

**Permit Rationale Addendum**  
**Georgia Power Plant McDonough- Atkinson**  
**NPDES Permit No. GA0001431**  
**Cobb County**

**Application For Reissuance Of A National Pollutant Discharge Elimination System  
(NPDES) Permit To Discharge Treated Wastewater Into Waters Of The State Of  
Georgia**

Were there any revisions between the draft proposed NPDES Permit and the final proposed NPDES permit?     Yes     No

If yes, specify:

Page 2 of 4            Added language to specify that the permit was prepared in accordance with the new EPA Steam Electric Rule.

Page 2 of 4            Added language about the EPA regulation on Coal Combustion Residuals (CCRs) / ash pond disposal.

The permittee has been made aware of these changes.

**Permit Addendum  
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**Application For Reissuance Of A National Pollutant Discharge Elimination System (NPDES)  
Permit To Discharge Treated Wastewater Into Waters Of The State Of Georgia**

Were there any revisions between the draft proposed NPDES Permit and the final proposed NPDES permit?      Yes     No

If yes, specify:

Permit Cover Page     Language has been modified from:  
“In compliance with the provisions of the Georgia Water Quality Control Act (Georgia Laws 1964, p. 416, as amended), hereinafter called the “State Act;” the Federal Water Pollution Control Act, as amended (33 U.S. C. 1251 et seq.), hereinafter called the “Federal Act;” and the Rules and Regulations promulgated pursuant to each of these Acts,  
is authorized to discharge from a facility located at  
Plant McDonough-Atkinson  
5551 South Cobb Drive  
Smyrna, Georgia 30080 (Cobb County)  
to receiving waters  
Chattahoochee River in the Chattahoochee River Basin  
in accordance with effluent limitations, monitoring requirements and other conditions set forth in the permit and with the statements and supporting information submitted with the application.”

To:

“In accordance with the provisions of the Georgia Water Quality Control Act (Georgia Laws 1964, p. 416, as amended), hereinafter called the State Act; the Federal Water Pollution Control Act, as amended (33 U.S. C. 1251 et seq.), hereinafter called the Federal Act; and the Rules and Regulations promulgated pursuant to each of these Acts,  
is issued a permit to discharge from a facility located at  
Plant McDonough-Atkinson  
5551 South Cobb Drive  
Smyrna, Georgia 30080 (Cobb County)  
in accordance with effluent limitations, monitoring requirements and other conditions set forth in the permit.  
This permit is issued in reliance upon the permit application signed on May 24, 2012, any other applications upon which this permit is based, supporting data entered therein or attached thereto, and any subsequent submittal of supporting data.”

**Permit Addendum**  
**Georgia Power Plant McDonough- Atkinson**  
**NPDES Permit No. GA0001431**  
**Cobb County**

- Part I.A.1 Added monitoring of actual intake flow, corresponding footnote and the language for reporting all discharges.
- Part I.A.3 Outfall 02A was inadvertently listed as outfall 02 previously.
- Part I.A.4 Removed footnote stating that flow monitoring is only required for outfall 03.
- Part I.B Revised the paragraph heading from “Monitoring and Reporting” to “Monitoring.”
- Part I.B.2 Removed the paragraph for Reporting, replaced it with a paragraph for the Sampling Period and added revised language to:  
**“2. Sampling Period**  
a. Unless otherwise specified in this permit, quarterly samples shall be taken during the periods January-March, April-June, July-September, and October-December.  
b. Unless otherwise specified in this permit, semiannual samples shall be taken during the periods January-June and July-December.  
c. Unless otherwise specified in this permit, annual samples shall be taken during the period of January-December.”
- Part I.B.3 Moved the “Definitions” paragraph to Part I.C and renumbered the remaining paragraphs in Part I.B.
- Part. I.B.7 Removed the DMR form number “3320-1.”
- Part I.C Added “Definitions” Section.
- Part I.D Added a new section for Reporting Requirements and revised the language to require electronic reporting as follows:  
**D. REPORTING REQUIREMENTS**  
1. The permittee must electronically report the DMR, OMR and additional monitoring data using the web based electronic NetDMR reporting system, unless a waiver is granted by EPD.  
a. The permittee must comply with the Federal National Pollutant Discharge Elimination System Electronic Reporting regulations in 40 CFR §127. The permittee must electronically report the DMR, OMR, and additional monitoring data using the web based electronic NetDMR reporting system online at: <https://netdmr.epa.gov/netdmr/public/home.htm>  
b. Monitoring results obtained during the calendar month shall be summarized for each month and reported on the

**Permit Addendum**  
**Georgia Power Plant McDonough- Atkinson**  
**NPDES Permit No. GA0001431**  
**Cobb County**

DMR. The results of each sampling event shall be reported on the OMR and submitted as an attachment to the DMR.

- c. The permittee shall submit the DMR, OMR and additional monitoring data no later than 11:59 p.m. on the 15th day of the month following the sampling period.
- d. All other reports required herein, unless otherwise stated, shall be submitted to the EPD Office listed on the permit issuance letter signed by the Director of EPD.
- 2. **No later than December 21, 2020** the permittee must electronically report the following compliance monitoring data and reports using the online web based electronic system approved by EPD, unless a waiver is granted by EPD:
  - a. CWA Section 316(b) Annual Reports;
  - b. Bypass Event Reports;
  - c. Noncompliance Notification;
  - d. Other noncompliance; and
  - e. Bypass
- 3. **Other Reports**  
All other reports required in this permit not listed above in Part I.D.2 or unless otherwise stated, shall be submitted to the EPD Office listed on the permit issuance letter signed by the Director of EPD.
- 4. **Other Noncompliance**  
All instances of noncompliance not reported under Part I.B. and Part II. A. shall be reported to EPD at the time the monitoring report is submitted.
- 5. **Signatory Requirements**  
All reports, certifications, data or information submitted in compliance with this permit or requested by EPD must be signed and certified as follows:
  - a. Any State or NPDES Permit Application form submitted to the EPD shall be signed as follows in accordance with the Federal Regulations, 40 C.F.R. 122.22
    - 1. For a corporation, by a responsible corporate officer. A responsible corporate officer means:
      - i. a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision making functions for the corporation, or
      - ii. the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in

**Permit Addendum**  
**Georgia Power Plant McDonough- Atkinson**  
**NPDES Permit No. GA0001431**  
**Cobb County**

accordance with corporate procedures.

2. For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
3. For a municipality, State, Federal, or other public facility, by either a principal executive officer or ranking elected official.
- b. All other reports or requests for information required by the permit issuing authority shall be signed by a person designated in (a) above or a duly authorized representative of such person, if:
  1. The representative so authorized is responsible for the overall operation of the facility from which the discharge originates, e.g., a plant manager, superintendent or person of equivalent responsibility;
  2. The authorization is made in writing by the person designated under (a) above; and
  3. The written authorization is submitted to the Director.
- c. Any changes in written authorization submitted to the permitting authority under (b) above which occur after the issuance of a permit shall be reported to the permitting authority by submitting a copy of a new written authorization which meets the requirements of (b) and (b.1) and (b.2) above.
- d. Any person signing any document under (a) or (b) above shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Part II.A.1

Modified language to the following:

"Management Requirements

1. Notification of Changes
  - a. The permittee shall provide EPD at least 90 days advance notice of any planned physical alterations or additions to the permitted facility that meet the following criteria:
    1. The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR 122.29(b);

**Permit Addendum**  
**Georgia Power Plant McDonough- Atkinson**  
**NPDES Permit No. GA0001431**  
**Cobb County**

known or there is reason to believe that any activity has occurred or will occur which would result in any discharge on a nonroutine or infrequent basis, of any toxic pollutant not limited in the permit, if that discharge will exceed (i) 500 µg/L, (ii) ten times the maximum concentration reported for that pollutant in the permit application, or (iii) 1 mg/L antimony.

- g. Upon the effective date of this permit, the permittee shall submit to EPD an annual certification in June of each year certifying whether or not there has been any change in processes or wastewater characteristics as described in the submitted NPDES permit application that required notification in paragraph a., b., or d. of this condition. The permittee shall also certify annually in June whether the facility has received offsite wastes or wastewater and detail any such occurrences.”

Part II.A.7      Changed the reporting reference in the paragraph from “Part I.B.2.” to “Part I.D”.

Part III.B.9      Added language for a Temperature Study, requiring temperature monitoring and submittal of temperature monitoring data.

Part III.D      Modified the impoundment integrity language to the following:

“Impoundment Integrity

Imminent impoundment failure conditions shall be reported **immediately** to the designated local entity in the County with responsibility for emergency management and EPD’s 24 hour Emergency Response contact.

1. Operation and Maintenance

a. The following impoundments that are used to hold or treat wastewater and associated waste materials shall be operated and maintained to prevent the discharge of pollutants to waters of the united states, except as authorized under this permit, as follows:

- i. Ash Pond 2
- ii. Ash Pond 3
- iii. Ash Pond 4

b. When practicable, piezometers or other appropriate instrumentation shall be installed as a means of assessing impoundment integrity.

c. Within 90 days of the effective date of this permit, the permittee shall submit a report that identifies and shows the location of all pipes, utilities or other penetrations through or beneath the impoundment(s). A Georgia-registered professional engineer must certify in the report what, if any, pipes, utilities, and penetrations exist and their condition. The report must address these penetrations and provide an inspection frequency and method of evaluation for them.

2. Inspections

**Permit Addendum**  
**Georgia Power Plant McDonough- Atkinson**  
**NPDES Permit No. GA0001431**  
**Cobb County**

- a. Inspections of dams, dikes and toe areas for erosion shall, at a minimum, include observations of:
    - i. Cracks or bulges;
    - ii. Subsidence;
    - iii. Wet or soft soil;
    - iv. Changes in geometry;
    - v. Elevation of the impounded water and freeboard, depth of sediment and slurry;
    - vi. Changes in vegetation such as being overly lush;
    - vii. Obstructive vegetation and trees;
    - viii. Animal burrows;
    - ix. Changes to liners (if applicable);
    - x. Spillway integrity; and
    - xi. Any other changes which may indicate a potential compromise to impoundment integrity.
  - b. All impoundments shall be inspected at least **weekly** by qualified personnel with knowledge and training in impoundment integrity.
  - c. All impoundments shall be inspected annually by a State-registered professional engineer or professional geologist with knowledge and training in impoundment integrity.
  - d. The findings of each inspection shall be documented in a written inspection report and the personnel conducting the inspection will certify that the inspection occurred.
  - e. The certified inspection report shall be submitted to EPD annually on June 30<sup>th</sup>.
3. Corrective Measures
- a. For Category I structures or structures regulated under the Safe Dams Act, the permittee shall coordinate with EPD (EPD's Safe Dams Unit, EPD assigned Compliance Office, and EPD's Emergency Response Contact) and the permittee's Engineer of Record **immediately (within 24 hours)** after discovering any changes that may be signs of an imminent impoundment failure, or potentially significant compromise to the structural integrity of the impoundment; such as, but not limited to, significant increases in seepage or seepage carrying sediment, or as the formation of large cracks, slumping, or new wet areas not related to recent precipitation.
  - b. For structures not regulated by the Safe Dams Act, the permittee shall retain a qualified professional and coordinate with EPD (EPD's Safe Dams Unit, EPD assigned Compliance Office, and EPD's Emergency Response Contact) **immediately (within 24 hours)** after discovering any changes that may be signs of an imminent impoundment failure, or potentially significant compromise to the structural integrity of the impoundment; such as, but not limited to, significant increases in seepage or seepage carrying sediment or the formation of large cracks, slumping, or new wet areas not related to recent precipitation.
  - c. The permittee shall begin the corrective measures agreed upon by EPD and the permittee **within 60 days** of first observing any other issues which may have long term impacts on the structural integrity of the impoundment, such as trees growing on the

**Permit Addendum**  
**Georgia Power Plant McDonough- Atkinson**  
**NPDES Permit No. GA0001431**  
**Cobb County**

- impoundment or vegetation blocking spillways, culverts or other drainage pathways.
4. Reporting and Recordkeeping Requirements
    - a. **Within 5 days** of discovering conditions that indicate a potentially significant compromise to the structural integrity of the impoundment, the permittee must notify EPD (EPD's Safe Dams Unit and EPD assigned Compliance Office) in writing, describing the findings of the inspection, corrective actions taken, and expected outcomes.
    - b. The permittee shall maintain records of all impoundment inspection and maintenance activities, including corrective actions made in response to inspections and all other activities undertaken to repair or maintain the impoundments referenced in this permit. All records shall be retained, and made available to State or Federal inspectors upon request.
    - c. The permittee shall submit an **annual report** to EPD by June 30<sup>th</sup>, summarizing findings of all monitoring activities, inspections and corrective measures pertaining to the structural integrity, operation and maintenance of all impoundments referenced in this permit.
    - d. All pertinent impoundment permits, design, construction, operation, and maintenance information, including but not limited to: ~~plans, geotechnical and structural integrity studies, copies of permits, associated documentation of certifications by all qualified personnel, State-registered professional engineers, professional geologists, and regulatory approvals, shall be retained and made available to State or Federal inspectors upon request.~~
    - e. The permittee shall maintain the applicable certification and training records of the personnel that conducted the inspections required under this Section.
  5. Upon the State of Georgia's promulgation of the Resource Conservation and Recovery Act, 40 CFR Parts 257 and 261, for the disposal of Coal Combustion Residuals, EPD may modify the permit to revise or remove any or all of the language in Part III.D of this permit."

The permittee has been made aware of these changes.