INITIAL WRITTEN CLOSURE PLAN
40 C.F.R PART 257.102
PLANT BOWEN ASH POND 1 (AP-1)
GEORGIA POWER COMPANY

SITE INFORMATION

Site Name / Address
Plant Bowen
317 Covered Bridge Rd. S.W.
Cartersville, GA 30120

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

CCR Unit
AP-1

Closure Method
Close In-Place

CLOSURE PLAN DESCRIPTION

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

Plant Bowen AP-1 will be closed by leaving CCR in place and installing a final cover system. 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 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-1 will be dewatered sufficiently to remove the free liquids and to an extent to provide a stable base for the construction of the final cover system. Ash will be graded within the footprint of the impoundment to create a subgrade for the final cover system. In accordance with § 257.102(d), the final cover 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 for the crown and side slopes within the perimeter drainage ditch of the northern 128.6-acre dry ash stack consists of a minimum 18-inch compacted soil cover with a maximum hydraulic conductivity of $1 \times 10^{-5}$ cm/sec. This compacted clay cover is overlain with a 6-inch topsoil layer and is vegetated. The final cover for the slopes outside the perimeter drainage ditch consists of a geosynthetic clay liner (GCL) overlain with a drainage geocomposite, eighteen (18) inches of protective cover soil, and six (6) inches of topsoil. Vegetation has been established.

The final cover system for the southern 128.8 acres 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 $1 \times 10^{-5}$ 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-1 currently contains approximately 21,200,000 cubic yards of CCR. Future use of the unit will not substantially affect the written closure plan in effect.

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

AP-1 is 257.4 acres in size. As described above, the northern 128.6 acres is currently covered with either a minimum 18-inch compacted soil cover with a maximum hydraulic conductivity of $1 \times 10^{-5}$ cm/sec. or with a GCL and geocomposite. The compacted clay cover is overlain with a 6-inch topsoil layer and is vegetated. The GCL/geocomposite is covered with an 18-inch protective soil layer and a 6-inch topsoil layer with vegetation. A final cover will be applied to the remaining 128.8 acres of the southern portion 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. Milestones reflect approximate time to implement closure instead of dates since there is no specific date to initiate closure.

Estimated Milestones

State Agency coordination and permit acquisition – within 3 years
Dewatering – 6 months
Excavation/Grading & stabilization – 1.5 year
Installation of final cover – 1 year
Estimate of Year in which all closure activities will be completed - 2022
Certification Statement 40 CFR § 257.102(b)(4)

Initial Written Closure Plan

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CCR Unit

AP-1

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).

[Signature]

Gary H. McWhorter
Licensed State of Georgia, #PE012687