

POST-CLOSURE PLAN

PLANT SCHERER - ASH POND AP-1
MONROE COUNTY, GEORGIA

FOR



Georgia
Power

November 2018



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ACRONYMS AND ABBEVIATIONS

AP-1	Plant Scherer Ash Pond 1
ASTM	American Society for Testing and Materials
CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
EPA	Environmental Protection Agency
GAEPD	Georgia Environmental Protection Division
Georgia Power	Georgia Power Company
PCP	Post-Closure Plan

Note : Acronyms and abbreviations not included in the table are defined in the text the first time used.

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1. PURPOSE

The purpose of this Post Closure Plan (PCP) is to outline the requirements for post closure care of the closed Plant Scherer Ash Pond 1 (AP-1), which is the responsibility of the Georgia Power Company (Georgia Power). The plan has been prepared in accordance with the Georgia Environmental Protection Division (GAEPD) Coal Combustion Residual (CCR) Rule (391-3-4-.10) and the US Environmental Protection Agency (USEPA) Coal Combustion Residuals (CCR) Rule (40 CFR 257.104).

This Post-Closure Plan may be amended by Georgia Power at any time. As required by 391-3-4-.10(7)(g) and 40 CFR §257.104(d)(3)(ii), this plan must be amended whenever: (i) there is a change in the operation of the CCR unit that would substantially affect the written post-closure plan; or (ii) after post-closure activities have commenced, unanticipated events necessitate a revision of the written post-closure plan. The timeframes for amendment to the written closure plan will be in accordance with those specified in 40 CFR §257.104(d)(3)(iii).

2. GENERAL

Following completion of closure (e.g. deemed complete by Georgia Environmental Protection Division), the Site will begin the post-closure period (PCP) and implement the requirements of this Post-Closure Plan.

In accordance with 391-3-4-.10(7)(g) and 40 CFR §257.104(c)(1), the post-closure care period for the Site will be 30 years. As required by 391-3-4-.10(7) and 40 CFR §257.104(c)(2), if at the end of the PCP the owner or operator of the CCR unit is operating under assessment monitoring in accordance with 391-3-4-.10(6) and 40 CFR §257.95, the owner or operator must continue to conduct post-closure care until the unit returns to detection monitoring in accordance with 391-3-4-.10(6) and 40 CFR §257.95. Georgia Power will conduct the following activities during the PCP:

- i. Maintain 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, wildlife, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover.
- ii. Maintain the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of 391-3-4-.10(6) and 40 CFR 257.90 through 40 CFR 257.98.

3. POST-CLOSURE USE OF PROPERTY

Georgia Power has no current plans for future use of the closed AP-1 area at this time. The primary land use for AP-1 after closure will be open dormant green space. Additionally, the closure-by-removal area will be graded to promote drainage and/or use for stormwater management. Post-closure use of AP-1 will not affect the integrity of the final cover system, components of the containment system, or the function of the monitoring systems. Prior to any modifications to the future use, GAEPD approval is

required. Excavation and processing of CCRs may occur after the GAEPD approval and satisfaction of notification and demonstration requirements outlined in 391-3-4.10(7) and §257.104(d)(iii).

Plant operations and maintenance may occur within the permit boundary but outside the limits of the closed AP-1 area (e.g. outside the CCR boundary and final cover system). Activities not directly affecting the 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 the discretion of Georgia Power.

4. GROUNDWATER MONITORING

As required by the Georgia CCR Rule (391-3-4.10(6)) and Federal CCR Rule (§257.90(c)), groundwater monitoring will be conducted semiannually throughout the post-closure care period as described in the Groundwater Monitoring Plan. The groundwater monitoring wells will be maintained throughout this period. The groundwater monitoring locations are provided in the Groundwater Monitoring Plan and CCR Closure Permit Drawings.

5. INSPECTION PLAN

Throughout the post-closure care period, an inspection program will be implemented to examine the condition and function of the Final Cover System, drainage structures, and related infrastructure. A visually inspection of the entire closed AP-1 will be performed and a written record will be completed and maintained in the facility's Operating Record to document the condition of:

- a. Ditches, swales, riprap-lined conveyance channels, culverts/stormwater piping, sediment and erosion control structures and devices,
- b. Final Cover System surface vegetation density, type, and height, (where applicable),
- c. Perimeter embankments that support the closed AP-1 to be checked for animal burrows, erosion rills and scouring, and apparent structural defects,
- d. Crushed stone aggregate on the Final Cover System and perimeter of AP-1 (where applicable),
- e. Engineered Turf (where applicable), including sand ballast or other anchoring system,
- f. Letdowns or downdrains,
- g. Access roadways and ramps,
- h. Groundwater monitoring network.

The visual inspections will be conducted on an annual basis. If any deficiencies are identified during the inspections, an assessment and repair plan will be implemented as soon as practical.

6. SURFACE WATER MANAGEMENT SYSTEM

The surface water management system is composed of the drainage conveyances located on the Final Cover System, as well as the adjacent perimeter channels and features that route surface water away from the closure area to discharge points.

Inspection and maintenance will be performed in accordance with the recommendations contained in the Best Management Practice Operations & Maintenance Guidance Document, Appendix E of the Georgia Stormwater Manual, Volume 2, 2016 Edition. Inspection and maintenance practices will include: (i) removing built up sediment, debris, or trash; (ii) removing debris from the inflow and outflow structures; (iii) improving erosion and sediment control practices where the stabilization is missing or in poor condition; and (iv) inspecting the structural integrity and functionality of the surface water management system components.

During periods when vegetation may not be fully established (e.g. just after completion of closure, or just after performing PCP construction or maintenance activities), temporary erosion and sediment control best management practices (BMPs) will be installed in accordance with recommendations provided in the Georgia Soil and Water Conservation Commission's (GSWCC) Manual for Erosion and Sediment Control in Georgia. These temporary BMPs will be maintained until the disturbed areas are stabilized.

7. SITE ACCESS AND SECURITY CONTROL

AP-1 is located completely within the property boundary of Plant Scherer, and access is restricted to only authorized personnel. Access to the Site will be controlled by fencing, gates, and fulltime security personnel. Fences, gates, and locks will be checked during routine inspections and maintained/repared as necessary. Access roads will be maintained to provide appropriate access within the facility.

8. POST-CLOSURE SUPERVISION

The Georgia Power contact person for post-closure care of Plant Scherer is provided below:

General Manager
Environmental Affairs
Georgia Power Company
241 Ralph McGill Blvd.
Atlanta, GA 30308
(404) 506-6505
gpcenv@southernco.com

9. SITE EQUIPMENT

Georgia Power or its designated contractor will make adequate equipment available (either its own equipment or rental equipment) to ensure that post-closure care requirements are executed correctly and efficiently.

10. POST-CLOSURE CARE COST

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

11. NOTIFICATION OF MONITORING STANDARDS EXCEEDED

Georgia Power will be responsible for conducting all monitoring activities. If at any time the monitoring results indicate exceeding of established standards or indicate a threat to human health or the environment, Georgia Power will notify the GAEPD and comply with all requirements of Georgia Rule 391-3-4-.10(6).

12. NOTIFICATION AND CERTIFICATION

No later than 60 days following the completion of the PCP, Georgia Power will prepare a notification verifying that post-closure care has been completed. The notification will include a certification by a qualified Professional Engineer registered in the State of Georgia verifying that post-closure has been completed in accordance with this plan. Georgia Power will complete the post-closure process by: (i) placing a notification in the facility's Operating Record as required by §257.105(i)(13) and (ii) providing the notification to the Director of GAEPD. The release of the closed CCR unit from continuing post-closure care requirements will be provided by the GAEPD based on the adequacy of the notification.

13. RECORD KEEPING / NOTIFICATION / INTERNET REQUIREMENTS

Georgia Power will comply with all recordkeeping requirements of 391-3-4-.10(8) and 40 CFR 257.105(i), closure notification requirements specified in 391-3-4-.10(8) and 40 CFR 257.106(i) and closure internet posting requirements in 391-3-4-.10(8) and 40 CFR 257.107(i)