

POST-CLOSURE PLAN

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

FOR



Georgia
Power

Submitted – SEPTEMBER 2024



AECOM

TABLE OF CONTENTS

1.	Purpose	1
2.	General	1
3.	Post-Closure Use of Property.....	1
4.	Groundwater Monitoring.....	2
5.	Inspection Plan	2
6.	Surface water management system	3
7.	Site Access and Security Control.....	4
8.	Post-Closure Supervision	4
9.	Site Equipment.....	4
10.	Post-Closure Care Cost.....	4
11.	Notification of Monitoring Standards Exceeded.....	4
12.	Notification and Certification	5
13.	Recordkeeping / Notification / Internet Requirements	5

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
EPD	Georgia Environmental Protection Division
GPC	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.

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 (GPC). The plan has been prepared in accordance with the Georgia Environmental Protection Division (EPD) 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 PCP may be amended by GPC 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 via minor modification 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 post-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. GPC 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 and cover ballast infill dispersion, 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.

As required by Rule 391-3-4-.10(7)(g)3, the release of the CCR unit from post-closure care must be approved by the Division.

3. POST-CLOSURE USE OF PROPERTY

GPC 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 CCR 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, EPD approval is required. Excavation and processing of CCRs may occur after the EPD 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 GPC.

4. GROUNDWATER MONITORING

GPC will monitor groundwater semi-annually pursuant to the requirements defined in the Groundwater Monitoring Plan included in the permit. GPC proposes to monitor groundwater for a period of at least thirty (30) years following closure of the CCR unit 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 the requirements under this post-closure care plan. The post-closure care period will continue until a qualified groundwater scientist certifies that the site is in Detection Monitoring. 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 unit is operating under detection monitoring in accordance with 257.94 and Georgia Rules for Solid Waste section 391-3-4-.10 and monitoring requirements for post-closure care have been met. Upon EPD concurrence, the post-closure care period and the requirements under this plan will end.

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 visual inspection of the entire closed AP-1, including the knob area, 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. Surface vegetation density, type, and height, in the CCR removal areas (where applicable) and any Closure-in-Place areas that utilize the soil-geosynthetic final cover system

- alternative. Vegetative cover will consist of permanent grass species, application rates, and follow seasonal planting schedules outlined in the Georgia Soil and Water Conservation Commission (GSWCC) Manual for Erosion and Sediment Control in Georgia (Green Book).
- 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.

For the first five years, the visual inspections will be conducted on a quarterly and annual basis with the fourth quarter inspection also serving as the annual inspection. After the initial five years, inspections will be conducted on an annual basis (1 inspection per year) for the remainder of the post-closure care period. The already low potential for issues with the final cover system is substantially further reduced after five years, once tertiary consolidation of the closed CCR has occurred. 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/repaired as necessary. Access roads will be maintained to provide appropriate access within the facility.

8. POST-CLOSURE SUPERVISION

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

Manager
Environmental Affairs
Georgia Power Company
241 Ralph McGill Blvd.
Atlanta, GA 30308
(404) 506-6505
gpcenv2@southernco.com

9. SITE EQUIPMENT

GPC 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, GPC will provide cost estimate for post closure care to EPD under separate cover. The post-closure costs include all items necessary for a third-party to perform post-closure care in accordance with the post-closure plan as set forth herein. The post-closure cost estimates will be generated in current dollars. The cost estimate will be adjusted annually for inflation. GPC will provide a demonstration of financial assurance upon approval of the closure and post-closure care cost estimates by EPD.

11. NOTIFICATION OF MONITORING STANDARDS EXCEEDED

GPC 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, GPC will notify the EPD 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 PCC, GPC 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. GPC 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 EPD. The release of the closed CCR unit from continuing post-closure care requirements will be provided by the EPD based on the adequacy of the notification.

13. RECORDKEEPING / NOTIFICATION / INTERNET REQUIREMENTS

GPC 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).