

POST-CLOSURE PLAN

PLANT SCHERER COAL COMBUSTION RESIDUALS (CCR) LANDFILL

MONROE COUNTY, GEORGIA

FOR



Georgia Power

JANUARY 2023



HHNT

HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.

Consulting Engineers



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Approved
Solid Waste Management Program

Approved By: Keith Stevens Digitally signed by Keith Stevens
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1. GENERAL

The Plant Scherer CCR Landfill post-closure plan is prepared to meet the requirements of Rule 391-3-4-.10(7), which requires the owner or operator of an existing CCR Landfill that is closed in place to provide for post-closure care of the existing landfill for a period of at least 30 years. Post-closure care includes maintaining the integrity of the final cover system, the liner and leachate collection system, as well as continuing groundwater monitoring in accordance with Rule 391-3-4-.10(6).

Georgia Power prepared, placed in the facility's operating record and uploaded the initial written post-closure plan for the Plant Scherer CCR Landfill to the Georgia Power website under Environmental Compliance prior to October 17, 2016, as required by 40 CFR §257.104(d)(2). This new post-closure plan is being prepared as required by Georgia Solid Waste Rule 391-3-4-.10(7)(g) and will replace the initial written post-closure plan, once it is approved by the Georgia Environmental Protection Division (EPD).

Georgia Power will amend the initial and subsequent approved written post-closure plans whenever:

- A change in the operation of the landfill occurs (prior to closure) that substantially affects the written post-closure plan in effect; or
- If after post-closure activities have commenced, unanticipated events necessitate a revision of the written post-closure plan.

Georgia Power will amend the initial and subsequent approved written post-closure plan at least 60 days prior to a planned change in the operation of the CCR Landfill affecting post-closure care, or no later than 60 days after an unanticipated event requires the need to revise the existing written post-closure plan. If the written post-closure plan is revised after post-closure care activities have commenced, Georgia Power will amend the written post-closure plan no later than 30 days following an unanticipated event that necessitates a revision of the written post-closure plan.

All amendments to the approved post-closure plan will include a certification from a professional engineer licensed to practice in the State of Georgia, that the amended post-closure plan meets the requirements of Rule 391-3-4-.10(7).

The release from the post-closure requirements in this plan must be approved by the Director of the Georgia Environmental Protection Division (EPD).

2. POST-CLOSURE USE OF THE PROPERTY

Post closure care for the Plant Scherer CCR Landfill will consist of the following, at a minimum:

1. Maintaining the integrity and effectiveness of the final cover system, including making repairs to the final cover system 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 system;

2. Maintaining the integrity and effectiveness of the leachate collection and removal system; and
3. Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of Rule 391-3-4-.10(6).

There is no planned use of this property during the post-closure care period at this time. Prior to any future use, EPD approval is required.

3. GROUNDWATER MONITORING

Georgia Power Company will monitor groundwater semi-annually pursuant to the requirements defined in the Groundwater Monitoring Plan included in the permit. Georgia Power Company proposes to monitor groundwater for a period of at least thirty (30) years following closure of the landfill to confirm that groundwater constituent concentrations are not detected at statistically significant levels above the groundwater protection standards established in State CCR Rule 391-3-4-.10(6)(b), which references 40 CFR 257.104. If at the end of the 30-year post-closure care period the facility is operating under assessment monitoring in accordance with Georgia Rule 391-3-4-.10(6) and 40 CFR 257.95, the owner or operator must continue to conduct post-closure care until the facility returns to detection monitoring. Following the post-closure care period, a qualified groundwater scientist will certify that the site is in Detection Monitoring prior to release from post-closure care. The certification statement will be submitted to EPD for review and concurrence and will include the following language: "I am a qualified groundwater scientist and I hereby certify that the groundwater monitoring program at the CCR landfill is operating under detection monitoring in accordance with 40 CFR 257.94 and Georgia Rules for Solid Waste rule 391-3-4-.10 and monitoring requirements for post-closure care have been met".

4. LEACHATE COLLECTION AND TREATMENT

The leachate collection system will be maintained for a minimum of 30 years or until leachate is no longer produced. Leachate, collected during the post-closure care period, will be properly treated in a wastewater treatment plant or circulated back to the plant as scrubber make-up water.

5. ROUTINE INSPECTION OF VEGETATIVE / FINAL COVER / DRAINAGE SYSTEM

Throughout the post-closure care period, Georgia Power will inspect the disposal facility on a quarterly basis to ensure that all CCR disposed in the facility remains properly covered with the approved final cover system for the facility. Any repair work on the soil cover or synthetic cap liner will meet or exceed the original construction requirements. Any areas noted to have less than the required cover from the effects of erosion, vehicular traffic, etc., will be immediately repaired. All areas lacking proper vegetation will be grassed and maintained according to the vegetation and fertilization plans in the approved Closure Plan. DOWNDRAIN SYSTEMS will be maintained in proper working condition in accordance with the permit. The contact person for post-closure care of the facility is provided below:

Facility Contact: Director
Environmental Affairs
241 Ralph McGill Blvd NE
Atlanta, Georgia
Telephone Number: (404) 506-6505

6. SEDIMENT POND MAINTENANCE / CLEAN-OUT

Throughout the post-closure care period, all ditches, diversion berms, culverts, rip-rap, and other drainage structures will be maintained according to the Operations Plan. Sediment ponds will be cleaned upon the accumulation of the designed depth of sediment within the pond. Erosion control structures will be maintained to prevent damage to the final cover system.

7. LIMITED ACCESS

Access to the disposal facility will be controlled by fencing, gates, buffers, etc.

8. POST-CLOSURE SUPERVISION

Post-closure care of the site will be under the supervision of the Plant Manager. Contact information for this person will be provided to EPD at time of closure.

9. SITE EQUIPMENT

Georgia Power will make adequate equipment available to ensure that post-closure care requirements are executed correctly and efficiently. Rental equipment will be utilized in the event that equipment dedicated to the CCR landfill should break down during post-closure care procedures.

10. REMOVAL OF CCR

If Georgia Power wishes to remove CCR, Georgia Power will request and receive written approval from EPD, prior to conducting any such activity.

11. POST-CLOSURE CARE COST AND FINANCIAL ASSURANCE

The post-closure care cost estimate is provided in Table 1 below. In compliance with applicable securities laws and regulations, GPC will provide unredacted cost estimates for post-closure care to GA EPD under separate cover. The post-closure care cost includes all items necessary for a third-party to conduct post-closure care maintenance and monitoring in accordance with the Post-Closure Plan as set forth herein. The cost estimate is generated in current dollars and will be adjusted annually for inflation. GPC will provide a demonstration of financial assurance upon approval of closure and post-closure care cost estimates by GA EPD.

Table 1 - Scherer Landfill Cells 1,2,3 & PAC Ash Post-Closure Cost Estimate

| Item Description | Quantity | Unit | Unit Cost | Cost |
|---|----------|------|---|------|
| Post Closure Cost | | | | |
| Maintenance - Grass/Turf ¹ | | | | |
| Dike, Road, and Maintenance | | | | |
| Water Treatment | | | | |
| Environmental Monitoring | | | | |
| Groundwater Monitoring & Reporting ² | | | | |
| Sampling | | | | |
| Reporting | | | | |
| Laboratory Analysis | | | | |
| Groundwater Well Maintenance and Abandonment | | | | |
| Well Maintenance & Replacement ³ | | | | |
| Well Abandonment ⁴ | | | | |
| | | | | |
| | | | Subtotal | |
| | | | Contingency | |
| | | | 30 Year Post Closure Cost Estimate | |
| Total Financial Assurance Required (Closure Cost + 30 Year Post Closure Care Cost) | | | | |

Notes:

1. Maintenance - Grass includes cost for mowing the site five times per year.
2. Assumes 50 wells + 12 QA/QC samples = 62 samples collected 2 times/year for 30 years. Includes cost for additional analyses for semiannual well inspections, Alternate Source Demonstrations, resamples, and rush analysis. Assumes semi-annual reporting for 30 years.
3. Assumes 5% of miscellaneous costs in post-closure care are associated with well maintenance and replacement. Assumes, no additional wells will be installed during post-closure care.
4. Well abandonment includes 50 wells completed above grade.

12. NOTIFICATION

No later than 60 days following the completion of the post-closure care period, Georgia Power must prepare a notification verifying that post-closure care has been completed. The notification must include a certification by a qualified professional engineer verifying that post-closure care has been completed in accordance with this plan. Georgia Power has completed the notification when it has been placed in the facility’s operating record as required by Rule 391-3-4-.10(7) and provided to EPD. The release of the CCR landfill from post-closure care must be approved by EPD. These notifications will be posted to the Georgia Power website under Environmental Compliance.

13. RECORDKEEPING/NOTIFICATION/INTERNET REQUIREMENTS

The requirements set forth in this Post Closure Plan comply with the recordkeeping requirements of Rule 391-3-4-.10(8), closure and post-closure notification requirements specified in Rule 391-3-4-.10(8) and internet requirements in Rule 391-3-4-.10(8). A summary of the specific recordkeeping, notification and internet posting requirements for post-closure care are listed below:

Recordkeeping Requirements

Georgia Power will maintain these documents in the facility's operating record as soon as the required document/information is available or applicable and approved by EPD:

- (a) The written post-closure plan, and any amendment made to the initial plan, will be kept in the Plant Scherer CCR Landfill facility's operating record. Georgia Power may elect to maintain only the most recent post-closure plan approved by EPD in the facility's operating record.
- (b) The notification of completion of post-closure care period as required by Rule 391-3-4-.10(8) will be added to the Plant Scherer CCR Landfill facility's operating record.

Notification Requirements

The requirements for notification consist of informing EPD when information has been placed in the facility's operating record and on Georgia Power website under Environmental Compliance. EPD reviews and approves the post-closure plan and is also the regulatory agency responsible for releasing the Plant Scherer CCR Landfill from post-closure care: therefore, the requirements specified in Rule 391-3-4-.10(8) are met during the State's CCR landfill permitting process.

Publicly accessible Internet Site Requirements

Georgia Power will post the information required by Rule 391-3-4-.10(8) for the Plant Scherer CCR Landfill within 30 days of review and approval by EPD. The information required to be posted on the Georgia Power website under Environmental Compliance will remain available at least five (5) years following the date on which Georgia Power first posts the information.

The following information related to post-closure will be posted on the Georgia Power website under Environmental Compliance:

- (a) The most recent post-closure plan, and any amendment made to the initial plan,
- (b) The notification of completion of post-closure care period.

14. CERTIFICATION

This post-closure plan meets the requirements of Rule 391-3-4-.10(7).