

POST-CLOSURE PLAN

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

FOR



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1.	INTRODUCTION	1
2.	GENERAL	1
3.	POST-CLOSURE USE OF THE PROPERTY	2
4.	GROUNDWATER MONITORING	2
5.	INSPECTION PLAN	2
5.1	OVERVIEW OF INSPECTION PLAN	2
5.2	INSPECTION FREQUENCY.....	3
5.3	SITE ACCESS AND SECURITY CONTROL	3
5.4	FINAL COVER SYSTEM	3
5.5	SURFACE WATER MANAGEMENT SYSTEM	3
5.6	HYDRAULIC CONVEYANCE SYSTEM	4
5.7	GROUNDWATER MONITORING SYSTEM	4
6.	RESPONSIBLE PERSON.....	4
7.	SITE EQUIPMENT.....	4
8.	POST CLOSURE CARE COST AND FINANCIAL ASSURANCE.....	4
9.	NOTIFICATION OF MONITORING STANDARDS EXCEEDED	4
10.	NOTIFICATION AND CERTIFICATION.....	5
11.	RECORDKEEPING/NOTIFICATION/INTERNET REQUIREMENTS.....	5

1. INTRODUCTION

This Post-Closure Plan (Plan) is submitted as part of the permit application package for the Ash Management Area (AMA) which 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 plan has been prepared for Georgia Power Company (Georgia Power) pursuant to Rule 391-3-4-.10, Coal Combustion Residuals (Georgia EPD CCR Rule) for the Post-Closure Care of consolidated AMA.

This Post-Closure Plan may be amended by Georgia Power at any time. Moreover, as required by 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 written post-closure plan; or (ii) after post-closure activities have commenced, unanticipated events necessitate a revision of the written post-closure plan. The timeframes for amendment to the written closure plan will be in accordance with those specified in 40 CFR 257.104(d)(3)(iii).

2. GENERAL

The AMA surface impoundments will be closed in accordance with both Federal and Georgia EPD CCR Rule requirements using a consolidate and close-in-place approach for the AMA waste footprint and by removal for AP-A and AP-B. The permit package for closure includes narrative plans, drawings, and calculations packages necessary to present and address the design and operational features of closure for each CCR unit. Further details about the closure process and sequencing are presented in the Closure Plan.

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).

Following completion of closure (e.g. deemed complete by Georgia Environmental Protection Division), the Site will begin the post-closure care period and implement the requirements of this Post-Closure Plan. In accordance with 40 CFR 257.104(c)(1) (incorporated by reference in State CCR Rule 391-3-4-.10(7)(g)), the post-closure care period for the Site will be 30 years. As required by 40 CFR 257.104(c)(2), if at the end of the post-closure care period Georgia Power is operating under assessment monitoring in accordance with 40 CFR 257.95, Georgia Power will continue to conduct post-closure care until the monitoring system returns to detection monitoring in accordance with 40 CFR 257.95. Georgia Power will conduct the following activities for the AMA as well as AP-A and AP-B during the post-closure care period:

- Inspections of the CCR containment structure to check the structural integrity;
- Maintaining the integrity and effectiveness of the final cover system, including making repairs to the final cover system as necessary to correct the effects of settlement, subsidence, animal intrusion, or other natural or man-made events, and preventing run-on and runoff from eroding or otherwise damaging the final cover system; and

- Maintaining the groundwater monitoring system and monitoring of the groundwater in accordance with the Groundwater Monitoring Plan.

3. POST-CLOSURE USE OF THE PROPERTY

Plant Yates will continue to operate as a natural gas electric power generation plant. The primary land use for the closed areas associated with AP-A and AP-B will be open green space. Post-closure use of the AMA waste footprint area will not affect the integrity of the cap system, any components of the containment system, or the function of the monitoring systems unless necessary to comply with the requirements in the Solid Waste Management Rules. The Georgia EPD may approve disturbance if Georgia Power demonstrates that disturbance of the cap system or any components of the containment system will not increase the potential threat to human health or the environment. Prior to any modifications to this post-closure use, Georgia EPD approval will be requested in accordance with the Georgia EPD CCR Rule.

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 discretion of Georgia Power.

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.

4. GROUNDWATER MONITORING

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 Georgia Rule 391-3-4-.10, which references 40 CFR 257.94 and monitoring requirements for post-closure care have been met."

5. INSPECTION PLAN

5.1 Overview of Inspection Plan

The purpose of the post-closure inspection program is to ensure the proper functioning of all engineered

features during the post-closure care period. A visual inspection of CCR units covered by the AMA permit will be performed at the frequency specified subsequently in this Post-Closure Plan, and a written record will be completed and maintained as part of the facility's operating record. Items to be included in the inspection will be as follows:

- Access and security control;
- Final cover system;
- Storm water management;
- Erosion and sediment control;
- Groundwater monitoring system; and
- Integrity of site benchmarks.

5.2 Inspection Frequency

Inspections will be conducted quarterly. If any deficiencies are identified during the inspections, an assessment and corrective action plan will be implemented as soon as practical.

5.3 Site Access and Security Control

The AMA 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 full-time security personnel. During the post-closure care period, security measures will be checked and repaired as necessary.

Access roads will be maintained to provide appropriate access within the facility. Maintenance will include repairing potholes and washouts as well as periodic regrading as necessary.

5.4 Final Cover System

Routine inspection will include checking the final cover system for conditions that could impact cover integrity and effectiveness. If the routine inspection program reveals any areas of unacceptable levels of cover system settlement, the areas will be repaired. Any identified areas of water ponding on the cover system will likewise be repaired. The ClosureTurf® final cover system, maintenance and repairs will be performed in accordance with the manufacturer's design and installation manuals.

5.5 Surface Water Management System

The surface water management system for the post-closure care period will consist of the perimeter channels to, around, and through the east and south coves, outlet structures within the coves, pipes, and stabilization measures (i.e., vegetative, riprap, geomembrane liner, and/or alternative ballast material). All surface water is ultimately routed to the plant's permitted NPDES system.

Inspection and maintenance will be performed in accordance with the recommendations contained in the Best Management Practice Operations & Maintenance Guidance Document, of the Georgia Stormwater Manual, latest edition. Inspection and maintenance practices will include: removing built up sediment, debris, or trash, removing debris from the inflow and outflow structures, improving erosion and sediment control practices where the stabilization is missing or in poor condition, and inspecting

the structural integrity and functionality of the system components.

Surficial waters and outflow from the Advanced Engineering Method subsurface drain will be monitored and reported in accordance with the site NPDES permit and surface water monitoring plan as specified by Georgia EPD.

5.6 Hydraulic Conveyance System

Southern Company Services (SCS) completed the installation of the Advanced Engineering Method (AEM) hydraulic conveyance system 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 water collected within the AEM drain ultimately discharges to the plant's permitted NPDES system.

The AEM drain was installed with approximately 2,800 linear feet of horizontal perforated/slotted 8-inch high density polyethylene (HDPE) (ADS-brand) pipe and wrapped in polypropylene filter fabric and placed in a bed of ASTM 57 stone. This stone bed is enveloped in a non-woven geotextile fabric. Twelve vertical risers were installed from the drain to the ground surface to provide access for pumps and cleanout of the drain, if necessary. Maintenance of the subsurface drain will include inspections during the Post-Closure Care period, and sediment removal through the cleanout risers as needed.

5.7 Groundwater Monitoring System

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 groundwater monitoring plan, groundwater monitoring system components, including wells, well risers, well pads and seals, casings, caps, locks, and bollards, will be routinely inspected, maintained, and repaired or replaced, as necessary.

6. RESPONSIBLE PERSON

The Georgia Power contact person for the post-closure care of Plant Yates is provided below:

Manager
Environmental Affairs
Georgia Power Company
241 Ralph McGill Blvd.
Atlanta, GA 30308
(404) 506-6505
gpcenv2@southernco.com

7. SITE EQUIPMENT

Georgia Power will make adequate equipment available to ensure that Post-Closure Care requirements are executed correctly and efficiently. Rental equipment will be utilized in the event that equipment dedicated to the AMA should break down during post-closure care procedures.

8. POST CLOSURE CARE COST 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.

9. NOTIFICATION OF MONITORING STANDARDS EXCEEDED

Georgia Power will be responsible for conducting all monitoring activities. If at any time the monitoring results indicate the exceedance of established standards or a threat to human health or the environment, Georgia Power will promptly notify Georgia EPD and comply with the 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 / INTERNET REQUIRMENT

During post-closure care, recordkeeping, notification, and internet requirements will be performed in accordance with the following sections of 391-3-4-.10(8) which reference the requirements of 40 CFR § 257 as follows:

- recordkeeping in accordance with 40 CFR § 257.105(i);
- closure notification in accordance with 40 CFR § 257.106(i); and
- closure internet requirements in accordance with 40 CFR § 257.107(i).