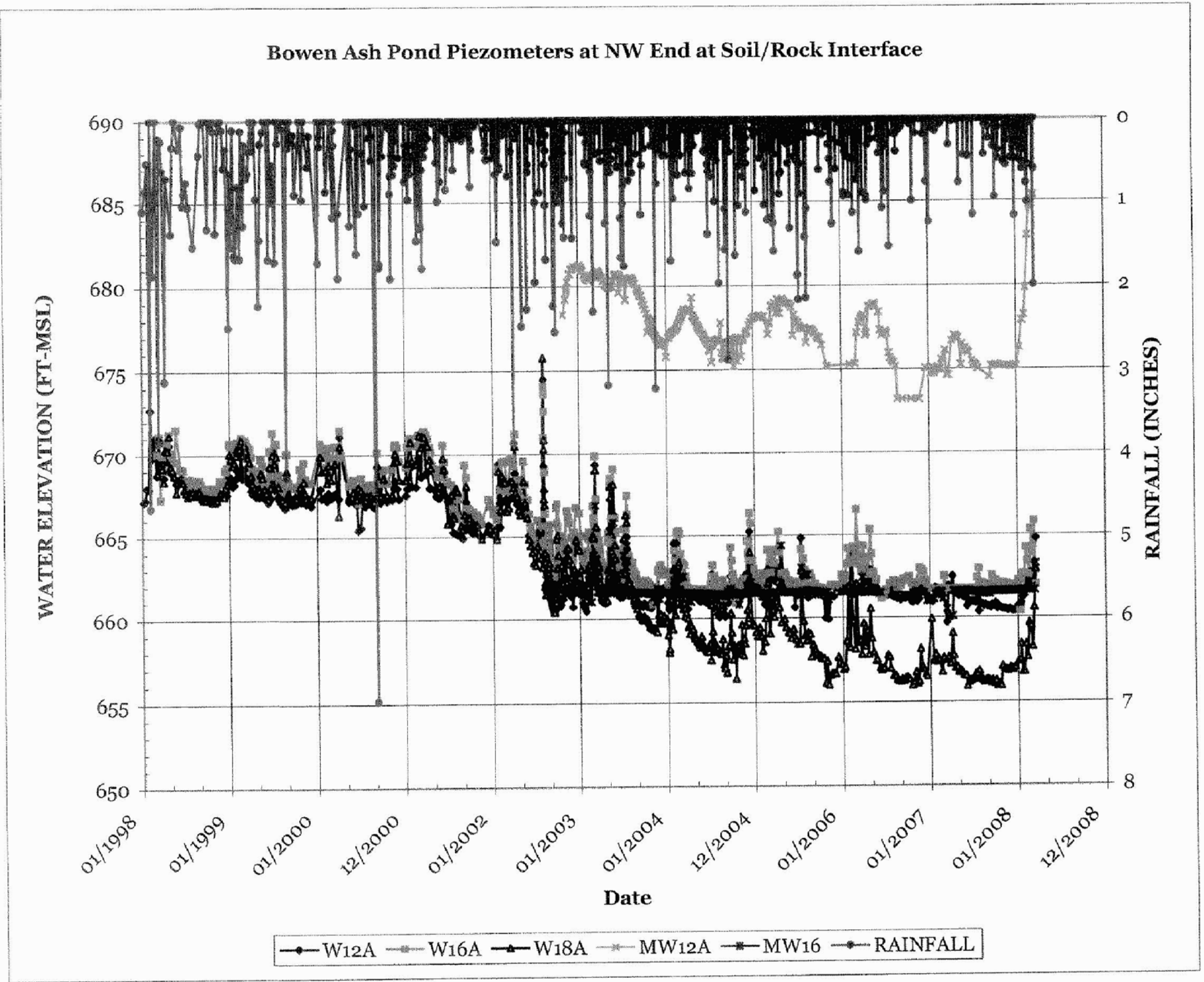
PIEZOMETER READINGS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

PROJECT NO.
 20085.1000

DATE: JULY 2009

FIGURE 16-2A

Bowen Ash Pond Piezometers at NW End at Soil/Rock Interface



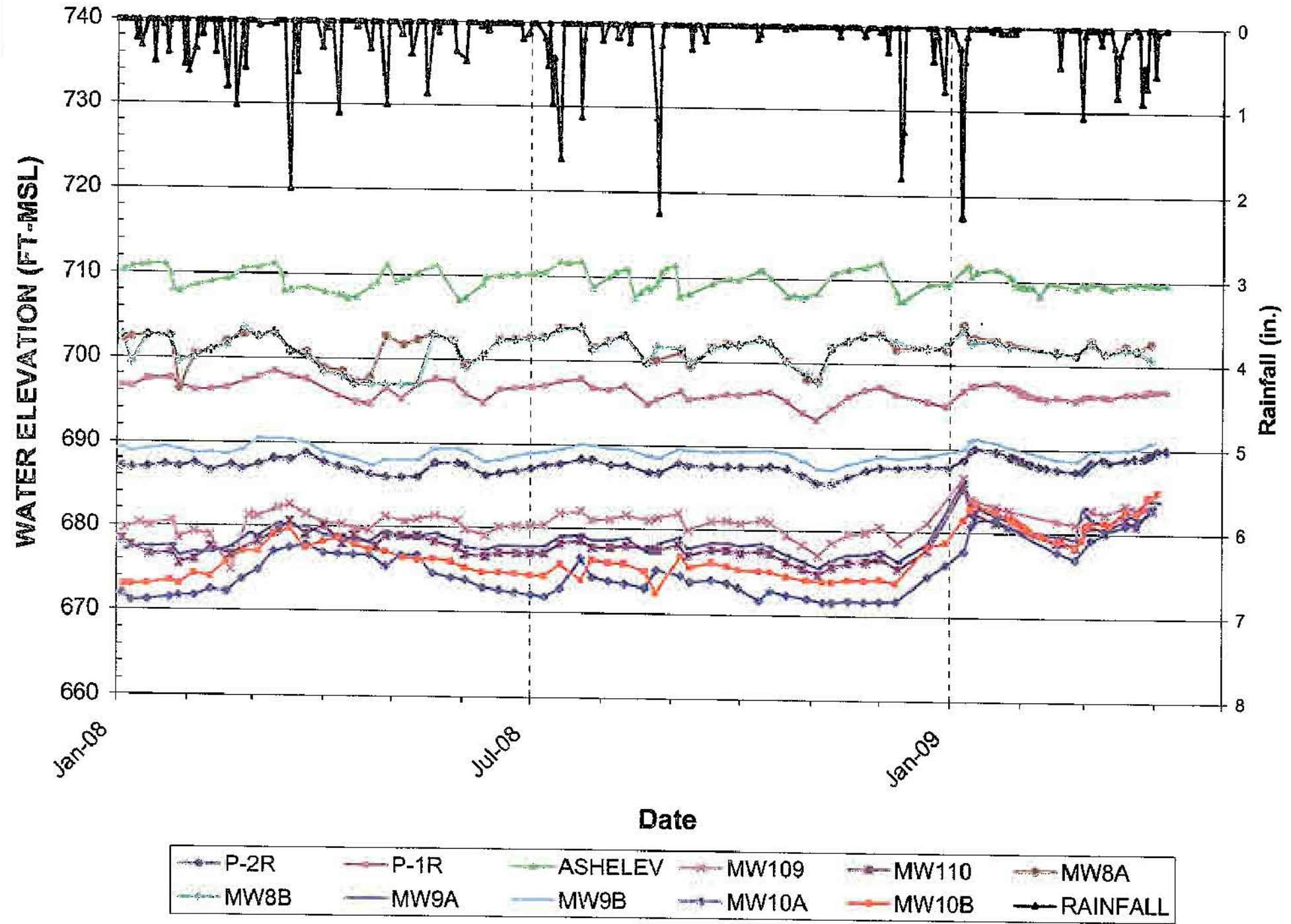
5/5/2008

| | | |
|--|---|---------------------------|
| | PIEZOMETER READINGS PLANT BOWEN GEORGIA POWER COMPANY CARTERSVILLE, GEORGIA | PROJECT NO. 20085.1000 |
| | | DATE: JULY 2009 |
| | | FIGURE 16-2B |

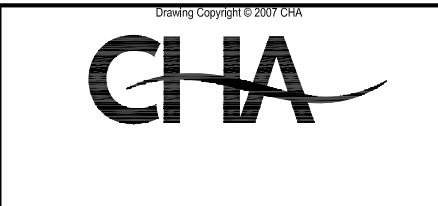
BOWEN PLANT SOUTH DIKE PIEZOMETER READINGS

Z:\BOWEN\APPZ1.XLS

Bowen Ash Pond South Dike Piezometers



4/17/2009



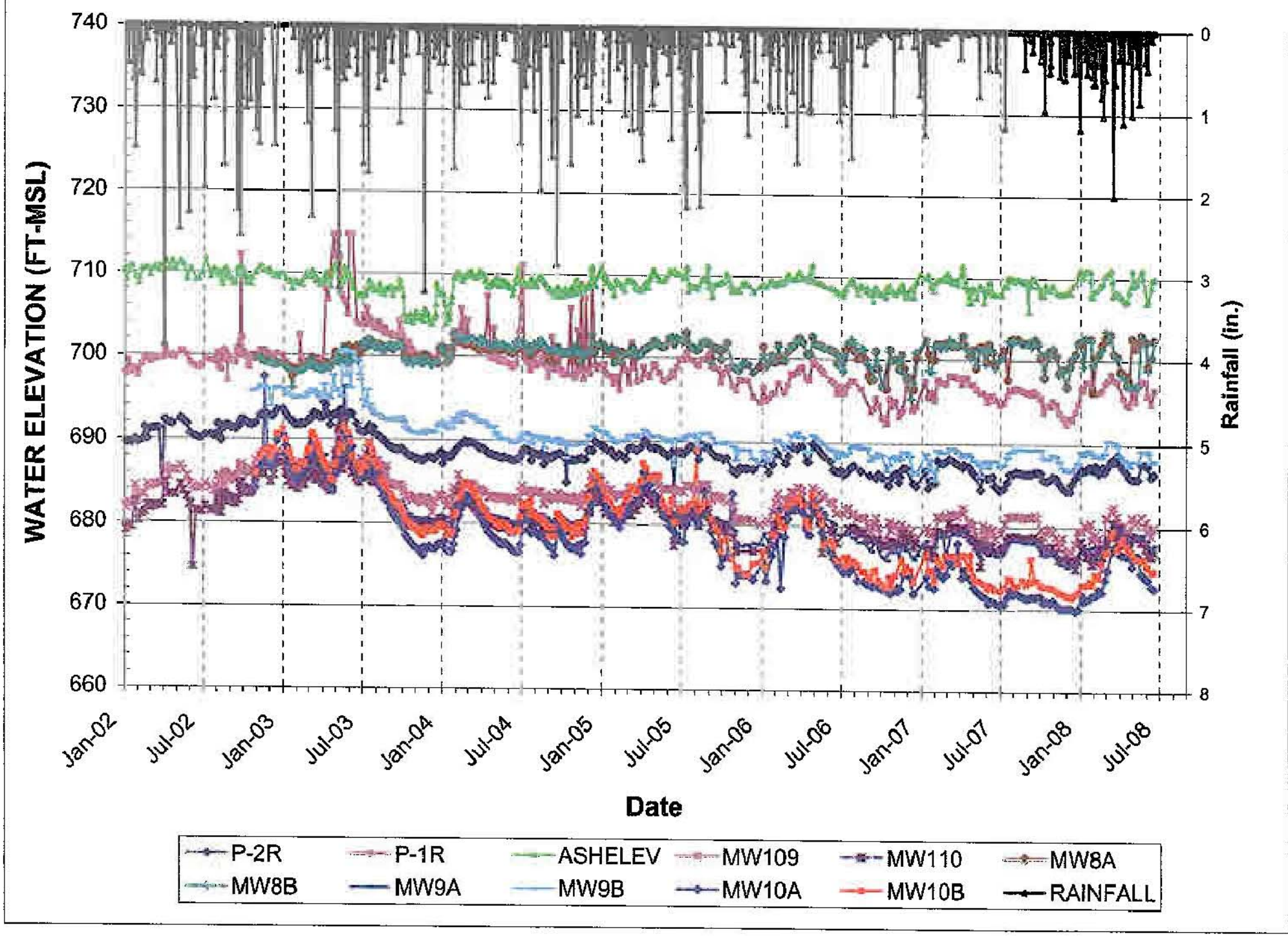
PIEZOMETER READINGS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

| |
|---------------------------|
| PROJECT NO. 20085.1000 |
| DATE: JULY 2009 |
| FIGURE 16-3A |

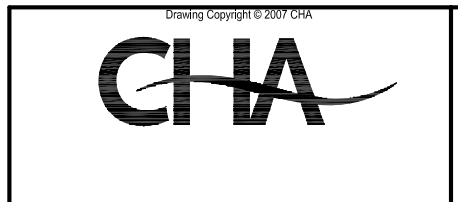
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CONFIDENTIAL BUSINESS INFORMATION

Bowen Ash Pond South Dike Piezometers



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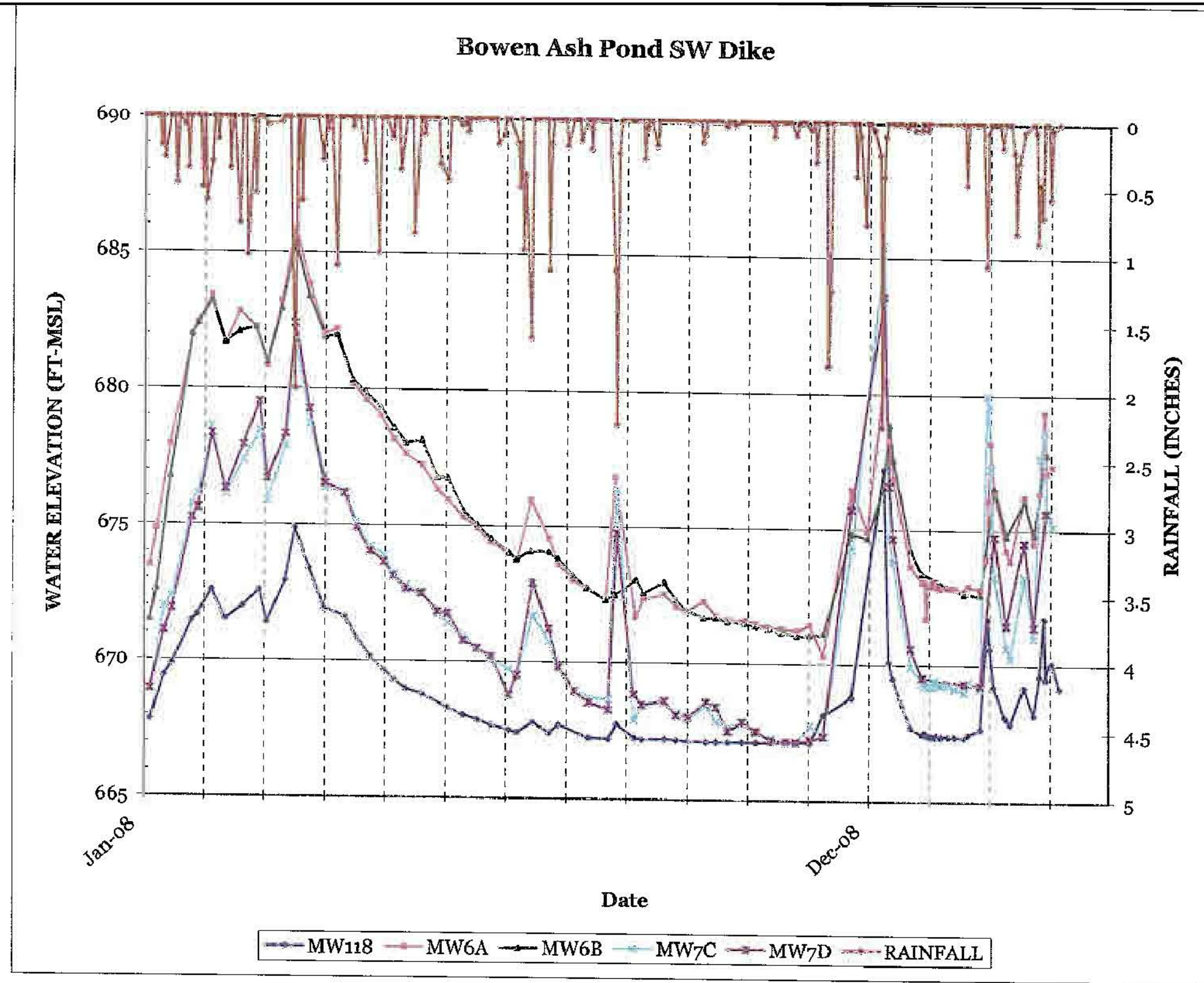
PIEZOMETER READINGS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

PROJECT NO.
 20085.1000
 DATE: JULY 2009
 FIGURE 16-3B

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Bowen Ash Pond SW Dike

PIEZOMETER READINGS



Z:\BOWEN\WASHPIEZ.XLS

4/17/2009



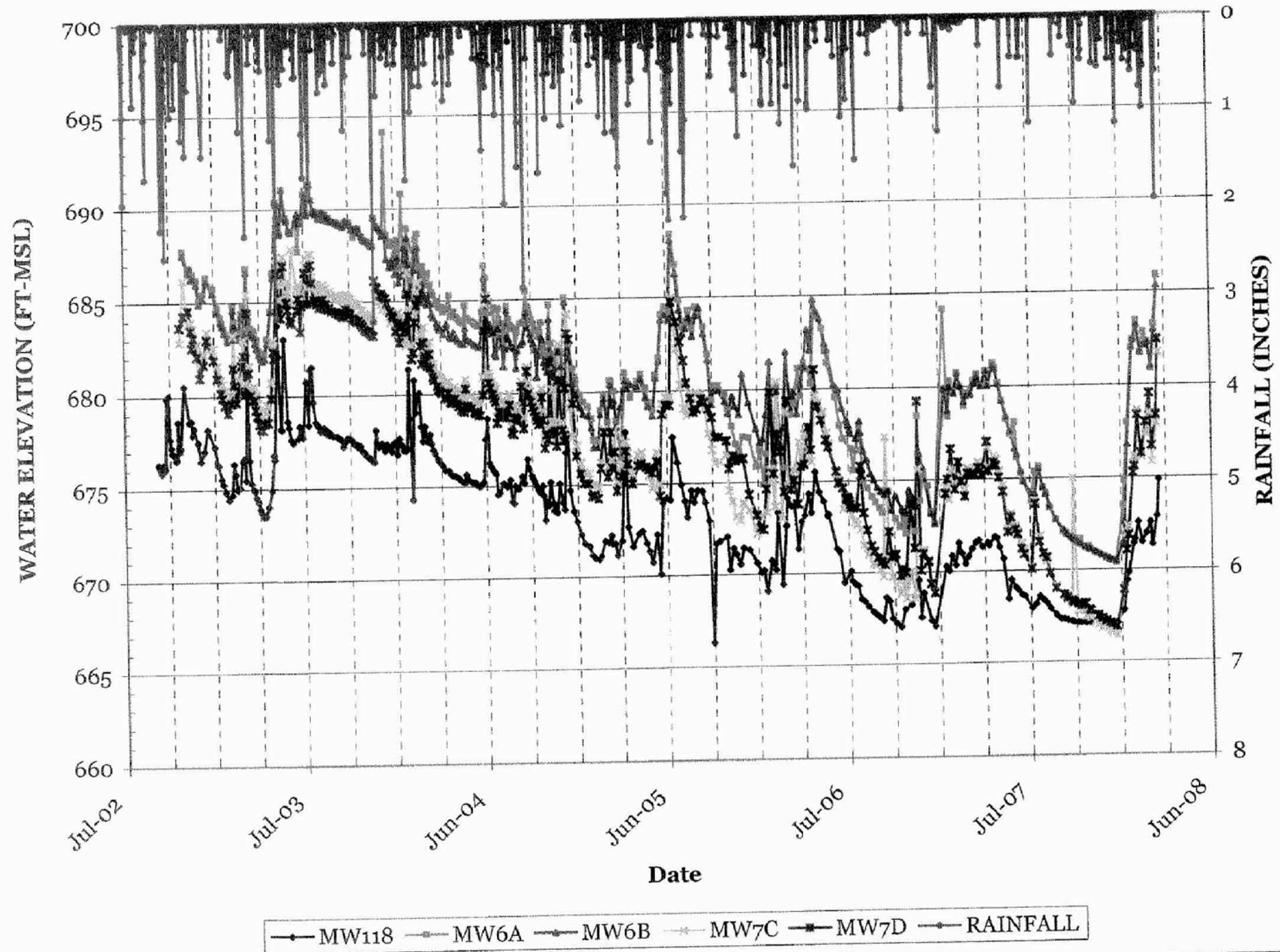
PIEZOMETER READINGS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

PROJECT NO.
 20085.1000

DATE: JULY 2009

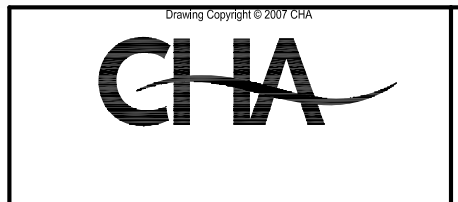
FIGURE 16-4A

Bowen Ash Pond SW Dike



DATE: 5/5/2008

5/5/2008



PIEZOMETER READINGS
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

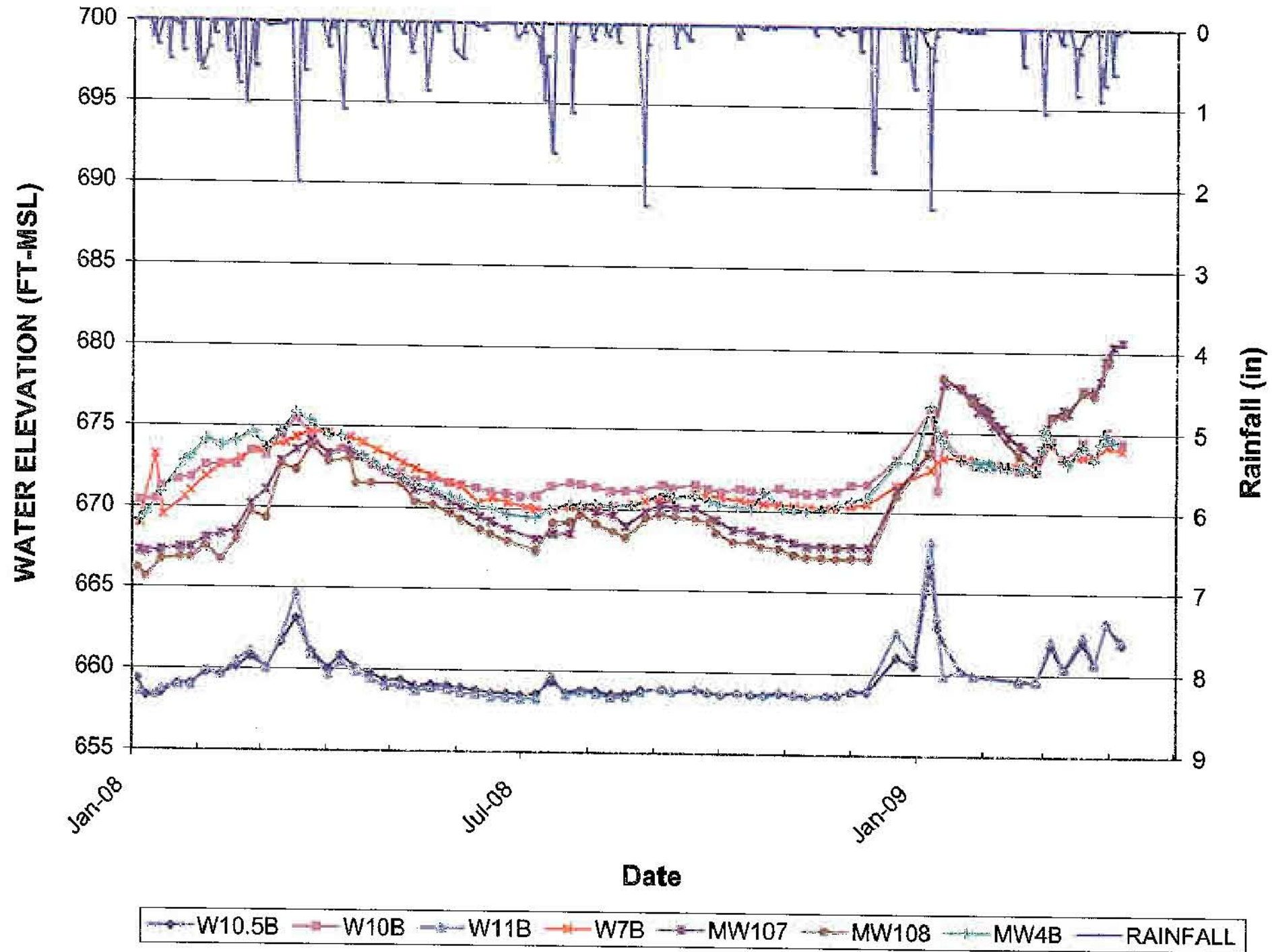
PROJECT NO.
20085.1000

DATE: JULY 2009

FIGURE 16-4B

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Bowen Ash Pond Piezometers at Horseshoe in Rock



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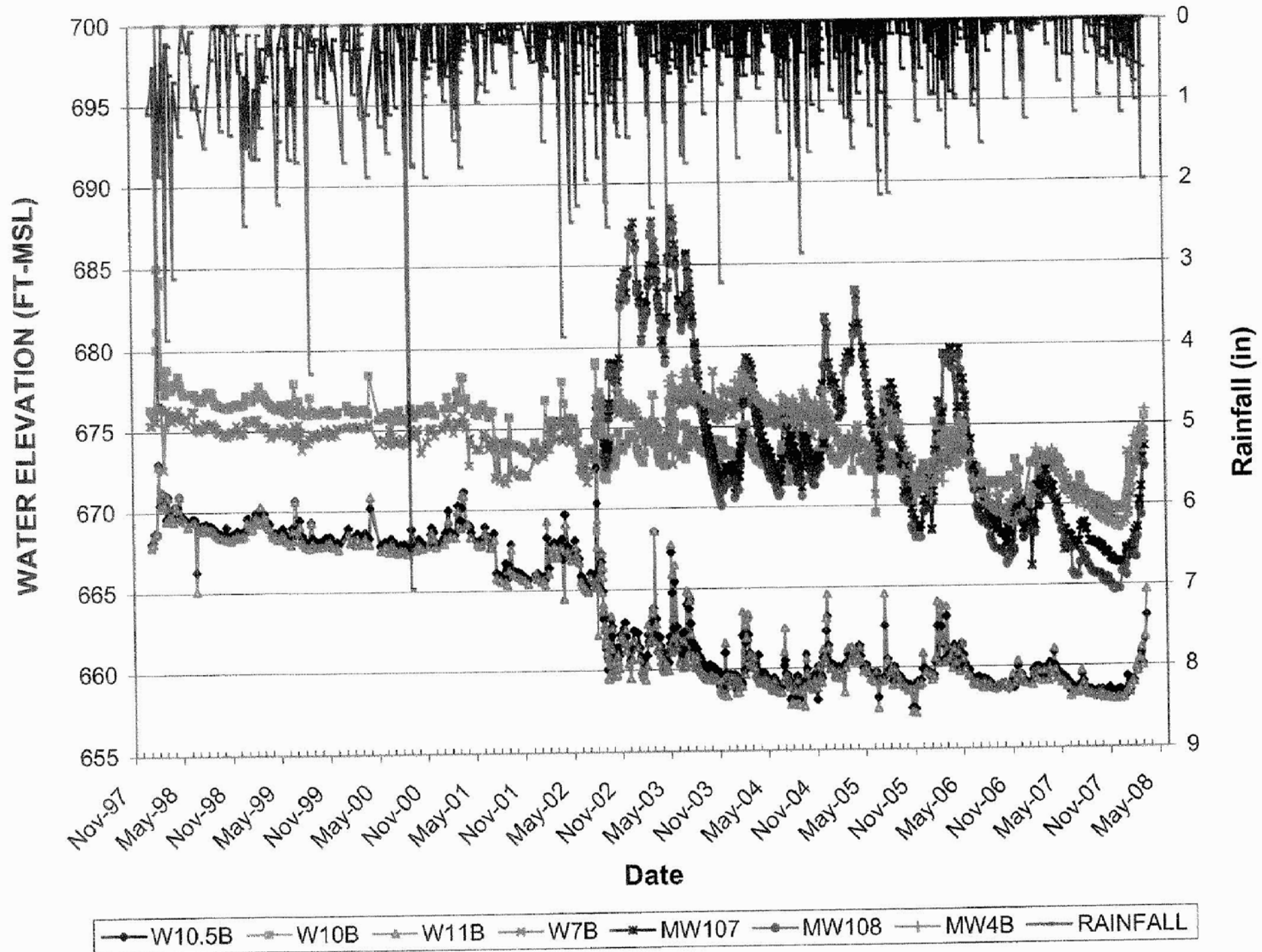
PIEZOMETER READINGS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

PROJECT NO.
 20085.1000

DATE: JULY 2009

FIGURE 16-5A

Bowen Ash Pond Piezometers at Horseshoe in Rock



5/5/2008



PIEZOMETER READINGS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

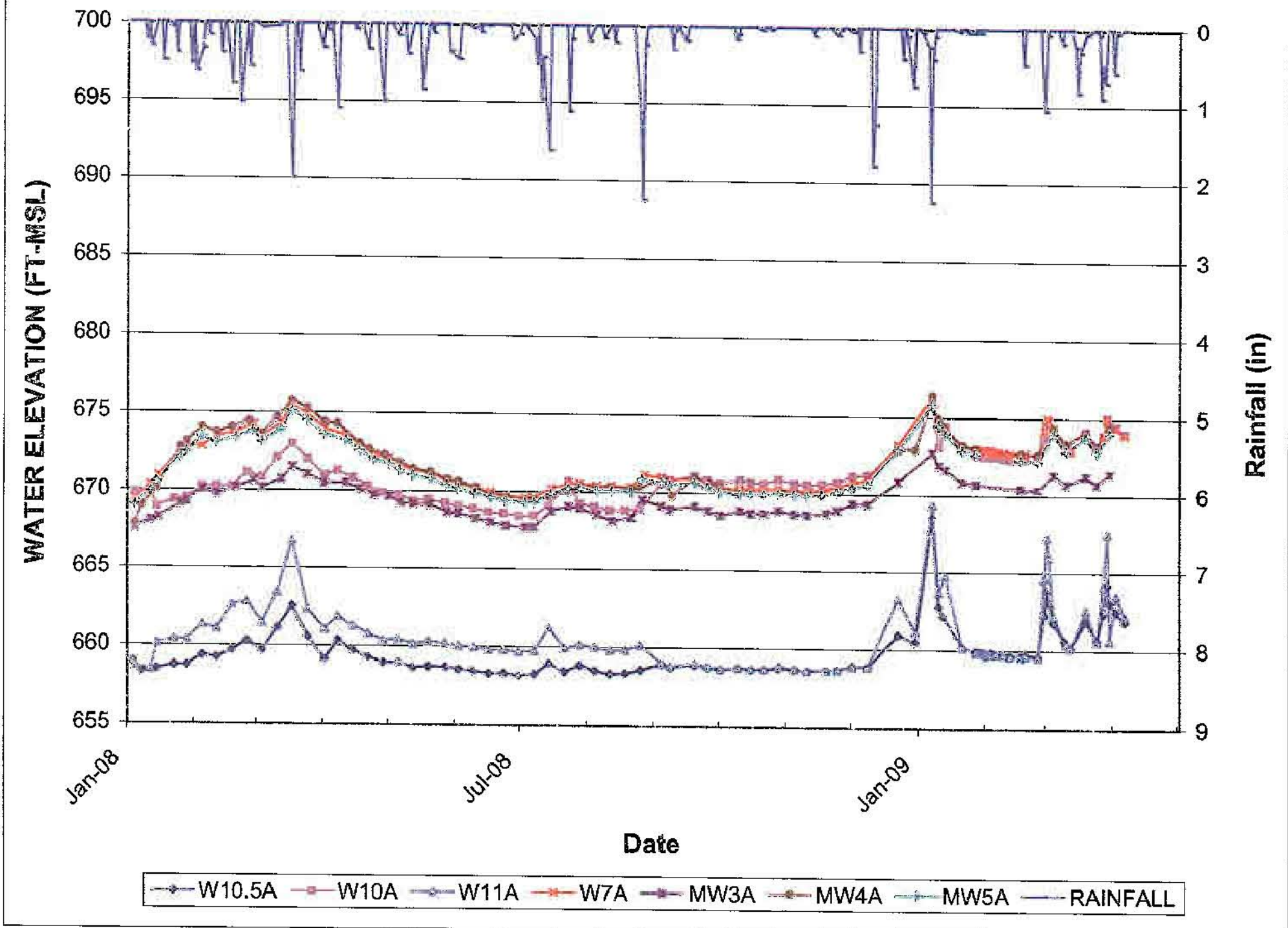
PROJECT NO.
 20085.1000

DATE: JULY 2009

FIGURE 16-5B

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Bowen Ash Pond Piezometers in Horseshoe at Soil/Rock Interface



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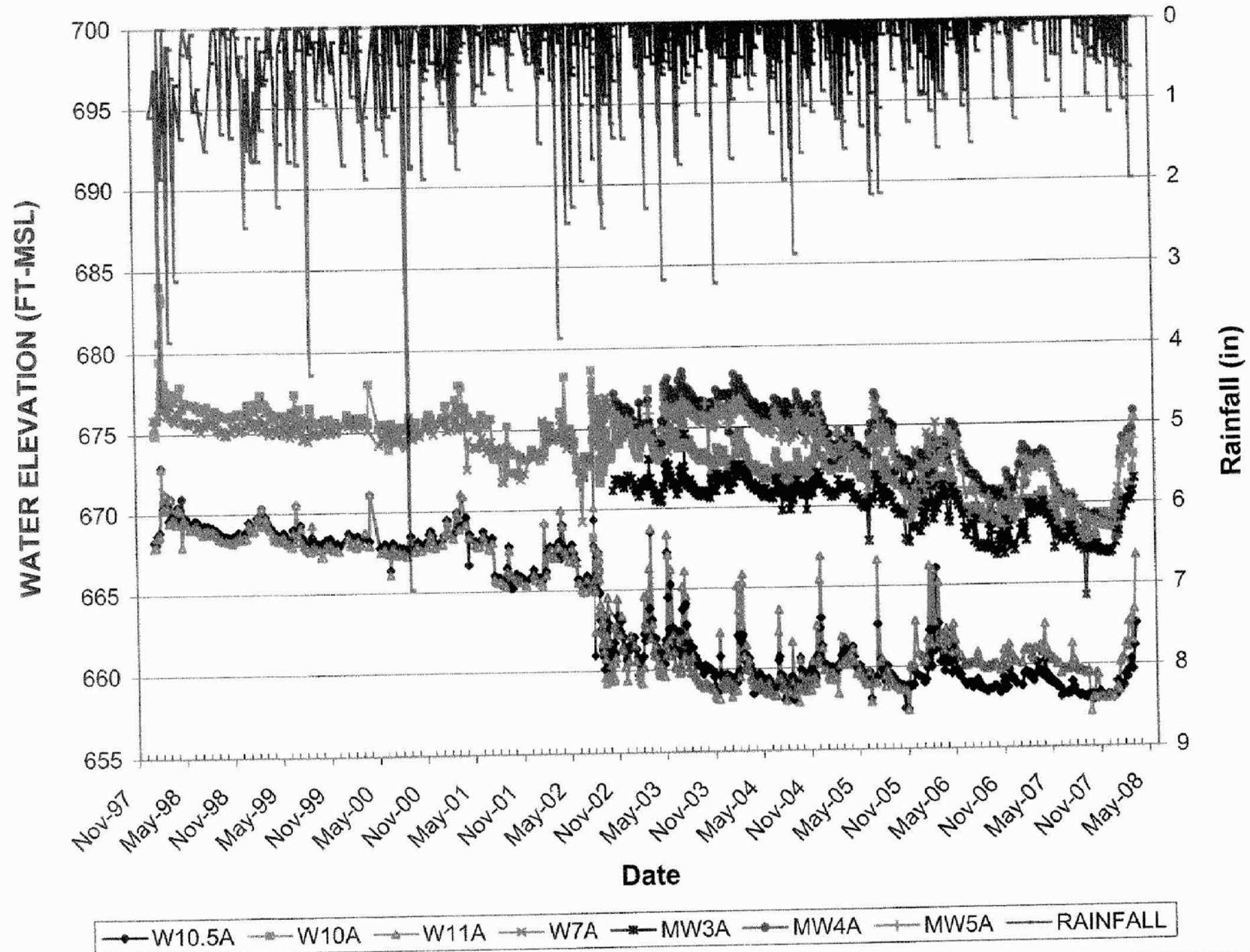
4/17/2009



PIEZOMETER READINGS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

| |
|---------------------------|
| PROJECT NO. 20085.1000 |
| DATE: JULY 2009 |
| FIGURE 16-6A |

Bowen Ash Pond Piezometers in Horseshoe at Soil/Rock Interface



5/5/2008



PIEZOMETER READINGS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

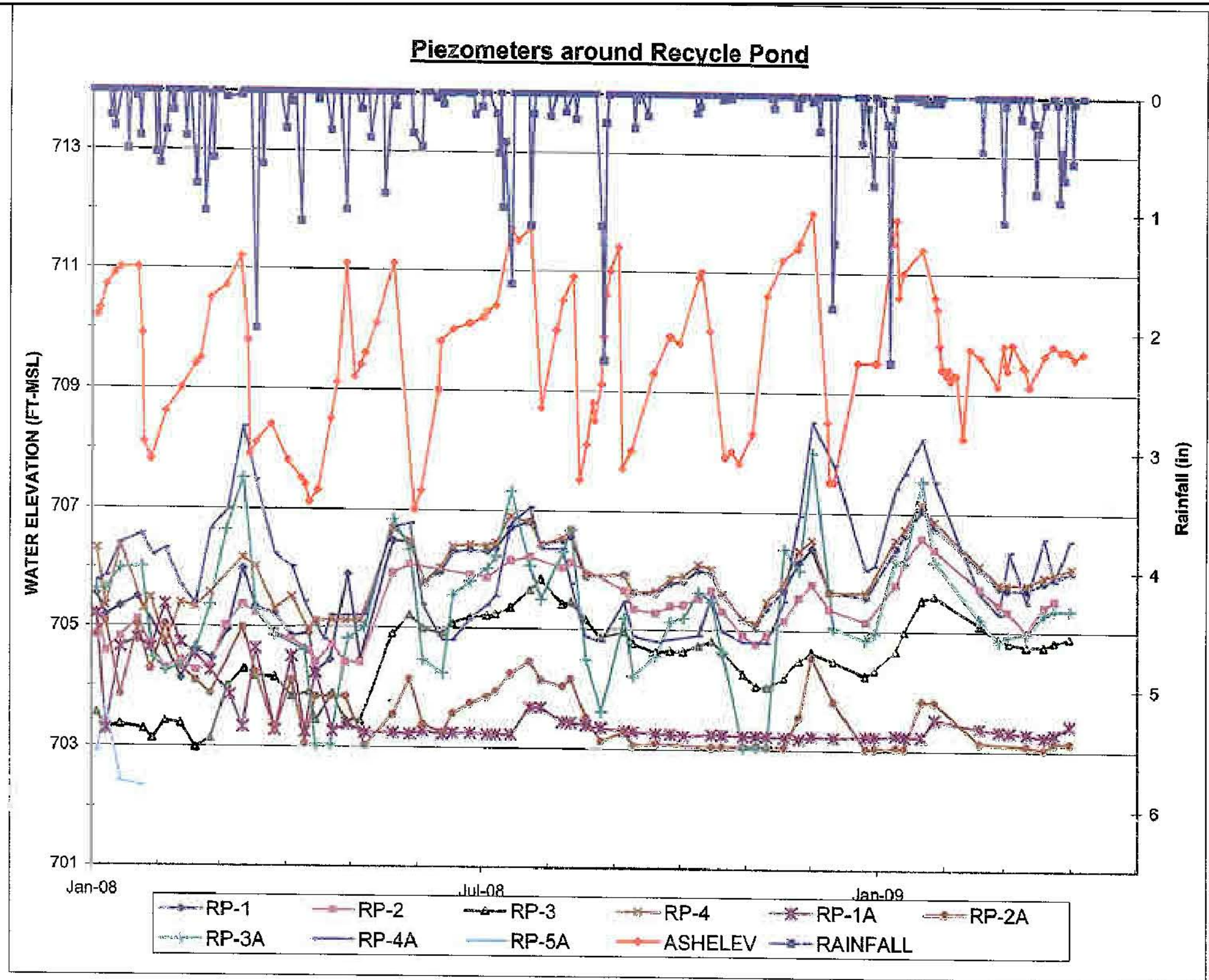
PROJECT NO.
 20085.1000

DATE: JULY 2009

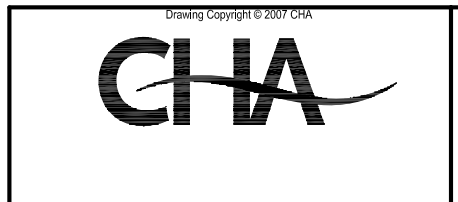
FIGURE 16-6B

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4/17/2009
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 11/17/2009



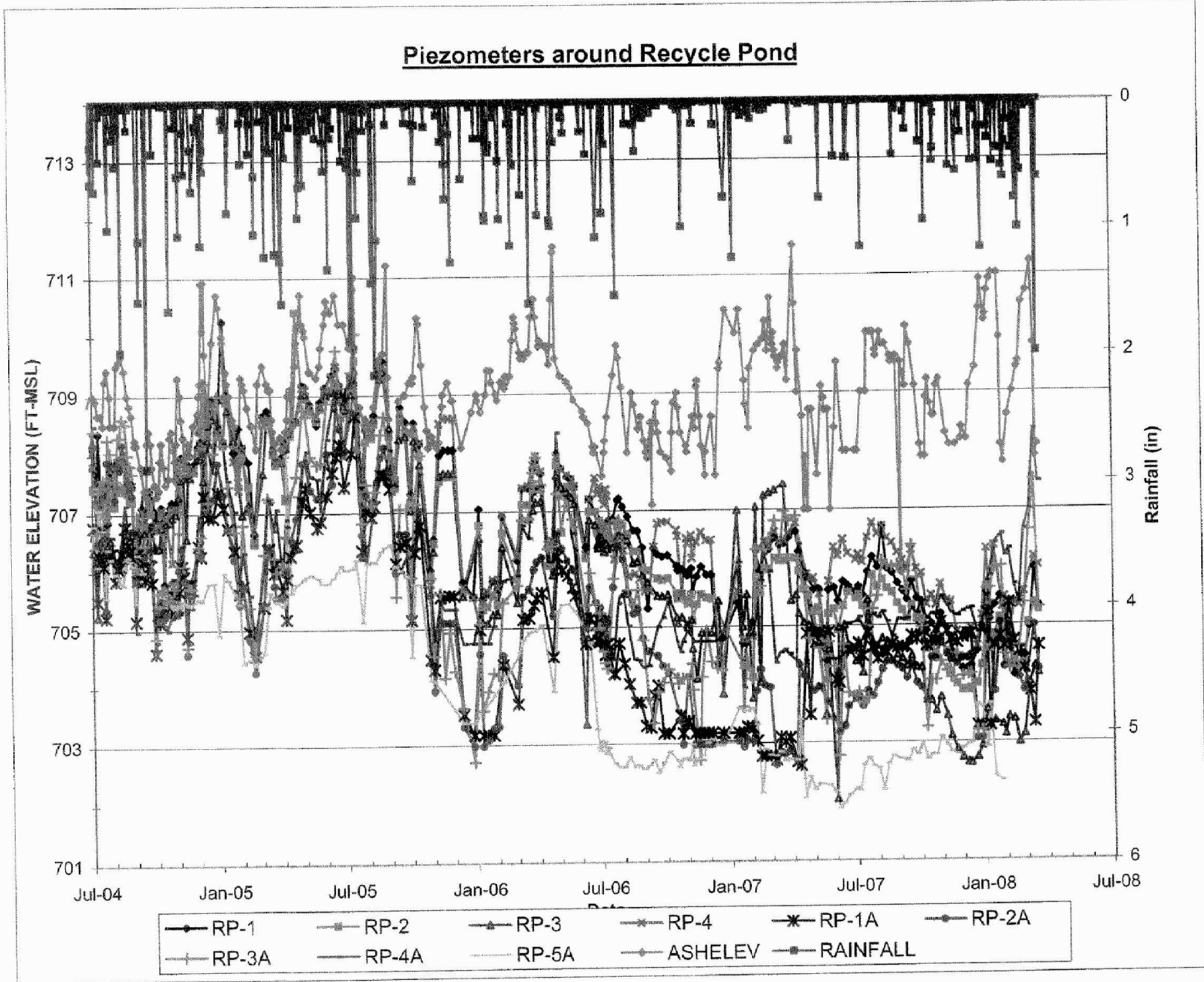
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PIEZOMETER READINGS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

PROJECT NO.
 20085.1000
 DATE: JULY 2009
 FIGURE 16-7A

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5/5/2008



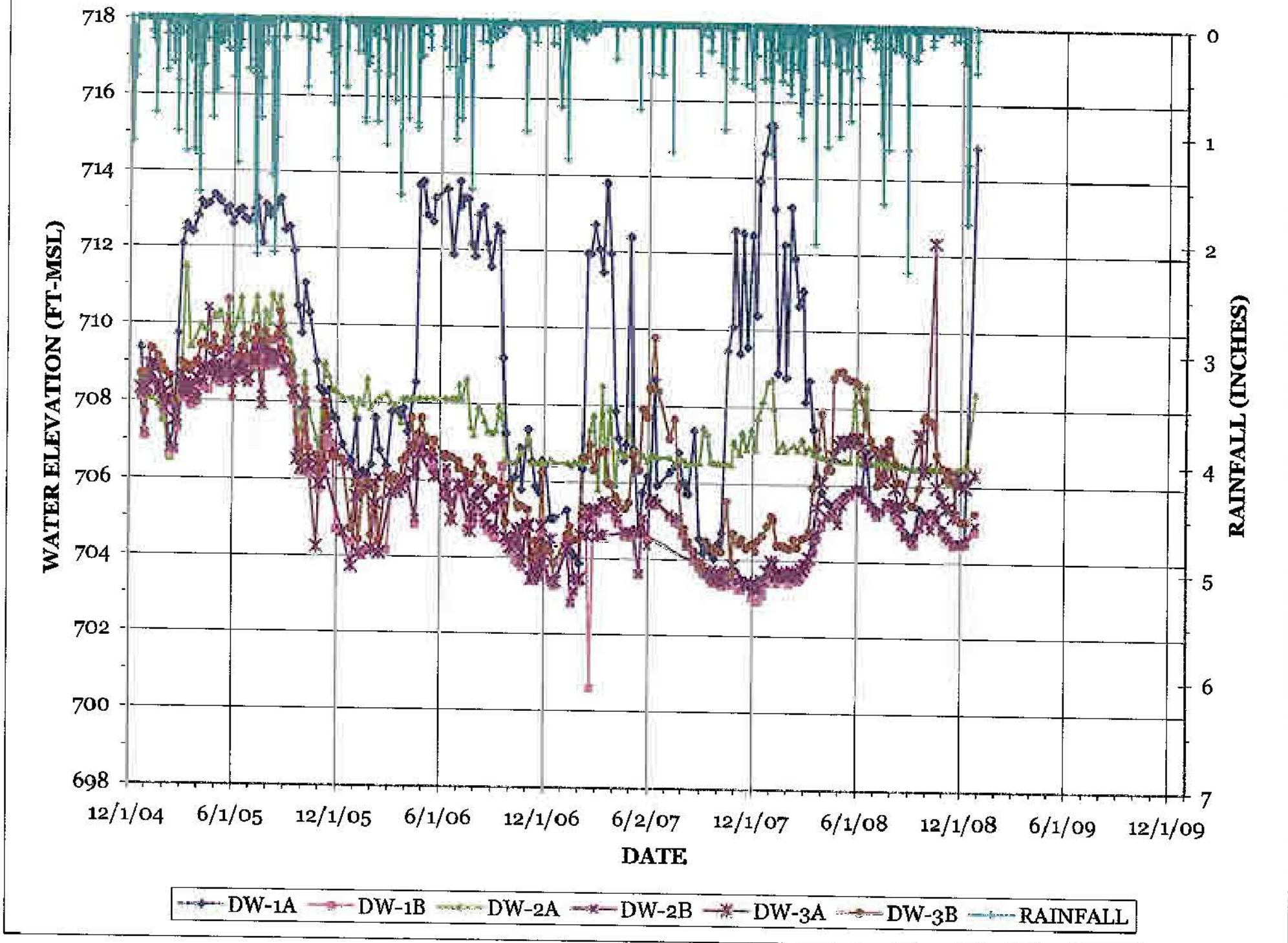
PIEZOMETER READINGS
PLANT BOWEN
GEORGIA POWER COMPANY
CARTERSVILLE, GEORGIA

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|---------------------------|
| PROJECT NO. 20085.1000 |
| DATE: JULY 2009 |
| FIGURE 16-7B |

File: K:\20085\CADD\ACAD\FIGURES\GEO\1000 BOWEN PLANT\BOWEN DATA.DWG Saved: 7/6/2009 12:24:27 PM Plotted: 7/6/2009 1:37:51 PM User: Filkins, Rebecca

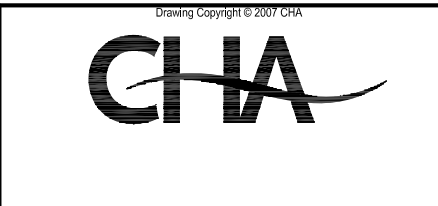
CONFIDENTIAL BUSINESS INFORMATION

BOWEN Dewatering Cells A and B



Z:\BOWEN\DEWATER.XLS

1/12/2009

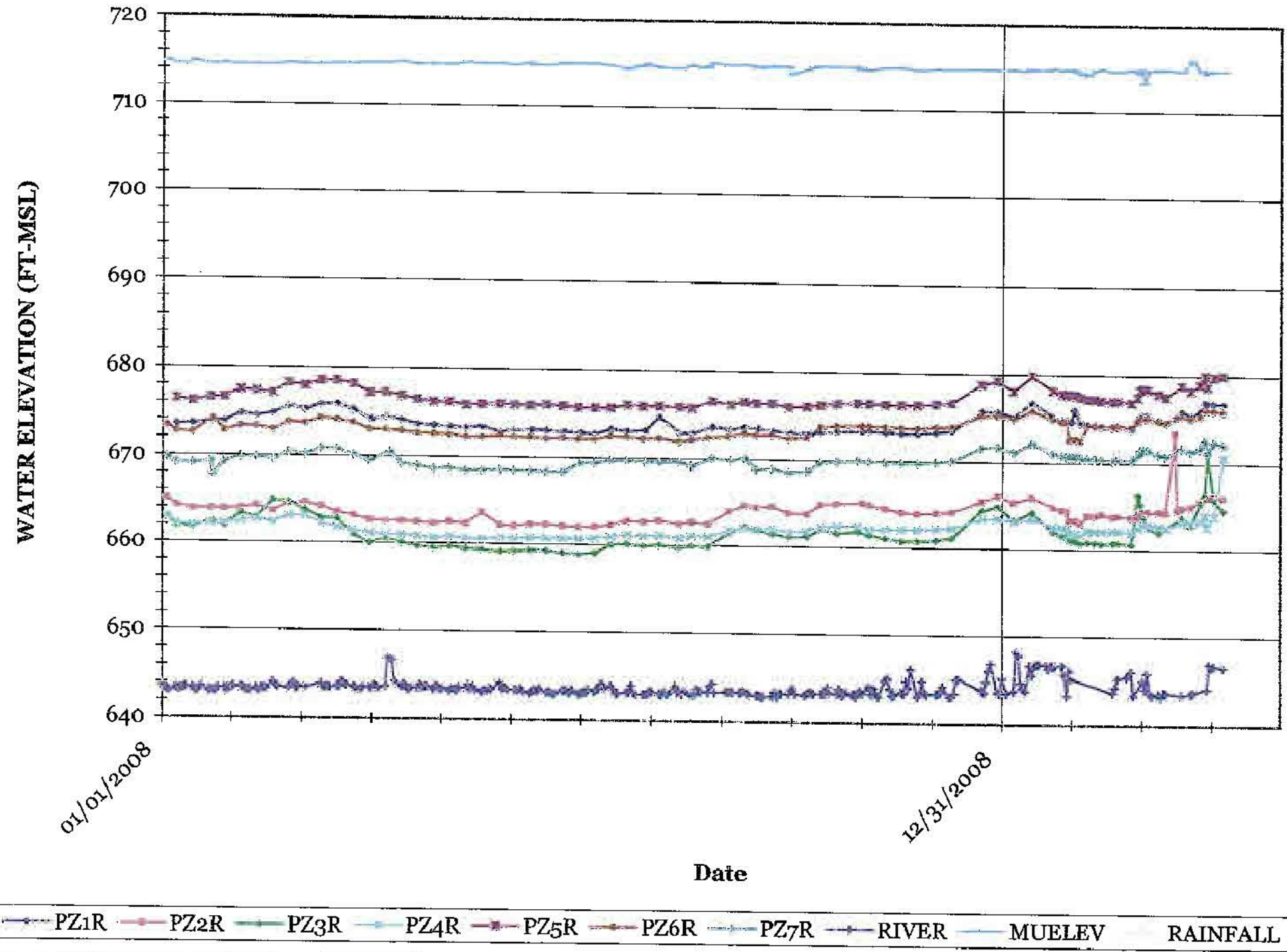


PIEZOMETER READINGS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

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|---------------------------|
| PROJECT NO. 20085.1000 |
| DATE: JULY 2009 |
| FIGURE 16-8 |

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SWP Wells in Rock



Z:\BOWEN\ROCKWELL.XLS

4/17/2009



PIEZOMETER READINGS
 PLANT BOWEN
 GEORGIA POWER COMPANY
 CARTERSVILLE, GEORGIA

PROJECT NO.
 20085.1000

DATE: JULY 2009

FIGURE 16-9

4.0 CONCLUSIONS/RECOMMENDATIONS

4.1 Acknowledgement of Management Unit Condition

I acknowledge that the management unit reference herein was personally inspected by me and was found to be in the following condition: **Satisfactory.**

The proactive measures taken after the 2002 and 2008 releases appear to have been effective with respect to improving and maintaining dike stability and addressing the karst features at the site below the ash basin and dike structures. Based upon the information obtained during this investigation, the Bowen Steam Plant has an effective monitoring and inspection program for this unit.

4.2 Hydrologic and Hydraulic Recommendations

CHA recommends that the hydrology of the site be evaluated and operating procedures developed for a larger storm than the 10-year storm, which can be stored with no discharge in the Recycle Pond. Even though the basin is no longer used for wet ash storage, inundation from storm water runoff and/or breach of wet ash or gypsum ponds is contained within the original impoundment could result in overtopping of the main dikes resulting in embankment failure and a subsequent release of ash. Best Management Practice should be used to consider a reasonable design storm in combination with Georgia Power's tolerance for risk of this type of event occurring. Based on the size of this facility, if development downstream put human life in jeopardy, the Georgia EPD Safe Dam regulations would require the impoundment to contain 33% to 50% (depending on total storage volume and height) of the Probable Maximum Flood (PMF). We suggest that because of potential environmental impacts that could result from an overtopping failure, that this criteria be considered for in storm event planning for the facility.

4.3 Stability Recommendations

Two stability conditions evaluated by Southern Company produce lower bound factors of safety. The first is under seismic loading, the factor of safety for the main embankment ranges from 0.99 to 1.1 for events ranging from 2% to 10% chance for exceedance in 50 years. The other condition is a Southern Company defined condition of uplift and reduced strength from a seismic event occurring at about the same time, which is a reasonable consideration for the site specific conditions.

CHA recommends that immediately following seismic events resulting in 25% of the peak ground acceleration for a 500-year earthquake (i.e., 10% chance for exceedance in 50 years), Southern Company perform a site inspection and thorough review of instrumentation data in anticipation of changing conditions within the karst terrain.

4.4 Inspection Recommendations

CHA recommends that Georgia Power and Southern Company continue the piezometer monitoring and inspections that have been implemented for the ash pond. This type of inspection allows for proactive responses to developing situations, which can reduce the risk of damaging releases or failures from occurring.

5.0 CLOSING

The information presented in this report is based on visual field observations, review of reports prepared by Southern Company Services, Inc. and this limited knowledge of the history of the Plant Bowen ash pond. The recommendations presented are based, in part, on project information available at the time of this report. No other warranty, expressed or implied is made. Should additional information or changes in field conditions occur the conclusions and recommendations provided in this report should be re-evaluated by an experienced engineer.