INITIAL WRITTEN CLOSURE PLAN 40 CFR PART 257.102 PLANT YATES ASH POND 3 (AP-3) GEORGIA POWER COMPANY

SITE INFORMATION

Site Name / Address Plant Yates 708 Dyer Road Newnan, GA 30263

Owner Name / Address Georgia Power Company 241 Ralph McGill Blvd Atlanta, GA 30308

CCR Unit AP-3

Close In-Place

CLOSURE PLAN DESCRIPTION

§ 257.102(b)(1)(i) – Narrative description of how the CCR unit will be closed.

Plant Yates AP-3 will be closed by leaving CCR in place, with some consolidation of ash to reduce the closure footprint. In accordance with § 257.102(b)(3), the written closure plan will be amended if there is a change in operation that would substantially affect the written closure plan in effect and/or if there are unanticipated events that necessitate a revision of the closure plan.

§ 257.102(b)(1)(iii) -Closure of the CCR unit by leaving CCR in place

Methods and Procedures

AP-3 will be dewatered sufficiently to remove the free liquids and to an extent to provide a stable base for the construction of an ash containment structure for the consolidated footprint, excavation of ash outside the consolidated footprint, and construction of the final cover system. CCR will be excavated from the area outside the consolidated footprint, transported, and disposed of in the consolidated footprint to create a subgrade for the final cover system. Excavation will include removing all visible ash and over excavating into the subgrade soils.

In accordance with § 257.102(d), the final cover system will be constructed to control, minimize or eliminate, to the maximum extent feasible, post closure infiltration of liquids into the waste and potential releases of CCR from the unit. This will be accomplished by providing sufficient grades and slopes to; 1) preclude the probability of future impoundment of water, slurry, or sediment; 2) ensure slope and cover system stability; 3) minimize the need for further maintenance; and, 4) be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices.

Description of Final Cover System

The final cover system will be designed to minimize infiltration and erosion. The cover system to be used is currently being evaluated and final design is not yet complete. The final cover system, at a minimum, will be designed to meet or exceed the requirements of 40 C.F.R. §257.102(d)(3)(i) or (ii) (traditional and alternative cover system) in that the permeability of the final cover system will be less than or equal to the permeability of the natural subsoils present beneath the surface impoundment, but no greater than 1×10^{-5} cm/sec. Final design will ensure the disruption of the integrity of the final cover system is minimized through a design that accommodates settlement and subsidence, in addition to providing an erosion layer for protection from wind or water erosion.

§ 257.102(b)(1)(iv) – Estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit

AP-3 currently contains approximately 1,400,000 cubic yards of CCR. The plant no longer generates electricity using coal as fuel, and no further ash is expected to be placed in the surface impoundment. Future use of the unit will not substantially affect the written closure plan in effect.

\S 257.102(b)(1)(v) – Estimate of the largest area of the CCR unit ever requiring a final cover

AP-3 is about 55 acres in size. The final cover will be applied to the approximate 50-acre consolidated footprint of the CCR unit.

§ 257.102(b)(1)(vi) - Closure Schedule

The milestones and the associated timeframes are initial estimates. Some of the activities associated with the milestones will overlap. Some milestones outlined below reflect approximate time durations for implementing closure, rather than dates, since there is no specific date to initiate closure.

Milestones

State Agency coordination and permit acquisition – up to 3 years

Dewatering – 1 year

Consolidation and stabilization – 2 years

Installation of final cover – 1 year

Estimate of Year in which all closure activities will be completed – 2021

Certification Statement 40 CFR § 257.102(b)(4)

Initial Written Closure Plan

Site Name / Address

Plant Yates 708 Dyer Road Newnan, GA 30263

Owner Name / Address

Georgia Power Company 241 Ralph McGill Blvd Atlanta, GA 30308

CCR Unit

AP-3

I hereby certify that the written closure plan was prepared in accordance with the requirements of 40 CFR § 257.102, and that the final cover system will meet the requirements of § 257.102(d)(3).

James 7. Pegues

Licensed State of Gookgia, No. PE1741