

# POST-CLOSURE PLAN

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## R6 CCR LANDFILL PLANT YATES COWETA COUNTY, GEORGIA

FOR



# Georgia Power

NOVEMBER 2018



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## **1. POST-CLOSURE USE OF THE PROPERTY**

This Post Closure Plan fulfills the requirements of Rules 391-3-4-.10(9)(c)(4) and 391-3-4-.10(9)(c)3.(i)–(iv) for the Inactive R6 CCR Landfill. This Plan provides a description of how the post closure requirements of 40 CFR 257.104 will be met throughout the post closure care period. The facility stopped receiving CCR prior to October 19, 2015 and provided the formal notice of closure to EPD in a letter dated November 4, 2015. Post-closure care is required for a period of 30 years and must consist of at least the following:

- A. Maintaining the integrity and effectiveness of the final cover system, including making repairs to the final cover as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover and
- B. Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with Groundwater Monitoring Plan included in this application.

This post-closure plan may be amended by Georgia Power at any time. Moreover, as required by State CCR Rule 391-3-4-.10(7)(g), which references 40 CFR §257.104(d)(3)(ii), this plan must be amended whenever: (i) there is a change in the operation of the CCR unit that would substantially affect the plan; or (ii) after post-closure activities have commenced, unanticipated events necessitate a revision of the plan. The timeframes for amendment to the plan will be in accordance with those specified in 40 CFR §257.104(d)(3)(iii).

At the end of the 30-year post-closure care period, if the site is in detection monitoring, Georgia Power Company (Georgia Power) may request a release from the post-closure care requirements in this plan. The release must be approved by the Director of Georgia EPD. However, if the site is operating under assessment monitoring, Georgia Power will continue to conduct post-closure care and monitoring until the site returns to detection monitoring.

There is no planned use of this property during the Post-Closure Care Period at this time. Prior to any future use, EPD approval is required.

## **2. GROUNDWATER MONITORING**

As required by Georgia EPD Rule 391-3-4.10(6), groundwater monitoring, sampling will be conducted semiannually (or at least annually) throughout the post-closure care period in accordance with the facility Groundwater Monitoring Plan. In accordance to groundwater monitoring plan, groundwater monitoring system components, including wells, well risers, well pads and seals, casings, caps, locks, and bollards, will be routinely inspected, maintained, and repaired or replaced, as necessary.

The groundwater monitoring activities for the R6 CCR Landfill will follow the Groundwater Monitoring Plan included in this application.

### **3. ROUTINE INSPECTION OF VEGETATIVE / FINAL COVER / DRAINAGE SYSTEM**

Throughout the Post-Closure Care Period, the site shall be inspected on a quarterly basis by a qualified person, and on an annual basis by a Professional Engineer, to ensure that all CCR disposed of in the facility remains properly covered with the approved final closure system for the facility. Repairs to the final cover system will be made as necessary to maintain the integrity and effectiveness of the final cover system. The repairs shall meet or exceed the original construction requirements. Any areas noted to have less than the required cover from the effects of erosion, vehicular traffic, etc., shall be immediately repaired. All areas lacking proper vegetation shall be grassed and maintained according to the vegetation and fertilization plans in the Closure Plan. Downdrain systems shall be maintained in proper working condition in accordance with the Permit Application. The contact person for post-closure care of the facility is provided below:

General Manager  
Environmental Affairs  
Georgia Power Company  
241 Ralph McGill Blvd.  
Atlanta, GA 30308  
(404) 506-6505

### **4. STORM WATER MANAGEMENT SYSTEM**

Throughout the Post-Closure Care Period, all ditches, diversion berms, culverts, rip-rap, and other drainage structures shall be maintained in accordance with the permit application to prevent run-on and run-off from eroding or otherwise damaging the final cover. Erosion control structures shall be maintained so as to prevent damage to the final cover. Inspections of ditches, diversion berms, culverts, rip-rap, and other drainage structures will be performed by a qualified person and maintenance of these structures will be addressed as soon as practical.

### **5. LIMITED ACCESS**

R6 CCR Landfill is located completely within the property boundary of Plant Yates, and access is restricted to authorized personnel only. Access is controlled by chain link security fence, locked gates, and/or fulltime security personnel. During the post-closure care period, security measures will be checked and repaired as necessary.

### **6. POST-CLOSURE SUPERVISION**

Post-Closure Care of the site shall be under the supervision of a qualified professional. Contact information for this person will be provided to EPD at time of closure.

### **7. SITE EQUIPMENT**

Georgia Power will make adequate equipment available to ensure that Post-Closure Care requirements are executed correctly and efficiently. Rental equipment shall be utilized in the event that equipment dedicated to the CCR landfill should break down during Post-Closure Care procedures.

**8. POST-CLOSURE CARE COST AND FINANCIAL ASSURANCE**

In compliance with applicable securities laws and regulations, Georgia Power will provide specific cost estimates for post-closure care during the permit application review process as estimates are developed and finalized. It is anticipated these estimates will be available to GA EPD in the first half of 2019. Georgia Power will provide a demonstration of financial assurance upon approval of closure and post-closure care cost estimates by GA EPD.

**9. NOTIFICATION OF MONITORING STANDARDS EXCEEDED**

Georgia Power will be responsible for conducting all monitoring activities. If at any time the monitoring results indicate exceeding of established standards or indicate a threat to human health or the environment, the owner and/or operator shall notify the EPD and comply with all requirements of Georgia Rule 391-3-4-.10(6).

**10. NOTIFICATION AND CERTIFICATION**

Within 60 days of the completion of the post-closure care period, Georgia Power will prepare a notification verifying that post-closure care has been completed. The notification will include a certification by a qualified professional engineer verifying that post-closure care has been completed in accordance with this plan. Georgia Power will complete the post-closure care process by: (1) placing the notification in the facility's operating record as required by Rule 391-3-4-.10(7) and (2) providing the notification to the Director of Georgia EPD. Release of Plant Yates AMA from continuing post-closure care requirements must be approved by Georgia EPD.

**11. RECORDKEEPING/NOTIFICATION REQUIREMENTS**

Georgia Power will comply with all applicable recordkeeping requirements and maintain the facility's operating record at all times.