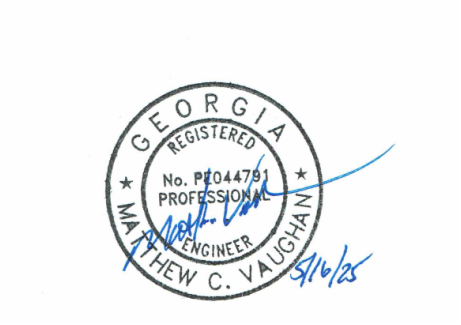
CLOSURE PLAN FOR INACTIVE CCR UNIT

AP2-DAS

FORMER PLANT ARKWRIGHT
MACON-BIBB COUNTY, GEORGIA
FOR

Georgia Power

May 2025



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1. GENERAL

The former Plant Arkwright owned by Georgia Power Company (Georgia Power) is located in Bibb County, approximately six miles northwest of Macon, Georgia. Commercial operation of the plant began in 1941 and consisted of four 40-megawatt units that produced approximately 25,000 tons of coal combustion residuals (CCRs) annually. The plant was retired in 2002 and decommissioned in 2003. During its lifetime, Plant Arkwright utilized 4 locations to store CCR: two surface impoundments, AP-1 and AP-2, a landfill and a dry stack area identified as AP2-DAS.

Plant Arkwright ceased producing electricity prior to April 2015. AP2-DAS is an inactive CCR landfill (as defined by EPD Rule 391-3-4-.10(2)3). The CCR unit was used for disposal of the plant's CCR by means of dry handling and stacking. Since AP2-DAS did not receive CCR on or after October 19, 2015, and is located at an electric utility that has ceased producing electricity prior to October 19, 2015, it was not subject to requirements of the 2015 federal CCR Rule. However, AP2-DAS is a "legacy CCR management unit" as defined in 40 CFR § 257.53 and is subject to the federal regulations under the "Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Legacy CCR Surface Impoundments" (i.e., Legacy Rule). Although Georgia has not yet incorporated the Legacy Rule, this Closure Plan addresses applicable Legacy Rule requirements for completeness.

In 2010 a final cover system was installed on AP2-DAS to close the unit. After a technical and administrative review of the closure documentation and conducting an inspection of the site, EPD issued Closure Certificate 011-031D(LI) for AP2-DAS under the Solid Waste Rules in effect at that time. AP2-DAS is currently maintained in accordance with the Post-Closure Plan approved by EPD.

Georgia Power plans to remove and relocate the CCR from this unit and place the material into a separate, CCR permitted landfill or send to a beneficial use facility. This plan has also been developed to address the requirements of EPD Rule 391-3-4-.10(9) to support the issuance of a new CCR Closure Permit that will supersede the existing Closure Certificate 011-031D(LI).

2. NOTIFICATION

Georgia Power will provide written notification within 30-days of initiating removal and relocation activities of CCR from AP2-DAS.

3. SURVEY CONTROL

The permit boundary and legal description for AP2-DAS is provided on the Permit Boundary Survey and Legal Description sheet of the permit drawings. Survey control on site will be maintained and verified by use of onsite survey markers as identified in the permit drawings.

4. LOCATION RESTRICTIONS

In accordance with Georgia Solid Waste Rule 391-3-4-.10(9), an Inactive CCR Landfill permit application must include the location restriction demonstration requirements in 40 CFR 257.64 for unstable areas. AP2-DAS and surrounding area have been evaluated by a professional engineer for the presence of unstable areas. No unstable areas have been identified, and a certification by the Georgia-registered professional engineer is included in the Engineering Report.

5. FUGITIVE DUST CONTROL PLAN

The currently installed final cover system at AP2-DAS controls the generation of fugitive dust. Fugitive dust originating from AP2-DAS during CCR excavation and removal will be further controlled by multiple methods including water suppression, compaction, synthetic or vegetative covers, or dust suppression agents to meet the requirements of Rule 391-3-4-.10(5)(a).

This fugitive dust control plan identifies and describes the CCR fugitive dust control measures that Georgia Power will use to minimize CCR from becoming airborne at AP2-DAS, including CCR fugitive dust originating from the CCR unit, roads and other CCR management and material handling activities.

CCR Rule 391-3-4-.10(2)(a) 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".

The fugitive dust control measures identified and described in this plan were adopted and implemented based upon an evaluation of site-specific conditions and are determined to be applicable and appropriate for AP2-DAS. Evaluation included assessing the effectiveness of the fugitive dust control measures for the facility, taking into consideration various factors such as site conditions, weather conditions, and operating conditions during removal activities.

Transported CCR will be conditioned to appropriate moisture content to reduce the potential for fugitive dust. Water suppression and/or dust suppression agents will be used as needed to control fugitive dust on facility roads. Speed limits will be utilized to reduce the potential for fugitive dust. CCR that is transported via truck to stockpiles will be filled to or under capacity to reduce the potential for material spillage.

Georgia Power and construction personnel shall assess the effectiveness of the control measures by performing visual observations of AP2-DAS and surrounding areas and implement appropriate corrective actions for fugitive dust, as necessary. A log will be used to record the utilization of water-spray equipment.

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

6. EQUIPMENT DECONTAMINATION

CCR removal equipment shall be physically cleaned to the extent that is practically feasible with standard cleaning practices (e.g. brooming, water rinse) to remove visible ash after use. All material from the cleaning process will be consolidated and managed within an appropriately permitted solid waste facility and all liquids will be managed through an approved NPDES outfall.

7. WATER MANAGEMENT

Water encountered at the site within the excavation and removal areas will be classified as either industrial wastewater or industrial stormwater as described below.

Industrial wastewater is water that is encountered within the CCR during excavation or stormwater that has come in contact with CCR or soil underlying the CCR prior to the CQA Engineer of Record certifying or verifying that the CCR and soil undercut has been conducted in accordance with the CQA requirements listed under Section 11. Industrial wastewater will be collected and pumped through equalization basins or storage tanks and discharged through a permitted wastewater treatment system (WWTS) to an approved NPDES outfall. Industrial wastewater will be managed under the requirements of the Plant Arkwright NPDES permitted outfall GA0050237. After meeting the CCR removal criteria, installing appropriate best management practices (BMPs), and receiving certification from the CQA Engineer of Record, any new stormwater in contact with or accumulated within the former excavated areas may be re-classified as Industrial Stormwater.

Industrial stormwater is stormwater at the site that does not meet the above definition for industrial wastewater. Industrial stormwater will be managed under the requirements of the Georgia Stormwater Industrial General Permit GAR050000. Stormwater runoff from areas with CCR that have temporary cover (six inches of soil, tarps, or other methods that serve to isolate stormwater from being classified as industrial wastewater) or stormwater in contact in areas meeting the CCR removal criteria, will be classified as industrial stormwater.

8. RUN-ON AND RUN-OFF CONTROL

The run-on and run-off control plan for AP2-DAS describes the run-on and run-off control systems based on the current CCR removal plan. Additional controls will be implemented during removal if changes are made based on field conditions or changes to the sequence of excavation.

During CCR removal, run-on stormwater, run-off stormwater, and water that accumulates within active and inactive CCR removal areas will be controlled with best management practices such as ditches, diversion berms, equalization basin storage, pumps, piping, and outlet controls. The water will be managed in accordance with applicable NPDES, Industrial Stormwater, and Industrial Wastewater Discharge permit(s) and criteria. Georgia Power will prepare a phased erosion and sediment control plan for construction activities as part of the construction documents, as needed. Stormwater will be prevented from ponding as much as practical to facilitate CCR unit closure activities.

9. CCR REMOVAL PROCEDURES

A closure completion report was previously submitted and approved by the EPD for the in-place closure of AP2-DAS. Post-closure care was initiated in 2010 after the Closure Certificate was issued. Georgia Power now plans to remove and relocate the CCR from this unit to a beneficial use facility or a separate, CCR permitted solid waste management facility. This update has been prepared for the removal of the CCR from AP2-DAS.

The CCR in AP2-DAS will be removed in accordance with the procedures below.

a) Description of CCR Unit

AP2-DAS is located adjacent to Beaverdam Creek and separated from the former plant area by Arkwright Road. The facility is covered with soil and a mature stand of trees and thick undergrowth vegetation and maintains an existing groundwater monitoring network which is currently being monitored semi-annually.

b) CCR Removal Process

Per this update for AP2-DAS, CCR within the unit will be excavated along with a minimum of an additional six (6) inches of underlying soil beneath the CCR.

"CCR removal" refers to the process of verifying and documenting that the CCR has been removed from the CCR unit. The removal of CCR from AP2-DAS will include removing visible CCR waste within the limits shown in the Closure Plan drawings. The site will be excavated in phases to minimize the area of CCR that is exposed at any one time to the extent feasible. The excavation will be sequenced to internally manage water within the excavation areas and minimize uncontrolled run-off to provide protection of the creek and nearby wetlands during the removal process.

Since the excavation area is adjacent to wetlands and an associated perennial stream, permits for potential wetland and stream impacts will be obtained through the United States Army Corps of Engineers (USACE) before work that would impact the wetlands and streams begins.

Erosion and sedimentation controls will be implemented before excavation begins. Best Management Practices (BMPs) will conform to the most recent version of the Manual for Erosion and Sediment Control in Georgia. An Erosion and Sediment Control Plan will be prepared prior to beginning closure construction.

Trees and stumps will be removed just ahead of the excavation to minimize the area of CCR that is exposed at any one time. When encountered during clearing, trees will be cut, removed, and the tree stumps and root balls excavated and sent off-site to an approved solid waste landfill with an appropriate solid waste permit. Alternatively, the stumps/rootballs may be managed by use of an on-site Air Curtain Destructor that will be permitted prior to initiating operation.

CCR will be excavated and sloped towards the middle of the site to provide internal detention of the collected water. CCR will be excavated from the interior leaving the perimeter as a berm to isolate the interior excavation from potential flood events of Beaver Dam Creek. Once the CCR is removed from the interior, the remaining exterior CCR berm will be removed. A soil berm may be constructed to replace the excavated CCR berm should weather forecasts indicate a potential flood of Beaver Dam Creek.

Internal sumps will be constructed and maintained within the excavation to provide removal of water during the phased excavation. An equalization basin will be constructed to provide in-line storage for the water management system. Water will be collected and pumped from the internal sumps to the equalization basin where it will then be routed to the onsite treatment system prior to being discharged through the NPDES outfall (GA0050237). Onsite storage tanks may be utilized as necessary.

Berms and drainage ditches will be used to reduce the potential stormwater runoff from professional engineer certified CCR-removed areas onto active/ ongoing CCR removal areas. For all areas, once the visible CCR is removed, the CCR excavation area will then be further excavated a minimum of six additional inches into the subgrade soils. The excavated CCR and over-excavated soils will be transported to a permitted disposal facility that has been approved to accept CCR. The removal verification procedure is presented in Section 11 of this plan for Construction Quality Assurance.

After the CCR removal has been certified as complete, AP2-DAS will be regraded and vegetated to prevent surface water ponding and to minimize erosion. Groundwater monitoring will continue throughout the removal and regrading process in accordance with the Groundwater Monitoring Plan.

c) Dewatering

The CCR in AP2-DAS is not expected to need dewatering. If dewatering is necessary, water may be removed by 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. Water meeting the criteria of Industrial Wastewater will be removed, and managed and discharged in accordance with an NPDES Wastewater Discharge Permit (GA0050237). Consistent with Georgia Power's NPDES Industrial Wastewater Discharge Permit requirements, if dewatering becomes necessary, Georgia Power will develop a written "Dewatering Plan" to describe treatment processes, monitoring, and best management practices necessary to comply with the Site's NPDES Industrial Wastewater Discharge Permit requirements. The Dewatering Plan will be submitted to the EPD Watershed Protection Branch for review and approval prior to commencing dewatering activities.

In addition, and if needed, the excavated CCR may be removed to a designated onsite staging area east of AP3 that will be identified and discussed in the AP-3 CCR permit documents, where it will be placed in windrows and mechanically turned to allow the release of water. Onsite personnel will monitor the moisture content of the windrows and upon reaching a suitable moisture content, the CCR will be considered ready for transport to a CCR Permitted solid waste facility.

d) Safety Practices During Excavation of CCR

If unidentified and unexpected material is encountered during excavation, proper identification will be made and the material will then be removed, managed, and disposed of in a manner that meets the appropriate regulations.

e) Estimate of the Maximum Inventory of CCR

AP2-DAS contains approximately 306,000 cubic yards of CCR and impacted soils that will be removed.

f) Estimate of the Area

The area of AP2-DAS where CCR will be removed covers an estimated 9.7 acres.

10. SUPPLEMENTAL PROVISIONS

AP2-DAS meets the definition of a CCR Management Unit (MU) under the USEPA CCR Legacy Rule. The changes to the Federal CCR Rule, which went into effect on November 8, 2024, are currently applicable to the CCR unit AP2-DAS. Although certain associated requirements are not yet required under Georgia regulations to be addressed in this Closure Plan, Georgia Power is including the following Legacy Rule-related information for completeness.

The closure schedule anticipates complying with the Legacy Rule's closure timeline due to the availability of one two-year extensions to the otherwise applicable requirement to complete closure within 5 years of the submittal of the NOI.

The requirements of this Closure Plan comply with the recordkeeping requirements, closure notification requirements and closure internet posting requirements in 40 CFR §257.105. A summary of the specific recordkeeping, notification and internet posting requirements for closure are listed below.

Recordkeeping Requirements [40 CFR §257.105)]

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 closure plan, and any amendment of the plan, as required by 40 CFR §257.102(b). Georgia Power may elect to maintain only the most recent closure plan approved by EPD in the facility's operating record.

b) If Georgia Power chooses to secure a two- (2) year extension to initiate closure of AP2-DAS at the Plant Arkwright, Georgia Power will place in the operating record a written demonstration(s) meeting the requirements of 40 CFR §257.102(e)(2)(ii).

c) The notification of intent to close, as required by 40 CFR §257.102(g).

d) The notification of completion of closure as required by 40 CFR §257.102(h).

Notification Requirements [40 CFR 257.106]

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.

Publicly accessible Internet Site Requirements [40CFR 257.107]

Georgia Power will post the information required by 40 CFR §257.105 for the Plant Arkwright AP2-DAS within thirty (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.

EPD Rule 391-3-4-.10 Requirements

In addition to the Federal Legacy Rule, Georgia Power will maintain the facility's operating records throughout the closure by removal and post-CCR removal periods as outlined in the EPD Rule 391-3-4-.10 for an inactive CCR landfill. These records will be maintained in an approved location. The following records will be maintained as part of the facility's operating record for at least five years following the date of each record:

a) A copy of the CCR unit solid waste handling permit and supplemental application documents;

b) Groundwater Monitoring Plan and any demonstration, certification, finding, monitoring, testing, or analytical data pertaining to groundwater monitoring as required by GA Rule 391-3-4-.10(6);

c) Closure and Post-Closure Plans and any monitoring, testing, or analytical data required by those plans and GA Rule 391-3-4-.10(7); and

d) Inspection records, certifications, and notifications as required by the permit and GA Rule 391-3-4-.10.

Information contained in the facility's operating record will be furnished to EPD or be made available at all reasonable times for inspection by GA EPD staff.

11. CONSTRUCTION QUALITY ASSURANCE

Construction Quality Assurance (CQA) services will be required during removal of CCR from AP2-DAS and will be provided by a qualified consulting engineering firm. "CCR removal" refers to the process of verifying and documenting that CCR has been removed from the CCR unit. The CCR excavation and removal criteria are described below.

Visual Verification of CCR Removal Procedure:

Georgia Power will engage the services of a Construction Quality Assurance (CQA) firm to monitor and document CCR removal according to the following procedure:

1) The CQA Engineer will prepare a map using a 100-ft grid spacing. Grid points will be assigned a unique alphanumeric label for reference and documentation of CCR removal.
2) CCR will be excavated until there is no visible CCR present. This surface will be referred to as the CCR/soil interface.
3) CQA personnel will observe the CCR/soil interface at the working face to confirm that visible CCR has been removed. Observations shall be made with reference to the grid map. Observations will include, but not be limited to, taking photographs and describing soil color. Soils will be described and identified in accordance with ASTM D2488. CQA personnel will document observations in field logs or reports.
4) The CCR/soil interface will be surveyed at grid points.
5) The excavation will continue to a minimum 6 inches below the CCR/soil interface. If rock is encountered prior to reaching the 6 inch depth, excavation will be halted and considered complete. This surface will be referred to as the bottom of excavation. Excavated soil will be disposed of at a permitted landfill that is approved to accept CCR.
6) The bottom of excavation surface will be surveyed and confirmed to be a minimum of 6 inches below the CCR/soil interface except in areas where rock is encountered within 6 inches of the CCR/soil interface. A topographic map will be provided for this surface.

Earthen fill (where required) will be placed after the CCR is verified removed following the above process by the certifying P.E. as necessary to achieve final grades. Sources for earthen fill may include on-site or off-site soils. The fill will be placed and graded to promote positive drainage and support permanent vegetation to minimize erosion. The surficial soil layer shall be capable of supporting vegetation and may be evaluated through soil testing and amended as necessary to support a permanent vegetative cover.

An as-built certification survey of final restoration grades after CCR removal shall be performed by a registered professional land surveyor licensed in Georgia and provided to GA EPD prior to or included with the Certification of Closure Report.

12. CERTIFICATION OF REMOVAL

Upon completion of removal activities, a professional engineer registered in Georgia shall prepare a certification report documenting the CCR removal activities. This report will be submitted to EPD.

13. CERTIFICATION OF CLOSURE

Pursuant to Solid Waste Management 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 state groundwater protection standards, Georgia Power will submit a closure report to EPD. The closure report will be completed on forms provided by EPD.

14. DIRECTIONAL INFORMATIONAL SIGNS

Signs shall be posted at the property entrance gate and shall include a telephone number for emergencies.

15. VEGETATIVE PLAN

All disturbed areas shall initially be grassed in accordance with the following schedules. Permanent covers which are slow to establish shall receive temporary seeding. The fertilizer requirements are suggested and will be adjusted based on site conditions. If needed, the owner will submit soil samples to the County Extension Agent for analysis and determination of proper soil conditioners, including lime. Planting dates, fertilizer rates, and seeding rates shall meet the requirements in the Manual for Erosion and Sediment Control in Georgia. As an alternative to seeding, the owner may install sod.

TABLE 1. SEEDING REQUIREMENTS

Seeds - Permanent	lbs/Acre	Depth of Cover	Date of Planting
Bermuda Grass-Hulled	10	¼" – ½"	2/15 – 6/30
Bermuda Grass – Unhulled	6	¼" – ½"	11/1 – 1/31
Bahia, Pensacola	30	¼" – ½"	1/1-12/31
Seeds - Temporary	**lbs/Acre**	**Depth of Cover**	**Date of Planting**
Annual Ryegrass	40	¼" – ½"	8/15 – 3/31
Pearl Millet	50	¼" – ½"	4/1 – 8/31
Weeping Lovegrass	2	¼" – ½"	2/15 – 6/15

Notes:

1. All seeding rates are pure live seed rates.
2. All seeding shall be mulched with clean dry hay at the rate of 2.5 tons per acre. Mulch shall 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. Annual ryegrass will not be used with perennial species due to its nature of out-competing perennial species.
5. Disturbed slopes greater than 3%, including soil stockpiles, are to be mulched upon reaching final grade.
6. D.O.T. or County Extension seed type, seed rates, fertilizer requirements, etc. may also be used in lieu of the table above.

TABLE 2. FERTILIZER REQUIREMENTS

Type of Species	Year	Analysis or Equivalent N-P-K	Rate	N Top Dressing Rate
Cool Season Grasses	First Second Maintenance	6-12-12 6-12-12 10-10-10	1500 lbs./ac. 1000 lbs./ac. 400 lbs./ac.	10-100 lbs.ac.(1)(2) - 30
Cool Season Grasses and Legumes	First Second Maintenance	6-12-12 0-10-10 0-10-10	1500 lbs./ac. 1000 lbs./ac. 400 lbs./ac.	0-50 lbs./ac/(1) - -
Ground Covers	First Second Maintenance	10-10-10 10-10-10 10-10-10	1300 lbs./ac.(3) 1300 lbs./ac.(3) 1100 lbs./ac.	- - -
Pine Seedlings	First	20-10-5	One 21-gram pellet/seeding placed in closed hole	-
Shrub Lespedeza	First Maintenance	0-10-10 0-10-10	700 lbs./ac. 700 lbs./ac.(4)	- -
Temporary Cover Crops Seeded Alone	First	10-10-10	500 lbs./ac.	30 lbs./ac.(5)
Warm Season grasses	First Second Maintenance	6-12-12 6-12-12 10-10-10	1500 lbs./ac. 800 lbs./ac 400 lbs./ac.	50-100 lbs./ac.(2)(6) 50-100 lbs./ac.(2) 30 lbs./ac.
Warm Season Grasses and Legumes	First Second Maintenance	6-12-12 0-10-10 0-10-10	1500 lbs./ac. 1000 lbs./ac 400 lbs./ac.	50 lbs./ac.(6) - -

Notes:

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".

16. SITE EQUIPMENT NEEDED

Georgia Power will coordinate with the contractor to make adequate equipment available to ensure that requirements are executed correctly and efficiently.

17. SEDIMENT REMOVAL

Accumulated sediment shall be removed from drainage features as required.

18. EROSION AND SEDIMENTATION CONTROL

Upon completion of removal activities and restoration, all ditches, diversion berms, riprap, and other drainage structures serving disturbed areas but not already built, will be constructed. Erosion control features include, but are not limited to, silt fence, straw wattles, turf reinforcement matting, and riprap protection and vegetation (both temporary and permanent) and will be based on the latest edition of the Manual for Erosion and Sediment Control in Georgia. These controls will be used until the site is stabilized.

19. GROUNDWATER MONITORING

Pursuant to the Rules of Solid Waste Management, Chapter 391-3-4-.10(6), Georgia Power has installed a groundwater monitoring system within the uppermost aquifer underlying AP2-DAS. Groundwater monitoring is performed in accordance with the AP2-DAS Groundwater Monitoring Plan.

Georgia Power will monitor groundwater semi-annually pursuant to the requirements defined in the Groundwater Monitoring Plan included in the permit documents. Groundwater will be monitored for a period of five (5) years after the CCR has been removed from the AP2-DAS footprint 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 reference the constituents listed in the Federal CCR Rule Subpart D, Appendix III and IV. A demonstration certified by a Qualified Groundwater Scientist will be submitted to EPD for approval documenting that groundwater constituent concentrations are not detected at statistically significant levels above the groundwater protection standards established in Rule 391-3-4.10(6)(b) for constituents listed in Appendix IV. Evaluation criteria may include but are not limited to additional sampling, analysis, calculations, and/or modeling to demonstrate compliance with 391-3-4.10(7)(b) as determined by the Qualified Groundwater Scientist and approved by EPD.

20. SCHEDULE

The schedule milestones and the associated timeframes are initial estimates. Some of the activities associated with the milestones will overlap.

a. Dewatering, excavation, and removal – 2 years

b. Complete earthwork to promote positive drainage – 1 year

c. Stabilize site – 0.5 years

d. Groundwater Monitoring – 5 years

Following verification of removal of all CCR from the unit, the post removal period will begin and extend for five (5) additional years. During this period, groundwater monitoring and site maintenance will be performed. groundwater monitoring will be conducted in accordance with the Groundwater Monitoring Plan.

It is estimated that closure will be complete in 2039. If it is estimated that the time required to complete closure activities will exceed the regulatory timeframes allowed under 40 CFR 257.102(f), site-specific information, factors, and considerations will be provided to support any time extensions. The closure of AP2-DAS may occur concurrently with the closure of other CCR facilities at Plant Arkwright which could impact the total estimated construction time.

21. CLOSURE COST

In compliance with applicable securities laws and regulations, cost estimates for removal activities and post-CCR removal groundwater monitoring will be provided to EPD under separate cover. The costs include all necessary items for a third party to complete the removal activities and post-CCR removal requirements in accordance with the Closure Plan and Groundwater Monitoring Plan included herein. The cost estimates provided to GA EPD will be based on an acreage of 9.7 acres and be in 2025 dollars and adjusted annually for inflation.

22. LEGAL DESCRIPTION

The legal description representing the permit boundary for AP2-DAS was provided by a Georgia Registered Land Surveyor (RLS) and is included in the Drawings of this permit application.

23. INSPECTIONS

AP2-DAS is subject to the Georgia Solid Waste Management Rules and, specifically, Rule 391-3-4-.10 for Coal Combustion Residuals, which became effective on November 22, 2016.