

## Georgia and the Threat from Coal Ash Disposal in Pond and Landfills

## Coal-Fired Power Plants in Georgia

Plant	Operator	Coal Ash Disposal Sites	County
Bowen Power Station	Georgia Power Co.	1 pond/landfill*	Bartow
Hammond	Georgia Power Co.	Landfill*, 4 ponds (1	Floyd
		listed as inactive)	
Harllee Branch Power	Georgia Power Co.	5 ponds	Putnam
Station			
Jack McDonough	Georgia Power Co.	Landfill*, 4 ponds (1	Cobb
		listed as inactive)	
Kraft Power Station	Georgia Power Co.	1 pond	Chatham
McIntosh Power Station	Georgia Power Co.	1 pond	Effingham
McManus Power Station	Georgia Power Co.	Landfill*	Glynn
Mitchell	Georgia Power Co.	Landfill*, 3 ponds (2	Dougherty
		listed as inactive)	
Scherer Power Station	Georgia Power Co.	2 ponds	Monroe
Wansley Power Station	Georgia Power Co.	1 pond	Heard
Yates Power Station	Georgia Power Co.	Landfill*, 8 ponds (5	Coweta
		listed as inactive)	

\* indicates one or more coal ash landfills.<sup>i</sup>

Amount of coal ash generated per year: Nearly 6.1 million tons. Georgia ranks 8th in the country for coal ash generation.<sup>ii</sup>

## Information on Georgia Coal Ash Ponds

*Number of coal ash ponds:* There are a total of 30 coal ash ponds at 10 power plants. Of those ponds, 16 are active. The remaining 14 ponds are inactive, of which six are covered and six have not been covered.<sup>iii</sup>

*Pond ratings:* Two ponds in Georgia are high hazard and 10 are significant hazard.<sup>iv</sup> According to the National Inventory of Dams, a pond is rated "high hazard" if failure or failure or mis-operation will probably cause loss of human life.<sup>v</sup> Dams assigned the significant hazard rating are those dams where failure is likely to cause economic loss, environment damage, disruption of lifeline facilities, or impact other concerns. In 2011, EPA rated the condition at the 54-acre ash pond at Plant Hammond "poor."<sup>vi</sup> This pond has a "significant hazard" rating.

*Age of Ponds:* Almost all ponds in Georgia are over 30 years old. Seven of the active ponds are over 40 years old, while 2 of the active ponds are over 50 years old. Of the inactive ponds, there are five uncovered ponds over 30 years old, two ponds over 40 years old, and one over 50 years old. The age of these ponds makes it highly unlikely that they have safeguards like liners and leachate collection systems.<sup>vii</sup> According to a 2007 risk assessment by the U.S. Environmental Protection Agency, at least 11 surface impoundments and landfills in Georgia are unlined. Of these sites, at least 10 do not have a leachate collection system and nine do not have any groundwater monitoring.<sup>viii</sup>

*Capacity and Releases:* Total storage capacity at the 30 ponds is roughly 54,000 acre feet. Current volume at the ponds (active and inactive) is roughly 87 million cubic yards (tons) of coal ash.<sup>ix</sup> The total surface area covered by impoundments is 2,218 acres—almost three times the size of Central Park. The EPA database

notes that three releases have occurred at Georgia ponds: two at Plant Bowen (a significant sinkhole failure in the pond in 2002 and a stack failure in 2008). In addition, in 2000, there was a discharge of slurry at a Harllee Branch waste pond.<sup>x</sup> The pond is located in Coosa where the percent of citizens living below the poverty line exceeds the county average.

Coal Ash Contamination in Georgia: Sites where coal ash has contaminated water in Georgia include:xi

- Georgia Power Company, Plant Bowen: "This unlined CCW management unit was put in service in 1968. On July 28, 2002, a sinkhole developed in the (coal) ash pond of the Georgia Power Company - Plant Bowen Facility (coal-fired generating facility). The sinkhole ultimately reached four acres and a depth of thirty feet. The integrity of the ash pond dikes did not appear to be compromised. The company estimated that 2.25 million gallons of ash/water mixture was released to an unnamed tributary of the Euharlee Creek, containing 281 tons of ash. Georgia's Department of Natural Resources alleges an unpermitted discharge of water containing approximately 80 tons of ash slurry entered Euharlee Creek through a stormwater drainage pipe resulting in a temporary degradation of public waters."xii
- Georgia Power Company, Plant Yates: Groundwater monitoring at Plant Yates found exceedances of federal health standards for chromium, selenium, and nickel.xiii

Deficiencies in Georgia Laws and Regulations: Although Georgia is one of the top coal ash-generating states in the U.S., it has some of the weakest coal ash disposal regulations in the nation. Georgia's role in ensuring the safety of its numerous high and significant hazard coal ash impoundments basically stops at dam construction. There is nothing in Georgia law to specify how often inspections must occur, and in practice, regulatory inspections of Georgia's numerous aging ponds are exceedingly rare—only 7 percent of Georgia's dams have been inspected by the state in the past five years, yet 13 of the state's 29 ponds are at least 40 years old. Georgia requires no emergency action plans, no inundation maps to determine what areas would be impacted in the event of a breach, and no bonds to cover closure or cleanup. Furthermore, the state does not require liners or monitoring wells at coal ash ponds-despite the fact that many of the ponds are built on unstable, karst terrain. The state does not even prohibit the siting of landfills and ponds directly in the water table.

For more information, contact Lisa Evans, Senior Administrative Counsel, Earthjustice, levans@earthjustice.org, 781-631-4119.

<sup>&</sup>lt;sup>1</sup> U.S. Department of Energy's Energy Information Administration, Form EIA-767, Annual Steam-Electric Plant Operation and Design Data. 2005.

<sup>&</sup>lt;sup>ii</sup> U.S. EPA, Regulatory Impact Analysis for EPA's Proposed RCRA Regulation of Coal Combustion Residues (CCR) Generated by the Electric Utility Industry, citing 2007 US Department of Energy, Energy Information Agency (EIA) database for electricity power plants from the Form EIA-860 "Annual Electric Generator Report."

iii Letters from Georgia Power Co. to the U.S. EPA, Dated April 6, 2009: "Response to Request to Georgia Power Plant McIntosh for Information Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C., 9604(e), dated March 9, 2009"; Dated May 13, 2009: "Identification of Georgia Power's Information Subject to a Claim of Confidentiality"; Dated February 2, 2010: "Response to Request to Georgia Power for Plants Hammond, McDonough, Mitchell and Yates for Information Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C., 9604(e), dated December 29, 2009". <sup>iv</sup> U.S. EPA. Database of coal combustion waste surface impoundments (2011).

<sup>&</sup>lt;sup>v</sup> http://www.epa.gov/osw/nonhaz/industrial/special/fossil/coalash-faqs.htm#13.

vi http://www.epa.gov/osw/nonhaz/industrial/special/fossil/surveys2/index.htm.

vii Letters from Georgia Power Co. to the U.S. EPA, (2009-2010).

viii RTI International. Human and Ecological Risk Assessment of Coal Combustion Wastes, Draft (August 6, 2007), prepared for the U.S. Environmental Protection Agency.

ix Id.

<sup>\*</sup> RTI International. Human and Ecological Risk Assessment of Coal Combustion Wastes, Draft (August 6, 2007), prepared for the U.S. Environmental Protection Agency.

xi U.S. EPA. Coal Combustion Waste Damage Assessments (July 9, 2007).

xii RTI International. Human and Ecological Risk Assessment of Coal Combustion Wastes, Draft (August 6, 2007), prepared for the U.S. Environmental Protection Agency.

xiii EIP, Risky Business: Coal Ash Threatens America's Groundwater Resources at 19 More Sites (Dec. 2011), available at http://www.environmentalintegrity.org/documents/121311EIPThirdDamageReport.pdf.