

**NOTIFICATION OF INTENT TO INITIATE CLOSURE  
INACTIVE CCR SURFACE IMPOUNDMENTS AP-3 and AP-4  
GEORGIA POWER COMPANY  
PLANT MCDONOUGH, COBB COUNTY, GEORGIA**

Georgia Power Company (GPC) intends to close the inactive CCR surface impoundments known as AP-3 and AP-4 located at Plant McDonough in Cobb County, Georgia under the requirements of 40 C.F.R. §257.100(b). AP-3 and AP-4 are Inactive Surface Impoundments, as defined in 40 C.F.R. §257.53.

Closure of AP-3 and AP-4 will be conducted primarily under 40 C.F.R. §257.100(b)(1), *Closure by leaving CCR in place*; in combination with 40 C.F.R. §257.100(b)(5), *Closure through removal of CCR*. In portions of AP-3 and AP-4 where CCR will remain in place, CCR will be consolidated in a manner that will control, minimize or eliminate, to the maximum extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate, or contaminated runoff to the ground or surface waters or to the atmosphere. Where CCR will remain in place, closure will also preclude the probability of future impoundment of water, sediment, or slurry. Measures will be taken during design and construction of the closure system that provide for major slope stability to prevent sloughing or movement of the final cover system. Closure will also minimize the need for further maintenance of the CCR unit.

Prior to installation of the final cover system, any free liquids will be eliminated from AP-3 and AP-4. Free liquids within AP-3 and AP-4 will be discharged through the facility's National Pollution Discharge Elimination System (NPDES) Permit outfall. The outfall is monitored in compliance with the facility's NPDES permit.

CCR remaining in AP-3 and AP-4 will be stabilized, as needed, to support construction of and performance of the final cover system. The surface of AP-3 and AP-4 will be graded to facilitate positive site drainage. A final cover system will then be installed that is designed to minimize infiltration and erosion. The final cover system will meet or exceed the requirements of 40 C.F.R. §257.100(b)(3)(i) or (ii) and will include a geomembrane liner component, or equivalent, such that the permeability of the final cover system will be less than or equal to the permeability of the natural sub-soils present beneath the surface impoundments. The integrity of the final cover system will be supported by a design that minimizes settlement and subsidence, in addition to providing protection from wind or water erosion.

Tentative schedule for closure is as follows:

- |  |                               |
|--|-------------------------------|
| • Design                                 | Ongoing completion Q1.2016    |
| • Award of Closure Construction Contract | December 2015 or January 2016 |
| • Contractor Mobilization                | Q1 2016                       |
| • Commence Removal of Free Liquids       | Q1 2016                       |
| • Stabilization of CCR & Grading         | Q1 2016 to Q1 2018            |
| • Construction of Final Cover            | Q3 2016 to Q1 2018            |
| • Certification of Closure               | Q1 2018                       |

By signature below, certification is made that

- The closure of select portions of Plant McDonough CCR surface impoundments AP-3 and AP-4 will be completed by a combination of 40 C.F.R. §257.100(b)(5), removal of CCR, and 40 C.F.R. §257.100(b)(1), leaving CCR in place,
- The final cover system of Plant McDonough CCR surface impoundments AP-3 and AP-4, where CCR will remain in place, will meet the requirements of 40 C.F.R. §257.100(b)(3)(i) or (ii), and
- It is technically feasible to complete closure of Plant McDonough CCR surface impoundments AP-3 and AP-4 under the requirements of 40 C.F.R. §257.100(b)(1) – (4) and (b)(5) by April 17, 2018.



---

Gregory L. Hebel, PhD, PE  
Georgia Licensed Professional Engineer No. 034749  
Senior Consultant and Associate, Golder Associates Inc.