

**PLANT McDONOUGH-ATKINSON
CCR SURFACE IMPOUNDMENT
(CCR UNIT AP-1)
COBB COUNTY, GEORGIA
PART A SECTION 8
POST-CLOSURE CARE PLAN**

FOR



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WSP USA Inc.
5170 Peachtree Road
Building 100, Suite 300
Atlanta, GA 30341
(770) 496-1893



Table of Contents

1.0 INTRODUCTION 1

2.0 POST-CLOSURE CARE PLAN 1

 2.1 Facility Contact Information..... 1

 2.2 Post-Closure Property Care 1

 2.3 Monitoring and Maintenance Activities 1

 2.3.1 Cover System Inspections 1

 2.3.2 Groundwater Monitoring System 2

 2.3.3 AP-1 Maintenance 2

 2.4 Planned Use of Property 3

 2.5 Post-Closure Operations..... 3

3.0 POST-CLOSURE CARE PERIOD 4

 3.1 Recordkeeping 4

4.0 FINANCIAL ASSURANCE 4

ATTACHMENT: McDonough Ash Pond 1 Post-Closure Cost Estimate

1.0 INTRODUCTION

This Post-Closure Care Plan for Georgia Power's Plant McDonough CCR Unit AP-1 was prepared in accordance with the State of Georgia Solid Waste Management Rule 391-3-4-.10(9)(c)(5)(v) as well as 40 CFR Part §257, Subpart D and meets the requirements of 40 CFR §257.104.

This plan will be used to guide the post-closure care for the closed CCR Unit AP-1.

2.0 POST-CLOSURE CARE PLAN

2.1 Facility Contact Information

During the post-closure care period, the following person(s) or office can be contacted about the facility:

Georgia Power Company

Manager, Environmental Affairs

241 Ralph McGill Boulevard

Atlanta, GA 30308

404-506-6505

gpcenv@southernco.com

2.2 Post-Closure Property Care

The owner/operator shall complete post-closure care for the CCR unit which shall consist of at least:

- Maintaining the integrity and effectiveness of the final cover system, including making repairs to the final cover as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover; and
- Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of 40 CFR §257.90 through 40 CFR §257.98.

2.3 Monitoring and Maintenance Activities

Throughout the post-closure care period, the site shall be inspected to maintain the structural integrity of the cover system. Inspections will be completed to ensure that all CCR remain properly covered by the final cover system and stormwater control systems are maintained in proper working condition.

Any areas identified during inspections that require repair work shall be noted and scheduled for repairs as quickly as practical. Any repair work on the final cover system shall meet or exceed the design requirements. Final cover inspection and repair protocols will be performed following the manufacturer's guidance for ClosureTurf™ provided by Watershed Geosynthetics and will be routinely reviewed and updated per current best management practices.

2.3.1 Cover System Inspections

The AP-1 final cover and stormwater control systems will be periodically inspected to monitor the function and integrity of the systems. Inspections will be completed on a quarterly and annual basis with the final quarterly inspection each year also serving as the annual inspection (4 inspections per year) for the first five (5) years following closure completion. After the initial five years, inspections will be conducted on an annual basis (1 inspection per year) for the remainder of the post-closure care period. These routine inspections will be completed per the guidelines listed in Table 1. During each quarterly and annual inspection, the appropriate inspection

checklists should be completed, and any areas in need of repair should be noted on the appropriate checklist and logged in a repair log and maintained in the facility operating record.

Table 1: Routine Inspections for AP-1

Frequency	Description
Quarterly and Annually for First 5 Years Post Closure	<ul style="list-style-type: none"> ■ Slow driving or walking inspection focusing on: <ul style="list-style-type: none"> ■ Obvious signs of damage ■ General performance of the cover system and stormwater management structures ■ General housekeeping and site maintenance. <p><i>Note: Quarterly Inspection tasks to be completed during annual inspection after five (5) years into the post-closure care period.</i></p>
Annually	<ul style="list-style-type: none"> ■ Detailed walking inspection of all areas of AP-1, including: <ul style="list-style-type: none"> ■ Cover systems - turf seams, anchor trenches, infill and armoring conditions, and vegetation where applicable ■ Stormwater systems – attenuation pond stabilization, discharge structures, berms, channels, and culverts ■ Slopes, berms, and roads ■ Monitoring wells and instrumentation ■ Site security and maintenance ■ Other structures or areas within the site boundary that may impact the integrity of the closed unit

2.3.2 Groundwater Monitoring System

Georgia Power Company will monitor groundwater semi-annually pursuant to the requirements defined in the Groundwater Monitoring Plan included in the permit. Georgia Power Company proposes to monitor groundwater for a period of at least thirty (30) years following closure of the CCR Unit to confirm that groundwater constituent concentrations are not detected at statistically significant levels above the groundwater protection standards established in State CCR Rule 391-3-4-.10(6)(b), which references 40 CFR 257.104. If at the end of the 30-year post-closure care period the facility is operating under assessment monitoring in accordance with Georgia Rule 391-3-4-.10(6) and 40 CFR 257.95, the owner or operator must continue to conduct post-closure care until the facility returns to detection monitoring. Following the post-closure care period, a qualified groundwater scientist will certify that the site is in Detection Monitoring prior to release from post-closure care. The certification statement will be submitted to EPD for review and concurrence and will include the following language: “I am a qualified groundwater scientist and I hereby certify that the groundwater monitoring program at the CCR Unit is operating under detection monitoring in accordance with 40 CFR 257.94 and the Georgia Rules for Solid Waste Management Section 391-3-4-.10 and monitoring requirements for post-closure care have been met.

2.3.3 AP-1 Maintenance

Following closure, maintenance and repairs will be provided on the final cover system for the required post-closure care period so that the integrity and effectiveness of the final cover system will be maintained. Maintenance activities will include, but not be limited to:

- Any needed repairs to the final cover system to correct damages related to settlement, subsidence, erosion, or other events, and will be performed to prevent run-off from eroding or otherwise damaging the final cover.
- Repair of erosion features
- Repairs to any observed synthetic cover system components damage
- Re-establishment of vegetation (where applicable)
- Repairs to accessible portions of stormwater attenuation ponds, discharge structures and pipe outlets, and auxiliary spillways
- Housekeeping and general upkeep of the closed Units

Regular maintenance will be performed on a semi-annual schedule, with more frequent maintenance performed if and as needed following the inspections performed by qualified personnel.

2.4 Planned Use of Property

At present, there are no future development plans considered for AP-1. Should Georgia Power consider a future development within the permitted boundary, Georgia Power will submit a minor modification to the Solid Waste Permit as applicable.

It is noted that the permit boundary of AP-1 includes an active natural gas pipeline and gas conditioning yard, active plant transmission, and other power plant infrastructure that will be maintained and may require repairs and replacement of materials including installation of temporary and permanent support infrastructure. Additionally, a beneficial use storage tank and loading/unloading facility is located to the northeast of AP-1.

Any future use of the property after closure will not disturb the integrity of the final cover, stormwater management system, subsurface barrier wall, or any other component of the containment system. Furthermore, the functionality of the groundwater monitoring system will be maintained.

2.5 Post-Closure Operations

Plant operations and maintenance will occur within the permit boundary but outside the limits of the CCR consolidation area (e.g., outside the CCR 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 Georgia Power's discretion.

Operation and maintenance of transmission and/or distribution structures within the limits of the CCR consolidation area as engineered and permitted not directly affecting the CCR consolidation or final cover system, may also be conducted at Georgia Power's discretion.

However, should utility operations be required such that the final cover system or subsurface barrier is required to be disturbed, a report documenting any disturbance and repairs of the final cover system or subsurface barrier wall will be placed in the facility operating record. The repair documentation will include as-builts, CQA information and certification from a professional engineer licensed to practice in Georgia.

Activities related to ongoing operations at AP-1 and within the AP-1 permit boundary may include but are not limited to those listed below.

Piezometers, Dewatering Wells, and Instrumentation

Temporary Instrumentation for Unit AP-1 may consist of piezometers for water level documentation and inclinometers and settlement monuments to monitor for potential movement of the closure, as well as temporary dewatering wells used to accelerate long term unit dewatering. Any installed site instrumentation will be routinely inspected and maintenance performed as needed per the facility's instrumentation guidance.

3.0 POST-CLOSURE CARE PERIOD

In accordance with State Rule 391-3-4-.10(9)(c)(5)(v) and 40 CFR §257.104(c), Georgia Power will conduct post-closure care for 30 years for AP-1. If at the end of the 30-year post-closure care period groundwater at AP-1 is being monitored under the assessment monitoring program in accordance with 40 CFR §257.95, Georgia Power must continue to conduct post-closure care until AP-1 returns to detection monitoring in accordance with 40 CFR §257.95.

3.1 Recordkeeping

Georgia Power shall comply with all closure and post-closure care recordkeeping requirements of 391-3-4-.10(7)(g) and 391-3-4-.10(8) as well as 40 CFR §257.105(i), closure and post-closure care notification requirements specified in 40 CFR §257.106(i) and closure and post-closure care internet requirements in 40 CFR §257.107(i). Additionally, CCR Rule Compliance website information will be made available to the public for at least five (5) years from the date of posting and information must be posted to the CCR Website within 30 days of placing the pertinent information required by 391-3-4-.10(8) and 40 CFR 257.105 in the operating record per 40 CFR 257.107(c) and (d). In accordance with 391-3-4-.10(8)(a)(1) and 257.106(d), electronic mail sent to a designated EPD recipient is an authorized form of notification when approved by EPD.

No later than 60 days following completion of the post-closure care period of 30 years and provided the provisions of §257.104(c)(2) don't apply, Georgia Power Company will prepare a notification verifying completion of the post-closure care as described in §257.104(e). Release from post-closure care must be approved by EPD.

Documentation for Plant McDonough AP-1 operating record is located electronically at the website titled "Plant McDonough CCR Rule Compliance Information" located at the Georgia Power Company website under Environmental Compliance.

4.0 FINANCIAL ASSURANCE

The post-closure cost estimate is provided as an attachment to this Post-Closure Care Plan. In compliance with applicable securities laws and regulations, Georgia Power will provide cost estimates for post-closure care to GA EPD under separate cover. The post-closure care costs include all items necessary for a third-party to conduct post-closure care maintenance and monitoring in accordance with the Post-Closure Plan as set forth herein. The cost estimate is generated in current dollars and adjusted annually for inflation. GPC will provide a demonstration of financial assurance upon approval of the closure and post-closure care cost estimates by GA EPD.

ATTACHMENT
McDonough Ash Pond 1 Post-Closure Cost Estimate

CONFIDENTIAL TRADE SECRET - WITHHOLD FROM PUBLIC DISCLOSURE

McDonough AP-1 Closure and Post Closure Cost Estimate

McDonough AP-1 Post-Closure In Place Cost Estimate

Item Description		Quantity	Unit	Unit Cost	Cost
Post Removal Cost					
	Maintenance - Grass/Turf ¹				
	Dike, Road, and Maintenance				
	Water Treatment				
Environmental Monitoring					
	Groundwater Monitoring & Reporting ²				
	Sampling				
	Reporting				
	Laboratory Analysis				
	Groundwater Well Maintenance and Abandonment				
	Well Maintenance & Replacement ³				
	Well Abandonment ⁴				
Subtotal					
Contingency					
30 Year Post Removal Cost Estimate					
Total Financial Assurance Required (Closure Cost + 30 Year Post Removal Care Cost)					

Note 1: Maintenance - Grass includes cost for mowing the site five times per year. Turf includes cost for material maintenance.

