

POST-CLOSURE PLAN

R6 CCR LANDFILL PLANT YATES COWETA COUNTY, GEORGIA

FOR



Georgia Power

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Atlantic Coast Consulting, Inc.
11545 Wills Road, Suite 100, Alpharetta, GA,
p. 770-594-5998

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1. POST-CLOSURE USE OF THE PROPERTY

This Post Closure Plan fulfills the requirements of Rules 391-3-4-.10(9)(c)(4) and 391-3-4-.10(9)(c)3.(i)–(iv) for the Inactive R6 CCR Landfill. This Plan provides a description of how the post closure requirements of 40 CFR 257.104 will be met throughout the post closure care period. The facility stopped receiving CCR prior to October 19, 2015 and provided the formal notice of closure to EPD in a letter dated November 4, 2015. Post-closure care is required for a period of 30 years and must consist of at least the following:

- A. 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
- B. Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with Groundwater Monitoring Plan included in this application.

This post-closure plan may be amended by Georgia Power at any time. Moreover, as required by State CCR Rule 391-3-4-.10(7)(g), which references 40 CFR §257.104(d)(3)(ii), this plan must be amended whenever: (i) there is a change in the operation of the CCR unit that would substantially affect the plan; or (ii) after post-closure activities have commenced, unanticipated events necessitate a revision of the plan. The timeframes for amendment to the plan will be in accordance with those specified in 40 CFR §257.104(d)(3)(iii).

At the end of the 30-year post-closure care period, if the site is in detection monitoring, Georgia Power Company (Georgia Power) may request a release from the post-closure care requirements in this plan. The release must be approved by the Director of Georgia EPD. However, if the site is operating under assessment monitoring, Georgia Power will continue to conduct post-closure care and monitoring until the site returns to detection monitoring.

There is no planned use of this property during the Post-Closure Care Period at this time. Prior to any future use, EPD approval is required.

2. GROUNDWATER MONITORING

As required by Georgia EPD Rule 391-3-4.10(6), groundwater monitoring, sampling will be conducted semiannually (or at least annually) throughout the post-closure care period in accordance with the facility Groundwater Monitoring Plan. In accordance with the Georgia Water Well Standards Act (O.C.G.A. § 12-5-120), at least once every five years, the owner of the property on which a monitoring well is constructed shall have the monitoring well(s) inspected by a professional engineer or professional geologist, who shall direct appropriate remedial corrective work to be performed if the well does not conform to standards. Well inspection records and records of remedial corrective work are subject to review by EPD. Additionally, as part of the closure plan, the cost estimate based upon current year cost for the well inspections must be provided for as part of the cost calculations for the groundwater monitoring period.

The groundwater monitoring activities for the R6 CCR Landfill will follow the Groundwater Monitoring Plan included in this application.

3. ROUTINE INSPECTION OF VEGETATIVE / FINAL COVER / DRAINAGE SYSTEM

Throughout the Post-Closure Care Period, the site shall be inspected on a quarterly basis by a qualified person, and on an annual basis by a Professional Engineer, to ensure that all CCR disposed of in the facility remains properly covered with the approved final closure system for the facility. Repairs to the final cover system will be made as necessary to maintain the integrity and effectiveness of the final cover system. The repairs shall meet or exceed the original construction requirements. Any areas noted to have less than the required cover from the effects of erosion, vehicular traffic, etc., shall be immediately repaired. All areas lacking proper vegetation shall be grassed and maintained according to the vegetation and fertilization plans in the Closure Plan. Downtrain systems shall be maintained in proper working condition in accordance with the Permit Application. The integrity of the terraces and downturn flumes will be inspected for erosion and undercutting of flumes following major storm events. The contact person for post-closure care of the facility is provided below:

General Manager
Environmental Affairs
Georgia Power Company
241 Ralph McGill Blvd.
Atlanta, GA 30308
(404) 506-6505

4. STORM WATER MANAGEMENT SYSTEM

Throughout the Post-Closure Care Period, all ditches, diversion berms, culverts, rip-rap, terraces, downturn flumes, and other drainage structures shall be maintained in accordance with the permit application to prevent run-on and run-off from eroding or otherwise damaging the final cover. Erosion control structures shall be maintained so as to prevent damage to the final cover. Inspections of ditches, diversion berms, culverts, rip-rap, terraces, downturn flumes, and other drainage structures will be performed by a qualified person and maintenance of these structures will be addressed as soon as practical.

5. LIMITED ACCESS

R6 CCR Landfill is located completely within the property boundary of Plant Yates, and access is restricted to authorized personnel only. Access is controlled by chain link security fence, locked gates, and/or fulltime security personnel. During the post-closure care period, security measures will be checked and repaired as necessary.

6. POST-CLOSURE SUPERVISION

Post-Closure Care of the site shall be under the supervision of a qualified professional. Contact information for this person will be provided to EPD at time of closure.

7. SITE EQUIPMENT

Georgia Power will make adequate equipment available to ensure that Post-Closure Care requirements are executed correctly and efficiently. Rental equipment shall be utilized in the

event that equipment dedicated to the CCR landfill should break down during Post-Closure Care procedures.

8. POST-CLOSURE CARE COST AND FINANCIAL ASSURANCE

The post-closure care cost is provided in Table 1. In compliance with applicable securities laws and regulations, unredacted cost estimates for post-closure care will be provided to EPD under separate cover. The costs include all items necessary for a third-party to maintain the property and complete the post-closure care in accordance with the plan included herein. The cost estimates provided to EPD are based on an area of 89 acres and 2025 unit costs and will be adjusted annually for inflation. GPC will provide a demonstration of financial assurance upon approval of the cost estimates by EPD.

9. NOTIFICATION OF MONITORING STANDARDS EXCEEDED

Georgia Power will be responsible for conducting all monitoring activities. If at any time the monitoring results indicate exceeding of established standards or indicate a threat to human health or the environment, the owner and/or operator shall notify the EPD and comply with all requirements of Georgia Rule 391-3-4-.10(6).

10. NOTIFICATION AND CERTIFICATION

Within 60 days of the completion of the post-closure care period, Georgia Power will prepare a notification verifying that post-closure care has been completed. The notification will include a certification by a qualified professional engineer verifying that post-closure care has been completed in accordance with this plan. Georgia Power will complete the post-closure care process by: (1) placing the notification in the facility's operating record as required by Rule 391-3-4-.10(7) and (2) providing the notification to the Director of Georgia EPD. Release of Plant Yates AMA from continuing post-closure care requirements must be approved by Georgia EPD.

11. RECORDKEEPING/NOTIFICATION REQUIREMENTS

Georgia Power will comply with all applicable recordkeeping requirements and maintain the facility's operating record at all times.

TABLE 1

R6 Ash Monofill Post-Closure Cost Estimate

Item Description	Quantity	Unit	Unit Cost	Cost
Project Management				
1 Independent Project Manager		LS		\$5,000
Contract				
2 Administration ¹		LS		\$2,000
3 Contract Negotiation ¹		LS		\$2,000
4 Bidding ¹		LS		\$2,000
Environmental Monitoring				
5 Groundwater Monitoring Samples & Reporting	16	EA	\$735.00	\$11,760
6 Well Inspection/Recertification		LS		\$500
Routine Inspections and Repairs				
7 Slope/Final Cover repair (10%) ²	26,500	CY	\$2.50	\$66,250
8 Grassing and Soil Amendments ³	8.2	AC	\$1,650.00	\$13,530
9 Quarterly Inspections & Reporting	4	EA	\$500.00	\$2,000
10 Well Maintenance	8	EA	\$25.00	\$200
Site Maintenance/Site Security				
11 Mowing ⁴	92	AC	\$200.00	\$18,400
12 Access Road Maintenance	3,050	LF	\$0.50	\$1,525
13 Entrance Gate Repairs		LS		\$500
14 Diversion Berm Maintenance ⁵	3,060	LF	\$0.40	\$1,224
15 Flume Maintenance ⁶	780	LF	\$0.30	\$234
16 Stormwater Ditch Maintenance/Repair ⁷	310	LF	\$0.40	\$124
Subtotal				\$127,247
5% Contingency				\$6,362
Annual Post Closure Care Cost Estimate				\$133,609
30 Year Post Closure Care Cost Estimate				\$4,008,281
Abandon Wells after 30 years/ Certification				\$100,000
R6 Ash Monofill Total Financial Assurance Required (Closure Cost + 30 Year Post Closure Care Cost)				\$4,747,290

NOTES:

1. Work by Independent Project Manager
2. Base on 10% of final cover cap at 1' deep.
3. Base on 10% final cover cap.
4. Mow ing includes the cost of mow ing the site twice per year. The unit rate assumes that the hourly cost is \$100 and that each acre can be mow ed in one hour.
5. Based on 10% Diversion Berms
6. Based on 10% Dow ndrains
7. Based on 10% perimeter ditches.