Ronald Shipman
Vice President
Environmental Affairs

241 Ralph McGill Boulevard NE
Atlanta, Georgia 30308-3374

Tel 404.506.7777
Fax 404.506.7066
rshipman@southernco.com

GEORGIA POWER
A SOUTHERN COMPANY

February 7, 2011

CERTIFIED MAIL AND ELECTRONIC MAIL

Mr. Stephen Hoffman
Office of Resource Conservation and Recovery
U. S. Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

hoffman.stephen@epa.gov

Re: Report of Safety Assessment Coal Combustion Surface Impoundments, Georgia Power, Plant Hammond, Rome, Georgia December 2010

Dear Mr. Hoffman:

On January 7, 2011, the U. S. Environmental Protection Agency ("EPA") provided Georgia Power with a final report regarding certain facilities for the management of coal combustion byproducts at Georgia Power's Plant Hammond ("Final Report"). The Final Report was prepared by AMEC Earth & Environmental, Inc. ("AMEC") and dated December 2010. EPA stated that Georgia Power's comments were considered in preparation of the Final Report. Georgia Power appreciated the opportunity to provide comments. EPA also requested Georgia Power's response to the Final Report's recommendations, including specific plans and schedules for implementing the recommendations. This letter provides Georgia Power's response to the recommendations in the Final Report and additional comments on the Final Report. With this submittal, Georgia Power has addressed all recommendations identified in the Final Report and EPA's transmittal letter dated January 7, 2011. EPA's recommendations are shown in italics below, and Georgia Power's responses follow each recommendation. The Georgia Power comments on the Final Report are shown at the end of the letter.

Acknowledgement of Management Unit Condition and Potential Hazard Rating

Georgia Power is committed to the management of coal combustion byproducts in a safe manner that is protective of human health and the environment. Georgia Power has had a robust ash pond

dike inspection and maintenance program in place for many years. We are pleased that EPA's on-site inspection and document review have confirmed that Georgia Power's facilities are well constructed and managed effectively.

4.2 Hydrologic and Hydraulic Recommendations

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

Georgia Power will continue to maintain each of Plant Hammond's ash ponds.

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 the 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.

Georgia Power will implement this recommendation by June 30, 2011. Georgia Power will provide EPA with a completion date for this recommendation.

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.

In March 2010, Georgia Power installed several piezometers on each ash pond, including the river side dike of Ash Pond 2 and Ash Pond 4. Additionally, three piezometers exist on the east side of Ash Pond 1. These have been included in the instrumentation program for monitoring dike stability.

Georgia Power will add a water surface gauge to Ash Ponds 2 and 4. By the end of 2011, Georgia Power will provide EPA with documentation showing that this recommendation has been completed.

Georgia Power will consider the future use of inclinometers as appropriate based on the data that is generated by the existing instrumentation and continued field monitoring.

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.

Georgia Power is committed to continuing its inspection practices, including vegetation and animal management, at Plant Hammond.

Additional Georgia Power comments on the Final Report

Page 4: The date in the last line of Section 1.4.4 should be changed from July 2007 to May 2009.

Page 9: 2nd line date should be April 2010 not 2001.

Page 15: Table 5: the total stress parameters for Sample AP4-1@10' – 12' should be change to cohesion = 300 and friction = 22.

Page 19: Sect 3.4 1st line, word "that" should be replaced with "was".

Page 21: Sect 4.1 2nd line, word "was" should be replaced with "were".

Figure 9: Note under top x-section states, "Topsoil to be Stripped 1" min'; 1" (inch) should read 1' (foot).

Inspection checklist for Ash Pond #4, box 23 is checked "Yes". It should be checked "No," as there is no water against the downstream toe.

Photos 2-9, 2-10, 2-12, 2-46 and 2-47 are noted as "creek". Instead, they should be noted as 'Drainage ditch" as stated in photo # 2-48.

Photo 4-19 should indicate pump station is no longer in use.

With this response, Georgia Power has addressed all recommendations in the Final Report and EPA's letter dated January 7, 2011. Please direct any future correspondence to my attention.

Sincerely,

Ron Shipman

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