

US EPA ARCHIVE DOCUMENT

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September 29, 2009

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: "Assessment of Dam Safety Coal Combustion Surface Impoundments (Task 3) Draft Final Report – Version 1" for Georgia Power Company Plant Bowen, Cartersville, Georgia

On September 15, 2009, the U.S. Environmental Protection Agency ("EPA") provided to Georgia Power ("GPC") a final report regarding certain facilities for the management of coal combustion byproducts at GPC's Plant Bowen ("Final Report"). The Final Report was prepared by CHA under contract to Lockheed Martin and was dated September 14, 2009. EPA indicated that Georgia Power's comments were considered in the preparation of the final report. We appreciate the opportunity to provide comments. Additionally, EPA requested Georgia Power's response to the report recommendations, including specific plans and schedules for implementing the recommendations. This letter provides Georgia Power's response to the final report recommendations as well as additional comments on the final report.

Acknowledgement of Management Unit Condition and Potential Hazard Rating

Georgia Power is committed to management of coal combustion byproducts in a safe manner, protective of human health and the environment. We have had robust programs in place for many years in that regard. We are pleased that EPA's on-site inspection and document review have confirmed that GPC's facilities are well built and managed effectively.

GPC is pleased that the report concludes that the coal combustion byproduct management unit at Plant Bowen is in "Satisfactory" condition, which is the most favorable category. We are also pleased the report recognizes that Plant Bowen has an "effective monitoring and inspection program for this unit."

Report Recommendations

The Final Report includes three recommendations. As indicated in our letter on September 3, 2009, providing comments on the Draft Report, GPC is already conducting or has initiated those recommendations. Specific plans and schedules for implementing those recommendations are provided below, as appropriate.

- **Hydrologic and Hydraulic Recommendation:** Georgia Power has initiated evaluation of the hydrology of the ash pond site for a larger than 10-year storm event. This evaluation will include modeling of existing conditions as well as modifications to the perimeter drainage ditch currently underway.

The perimeter drainage ditch and culverts which tie together the active ash stack to the recycle pond are currently being modified and will be incorporated into revised ash stacking plans. Georgia Power will utilize the design plans in performing new site hydraulic calculations.

It is estimated that data collection, including any necessary field surveys, will occur by the end of 2009. Modeling and consultation with the plant will occur the first quarter of 2010. By April 1, 2010, Georgia Power will submit to EPA results of the evaluation, including a schedule for implementing any modifications deemed necessary.

- **Stability Recommendation:** GPC already conducts site inspections and reviews instrumentation data after seismic events, including those resulting in 25% of the peak ground acceleration for a 500-year earthquake.
- **Inspection Recommendation:** GPC will continue piezometer monitoring and inspections that have been implemented for the ash pond as these inspections allow for proactive responses to developing situations.

Comments on Final Report

GPC appreciates the opportunity to provide comment on the Draft Report and the incorporation of many of those comments in the Final Report. Our primary comment on the Final Report regards redacting of "Confidential Business Information". The Final Report redacts information not specifically identified by GPC. We understand that EPA may have attempted to be overly conservative in redacting potential "CBI" information. While we understand and appreciate EPA's effort, we think it is important for EPA to be clear that not all redacted information was at the company's request. For example, on EPA's website for "Frequent Questions About Coal Ash Reports", the following is provided:

"1. Why do some assessment reports contain information that has been blacked out?"

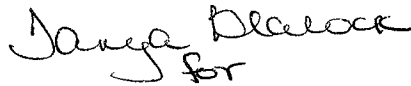
Answer: Blacked out sections contain information that companies have claimed as confidential business information (CBI). All of the CBI is subject to a review which will determine if the company's CBI claims are justified. If the claims are determined to be justified, the information will not be released. If the claims are not justified, the information will be posted."

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It would be appropriate for EPA to indicate that the Agency, in some cases, has "blacked out" or redacted information not specifically requested by the company.

GPC is pleased to continue to cooperate on a voluntary basis with EPA's efforts to gather information regarding the management of coal combustion byproducts at various facilities around the country. GPC appreciates this opportunity to comment. Please direct any future correspondence on this issue to me.

Sincerely,

A handwritten signature in cursive script that reads "Janya Blalock".

for
Charles H. Huling