

US EPA ARCHIVE DOCUMENT

EPA Notes on Wansley Draft Report

EPA Comments:

None

EPA Notes:

Slope stability analyses were not provided for the western dike. Perform slope stability analyses with seismic loading conditions for western dike.

Charles H. (Chuck) Huling, P.E.
Vice President
Environmental Affairs

241 Ralph McGill Boulevard NE
Atlanta, Georgia 30308-3374
Tel 404.506.7716
Fax 404.506.7066
chhuling@southernco.com



October 28, 2010

CERTIFIED MAIL

Mr. Stephen Hoffman
Office of Resource Conservation and Recovery (5304P)
U.S. Environmental Protection Agency
2733 South Crystal Drive, Fifth Floor
Arlington, Virginia 22202

Re: Comments on "Assessment of Dam Safety Coal Combustion Surface Impoundments Draft Report" for Georgia Power Plant Wansley, Carrollton, Georgia

Dear Mr. Hoffman:

On September 30, 2010, the U.S. Environmental Protection Agency ("EPA") provided to Georgia Power ("GP") a draft report regarding certain facilities for the management of coal combustion byproducts at GPC's Plant Wansley ("Draft Report"). The Draft Report was prepared by Dewberry & Davis under contract to EPA and was dated July 2010. Georgia Power appreciates the opportunity to provide comments on the draft report before it is finalized. This letter provides Georgia Power's comments on that draft report.

Acknowledgement of Management Unit Condition and Potential Hazard Rating

We are pleased that the report concludes that the coal combustion byproduct management unit at Plant Wansley is in "Satisfactory" condition, which is the most favorable category. We also agree with the report's recommended potential hazard rating as "Low".

Stability Analyses

Georgia Power did provide the necessary slope stability analysis to warrant a "Satisfactory" rating for the Plant Wansley ash pond. An updated slope stability analysis for the west dike is being provided to Dewberry as requested under separate cover. Given that the slope stability analyses resulted in acceptable minimum factors of safety for the

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existing dams, we are confident that the rating for the Plant Wansley ash pond will remain "Satisfactory" in the final report.

Inspection Recommendations

Georgia Power and Southern Company will continue the current maintenance and inspection program and practices for Plant Wansley. As recommended Georgia Power will pay particular attention to erosion at the concrete channel to avoid the channel being undermined and will monitor cracking along the concrete channel

Attached to this letter are Georgia Power's comments on the draft report regarding certain facilities for the management of coal combustion byproducts at Georgia Power's Plant Wansley.

Thank you again for this opportunity to comment. Please continue to direct correspondence to my attention.

Sincerely

A handwritten signature in dark ink, appearing to read "Charles H. Huling", with a stylized flourish at the end.

Charles H. Huling

CHH/
Attachments

cc:
Fredrick Shmurak, Dewberry and Davis

Plant Wansley				
PAGE	SECTION	CURRENT STATEMENT READS	RECOMMENDED CHANGE	ADDITIONAL NOTES
0	v - Introductionis a wake-up call for diligence on coal combustion waste disposal units..is a wake-up call for diligence on coal combustion waste disposal units.	Double punctuation
0	v - Introduction	In summary, the Wansley Plant ash ponds are SATISFACTORY for continued....	In summary, the Plant Wansley ash pond is SATISFACTORY for continued....	There is only one ash pond at Plant Wansley.
0	v - Purpose and Scope	In December 2009, the EPA sent letters to coal-fired electric utilities seeking information on the safety of surface impoundments and similar facilities that receive liquid-borne material that store or dispose of coal combustion waste.	In December 2009, the EPA sent letters to coal-fired electric utilities seeking information on the safety of surface impoundments and similar facilities that receive liquid-borne material that store or dispose of coal combustion waste.	Please change "if coal combustion waste" to "of coal combustion waste".
0	v - Purpose and Scope	(For classification, see pp. 3-8 of the 2004 Federal Guidelines for Dam Safety)	(For classification, see pp. 3-8 of the 2004 Federal Guidelines for Dam Safety).	Please add period at end of this sentence.
0	v - Purpose and Scope	EPA asked utility companies to identify all management units: surface impoundments or similar diked or bermed structures; and; landfills.....	EPA asked utility companies to identify all management units: surface impoundments or similar diked or bermed structures and landfills.....	Please remove semi-colon after "and".
0	vi - Purpose and Scopeso that EPA could gauge which management units had or potential could rank as having High Hazard Potential.so that EPA could gauge which management units had, or potentially could rank as having, High Hazard Potential.	Please see Georgia Power's suggestion for revised wording of this sentence.
0	vi - Purpose and Scope	This evaluation included a site visit. EPA sent two engineers, one licensed in the State of Georgia, for a one-day visit.	This evaluation included a site visit. EPA sent two engineers from Dewberry & Davis, including one licensed in the State of Georgia, for a one-day visit.	
0	vi - Purpose and Scope	EPA is addressing any land-based units that receive fly ash, bottom ash, boiler slag, or flue gas emission control waster along with free liquids.	EPA is addressing any land-based units that receive fly ash, bottom ash, boiler slag, or flue gas emission control wastes along with free liquids.	This sentence has a typographical error ("waster").
0	vi - Purpose and Scope	The two-person team met with the owner of the management unit as well as technical and several technical representative and management unit supervisors....	The two-person team met with the owner of the management unit as well as several technical representatives and management unit supervisors....	Please see Georgia Power's suggestion for revised wording of this sentence.
1-1	1.1technical documentation provided by Georgia Power, and review of state inspection reports.		Georgia Power is not aware of any inspections of the ash pond dikes by the Georgia Safe Dams Program. If copies of these reports are available, please provide them to Georgia Power. If not, please revise the wording accordingly.
1-1	1.1.1	Slope stability analyses were not provided for the western dike; however, foundation preparation, embankment soils and geometry are consistent.		Georgia Power has submitted a slope stability analysis for the western dike with these comments. This sentence should be revised accordingly.
1-2	1.2.3	Although not deemed a critical analysis, additional documentation is needed to assess the slope stability analysis of the western dike.		Georgia Power has submitted a slope stability analysis for the western dike with these comments. This sentence should be revised accordingly.
1-3	1.2.3	Perform slope stability analyses with seismic loading conditions for western dike.		Georgia Power has submitted a slope stability analysis for the western dike with these comments. This sentence should be revised accordingly.
2-1	2.1	Plant Wansley's ash pond facility is located south of Carrollton, Georgia.	Plant Wansley's ash pond facility is located south of Carrollton, Georgia.	The name "Carrollton" has two is.
2-2	2.2	Based on data provided by Georgia Power, Inc. the ash pond...	Based on data provided by Georgia Power, the ash pond...	
2-3	2.2	The ash pond embankment system has been assigned a Hazard Classification of Low by the Georgia Safe Dams Program (GSDP).	The ash pond embankment system has been classified as a Category II dam by the Georgia Safe Dams Program (GSDP).	According to the GSDP classification system, "Category II means the classification where improper operation or dam failure would not result in probable loss of human life".
2-4	2.3	(Table 2.3) 771	(Table 2.3) 343	The acreage shown for surface area is incorrect.
2-4	2.3	Table 2.3: Amount of Residuals and Maximum Capacity of Unit*	Table 2.3: Amount of Residuals and Maximum Capacity of Unit	Please remove asterisk from table header unless there is a notation that is missing.
2-4	2.3	Per Georgia Power, the ash pond primarily contains fly, bottom ash, boiler slag, flue gas...	Per Georgia Power, the ash pond primarily contains fly ash, bottom ash, boiler slag, flue gas...	Please add the word "ash".
2-4	2.4.1	(Figures 2.4.1 a and b...	Figures 2.4.1 a and b...	Delete lead parentheses or add closure parantheses.

7-7	7.3	Based on the previous assessment reports/inspections provided by Georgia Safe Dams Program and Georgia Power, this...	Based on the previous assessment reports/inspections provided by Georgia Safe Dams Program and Georgia Power, this...	Georgia Power is not aware of any inspections of the ash pond dikes by the Georgia Safe Dams Program. If copies of these reports are available, please provide them to Georgia Power. If not, please revise the wording accordingly.
7-7	7.3	Based on the previous assessment reports/inspections provided by Georgia Safe Dams Program and Georgia Power, this assessment of the fly ash pond is generally consistent with historical observations.	Based on the previous assessment reports/inspections provided by Georgia Safe Dams Program and Georgia Power, this assessment of the ash pond is generally consistent with historical observations.	remove the word "fly" from sentence.
9-1	9.2.1	The following data is based on inspection reports provided by American Electric Power.	The following data is based on inspection reports provided by Georgia Power.	
9-1	9.2.1	The piezometers are located around the separation dike.	The piezometers are located at the south end at the crest of the separation dike.	Please note wording changes.
9-1	9.1	Georgia Power stated they have daily, weekly, monthly, quarterly and annual inspections for the ash pond.	Georgia Power stated they have daily, weekly, monthly, and quarterly inspections of the ash pond.	