

CLOSURE PLAN (rev. 1)

ASH MANAGEMENT AREA (AMA) PLANT YATES COWETA COUNTY, GEORGIA

FOR



Georgia Power

JULY 2021



ACC

ATLANTIC COAST
CONSULTING, INC.

Atlantic Coast Consulting, Inc.
1150 Northmeadow Parkway, Suite 100, Roswell, GA.,
p. 770-594-5998

TABLE OF CONTENTS

| | |
|--|----|
| TABLE OF CONTENTS | 2 |
| 1. GENERAL..... | 3 |
| 2. NOTIFICATION..... | 3 |
| 3. AMENDMENTS OF THE CLOSURE PLAN..... | 3 |
| 4. BOUNDARY AND LEGAL DESCRIPTION..... | 4 |
| 5. CLOSURE PROCEDURES | 4 |
| 5.1 CLOSURE OVERVIEW | 4 |
| 5.2 FUGITIVE DUST CONTROL PLAN | 5 |
| 5.3 ORGANICS MANAGEMENT | 6 |
| 5.4 POND DEWATERING AND WASTE WATER TREATMENT SYSTEM | 6 |
| 5.5 STORMWATER AND CONTACT WATER MANAGEMENT | 6 |
| 5.6 CCR EXCAVATION AND REMOVAL CRITERIA | 7 |
| 6. FINAL COVER SYSTEM | 7 |
| 7. ESTIMATE OF CCR QUANTITY | 8 |
| 8. VEGETATION PLAN | 9 |
| 9. EROSION AND SEDIMENTATION CONTROL..... | 10 |
| 10. FUTURE HYDRAULIC CONVEYANCE SYSTEM | 10 |
| 11. ON-GOING PLANT OPERATIONS AND MAINTENANCE..... | 11 |
| 12. COST OF CLOSURE AND FINANCIAL ASSURANCE..... | 11 |
| 13. CLOSURE SCHEDULE | 11 |
| 14. INSPECTIONS..... | 12 |
| 15. RECORDKEEPING/NOTIFICATION/INTERNET REQUIREMENTS | 13 |
| 16. CERTIFICATION OF CLOSURE | 13 |
| 17. LEGAL DESCRIPTION | 13 |

1. GENERAL

Plant Yates, owned by Georgia Power Company (Georgia Power), is located at 708 Dyer Road, on approximately 2,400 acres on the east bank of the Chattahoochee River in Coweta County, Georgia. Plant Yates originally operated seven coal-fired steam generating units. Five of the units were retired in 2015 and the remaining two units were converted from coal to natural gas. Plant Yates currently operates as a natural gas electric generation plant.

This Closure Plan is included as part of the permit application package being submitted to the Georgia Environmental Protection Division (GA EPD) for the Ash Management Area (AMA) that encompasses AP-A and AP-B which will be closed by removal, and AP-B' and AP-3 which will be closed in place. This Closure Plan has been prepared for Georgia Power pursuant to the Federal CCR Rule in Title 40 of the Code of Federal Regulations (CFR) §257 (40 CFR §257) and the State CCR Rule in Chapter 391-3-4-.10 of the Georgia Rules for Solid Waste Management, Coal Combustion Residuals.

CCR from AP-A, AP-B, AP-B' and AP-3 has been or will be placed within the AMA. Additionally, CCR from AP-1 and AP-2, which are being permitted as separate CCR Units, will also be placed within the AMA. Georgia Power will close the AMA in a manner that minimizes the need for further maintenance. The written closure plan presented subsequently in this document and the closure drawings provide guidance on the sequence of closure. These documents are supported by engineering analyses and calculations contained in the Engineering Report in Section 2 of Part B of the permit application.

2. NOTIFICATION

Georgia Power filed a Notification of Intent to Initiate Closure for the Plant Yates CCR surface impoundments covered by this AMA permit application. These notifications were certified by James C. Pegues, P.E., D.GE. a Georgia Licensed Professional Engineer, as follows:

- AP-B, AP-B', AP-3, dated April 20, 2018; and
- AP-A, dated December 7, 2015

Georgia Power will substantially complete the closure activities of the Plant Yates surface impoundments in accordance with this Closure Plan.

3. AMENDMENTS OF THE CLOSURE PLAN

Georgia Power must amend the written Closure Plan whenever:

- There is a change in the operation of the CCR unit that would substantially affect the written closure plan in effect; or
- Before or after closure activities have commenced, unanticipated events necessitate a revision of the written closure plan.

Georgia Power must amend the closure plan at least 60 days prior to a planned change in the closure operation of the facility or CCR unit, or no later than 60 days after an unanticipated event requires the need to revise an existing written closure plan. If a written closure plan is revised after closure activities

have commenced for a CCR unit, Georgia Power must amend the current closure plan no later than 30 days following the triggering event.

Georgia Power will obtain a written certification from a qualified professional engineer that the amendment of the written closure plan meets the requirements of the GA EPD Rules.

4. BOUNDARY AND LEGAL DESCRIPTION

The permit boundary is defined on the Closure Drawings for AMA. A survey drawing of the permit boundary and a legal description, prepared by a Registered Professional Surveyor, is included on Sheet 3 in the Closure Drawings of this permit package. Additionally, the legal description is provided in Section 17 of this Closure Plan.

5. CLOSURE PROCEDURES

5.1 CLOSURE OVERVIEW

The Closure of the AP-A and AP-B has been accomplished. A general description of the closure activities are listed below:

- Site preparation, including but not limited to, removal of vegetation, access roadway construction, and installation of erosion and sediment controls;
- Removal and relocation of two transmission structures (STRA-1A & STRA-356), installation of seven fiber optic structures (#1 - #7), and installation of a new structure (STRA-356A);
- Removal of all CCR and an additional 6-inches minimum of over-excavation
- Dewatering and stabilization of CCR, as necessary, using dewatering wells, vacuum well points, trench drains, windrowing, or combination of measures as necessary within the consolidated area of AP-B' and AP-3;
- Installation of an underdrain system;
- Topsoil and permanent seeding applied to all disturbed areas; and
- Site re-vegetation and restoration on all disturbed areas.

The Closure of the AMA will be accomplished in multiple phases. A general description of the anticipated phases are listed below:

- Site preparation, including but not limited to, removal of vegetation, access roadway construction, and installation of erosion and sediment controls;
- Removal of CCR contact water within AP-3;
- Consolidation of CCR from AP-3 to create two detention ponds, east cove and west cove;
- Dewatering and stabilization of CCR, as necessary, using dewatering wells, vacuum well points, trench drains, windrowing, or combination of measures as necessary within the consolidated area of AP-B' and AP-3;
- CCR shall be placed in lifts, compacted and placed in the AMA waste footprint.
- Installation of non-contact storm water ditch around the AMA area;
- Incidental CCR in areas outside R6 and the AMA area shall be removed and the areas backfilled with earthen fill soil to drain;

- Final grading and contouring to prepare the subgrade for installation of the ClosurTurf® cover system on the consolidated CCR footprint;
- Topsoil and permanent seeding shall be applied to areas that are closed by removal as necessary; and
- Conduct site re-vegetation and restoration on areas not covered with ClosurTurf®.

5.2 FUGITIVE DUST CONTROL PLAN

This fugitive dust control plan identifies and describes the CCR fugitive dust control measures that Georgia Power uses to minimize CCR from becoming airborne during closure activities, including CCR fugitive dust originating from the ash pond, roads inside the pond, and material handling activities. GA EPD State CCR Rule 391-3-4-.10(2)(a) (incorporating 40 CFR § 257.53 by reference) defines “CCR fugitive dust” as “solid airborne particulate matter that contains or is derived from CCR, emitted from any source other than through a stack, or chimney.”

This plan identifies and describes the CCR fugitive dust control measures that Georgia Power will use during closure construction to minimize airborne CCR due to construction and related activities associated with closure of all CCR units within the AMA. The CCR fugitive dust control measures that will be used are presented below.

- Fugitive dust originating from the closure activities will be controlled using water suppression or polymer tackifiers.
- CCR that is transported via truck for placement within the consolidated AMA CCR footprint will be conditioned to a moisture content appropriate to reduce the potential for fugitive dust.
- Water suppression or polymer tackifiers will be used as needed to control fugitive dust on facility roads used to transport CCR and other CCR management areas.
- Speed limits will be utilized to reduce the potential for fugitive dust.
- Trucks used to transport CCR will be filled to or under capacity to reduce the potential for material spillage.

The fugitive dust control measures described above were selected based upon an evaluation of site-specific conditions for the Plant Yates ash pond closures, including the physical properties of CCR, site conditions, weather conditions, and operating conditions.

Georgia Power and construction personnel will assess the effectiveness of the control measures by performing visual observations of the ash ponds and surrounding areas and implementing appropriate corrective actions for fugitive dust, as necessary. Logs will be used to record the utilization of water-spray equipment.

Any complaint received from a citizen regarding a CCR fugitive dust event at the facility will be documented and investigated. Appropriate steps will be taken, including any corrective action, if needed.

Annual Fugitive Dust Reports are posted on the Georgia Power website under Environmental Compliance.

5.3 ORGANICS MANAGEMENT

The ponds contain a variety of vegetation from trees and underbrush to non-woody plants. Woody vegetation will be cut above the ground surface and removed prior to removing CCR. Vegetation and wood waste will be managed in the following manner:

1. Trees and logs may be harvested stockpiled for mulching prior to off-site disposal, chipped for use on site as a best management practice (BMP) measure, or disposed of at an off-site landfill.
2. Large bushes may be stockpiled for mulching prior to off-site disposal, or disposed of at an off-site landfill.
3. Stumps and tree roots may be stockpiled for mulching prior to off-site disposal, chipped for use on site as a BMP measure, or disposed of at an off-site landfill.
4. Grass and brush may be stockpiled for mulching prior to off-site disposal, or disposed of at an off-site landfill.

Remaining wood waste from grubbing work within the CCR will be managed and kept separate from clean wood waste. Wood waste that contains CCR will be managed within the pond limits in the following manner:

1. Stumps and tree roots may be mechanically screened to remove CCR, stockpiled for mulching prior to off-site disposal, or disposed of at an off-site landfill.
2. Grass and bushes may be mechanically screened to remove CCR, stockpiled for mulching prior to off-site disposal, or disposed of at an off-site landfill.

5.4 POND DEWATERING AND WASTE WATER TREATMENT SYSTEM

Wastewater discharges from Plant Yates are currently regulated under NPDES Permit GA0001473. This permit governs discharges into the Chattahoochee River from outfall 01. A detailed Dewatering Plan (“Dewatering Plan”) was prepared and submitted to EPD’s Watershed Protection Branch for review. This plan described specific treatment processes, monitoring frequency, any planned chemical usage, and best management practices necessary to comply with the NPDES permit limits. The Ash Pond Dewatering Plan was approved by the Watershed Protection Branch of the Georgia EPD on September 27, 2018.

Dewatering will include removing water using a variety of methods, including but not limited to passive, gravity-based methods (e.g. rim ditches) and/or active dewatering methods (e.g. pumps and well points) as needed to allow for CCR excavation and transportation. CCR contact water and legacy wastewater from the ash ponds will be further treated by an on-site wastewater treatment system (WWTS). Water will be managed and discharged in accordance with the site’s approved NPDES permit limits.

5.5 STORMWATER AND CONTACT WATER MANAGEMENT

During closure construction, run-on stormwater and run-off contact water (e.g. stormwater that has come into contact with CCR) will be controlled with best management practices such as channels, diversion berms, and pumps and managed in accordance with the NPDES Permit GA0001473. Georgia Power will prepare a phased

erosion and sediment control plan that will be followed for closure construction activities, as needed.

Stormwater, or non-contact stormwater, will be managed in accordance with applicable stormwater and erosion and sediment control requirements and will be used on-site or conveyed through appropriate stormwater management features and erosion and sediment controls.

5.6 CCR EXCAVATION AND REMOVAL CRITERIA

Dewatered CCR in the closure by removal areas will be mechanically excavated and transported using haul trucks to the final consolidated AMA waste footprint area or sold for beneficial re-use.

In the context of this Closure Plan, “CCR removal” refers to the process of excavating, verifying and documenting that CCR has been removed from the ash ponds. The ash ponds are known to contain a mixture of fly ash and bottom ash collectively referred to as CCR. The CCR removal verification is based on removing visible CCR and a minimum of six additional inches of soil. The documentation of this procedure is presented in Section 2 of the companion Construction Quality Assurance (CQA) Plan.

6. FINAL COVER SYSTEM

CCR placed within the AMA waste footprint is dewatered, moisture conditioned (as necessary), spread, compacted, and capped with the final cover system described in this permit application. Final cover grades will range from 3 percent to 25 percent except for surface water drainage conveyance features on the final cover system (i.e., valleys and perimeter channels) which will have slopes generally ranging from 0.2 percent to 4.0 percent. Closing the AMA waste footprint area will consist of installing a final cover system over 88.5 acres of consolidated CCR. CCR units AP-A and AP-B will be closed by removal and therefore no final cover system will be placed over those units. However, upon verification that visible CCR has been removed, and removal of the 6-inch underlying soil layer, AP-A and AP-B will be seeded and mulched to promote a stable vegetation layer.

The final cover system for the AMA waste footprint will consist of a prepared subgrade overlain with ClosureTurf®. The ClosureTurf® final cover system will consist of a 50 mil LLDPE or HDPE MicroDrain® covered by an engineered synthetic turf and a specified infill material. The specified infill material will be sand infill on the top of the closure cap and sand infill treated with Armorfill® on the side slopes and ditches. A detail of the final cover system is provided on the Closure Drawings.

The final cover systems will provide the following benefits:

- The final cover system will control and essentially eliminate infiltration of liquids into the CCR, release of CCR into the environment, and flow of contact water from the CCR pond to surface waters. This is accomplished by using an essentially impermeable geomembrane as part of the final cover system. The geomembrane will isolate the CCR from the surrounding environment and essentially eliminate infiltration into the CCR relative to existing conditions. The final cover system will be installed over the entire consolidated AMA waste footprint, eliminating direct

exposure of CCR to the surrounding environment.

- As required by regulation, the final cover system will preclude the probability of future impoundment of water, sediment, or CCR slurry. This will be accomplished by designing a surface water control system that allows for positive drainage for surface water runoff from the cover system and limiting surface water run-on. Surface water conveyance structures will be lined to resist erosion during the design storm event and to minimize surface water infiltration.
- The final cover system design includes measures that provide for adequate levels of slope stability, to prevent the sloughing or movement of the final cover system during the closure and post-closure care periods. This will be accomplished with the installation of the ClosureTurf® final cover system. The sand infill with Armorfill® is engineered to protect against high stormwater velocity and shear stress to insure no sloughing or movement during the life of the final cover system. The ClosureTurf® specification and technical data are provided in the Engineering Report.
- The final cover system is designed to minimize the need for further maintenance of the CCR ponds (AP-B' and AP-3). This will be accomplished by consolidating CCR within the Consolidation Area, thereby reducing the total area requiring maintenance. Installation of the final cover system on relatively mild grades will further limit the need for maintenance.
- Final cover system construction will be completed in the shortest amount of time consistent with recognized, generally-accepted, and appropriate engineering practice. This will be accomplished by using a phased construction approach designed to allow closure construction to be efficiently implemented. As top of CCR elevations are reached in phases during closure construction, the final cover system will be installed on those areas while other phases are either being filled, prepared for filling, and/or dewatered. This approach will allow multiple construction activities to occur simultaneously, shortening the total construction duration.

A testing and documentation program will be administered during placement of the final cover system to provide verification that the final cover materials are constructed in accordance with the design specifications. A list of testing methods, frequency of testing, and material specifications is provided in the Construction Quality Assurance Plan included in this permit application.

7. ESTIMATE OF CCR QUANTITY

The estimated volumes of CCR excavated and placed in the AMA are presented in Table 1 below.

Table 1. Estimated CCR Quantity

| Ash Pond | Quantity of CCR (cubic yards) to AMA |
|----------|--------------------------------------|
| 1 | 610,000 ¹ |
| A | 525,000 ² |
| 2 | 855,000 ³ |
| 3 | 1,400,000 ³ |
| B | 690,000 ⁴ |
| B' | 466,000 ³ |
| R6 Ditch | 119,000 |
| | |

| | |
|---|-----------|
| Estimated Total Ash to go to the AMA | 4,665,000 |
| Estimated Total Ash Capacity of the AMA | 7,191,000 |

1. Final Certification Report AP-1 Closure by Removal by Brantley Engineering, LLC with a cover letter date April 13, 2018 signed and sealed by Allan Brantley, P.E.
2. Final Certification Report Ash Pond A/Mound A Closure by Removal by Brantley Engineering, LLC with a cover letter date April 13, 2018 signed and sealed by Allan Brantley, P.E.
3. Initial Written Closure Plan posted to Plant Yates CCR Rule Compliance Information website.
4. Amended Written Closure Plan posted to Plant Yates CCR Rule Compliance Information website.

8. VEGETATION PLAN

Once CCR excavation from AP-A and AP-B was completed, soil structural fill was placed and compacted along with 6-inches of topsoil to achieve positive drainage. All disturbed areas were then seeded and mulched to achieve stabilization.

The AMA final cover system (ClosureTurf[®]), is composed of a geomembrane overlain by an engineered synthetic turf and sand infill material. Therefore, vegetation will not be required on the closure cap.

During temporary lapses in construction activity, temporary stabilization measures will be installed on exposed areas and in accordance with the Disturbed Area Stabilization (With Mulching Only) or Disturbed Area Stabilization (With Temporary Seeding) details in the closure drawings.

At the completion of closure activities all exposed areas will be grassed and maintained in accordance with the following schedules. Final surfaces will be seeded and mulched within 30-days of final cover placement. Permanent covers which are slow to establish will receive temporary seeding. The fertilizer requirements are suggested. Planting dates, fertilizer rates, and seeding rates will meet the requirements in the Manual for Erosion and Sediment Control in Georgia.

| BROADCAST | | | | | | | | | | | | | |
|---------------------------------------|-----------|----------------|---|---|---|---|---|---|---|---|---|---|---|
| SPECIES | RATES | PLANTING DATES | | | | | | | | | | | |
| | | J | F | M | A | M | J | J | A | S | O | N | D |
| Sericea Lespedeza (unscarified) | 75 lbs/ac | x | x | p | p | p | p | p | p | x | x | x | X |
| Wilmington Bahia | 30 lbs/ac | p | p | x | x | x | p | p | p | p | p | p | p |
| Common Bermuda Unhulled | 6 lbs/ac | x | x | | | | | | | | x | x | x |

Lespedeza, Bahia, and Bermuda may be mixed with tall fescue.

X – Optimum dates, p – permissible, but marginal dates

NOTES:

1. All seeding rates are pure live seed rates.

2. All seeding will be mulched with clean dry hay at the rate of 2.5 tons per acre. Mulch will be anchored by pressing the mulch into the soil immediately after the mulch is spread using a packer disk or disk harrow or equivalent piece of equipment.
3. Temporary seeding should also complement permanent seeding to produce a suitable cover while the permanent grasses germinate.
4. Disturbed slopes greater than 3%, including soil stockpiles, are to be mulched immediately.
5. D.O.T. or County Extension seed type, seed rates, fertilizer requirements, etc. may also be used in lieu of the table above.

| FERTILIZATION (Cool Season Grasses) | | | |
|--|--------------|-------------|--------------------------------|
| Year | N-P-K | Rate | N Top Dressing Rate |
| First | 6-12-12 | 1500 lbs/ac | 50-100 lbs/ac |
| Second | 6-12-12 | 1000 lbs/ac | - |
| Maintenance | 10-10-10 | 400 lbs/ac | 30 lbs/ac |

- (1) Apply in spring following seeding.
- (2) Apply in split applications when high rates are used.
- (3) Apply in 3 split applications.
- (4) Apply when plants are pruned.
- (5) Apply to grass species only.
- (6) Apply when plants grow to height of 2"-4".

9. EROSION AND SEDIMENTATION CONTROL

During CCR excavation, appropriate best management practices, such as silt fence and dust control methods, were followed to ensure minimal disturbance.

Sediment and erosion control measures for the AMA are shown on the drawings and in the Erosion, Sedimentation, and Pollution Control Plan (ESPCP) for the Plant Yates AMA Closure. Additional measures will be taken as required to minimize erosion of soil.

All disposal areas are confined within a perimeter drainage ditch which diverts all potential run-on around the disposal site and to Ash Pond 2, which will continue to be utilized as a NPDES pond for the site. All necessary erosion control measures will be maintained, repaired and/or replaced as necessary throughout the closure period.

10. HYDRAULIC CONVEYANCE SYSTEM

Southern Company Services (SCS) completed the installation of the Advanced Engineering Method (AEM) drain in December 2019. The purpose of the AEM drain is to lower and sustain a lowered groundwater elevation in the AMA relative to the elevation of the CCR closed in place. The drain was installed with approximately 2,800 linear feet of horizontal perforated/slotted 8-inch high density polyethylene (HDPE) (ADS-brand) pipe. The pipe was wrapped in polypropylene filter fabric and placed in a bed of ASTM 57 stone. This stone bed was enveloped in a non-woven geotextile fabric. Given the path of the drain and geologic variations, gravity drainage would not work to transport groundwater the entire length of the drain to AP-2; therefore, pumps were required to provide dewatering.

11. ON-GOING PLANT OPERATIONS AND MAINTENANCE

Plant operations and maintenance will occur within the permit boundary but outside the limits of the ash 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 the Permittee's discretion.

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

12. COST OF CLOSURE AND FINANCIAL ASSURANCE

In compliance with applicable securities laws and regulations, Georgia Power will provide specific cost estimates for remaining closure activities during the permit application review process as estimates are developed and finalized. These estimates will be available to EPD prior to issuance of the draft permit. Georgia Power will provide a demonstration of financial assurance upon approval of closure cost estimates by EPD.

13. CLOSURE SCHEDULE

Closure activities are currently ongoing. A list of milestones is provided below that either has been or will be met over the closure period:

- Site preparation and development of contractor laydown areas;
- Install and maintain erosion and sediment control systems serving disturbed areas;
- Provide dust control for earthwork and ash handling operations. Maintain for project duration and until the area reaches final stabilization.
- Installation of two detention ponds east cove and west cove;
- Dewatering or working of ash material (windrowing);
- Ash will be placed in lifts, compacted and placed in the AMA.
- Installation of clean water ditch around the AMA area;
- Incidental CCR in areas outside R6 and the AMA will be removed and the areas backfilled to drain;
- Topsoil and permanent seeding will be applied to all areas that are closed by removal;
- Final grading and installation of the ClosurTurf® cover system on the consolidated CCR footprint;

- Conduct site re-vegetation and restoration;
- Prepare accurate legal description of final CCR limit of waste boundary;
- Provide the closure report to the Director; and
- Submit to the Director confirmation that the notation on the property deed has been recorded.

14. INSPECTIONS

Surface impoundment inspections during closure activities will continue to be performed in accordance with 40 CFR 257.83 until CCR removal has been completed.

7-DAY INSPECTION

Georgia Power currently inspects the surface impoundments associated with the Plant Yates AMA permit application at intervals not exceeding seven (7) days. The 7-day inspections are made by a Qualified Person and include observation and documentation of any appearance of actual or potential structural weakness and other conditions which are disrupting or have the potential to disrupt the closure activities or the safety of the surface impoundment. Georgia Power records the results of these inspections on a form that is filed in the facility's operating record.

If a potential deficiency or release is identified during an inspection, Georgia Power will remedy the deficiency or release as soon as feasible. Georgia Power will prepare documentation detailing the corrective measures taken and place it in the facility's operating record.

7-day inspections will cease once GA EPD has acknowledged the Certification of Removal from surface impoundments, AP-A and AP-B.

ANNUAL INSPECTION

As required by Chapter 391-3-4-.10(5)(b), which incorporates the operating criteria listed in 40 CFR 257.80, 40 CFR 257.82, and 257.84 of the Federal CCR Rules, a Professional Engineer registered in Georgia inspects the Plant Yates AMA surface impoundments on an annual basis. The inspection includes, at a minimum:

- a. A visual inspection of Plant Yates AMA impoundments to identify signs of distress or malfunction of the compacted soil embankment and/or the principal spillway.
- b. A review of available information regarding the status and condition of Plant Yates AMA impoundments, including, but not limited to, files available in the facility's operating record such as:
 - i. The results of weekly inspections and the results of previous annual inspections,
 - ii. Files available in the operating record and other conditions which have disrupted or have the potential to disrupt the closure activities or safety of Plant Yates AMA impoundments.

Annual inspections for surface impoundments associated with AMA, AP-A and AP-B, will cease once GA EPD has acknowledged the Certification of Removal.

ANNUAL REPORTING

At the completion of each annual inspection, the Professional Engineer who completed the inspection will prepare an annual report that includes the following:

- a. Any changes in geometry of the Plant Yates AMA impoundments compacted soil embankment since the previous annual inspection;
- b. The approximate volume of CCR contained in Plant Yates AMA impoundments at the time of the inspection;
- c. Any appearances of an actual or potential structural weakness of the CCR within Plant Yates AMA impoundments, or any existing conditions that are disrupting or have the potential to disrupt the closure activities and stability of the CCR Plant Yates AMA impoundments; and
- d. Any other change(s) which may have affected the stability or operation of the compacted soil embankment since the previous annual inspection.

Annual Inspection Reports for the Plant Yates AMA surface impoundments, which meet the requirement of Chapter 391-3-4-.10(5) of the Georgia Rules, can be found online at Georgia Power website under Environmental Compliance Information.

15. RECORDKEEPING/NOTIFICATION/INTERNET REQUIREMENTS

Georgia Power will comply with the requirements of State CCR Rule 391-3-4-.10(8) which reference the closure recordkeeping, notification, and internet posting requirements listed in 40 CFR 257.105(i), 40 CFR 257.106(i) and 40 CFR 257.107(i) of the Federal Rules. Internet postings may be found in the Georgia Power Company website under Environmental Compliance.

<https://www.georgiapower.com/CCRRuleCompliance>

16. CERTIFICATION OF CLOSURE

Upon completion of CCR removal from AP-A and AP-B, a professional engineer registered in Georgia will prepare and Georgia Power will submit a closure construction report documenting the removal to GA EPD. Pursuant to State CCR Rule 391-3-4-.10(7)(e), once all CCR removal is complete and groundwater monitoring concentrations at the site have been demonstrated not to exceed the applicable Federal and State 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.

Upon completion of the AMA closure activities, a professional engineer registered in Georgia will prepare and Georgia Power will submit a closure construction report to GA EPD. Concurrent with the submission of this closure construction report, Georgia Power will submit confirmation to the GAEPD Director that a notation on the property deed, inclusive of the final consolidated CCR limit of waste boundary, has been recorded in accordance with State CCR Rule 391-3-4-.10(7)(f).

This recording will notify any potential purchaser of the property in perpetuity that the land has been used as a CCR surface impoundment and that its use is restricted under the post-closure care requirements of the GA EPD CCR Rule. The deed will include the dates that the surface impoundment operations commenced and terminated, an accurate legal description of the surface impoundment location, and a description of the type of CCR that have been deposited in the impoundment. Within 30 days of completing this deed notification, Georgia Power will place this documentation in the operating record for the Plant.

17. LEGAL DESCRIPTION

The legal description below was taken from a drawing titled "Survey of Plant Yates – Ash Management Area Permitted Site Boundary" by Georgia Power Company Atlanta, GA. Land Department and signed by William J. Daniel, P.L.S.

All that tract or parcel of land lying and being in land lots 21, 22, 43 and 44 of the 4th District, Coweta County, Georgia and being more particularly described as follows:

BEGINNING at the Land Lot Corner common to Land Lots 19, 20, 45 and 46, having Georgia State Plane, West Zone, NAD83 coordinates of: N 1262995.61 and E 2076620.13; thence leave said common Land Lot Corner and run S30°15'37"W a distance of 3,363.26 feet to a point, said point being the TRUE POINT OF BEGINNING.

FROM THE TRUE POINT OF BEGINNING AS THUS ESTABLISHED, thence run S52°07'18"E a distance of 366.62 feet to a point; thence run S37°06'35"E a distance of 980.75 feet to a point; thence run S38°17'30"E a distance of 341.30 feet to a point; thence run S36°39'43"E a distance of 141.26 feet to a point; thence run S35°36'34"E a distance of 141.26 feet to a point; thence run S34°33'24"E a distance of 141.26 feet to a point; thence run S33°30'14"E a distance of 141.26 feet to a point; thence run S32°55'51"E a distance of 20.43 feet to a point; thence run S32°20'32"E a distance of 130.13 feet to a point; thence run S31°22'23"E a distance of 130.13 feet to a point; thence run S30°24'13"E a distance of 130.13 feet to a point; thence run S29°26'03"E a distance of 130.13 feet to a point; thence run S30°49'25"E a distance of 111.04 feet to a point; thence run S14°42'08"E a distance of 128.97 feet to a point; thence run S00°58'13"E a distance of 159.96 feet to a point; thence run S01°08'28"E a distance of 333.54 feet to a point; thence run S10°22'12"W a distance of 278.35 feet to a point; thence run S17°19'13"W a distance of 60.21 feet to a point; thence run S24°13'32"W a distance of 228.86 feet to a point; thence run S32°24'54"W a distance of 156.33 feet to a point; thence run S43°03'10"W a distance of 72.59 feet to a point; thence run S43°56'52"W a distance of 136.27 feet to a point; thence run S52°40'45"E a distance of 49.05 feet to a point; thence run N89°43'43"E a distance of 86.16 feet to a point; thence run S87°37'50"E a distance of 358.81 feet to a point; thence run S70°10'05"E a distance of 131.77 feet to a point; thence run N69°35'05"E a distance of 301.53 feet to a point; thence run N87°20'24"E a distance of 294.72 feet to a point; thence run S30°07'03"E a distance of 181.67 feet to a point; thence run S59°20'01"W a distance of 243.05 feet to a point; thence run S71°01'07"W a distance of 145.23 feet to a point; thence run S12°25'22"W a distance of 45.06 feet to a point; thence run S61°43'36"E a distance of 316.07 feet to a point; thence run S21°48'37"E a distance of 96.50 feet to a point; thence run S27°59'12"W a distance of 317.39 feet to a point; thence run N81°34'04"W a distance of 92.80 feet to a point; thence run N56°22'27"W a distance of 458.14 feet to a point; thence run S61°57'56"W a distance of 401.33 feet to a point; thence run S15°15'57"W a distance of 91.13 feet to a point; thence run S89°08'36"W a distance of 27.61 feet to a point; thence run N40°41'25"W a distance of 70.40 feet to a point; thence run S85°30'37"W a distance of 284.31 feet to a point; thence run S47°14'49"W a distance of 86.62 feet to a point; thence run S17°17'09"W a distance of 313.88 feet to a point; thence run S50°32'27"E a distance of 248.70 feet to a point; thence run S52°29'01"E a distance of 181.74 feet to a point; thence run S10°37'27"E a distance of 97.21 feet to a point; thence run S46°52'40"W a distance of 197.19 feet to a point; thence run S64°34'39"W a distance of 173.90 feet to a point; thence run N47°27'49"W a distance of 112.86 feet to a point; thence run N49°48'23"W a distance of 215.23 feet to a point; thence run N84°08'48"W a distance of 48.34 feet to a point; thence run S46°02'22"W a distance of 243.24 feet to a point; thence run N64°26'16"W a distance of 194.00 feet to a point; thence run N81°27'49"W a distance of 102.05 feet to a point; thence run S62°32'55"W a distance of 245.57 feet to a point; thence run N61°41'22"W a distance of 147.04 feet to a point; thence run N88°22'00"W a distance of 303.34 feet to a point; thence run N51°09'47"W a distance of 157.52 feet to a point; thence run N10°42'57"W a distance of 191.52 feet to a point; thence run N21°15'34"E a distance of 236.68 feet to a point; thence run N47°05'09"E a distance of

413.95 feet to a point; thence run N03°42'22"E a distance of 87.88 feet to a point; thence run N54°04'35"E a distance of 108.27 feet to a point; thence run N32°48'48"W a distance of 382.07 feet to a point; thence run N32°29'15"W a distance of 68.65 feet to a point; thence run N13°59'32"W a distance of 121.80 feet to a point; thence run N00°38'25"E a distance of 81.06 feet to a point; thence run N13°13'52"W a distance of 186.62 feet to a point; thence run N37°34'43"E a distance of 271.37 feet to a point; thence run N59°23'26"E a distance of 138.03 feet to a point; thence run N14°18'33"E a distance of 309.60 feet to a point; thence run along the arc of a curve to the left, an arc distance of 242.93 feet to a point, having a radius of 400.00 feet, being subtended by a chord bearing N03°05'23"W and a chord distance of 239.22 feet; thence run N20°29'18"W a distance of 558.21 feet to a point; thence run N23°23'48"W a distance of 181.58 feet to a point; thence run N34°30'14"W a distance of 140.86 feet to a point; thence run along the arc of a curve to the left, an arc distance of 80.08 feet to a point, having a radius of 200.00 feet, being subtended by a chord bearing N45°58'29"W and a chord distance of 79.55 feet; thence run N57°26'44"W a distance of 333.23 feet to a point; thence run along the arc of a curve to the left, an arc distance of 122.51 feet to a point, having a radius of 200.00 feet, being subtended by a chord bearing N74°59'37"W and a chord distance of 120.60 feet; thence run S87°27'30"W a distance of 154.40 feet to a point; thence run along the arc of a curve to the right, an arc distance of 288.10 feet to a point, having a radius of 310.00 feet, being subtended by a chord bearing N65°55'05"W and a chord distance of 277.84 feet; thence run N39°17'40"W a distance of 25.49 feet to a point; thence run along the arc of a curve to the left, an arc distance of 35.40 feet to a point, having a radius of 90.00 feet, being subtended by a chord bearing N50°33'42"W and a chord distance of 35.17 feet; thence run N61°49'45"W a distance of 142.20 feet to a point; thence run N32°27'49"E a distance of 205.88 feet to a point; thence run N32°27'49"E a distance of 236.53 feet to a point; thence run N25°11'25"W a distance of 28.00 feet to a point; thence run N32°27'49"E a distance of 20.00 feet to a point; thence run S87°29'44"E a distance of 27.31 feet to a point; thence run N32°27'49"E a distance of 256.54 feet to a point; thence run N32°27'49"E a distance of 282.44 feet to a point; thence run along the arc of a curve to the left, an arc distance of 194.28 feet to a point, having a radius of 1040.08 feet, being subtended by a chord bearing N27°06'45"E and a chord distance of 193.99 feet; thence run N21°40'02"E a distance of 159.68 feet to a point; thence run N34°42'11"E a distance of 233.23 feet to a point; thence run N84°50'41"E a distance of 205.41 feet to a point; thence run N07°06'55"E a distance of 46.61 feet to a point; thence run N41°39'58"E a distance of 118.70 feet to a point; thence run N68°04'31"E a distance of 128.46 feet to a point, said point being the TRUE POINT OF BEGINNING.

Said tract or parcel of land containing 218.480 acres (9,516,990.41 square feet).