

# CLOSURE PLAN FOR INACTIVE CCR UNIT

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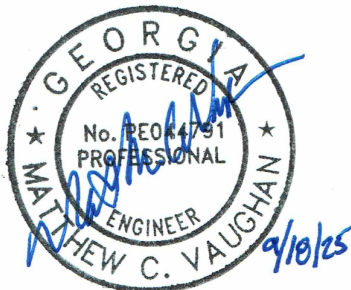
AP1

FORMER PLANT ARKWRIGHT  
MACON-BIBB COUNTY, GEORGIA  
FOR



Georgia  
Power

AUGUST 2025



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## 1. GENERAL

The former Plant Arkwright owned by Georgia Power Company is located in Bibb County, approximately six miles northwest of Macon, Georgia. Commercial operation of the plant began in 1941 and consisted of 4 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, AP1 and AP2, a landfill and a dry stack area identified as AP2-DAS.

Plant Arkwright ceased producing electricity prior to April 2015. AP1 is an inactive CCR unit (as defined by EPD Rule 391-3-4-.10(2)). Since AP1 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, AP1 is a “legacy CCR surface impoundment” 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.

The unit was used as a surface impoundment for the plant’s Coal Combustion Residuals (CCR) waste, was operational until the late 1970s and closed in 2010 under the EPD Solid Waste Rules in effect at that time with the issuance of Closure Certificate 011-031D(LI). A final closure cover system was placed and graded to drain on the site in 1990. Supplemental regrading and slope stability improvements were completed in 2004 and 2007. Subsequently, a closure completion report was submitted to the Environmental Protection Division (EPD) in 2008. After completing a technical and administrative review of the closure documentation and inspection of the site in November 2008, EPD issued Closure Certificate 011-031D(LI) for AP1 under the Solid Waste Rules in effect at that time. AP1 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 in a separate, CCR permitted landfill, or send to a beneficial use facility. This plan has 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 (GPC) will provide written notification to EPD within 30 days of initiating removal and relocation activities of CCR from AP1.

## 3. SURVEY CONTROL

The permit boundary and legal description for AP1 is provided in the Permit Boundary Survey & Legal Description section of the permit drawings. Survey control on site will be maintained and verified by use of onsite survey markers as identified in the plan.

#### 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. The AP1 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 AP1 controls the generation of fugitive dust. Fugitive dust originating from AP1 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 AP1, including CCR fugitive dust originating from the CCR unit, roads and other CCR managements 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 AP1. 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 AP1 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.

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 10. 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 AP1 describes the run-on and run-off control systems based on the current conceptual CCR removal plan. Additional controls will be provided during removal if changes are made by the contractor 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 CCR removal areas will be controlled with best management practices such as ditches, diversion berms, internal sumps, equalization basins, pumps, and piping. The water will be managed in accordance with applicable NPDES Industrial Stormwater, and Industrial Wastewater Discharge permit(s). Georgia Power will include a phased erosion and sediment control plan for construction activities as part of the contractor's construction documents, as needed. Stormwater will be prevented from ponding as much as practicable to facilitate CCR unit closure activities.

## 9. CCR REMOVAL PROCEDURES

A closure completion report was previously submitted and approved by EPD for the in-place closure of AP1. 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 updated Closure Plan has been prepared for the removal of the CCR from AP1.

The CCR in AP1 will be removed in accordance with the procedures below.

- a) Description of CCR Unit

AP1 is located adjacent to the former power plant and is bordered by the Ocmulgee River, Beaverdam Creek, and a Norfolk Southern Railroad. The existing site is covered with 2 feet of soil and vegetation. The area is mostly grassed with a few trees along the toe of the slope adjacent to the river and creek. The southern point of AP1 was historically heavily vegetated with large standing trees and shrubs. In the summer of 2023, GPC executed a minor modification package and removed the vegetation and underlying CCR from a portion of this area to allow for better access for landfill maintenance.

b) CCR Removal Process

Per this update for the AP1, the 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 AP1 will include removing all visible CCR within the limits shown in the Closure Plan drawings. The site will be excavated in phases to reduce the area of CCR that is exposed at any one time **to the extent feasible**. The excavation will be sequenced to internally **manage water and minimize uncontrolled run-off** to provide protection to the river and creek during the removal process. **In addition, Georgia Power will inspect and properly abandon, as necessary, any CCR conveyance piping encountered within the permit boundary during closure.**

Since the excavation area is adjacent to perennial streams, permits for potential stream and river impacts will be obtained through the United States Army Corps of Engineers (USACE) before **work that would impact the stream and river 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. During CCR removal, silt curtains will be deployed as necessary in the Ocmulgee River and Beaverdam Creek. An Erosion and Sediment Control Plan will be prepared prior to beginning construction.

The removal of CCR within AP1 will be conducted in a phased approach that will take into consideration challenges associated with its unique position adjacent to the Ocmulgee River and Beaver Dam Creek. The excavated CCR waste will be transported to a beneficial use facility or a permitted facility approved to accept CCR for disposal. The current approach to excavation is discussed in the following paragraphs.

The initial phase of excavation will remove CCR down to an elevation above the 100-year flood elevation. The 100-year flood elevation for the Ocmulgee River adjacent to AP1 is at approximate elevation 321 feet, while the top of the facility is at approximate elevation 340 to 345. 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.

Once CCR removal is complete to above the 100-year flood elevation, excavation work will progress to within the original soil berm for AP1. Similar to the above, water within the excavation will be directed to local sumps within the excavation area where it will be managed/discharged via the approved discharge permit.

Excavation of CCR on the south side of the former ash-impoundment's soil berm (southern extremity of AP1) will follow a similar approach utilized during the successful removal of CCR in the AP1 South Point Slope Improvements minor modification package performed in Summer 2023. The excavation will progress from the top down in stages with cut slopes graded to the interior or center of the excavation to allow for stormwater collection/containment and management. A perimeter berm will remain along the exterior of each staged excavation to detain to the extent practicable, stormwater from discharging away from the active removal area, and stormwater will be collected in interior sumps where it will be managed/discharged via the approved discharge permit. The berm will be removed as excavation of the subsequent stages take place. Upon obtaining P.E. certification from the certifying engineer that the CCR has been removed, stormwater will continue to be managed through BMPs and managed as industrial stormwater (unless comingled with water from active CCR removal areas).

Excavation of CCR on the exterior slope along the Ocmulgee River will likely be completed in two stages. The initial stage will remove CCR to a fixed elevation to provide access for removal of the CCR along the lower slope. The exterior slope below the excavation will not be disturbed in the first stage. As stated previously, the excavation will be graded inwards toward the interior of the excavation to minimize water erosion on the slopes. Once CCR removal is complete, the CCR removal verification process will be conducted and documented. Following completion of the CCR removal verification including the minimum 6-inch over-excavation, the slopes will be stabilized following the requirements for industrial stormwater discharges. The second stage of removal will repeat the same process, working from the access bench from the first stage. It is anticipated that the work along the Ocmulgee River to remove the CCR on the exterior slope will progress in a linear fashion to minimize the open area of the exterior slope and allowing bank stabilization to occur following the disturbances made to remove the CCR.

Topsoil and cover soil will be removed from the top in phases and transported by truck to designated onsite stockpile locations. The Final Cover system currently deployed along the side slopes of AP1 will not be removed until later phases of CCR removal project. 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 and removed, and the tree stumps and root balls will be excavated and sent off-site to an approved solid waste landfill with a CCR-approved solid waste management plan. Alternatively, the rootballs may be managed by use of an on-site Air Curtain Destructor (ACD).

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 verification procedure is presented in Section 11 of this plan for Construction Quality Assurance.

After the CCR removal has been **certified as complete**, AP1 will be regraded and vegetated to prevent surface water ponding and to minimize erosion. A groundwater monitoring network will be installed and monitored in accordance with the Groundwater Monitoring Plan.

c) Dewatering

The CCR in AP1 is not expected to require significant dewatering as most, if not all of the CCR is above the local groundwater table. If and when dewatering is necessary, water may be removed 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 the NPDES Industrial Wastewater Discharge Permit requirements, Georgia Power will develop a written “Dewatering Plan” to describe treatment processes, monitoring, and best management practices necessary to comply with onsite 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 an onsite staging area within the AP1 footprint 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. Upon reaching a suitable moisture content, the CCR will be considered ready for transport and disposal.

d) Safety Practices During Excavation of CCR

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

e) Estimate of the Maximum Inventory of CCR

AP1 currently contains an estimated 813,000 cubic yards of CCR that will be removed.

f) Estimate of the Area

The area of AP1 where CCR will be excavated covers an estimated 29.7 acres.

## 10. CONSTRUCTION QUALITY ASSURANCE

Construction Quality Assurance (CQA) services will be required during removal of CCR from AP1 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 will be excavated until visual confirmation by the certifying P.E. is obtained that it has been removed, then a minimum additional six-inches of underlying soil will be removed below the verified CCR/soil interface. The CCR excavation and removal criteria are described below.

### Visual Verification of CCR Removal Procedure:

GPC will engage the services of an independent 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 surface will be surveyed.
- 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.s 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.

As-built certification surveys of final 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.

## **11. CERTIFICATION OF REMOVAL**

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

## **12. 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.

## **13. DIRECTIONAL INFORMATIONAL SIGNS**

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

## **14. 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. The owner may 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**

<b>Seeds - Permanent</b>	<b>lbs/Acre</b>	<b>Depth of Cover</b>	<b>Date of Planting</b>
Bermuda Grass-Hulled	10	$\frac{1}{4}'' - \frac{1}{2}''$	2/15 – 6/30
Bermuda Grass – Unhulled	6	$\frac{1}{4}'' - \frac{1}{2}''$	11/1 – 1/31
Bahia, Pensacola	30	$\frac{1}{4}'' - \frac{1}{2}''$	1/1-12/31
<b>Seeds - Temporary</b>	<b>lbs/Acre</b>	<b>Depth of Cover</b>	<b>Date of Planting</b>
Annual Ryegrass	40	$\frac{1}{4}'' - \frac{1}{2}''$	8/15 – 3/31
Pearl Millet	50	$\frac{1}{4}'' - \frac{1}{2}''$	4/1 – 8/31
Weeping Lovegrass	4	$\frac{1}{4}'' - \frac{1}{2}''$	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	6-12-12	1500 lbs./ac.	10-100 lbs.ac.(1)(2)
	Second	6-12-12	1000 lbs./ac.	-
	Maintenance	10-10-10	400 lbs./ac.	30
Cool Season Grasses and Legumes	First	6-12-12	1500 lbs./ac.	0-50 lbs./ac/(1)
	Second	0-10-10	1000 lbs./ac.	-
	Maintenance	0-10-10	400 lbs./ac.	-
Ground Covers	First	10-10-10	1300 lbs./ac.(3)	-
	Second	10-10-10	1300 lbs./ac.(3)	-
	Maintenance	10-10-10	1100 lbs./ac.	-
Pine Seedlings	First	20-10-5	One 21-gram pellet/seeding placed in closed hole	-
Shrub Lespedeza	First	0-10-10	700 lbs./ac.	-
	Maintenance	0-10-10	700 lbs./ac.(4)	-
Temporary Cover Crops Seeded Alone	First	10-10-10	500 lbs./ac.	30 lbs./ac.(5)
Warm Season grasses	First	6-12-12	1500 lbs./ac.	50-100 lbs./ac.(2)(6)
	Second	6-12-12	800 lbs./ac	50-100 lbs./ac.(2)
	Maintenance	10-10-10	400 lbs./ac.	30 lbs./ac.
Warm Season Grasses and Legumes	First	6-12-12	1500 lbs./ac.	50 lbs./ac.(6)
	Second	0-10-10	1000 lbs./ac	-
	Maintenance	0-10-10	400 lbs./ac.	-

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".

## **15. SITE EQUIPMENT NEEDED**

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

## **16. SEDIMENT REMOVAL**

Accumulated sediment shall be removed from drainage features as required.

## **17. 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.

## **18. GROUNDWATER MONITORING**

Pursuant to the Rules of Solid Waste Management, Chapter 391-3-4-.10(6), Georgia Power will install a groundwater monitoring system within the uppermost aquifer underlying AP1. Groundwater monitoring will be performed in accordance with the approved AP1 Groundwater Monitoring Plan.

GPC will monitor groundwater semi-annually pursuant to the requirements defined in the Groundwater Monitoring Plan included in the permit application documents. GPC proposes to monitor groundwater for a period of five (5) years after the CCR has been removed from the AP1 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.

## 19. SCHEDULE

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

**Table 1 Anticipated Closure Schedule for AP1**

Activity	Duration/Schedule
Mobilization and Site Preparation (including clearing and grubbing)	Year 1
Ash Pond Closure Construction Activities (including dewatering, CCR removal, related earthwork, and site restoration)	Year 1 to Year 5
Submit Certification Reports Documenting the Removal to GA EPD	Year 1 to Year 5 (estimated 10 to 15 years)
Groundwater Monitoring During Ash Pond Closure	Year 1 to Year 5
Post CCR-Removal Groundwater Monitoring	5 years following completing closure construction
Submit a Closure Report to the GA EPD Director	Upon demonstrating groundwater monitoring concentrations at the Site do not exceed the applicable Federal and State groundwater protection standards

It is estimated that closure will be complete in 2030. 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 AP1 may occur concurrently with the closure of other CCR facilities at Plant Arkwright which could impact the total estimated construction time.

## 20. 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 29.7 acres and be in 2025 dollars and adjusted annually for inflation.

## 21. LEGAL DESCRIPTION

The legal description representing the permit boundary for AP1 was provided by a Georgia Registered Land Surveyor (RLS) and is included in the Permit Boundary Survey & Legal Description section of this permit application.

## 22. INSPECTIONS

During active CCR removal, the facility will be inspected in accordance with the requirements of the GA General Permit for Industrial Activity GAR 050000. Documentation as required by the General Permit will be maintained on-site per the record keeping requirements.

## 23. SUPPLEMENTAL PROVISIONS

### a. General Information Regarding the Changes to the Federal CCR Rule:

USEPA issued additional CCR regulations for inactive surface impoundments at inactive electric utilities, referred to as "legacy CCR surface impoundments."

AP1 meets the definition of a legacy surface impoundment, and these changes to the Federal CCR Rule, which went into effect on November 8, 2024, are currently applicable to AP1. 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 in this Closure Plan for completeness.

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

### b. Requirements for Permanent ID Marker

No later than January 8, 2025, a permanent identification marker which is a single post with placard, as set forth by § 257.73(a)(1) will be placed on or immediately adjacent to AP1.

### c. Site Security

Access to the former Plant Arkwright Site, and specifically to Pond AP1, is controlled by site perimeter controls, including perimeter fence and gates. Access to Plant Arkwright is controlled at all times and gates will be locked. Therefore, the possibility for unauthorized entry of persons or livestock onto AP1 has been minimized.

### d. Weekly, Monthly, and Annual Inspections

The following inspections are performed in accordance with State CCR Rule 391-3-4-.10(5)(b):

7-Day Inspections: Georgia Power inspects the CCR unit and discharge of all hydraulic structure outlets 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 operation or safety of the facility.

**30-Day Inspections:** Georgia Power monitors all CCR unit instrumentation at intervals not exceeding 30 days. These instrumentation monitoring examinations are made by a qualified person.

**Annual Inspections:** A qualified professional engineer (P.E.) registered in Georgia inspects the CCR unit on an annual basis to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards. The inspection includes at a minimum, the following activities:

- A review of available information regarding the status and condition of the CCR unit including but not limited to, files available in the operating record (e.g., CCR unit design and construction information required by §§ 257.73(c)(1) and 257.74(c)(1), previous periodic structural stability assessments required under §§ 257.73(d) and 257.74(d), the results of inspections by a qualified person, and results of previous annual inspections;
- A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit and appurtenant structures; and
- A visual inspection of any hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation.
- The results of this annual inspection are presented in a report that is placed in the facility's operating record as well as on the Georgia Power CCR Compliance website. The annual inspection report will address the following: (i) any changes in geometry of the impounding structure since the previous annual inspection; (ii) the location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection; (iii) the approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection; (iv) the storage capacity of the impounding structure at the time of inspection; (v) the approximate volume of impounded water and CCR at the time of the inspection; (vi) any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation or safety of the CCR unit and appurtenant structure; and (vii) any other changes which may have affected the stability or operation of the impounding structure since the previous annual inspection. If a potential deficiency or release is identified during an inspection, Georgia Power will remedy the deficiency as soon as feasible. If needed, Georgia Power will activate the Emergency Action Plan and follow the appropriate procedures outlined in that plan. Georgia Power will prepare documentation detailing the corrective measures taken and will place it in the facility's operating record.

e. **Structural Integrity and Requirements & Periodic Assessments**

The following requirements of §§ 257.73 and 257.100 will be implemented for Ash Pond E in accordance with the schedule provided in the rule as detailed below:

- Initial hazard potential classification assessments by May 8, 2026 and periodic hazard potential classification assessments thereafter;
- Preparation of an Emergency Action Plan (EAP) by May 8, 2026;
- Compilation of a history of construction by February 9, 2026; and
- Completion of the structural stability and safety factor assessments by May 8, 2026.

f. Inflow Design Flood Control System & Periodic Assessments

An initial inflow design flood control system plan for Pond AP1 will be prepared by May 8, 2026.

g. Recordkeeping, Notification, and Publicly Accessible Internet Site

Georgia Power will comply with the recordkeeping requirements of 40 CFR § 257.105(k), closure notification requirements specified in 40 CFR § 257.106(k), and closure internet requirements in 40 CFR § 257.107(k).

Specifically, the following notifications, document retention, and timely postings to the internet include:

- (i) Notifications will be sent to the State Director within 30 days of placing information required by 257.105 in the operating record in accordance with 40 CFR 257.106(d) and (k);
- (ii) The operating record information under 40 CFR 257.105 required by 40 CFR 257.107(d) and (k) to be posted to the CCR website within 30 days of placing the information in the operating record; and
- (iii) The information required to be posted to the CCR website, including the information required by 40 CFR 257.107(d) and (k) will be made available to the public for at least five years following the date on which the information was first posted to the CCR website as required by 40 CFR 257.107(c).