

Response to Comments
Draft Handling Permit for Coal Combustion Residuals (CCR)
Plant Wansley AP-1

In accordance with the Georgia Environmental Protection Division (EPD) public participation policy, the Draft Permit for closure by removal of Georgia Power's Plant Wansley's CCR Surface Impoundment Ash Pond 1 (AP-1) was posted on EPD's website on July 18, 2024. This initiated a comment period, which remained open until August 19, 2024 (30 days). EPD received a total of four comment letters via email. Three letters expressed support of the Wansley AP-1 Draft Permit. One letter included comments on the groundwater monitoring network and program. A summation of the comments is provided along with EPD's responses.

1. Letters/Comments in Favor of EPD Issuing the Permit for Closure by Removal of CCR

Three letters were received in support of Plant Wansley closure by removal of CCR in AP-1 and relocating the CCR to an existing onsite CCR Landfill that is to be expanded, sited, designed, permitted, constructed, operated, and closed in accordance with the State's Rules for Solid Waste Management and CCR Rule (Ga. Comp. Rules and Reg. R. 391-3-4-.10), and by reference, the applicable provisions of the Federal CCR Rule (40 CFR Part 257).

EPD Response:

EPD concurs and appreciates the interested parties' recognition that a timely permit issuance, which defines a path for contamination source removal, is the most protective long-term solution to the unique environmental challenges presented at Plant Wansley AP-1.

2. Comment related to the Groundwater Monitoring Network on the Separator Dike

The eastern waste boundary along the separator dike of AP-1 does not appear to be monitored as part of the downgradient (detection) monitoring program. While two piezometers exist along the separator dike for monitoring water levels, there are no detection monitoring wells present along the length of the eastern waste boundary. According to the approved Groundwater Monitoring Plan, dated May 2024, AP-1 has a groundwater monitoring network consisting of a total of eight upgradient detection monitoring wells, 17 downgradient monitoring wells and three assessment monitoring wells. However, there is a horizontal distance between groundwater monitoring wells WGWA-18 and WGWC-20 of approximately 5,000 feet, or nearly a full mile, leaving the eastern and portions of the northeastern waste boundary of AP-1 unmonitored. See 40 CFR 257.90(a)(2).

EPD Response:

Although the existing groundwater monitoring network effectively detected constituents of concern originating from the Unit within the uppermost aquifer, EPD proposed enhancements to the groundwater network. Georgia Power has agreed to implement them during the first quarter of 2025. The enhancements include installing 5 monitoring wells along the southeast boundary of AP-1 and 8 paired monitoring wells in the separator dike. In addition, 6 existing piezometers will be converted to monitoring wells. These enhancements have been included in the approved groundwater monitoring plan.

3. Comment related to the Groundwater Monitoring Network Downgradient of AP-1

The downgradient monitoring system does not ensure detection of groundwater contamination in the uppermost aquifer because wells are not screened to monitor all potential contaminant migration pathways. The vertical spacing of the detection monitoring network is focused on a zone of partially weathered rock and the upper fractured surface of the bedrock, often referred to as the “transition zone.” All detection monitoring wells are either partially or fully screened in this zone. However, the upper and lower portions of the uppermost aquifer outside of those zones are not being monitored. For example, a review of boring logs indicates water bearing zones above and/or below the well screens at the following detection monitoring wells: WAMW-1, WGWA-7, WGWC-8, WGWC-9, WGWC-22, WGWC-23, and WGWC-25. See 40 CFR §§ 257.53 (definition of uppermost aquifer) and 257.90(a)(2).

EPD Response:

Enhancements to the groundwater monitoring network, listed in response to comment 2 above, include strategic design of well depth and screen placement to supplement the existing monitoring network in the uppermost aquifer.

Future updates to the groundwater monitoring system may be required under the Rules for Solid Waste Management, Chapter 391-3-4.10 if changes occur to the potentiometric surface, groundwater monitoring data, or revisions to the site conceptual model. An addendum to the Hydrogeological Assessment Report (Hydrogeologic Assessment Report, Revision 05) (Geosyntec, 2025) provides additional details describing the rationale for well and screen placement (depth, lithology, etc.). See GEOS ID: 509341.

4. Comment related to the Assessment of Corrective Measures (ACM) Off-site Well Survey

According to the Assessment of Corrective Measures Report, dated March 2023, there are numerous drinking water wells within a three-mile radius of AP-1, which are identified on Figure 5 of the application, entitled “OFF-SITE WELL SURVEY RESULTS.” Many of the wells are marked with a symbol that is described in the legend with a note that reads “[t]he yellow star symbols represent a well that has been identified but the use of the well, and if it is still in operation, has not been determined.” Further, the legend also identified numerous parcels that are likely to have wells. Given the concerns with the groundwater detection monitoring network referenced in comment number two above, please consider whether there is a need to verify the use, or lack thereof, of the remainder of the wells within a three-mile radius from AP-1.

EPD Response:

To comply with the corrective action requirements in the CCR Rule, EPD is working in parallel with Georgia Power regarding AP-1 closure and remedy selection through the ACM process for the Appendix IV constituents (beryllium, cobalt, and lithium) identified at Statistically Significant Levels (SSLs) above regulatory thresholds.

For the purposes of this risk evaluation, the hypothetical off-site resident groundwater exposure pathway was conservatively assumed to be potentially complete regardless of the use, or nonuse, of any individual off-site well for potable water. Therefore, verifying if the wells were in-use or not would not result in an outcome more conservative than what is already assumed. In addition, EPD requires Georgia Power to update their off-site well survey annually as part of the ACM and remedy selection process. Georgia Power will continue to provide updated well surveys in routine groundwater monitoring reports submitted to EPD.

Although these SSLs are identified in three wells at AP-1, the groundwater flow direction is mostly flowing inward toward the pond. A detailed discussion is provided in Section 3.3.1 Groundwater Levels, HAR Rev 05 (Geosyntec, 2025), GEOS ID: 509341, regarding historical and anticipated groundwater flow characteristics during the closure by removal process. All indications suggest that there has not been a release of contaminants beyond the facility property boundary. EPD does not have a regulatory basis for requiring testing of the off-site groundwater wells in proximity to the ash pond at this time. Should conditions change, affected property owners will be notified in accordance with 40 CFR 257.25(g)(1)(iii).

5. Comment related to the Assessment of Corrective Measures Schedule and Progress

According to the Assessment of Corrective Measures Report, dated March 2023, AP-1 has been in assessment monitoring since May of 2018 based on statistically significant increases documented in the Annual Groundwater Monitoring and Corrective Action Report, and it remains in the assessment phase to date. The permit, as drafted, does not appear to address corrective action, which we believe may be warranted by site conditions. We encourage GA EPD to consider modifying the draft permit conditions to include a timeline for selecting and implementing a corrective action remedy as soon as feasible.

EPD Response:

Georgia's Rules for Solid Waste Management require that CCR permit holders address assessment monitoring and corrective action independently from closure and post closure permitting. This permitting regime is different than other regulations, such as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), that require corrective action to occur as a part of the closure permitting process. In this instance, a portion of the Groundwater Monitoring and Corrective Action component of the CCR Rules aligns with CCR permit issuance at Plant Wansley AP-1.

Consequently, EPD added a new permit condition (permit condition number 16) requiring a Draft Remedy Selection Report to be submitted to EPD within 36 months after the date of permit issuance or within 6 months of establishing background for the new groundwater monitoring wells (see comment 2).

The applicant will continue to submit semi-annual and annual groundwater monitoring and corrective action reports, respectively. EPD will continue to evaluate progress toward selection of a corrective measure in accordance with applicable rules.