

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

January 7, 2011

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

VIA E-MAIL AND FEDERAL EXPRESS

Mr. Charles Huling, Vice President, Environmental Affairs  
Georgia Power  
241 Ralph McGill Blvd., N.E. 22<sup>nd</sup> Floor, bin 10221  
Atlanta, Georgia 30308-3374

Dear Mr. Huling,

On April 26-27, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Plant Hammond Station. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain "wet" handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the Plant Hammond Station and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report.

The final report for the Plant Hammond Station is enclosed. This report includes a specific rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the Plant Hammond Station. These recommendations are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please explain why. Please provide a response to this request by February 7, 2011. Please send your response to:

Mr. Stephen Hoffman  
US Environmental Protection Agency (5304P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

If you are using overnight or hand delivery mail, please use the following address:

Mr. Stephen Hoffman  
US Environmental Protection Agency  
Two Potomac Yard  
2733 S. Crystal Drive  
5<sup>th</sup> Floor, N-237  
Arlington, VA 22202-2733

You may also provide a response by e-mail to [hoffman.stephen@epa.gov](mailto:hoffman.stephen@epa.gov)

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as "confidential" you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

Please be advised that providing false, fictitious, or fraudulent statements of representation may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued ongoing efforts to ensure protection of human health and the environment.

Sincerely,  
/Suzanne Rudzinski/, Director  
Office of Resource Conservation and Recovery

Enclosures

Enclosure 2  
Plant Hammond Station Recommendations

#### 4.2 Hydrologic and Hydraulic Recommendations

AMEC recommends that each of Plant Hammond's ash ponds continue to be maintained.

#### 4.3 Geotechnical and Stability Recommendations

The revised Slope Stability Analyses indicate that the ash stack will meet minimum factors of safety once the ash slopes have been flattened to no steeper than 3H:1V. Furthermore, it is indicated that this will be accomplished prior to closure under Georgia Rules for Solid Waste Management, Chapter 391-3-4. Although the potential amount of dry ash released to the environment during a seismic event is likely to be minimal, AMEC recommends that flattening of the ash stack slopes be performed as soon as possible to avoid possible failure of the ash stack during a seismic event.

#### 4.4 Instrumentation Monitoring Recommendations

AMEC recommends that additional instrumentation, consisting of combination slope inclinometers and piezometers be considered to monitor slope stability and landslide conditions on the river side dike of each ash pond. These instruments may be installed within the same borehole. Routine monitoring could be established with corresponding elevations within the ash ponds at the time of the measurement in order to establish an understanding of the embankment behavior.

In order to monitor change of water surface a gauge should be added to Ash Ponds 2 and 4. Routine monitoring should be established and read in conjunction with slope inclinometer and piezometer readings.

#### 4.5 Inspection Recommendations

AMEC has reviewed provided information and inspection records and determined that Georgia Power has adequate inspection practices. We recommend that Plant Hammond continue the current inspection program and practices.

Vegetation on the impoundments should continue to be aggressively managed. We further recommend that vegetation be managed based on guidance in (a) Corps of Engineers EM 1110-2-301, *Guidelines for Landscape Planting and Vegetation Management at Floodwalls, Levees, and Embankment Dams* and (b) FEMA 534, *Technical Manual for Dam Owners: Impacts of Plants on Earthen Dams*. Additionally, animal impact should be mitigated based on guidance in FEMA 473, *Technical Manual for Dam Owners: Impacts of Animals on Earthen Dams*.