

6. CLOSURE NARRATIVE

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A Notification of Intent to Initiate Closure of AP-1 was completed on December 7, 2015, as required by 40 CFR 257.100, and posted to the facility's operating record and to Georgia Power's website under Environmental Compliance. AP-1 was an inactive CCR surface impoundment as defined in 40 CFR 257.53 in that it no longer received CCR on or after October 19, 2015 and still contained both CCR and liquids on or after October 19, 2015.

AP-1 encompassed a total closure area of 23.44 acres. The AP-1 closure-by-removal activities consisted of excavation and removal of all visible CCR until native soils were encountered (CCR/soil interface) indicating that the CCR has been removed. Following removal of all visible CCR, the area was inspected, documented by CQA personnel, and surveyed. In addition, a minimum 6-inch layer of underlying soil was removed below the verified CCR/soil interface. The bottom of excavation surface was then surveyed to confirm a minimum of 6" excavation below the CCR/soil interface.

A total of approximately 650,000 cubic yards of CCR was removed from AP-1. Approximately 40,000 cubic yards of CCR removed from AP-1 was used to establish the final grade elevations for the closure of the onsite R6 CCR Landfill. The remaining CCR was used to establish final grades for a portion of the AMA.

CCR removal activities at AP-1 have been completed and site restoration activities are currently underway. Earthen fill material will be imported from on or off-site as needed and will be placed within the excavation to promote positive drainage and minimize erosion. The final restoration area will be seeded and maintained (fertilized) to meet the requirements in the Manual for Erosion and Sediment Control in Georgia. Areas will be stabilized within two weeks after reaching final grades. Areas where permanent vegetation is slow to establish will receive temporary seeding.

A closure construction report documenting the completion of the CCR removal activities will be prepared by a professional engineer registered in Georgia and submitted to GA EPD under separate cover. Since CCR removal activities have been completed, Georgia Power proposes to conduct post-CCR removal groundwater monitoring for five (5) years to verify the completion of closure-by-removal by demonstrating that the groundwater concentrations do not exceed the groundwater protection standard. Pursuant to State CCR Rule 391-3-4-.10(6), once groundwater monitoring concentrations for constituents listed in Appendix IV (40 CFR 257.95(h)) at the site have been demonstrated not to exceed the applicable groundwater protection standards, Georgia Power will submit a closure report to the EPD Director. The closure report will be completed on forms provided by GA EPD.

Georgia Power has no current plans for future use of the property within the AP-1 permit boundary. Georgia Power, as required by EPD, will submit confirmation that a notation on the property deed, inclusive of the AP-1 permit boundary, has been recorded in accordance with State CCR Rule 391-3-4-.10(7)(f).

AP-1 is not subject to the post closure care requirements because it was closed by removal of all CCR. In compliance with applicable securities laws and regulations, Georgia Power will provide specific cost estimates for post-CCR removal monitoring 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 post-CCR removal monitoring estimates by EPD.

It is understood that through the review process by the EPD and based on any comments or questions by the EPD, this application may be revised. These revisions could be reason for the financial assurance estimates in this application to change.