

**PLANT McDONOUGH-ATKINSON
CCR SURFACE IMPOUNDMENTS
(CCR UNIT AP-1)
COBB COUNTY, GEORGIA
PART A SECTION 8 – POST CLOSURE CARE PLAN**

FOR



**Georgia
Power**

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1.0 INTRODUCTION

This Post-Closure Care Plan for Georgia Power's Plant McDonough CCR Unit AP-1 was prepared in accordance with the State of Georgia Solid Waste Management Rule 391-3-4-.10(9)(c)(5)(v) as well as 40 CFR Part §257, Subpart D and meets the requirements of 40 CFR §257.104.

CCR Unit AP-1 has been consolidated and closed in place in accordance with §257.102(c) and §257.102(d), and no longer receives CCR. This plan will be used to guide the post-closure care for the closed Unit AP-1.

2.0 POST CLOSURE PLAN

2.1 Facility Contact Information

During the post-closure care period, the following person(s) or office can be contacted about the facility:

Georgia Power Company

General Manager, Environmental Affairs
241 Ralph McGill Boulevard
Atlanta, GA 30308
404-506-6505

2.2 Post Closure Property Care

The owner/operator shall complete post closure care for the CCR unit which shall consist of at least:

- 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
- Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of 40 CFR §257.90 through 40 CFR §257.98.

2.3 Monitoring and Maintenance Activities

Throughout the post-closure care period, the site shall be inspected to maintain the structural integrity of the cover system. Inspections will be completed to ensure that all CCR remain properly covered by the final cover system and stormwater control systems are maintained in proper working condition.

Any areas identified during inspections that require repair work shall be noted and scheduled for repairs as quickly as practical. Any repair work on the final cover system shall meet or exceed the design requirements. Final cover inspection and repair protocols will be performed following the manufacturer's guidance for ClosureTurf™ provided by Watershed Geosynthetics, and will be routinely reviewed and updated per current best management practices.

2.3.1 Cover System Inspections

The AP-1 cover and stormwater control systems will be periodically inspected to monitor the function and integrity of the systems. Inspections will be completed annually as listed in Table 1. During each quarterly and annual inspection, the appropriate inspection checklists should be completed, and any areas in need of repair should be noted on the appropriate checklist and logged in a repair log and maintained in the facility operating record.

Table 1: Routine Inspections for AP-1

Frequency	Description
Annually	<ul style="list-style-type: none"> ■ Detailed walking inspection of all areas of the Unit, including: <ul style="list-style-type: none"> ■ Cover systems - turf seams, anchor trenches, infill and armoring conditions, and vegetation where applicable. ■ Stormwater systems - outfalls, berms, channels, and culverts ■ Slopes, berms, and roads. ■ Monitoring wells and instrumentation. ■ Site security and maintenance ■ Other structures or areas within the site boundary that may impact the integrity of the closed unit.

2.3.2 Groundwater Monitoring System

The groundwater monitoring system required by 391-3-4-.10(6) will be maintained throughout the required post-closure care period. Groundwater monitoring, as required by §257.90 through 257.98 as well as State of Georgia Solid Waste Management Rule 391-3-4-.10(6), will be performed on a semiannual basis during the required post-closure care period. The Groundwater Monitoring Plan for Unit AP-1 is presented in Section 6 in Part A of this permit application.

2.3.3 AP-1 Maintenance

Following closure, maintenance and repairs will be provided on the final cover system for the required post-closure care period so that the integrity and effectiveness of the final cover system will be maintained.

Maintenance activities will include, but not be limited to:

- Any needed repairs to the final cover system to correct damages related to settlement, subsidence, erosion, or other events, and will be performed to prevent run-off from eroding or otherwise damaging the final cover.
- Repair of erosion features
- Repairs to any observed synthetic cover system components damage
- Re-establishment of vegetation (where applicable)
- Repairs to accessible portions of pipe outfalls and underdrain collection systems
- Housekeeping and general upkeep of the closed Units

Regular maintenance will be performed on a semi-annual schedule, with more frequent maintenance performed if and as needed following the inspections performed by qualified personnel.

2.4 Planned Use of Property

AP-1 is being evaluated for future potential developments following the complete closure of the unit. At present, future development plans include the potential installation of a solar panel farm over the gently sloped top deck and slopes of the unit.

The potential installation of the solar panel farm may include, but is not limited to, the following components and activities:

- Solar panel infrastructure installation
- Installation of transmission lines for conveyance of solar energy
- Access to solar panel farm areas via designed access roads and on ClosureTurf™

Portions of the closed unit are proposed to be used for temporary storage or staging of maintenance or replacement materials for the Unit such as additional infill, turf, liner, rock and other materials.

It is noted that the permit boundary of AP-1 includes an active natural gas pipeline and gas conditioning yard, active plant transmission, and other power plant infrastructure that will be maintained and may require repairs and replacement of materials including installation of temporary and permanent support infrastructure. Additionally, a beneficial use storage tank and loading/unloading facility is located to the northeast of AP-1.

Any future use of the property after closure will not disturb the integrity of the final cover or any other component of the containment system. Furthermore, the functionality of the groundwater monitoring system will be maintained.

2.5 Post Closure Operations

Plant operations and maintenance will occur within the permit boundary but outside the limits of the CCR consolidation area (e.g. outside the waste boundary and final cover system). Activities not directly affecting the CCR consolidation or final cover system, such as those needed to construct, maintain, replace or repair systems for electric power generation or its delivery (such as subsurface piping, electrical appurtenances, transmission structures, etc.) may be conducted at Georgia Power's discretion.

Operation and maintenance of transmission and/or distribution structures within the limits of the CCR consolidation area as engineered and permitted not directly affecting the CCR consolidation or final cover system, may also be conducted at Georgia Power's discretion.

However, should utility operations be required such that the final cover system is required to be disturbed, a report documenting any disturbance and repairs of the final cover system will be placed in the facility operating record. The repair documentation will include as-builts, CQA information and certification from a professional engineer licensed to practice in Georgia.

Activities related to ongoing operations at AP-1 and within the AP-1 permit boundary may include, but are not limited to those listed below.

Piezometers, Dewatering Wells, and Instrumentation

Temporary Instrumentation for Unit AP-1 may consist of piezometers for water level documentation and inclinometers and settlement monuments to monitor for potential movement of the closure, as well as temporary dewatering wells used to accelerate long term unit dewatering. Any installed site instrumentation will be routinely inspected and maintenance performed as needed per the facility's instrumentation guidance.

Solar Development

Section 2.4 indicates potential future development for an on-site solar farm. The solar farm is currently in the development phase and the limits and extents of potential solar panels across the site CCR Units is not yet defined. If solar development proceeds it will include construction of solar panel and other electric infrastructure

to tie in to the existing transmission service at Plant McDonough. If the solar farm design has the potential to modify stormwater management, closure system armoring, or other features of the closed Units, these design changes will be developed and submitted to Georgia Environmental Protection Division (GA EPD) at the time of detailed design for construction.

3.0 POST-CLOSURE CARE PERIOD

In accordance with 40 CFR §257.104(c), Georgia Power will conduct post-closure care for 30 years for AP-1. If at the end of the 30-year post-closure care period groundwater at AP-1 is being monitored under the assessment monitoring program in accordance with 40 CFR §257.95, Georgia Power must continue to conduct post-closure care until AP-1 returns to detection monitoring in accordance with 40 CFR §257.95.

3.1 Recordkeeping

Georgia Power shall comply with all recordkeeping requirements of 391-3-4-.10(7)(g) and 391-3-4-.10(8) as well as 40 CFR §257.105(i), closure and post-closure care notification requirements specified in 40 CFR §257.106(i) and closure and post-closure care internet requirements in 40 CFR §257.107(i). In accordance with 391-3-4-.10(8)(a)(1), electronic mail sent to a designated EPD recipient is an authorized form of notification when approved by EPD.

No later than 60 days following completion of the post-closure care period of 30 years and provided the provisions of §257.104(c)(2) don't apply, Georgia Power Company will prepare a notification verifying completion of the post-closure care as described in §257.104(e). Release from post closure care must be approved by EPD.

Documentation for Plant McDonough AP-1 operating record is located electronically at the website titled "Plant McDonough CCR Rule Compliance Information" located at the Georgia Power Company website under Environmental Compliance.

4.0 FINANCIAL ASSURANCE

In compliance with applicable securities laws and regulations, Georgia Power will provide specific cost estimates for remaining closure activities and post-closure care during the permit application review process as estimates are developed and finalized. It is anticipated these estimates will be available to 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 EPD.