Initial Closure Plan

Plant McDonough-Atkinson
Ash Pond 3 (AP-3) and Ash Pond 4 (AP-4)

Prepared for:
Georgia Power Company

Prepared by:
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1.0 CERTIFICATION

This Closure Plan for Georgia Power Company’s (Georgia Power) Ash Pond 3 (AP-3) and Ash Pond 4 (AP-4), located at Plant McDonough-Atkinson (Plant McDonough) was prepared by Golder Associates Inc. (Golder).

I certify that this Closure Plan was prepared in accordance with the United States Environmental Protection Agency’s “Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments” Final Rule (40 C.F.R. Part 257) §257.102(b).

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Georgia Licensed Professional Engineer No. 034749
Golder Associates Inc.
2.0 INTRODUCTION
This Closure Plan was prepared for Georgia Power’s AP-3 and AP-4, located at Plant McDonough in Cobb County, Georgia. This Closure Plan was prepared in accordance with 40 CFR Part §257, Subpart D and meets the requirements of 40 CFR §257.102(b).

AP-3 and the adjacent AP-4 are currently being consolidated and closed in place as combined unit AP-3/4 in accordance with §257.102(d), no longer receive CCR, and are in the process of obtaining a solid waste permit under the Georgia Rules for Solid Waste Management, 391-3-4-.10.

Facility details are as follows:

Site Name / Address
Plant McDonough – Atkinson
5551 South Cobb Drive SE
Atlanta, GA 30339

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

CCR Unit
Ash Pond 3 (AP-3)
Ash Pond 4 (AP-4)

Closure Method
Close in Place (AP-3, AP-4 partial)
Closure by Removal (AP-4 partial)

3.0 CLOSURE PLAN
The purpose of this Closure Plan is to outline the methods and procedures underway to close AP-3 and AP-4 consistent with recognized and generally accepted good engineering practices. A notice of intent to close was completed for AP-3 and AP-4 on December 8, 2015. AP-3 and AP-4 will undergo closure in accordance with 40 CFR §257.102(d). This Closure Plan may be amended in accordance with the requirements of 40 CFR §257.102(b)(3).

3.1 Methods and Procedures
AP-3 and AP-4 are being consolidated and closed in place. CCR in the eastern portion of AP-4 will be relocated to the western portion of AP-4 as well as dry stacked on AP-3. During closure, AP-3 and AP-4 are being dewatered as required to facilitate consolidation and closure in place. CCR will be graded within the footprint of the impoundment to create a subgrade for the final cover system. Closure shall be conducted in a manner that minimizes the need for further maintenance and controls, and minimizes or eliminates, to the maximum extent feasible to protect human health and the environment, the 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:

- Preclude the probability of future impoundment of water, sediment, or slurry;
- Ensure slope and cover system stability;
- Minimize the need for further maintenance of the CCR unit; and
Be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices.

**CCR Material Estimate**

The final closed configuration of AP-3/4 will contain approximately 4,900,000 cubic yards of CCR consolidated and closed in place.

### 3.2 Final Cover

The final cover system for AP-3 and AP-4 was designed in accordance with 40 CFR 257.102(d)(3)(ii) to minimize maintenance after closure of the CCR units. The final cover system was designed to prevent the future impoundment of water, and includes measures to prevent infiltration, sloughing, minimize erosion from wind and water, and settling. The largest area requiring a final cover is approximately 64 acres and covers both AP-3 and AP-4.

The engineered final cover system consists of the following minimum components, listed from top to bottom.

- Specified final cover infill as outlined in final closure plan design;
  - 1/2” minimum sand infill
  - 1/2” minimum sand infill with ArmorFill® application
  - 3/4” minimum HydroBinder® infill
- Engineered Synthetic Turf (ClosureTurf®); and
- 40 mil minimum low density polyethylene geomembrane liner.

The final cover system, consisting of engineered synthetic turf with run-on and run-off controls, meets the closure standards of §257.102(d)(3)(i).

### 4.0 SCHEDULE

Closure activities for AP-3 and AP-4 are outlined in the schedule presented in Table 1. Closure milestones and activities are approximate and some of the activities will overlap.

**Table 1: AP-3 and AP-4 Closure Milestones Schedule**

<table>
<thead>
<tr>
<th>Closure Activity</th>
<th>AP-3 &amp; AP-4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notice of Intent to Close</td>
<td>December 8, 2015</td>
</tr>
<tr>
<td>Begin Dewatering Activities</td>
<td>1Q 2016</td>
</tr>
<tr>
<td>End Final Closure Construction Activities</td>
<td>4Q 2018</td>
</tr>
<tr>
<td>Georgia Environmental Protection Division CCR Permit Submittal</td>
<td>4Q 2018</td>
</tr>
</tbody>
</table>