

CLOSURE PLAN

AP-4 – DEWATERED SURFACE IMPOUNDMENT

PLANT HAMMOND FLOYD COUNTY, GEORGIA

FOR



Georgia Power

OCTOBER 2020



Approved
Solid Waste Management Program

Approved By: _____



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1. INTRODUCTION

The Georgia Environmental Protection Division (EPD) adopted a new Solid Waste Regulation entitled “Rule 391-3-4-.10 Coal Combustion Residuals” (State CCR Rule). This rule, effective November 22, 2016, applies to owners and operators of new and existing coal combustion residuals (CCR) disposal facilities that dispose or otherwise engage in solid waste management of CCR generated from the combustion of coal at electric utilities and independent power producers. The State CCR Rule incorporates by reference the provisions contained in the United States Environmental Protection Agency (USEPA) Title 40 of the Code of Federal Regulations (CFR) §257 (40 CFR §257) (Federal CCR Rule). Per State CCR Rule 391-3-4.10(2)(a), Plant Hammond Ash Pond 4 (AP-4) meets the definition of a dewatered CCR surface impoundment.

Georgia Power Company (GPC) plans to perform closure-by-removal of CCR from AP-4. All CCR within AP-4 will be removed from the site. Upon removal of the CCR, the final sitework restoration will promote positive stormwater drainage.

This Closure Plan was prepared to describe the activities and requirements for closure-by-removal of AP-4 in accordance with State CCR Rules 391-3-4-.10(7)(a)2. and 391-3-4.10(9)(c)8.

2. NOTIFICATION

No later than 15 days prior to beginning removal of the AP-4 cover soils GPC will provide a written Notification of Intent to Close AP-4 by removal to EPD. The notice will be placed in the CCR unit’s Operating Record at that time. Closure activities will commence according to the closure schedule presented in Section 18 of this Closure Plan.

3. SURVEY CONTROL

A survey of the Permitted Site Boundary is included in the Closure Drawings.

4. LEGAL DESCRIPTION

The legal description of the permit boundary can be found in Appendix A.

5. ESTIMATE OF CCR IN UNIT

AP-4 contains approximately 3,940,000 cubic yards of CCR.

6. CCR EXCAVATION SEQUENCING PLAN

The Closure Drawings depict the proposed phased excavation of the CCR from AP-4. Excavation of AP-4 will take place in such a manner as to meet or exceed a short-term factor of safety for slope stability of 1.3. For short term slopes during excavation of CCR, the maximum allowable vertical height cut will be 30 feet with a slope steepness of 3H:1V and 15 feet for a cut slope of 2H:1V. These limits will apply for excavations greater than five feet tall that will remain for a minimum of 24 hours. During the detailed design process, the Design Engineer will also evaluate the amount of CCR to be exposed that can be safely removed, within the effectiveness of onsite stormwater controls. Cap soils will first be stripped and stockpiled on plant property outside the permitted boundary of AP-4. Exposed GCL material will be removed and disposed of in an



approved landfill. Excavation and removal of CCR will then be conducted in an organized manner to divert stormwater to temporary ditches or diversion berms that will convey runoff to the existing stormwater basin. As excavation proceeds, new diversion ditches will be installed to re-direct runoff from new excavation areas to the stormwater management structures; interim slopes will be graded to drain to the temporary ditches and then to the stormwater pond. This process will proceed until the base of AP-4 is reached and all CCR material has been removed. Once ash removal is completed according to the CCR Removal Verification process, the former CCR unit will be graded, backfilled and stabilized. Typical BMPs and other erosion control measures that may be employed during the excavation and removal of CCR within AP-4 are shown on sheets 6, 10 and 11 of the plan set. All existing and future outlet control structures/sumps have now been identified on applicable plan sheets.

The general steps to excavation and removal of CCR from AP-4 are:

1. Strip the cover system in areas to be excavated.
2. Excavate drainage run-off ditches for each excavated lift to control stormwater runoff.
3. Excavate a lift working west to east. Excavation will be graded as shown in the Closure Drawings to promote runoff. The lifts are anticipated to be approximately 10 to 15 feet deep.
4. Excavated CCR will be transported to an off-site permitted landfill or sold to an ash marketer for beneficial re-use.
5. After removal of the lift, the drainage run-off ditches will be excavated around the perimeter of the next lift. When it is no longer possible to drain the surface water to the sediment basin in the west, sumps will be installed to pump stormwater to the water treatment system.
6. This sequence will be followed until the CCR excavation is complete.

7. CCR REMOVAL VERIFICATION PROTOCOL

“CCR removal” refers to the process of verifying and documenting that the CCR has been removed from AP-4. AP-4 is known to contain a mixture of fly ash and bottom ash collectively referred to as CCR. The CCR removal verification is based on removing visible CCR and a minimum of six additional inches of soil. The documentation of this procedure is presented in the Construction Quality Assurance Plan included in the permit application. Groundwater monitoring will be implemented as described in Section 14 of this Closure Plan.

8. SURFACE WATER DRAINAGE

During CCR removal, run-on stormwater and run-off contact water (e.g. stormwater that has come into contact with CCR) will be controlled with best management practices such as channels, diversion berms, and pumps and managed in accordance with the NPDES Construction Storm Water, Industrial Storm Water and Industrial Wastewater Discharge permit(s). GPC will prepare a phased erosion and sediment control plan that will be followed for closure construction activities, as needed.

All CCR removal activities performed to close the Plant Hammond AP-4 surface impoundment will take place within the permit limits of AP-4 and the discharge of waters associated with construction activities will occur under the existing Plant Hammond National Pollutant Discharge Elimination System (NPDES) Permit GA0001457. As such, coverage of removal activities under the Georgia General Construction Stormwater Permit may not be necessary including the development of a three phase E&S plan.

However, upon completion of ash removal activities, and if necessary due to expiration of NPDES GA0001457 permit or otherwise, discharges of industrial stormwater or construction stormwater will be permitted under the applicable General Permit. A comprehensive system of best management practices required by the Georgia Water Quality Control Act in accordance with the current version of the Manual for Erosion and Sediment Control in Georgia will be developed as required to manage discharges.

The area surrounding AP-4 is currently graded to generally divert stormwater around the unit resulting in a low volume of run-on into the unit. As the unit is dewatered and CCR is excavated, sumps will be installed in low areas to collect stormwater and pump to the water treatment system.

9. CCR DRAINAGE AND STABILIZATION

If saturated CCR is encountered during excavation of the unit, the CCR will require dewatering prior to transport. The CCR will be dewatered by spreading the material within the waste limits of AP-4 to dry. Disking, harrowing, or other methods to work the saturated CCR may be utilized to promote drying.

Should the saturated CCR require stabilization for excavation operations, finger dikes or a bridge lift may be constructed from dry CCR or aggregate. The materials that contact CCR will be disposed offsite. Other alternatives to dewater and stabilize the CCR material may include use of pumps or well points. Water that is removed will be pumped into the NPDES treatment system prior to discharge.

10. FINAL GRADING

After CCR excavation and removal of the additional six inches of soil, the intermediate surface will be inspected by EPD. The site will then be backfilled with soil fill and graded to promote positive drainage. Sources of fill may include approved off-site borrow soils, the non CCR contact soil from existing perimeter dike, or removed cover soil. The perimeter dike of the unit will be breached as shown on the Closure Drawings to allow stormwater to drain once the site is



stabilized. Dike breach locations are located near the pre-construction low-laying areas based on historical drawings showing preconstruction contours.

11. FUGITIVE DUST EMISSIONS AND CCR TRACK-OUT MANAGEMENT

This fugitive dust control plan identifies and describes the CCR fugitive dust control measures that GPC will use to minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from ash ponds, roads, and material handling activities. State CCR Rule 391-3-4-.10(2)(a) (incorporating 40 CFR § 257.53 by reference) defines “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.”

Fugitive dust originating from the ash ponds and ash pond closure activities will be controlled using water suppression or polymer tackifiers.

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 AP-4 closure. 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.

CCR that is transported via truck to stockpiling prior to loading in rail cars or trucks for shipment off-site will be conditioned to appropriate moisture content to reduce the potential for fugitive dust.

Water suppression or polymer tackifiers will be used as needed to control fugitive dust on facility roads used to transport CCR and other CCR management areas. Speed limits will be utilized to reduce the potential for fugitive dust. Trucks used to transport CCR will be filled to or under capacity to reduce the potential for material spillage.

CCR removal equipment shall be physically cleaned to the extent that is practically possible to remove all visible ash after use. Cleaning activities will take place within the footprint of AP-4. All material from the cleaning process will be consolidated and hauled to an appropriately permitted solid waste facility and all liquids will be managed in accordance with the Plant Hammond NPDES Permit, GA 0001457, through the permitted outfall.

GPC and construction personnel will assess the effectiveness of the control measures by performing visual observations of the ash ponds 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.

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

12. VEGETATIVE PLAN

All disturbed areas will be grassed and maintained in accordance with the schedules shown in Tables 1 and 2. Disturbed areas will be stabilized within two weeks after final grades are achieved. Permanent covers which are slow to establish will receive temporary seeding. Planting dates, fertilizer rates, and seeding rates will meet the requirements in the current edition of the Manual for Erosion and Sediment Control in Georgia.

Table 1: Vegetation Schedule

Seeds	lbs/Acre	Date of Planting
Pensacola Bahia Alone or with temporary cover	60	April 1- May 31
Wilmington Bahia With other perennials	30	March 1 – May 31
Tall Fescue Alone	50	August 15 - October 15, March 1 – April 30
Tall Fescue With other perennials	30	September 1 - October 15
Reed Canary Grass Alone	50	August 15 - October 15
Reed Canary Grass With other perennials	30	September 1- October 15
Common Bermuda Unhulled seed w/ temporary cover	10	October 1- February 28
Common Bermuda unhulled seed w/ other perennials	6	November 1- February 28

Notes:

1. All seeding rates are pure live seed rates.
2. All seeding will be mulched with clean dry hay at the rate of 2.5 tons per acre. Mulch will 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. Disturbed slopes greater than 3%, including soil stockpiles, are to be mulched immediately.
5. 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: Fertilization Rates

Fertilizer Requirements				
Type of Species	Year	Analysis or Equivalent N-P-K	Rate	N Top Dressing Rate
1. Cool Season Grasses	First	6-12-12	1500 lbs./ac.	50-100 lbs/ac.(1)(2)
	Second	6-12-12	1000 lbs./ac.	-
	Maintenance	10-10-10	400 lbs./ac.	30
2. 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.	-
3. 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.	-
4. Temporary Cover Crops Seeded Alone	First	10-10-10	500 lbs./ac.	30 lbs./ac.(4)
5. Warm Season grasses	First	6-12-12	1500 lbs./ac.	50-100 lbs./ac.(2)(5)
	Second	6-12-12	800 lbs./ac.	50-100 lbs./ac.(2)
	Maintenance	10-10-10	400 lbs./ac.	30 lbs./ac.
6. Warm Season Grasses and Legumes	First	6-12-12	1500 lbs./ac.	50 lbs./ac.(5)
	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 to grass species only.
5. Apply when plants grow to height to 2"-4".

13. SITE EQUIPMENT NEEDED

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



14. GROUNDWATER MONITORING

GPC will monitor groundwater semi-annually pursuant to the requirements defined in the Groundwater Monitoring Plan included in the permit. GPC proposes to monitor groundwater for a period of five (5) years after the CCR has been removed from the AP-4 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.

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

15. SEDIMENT REMOVAL

Accumulated sediment will be removed from the Sediment Basin, drainage ditches, and structures as required. All accumulated material within the stormwater pond, whether sediment or CCR infused sediment, will be removed and disposed of in a solid waste facility permitted to accept CCR waste, until removal activities have been completed.

16. EROSION AND SEDIMENTATION CONTROL

Upon closure, all ditches, diversion berms, riprap, and other drainage structures serving disturbed areas, but not already built, will be constructed and placed according to the Closure Drawings or as required. Erosion control methods include, but are not limited to, silt fence, straw wattles, turf reinforcement matting, and riprap protection. These controls will be used until the site is stabilized. A site-specific stormwater management plan will be followed during construction following the most recent edition of the Manual for Erosion and Sediment Control in Georgia.

17. COST OF CLOSURE AND FINANCIAL ASSURANCE

In compliance with applicable securities laws and regulations, cost estimates for closure/construction/CCR removal/post CCR removal groundwater monitoring will be provided to EPD under separate cover. The total construction closure/removal costs include all items necessary for a third party to complete the project in accordance with the Closure Plan included herein. The cost estimates provided to EPD are based on an area of 54-acres and in 2020 dollars. The cost estimates will be adjusted annually for inflation.



Ash Pond 4 Closure by Removal Cost Estimate

Item Description	Quantity	Unit	Unit Cost	Cost
Program Management				
Misc Permitting Fees (NPDES, etc.)				
Regulatory Water Management				
Groundwater Monitoring ¹				
Engineering				
Detailed Engineering				
Construction Support				
Procurement				
Fuel Commodity Cost				
Fuel Facility Maintenance/Operations Cost				
Construction Directs				
Water Treatment Equipment Monthly Rental and Labor				
Dewatering Water Treatment Mobilization / Demobilization / Additional BOP				
Dust Control				
Backfill				
Top Soil				
Seeding				
Excavation				
Transport/Haul Offsite				
Transport/Haul Offsite (equipment leasing fee)				
Water Management				
Site Prep ²				
Transportation Improvements				
Site Work/Maintenance				
Demolition ³				
Organics Management				
Construction Indirect				
Construction Management				
Temporary Facilities				
Quality Assurance (CQA)				
Contractor Indirect				
OH&P				
Contractor Construction Management				
Equipment Costs				
Mobilization/Demobilization				
Contractor Temporary Facilities				
Project Indirect				
Bonds/Insurance				
				Subtotal Direct Costs
				Subtotal Indirect Costs
				Contingency
				Total Closure Cost Estimate

Notes:

1. Groundwater monitoring includes costs for conducting routine monitoring of App III & IV during the construction period.
2. Site Prep includes erosion control, silt fencing, access road stabilization and other related costs.
3. Demolition includes placement & grading of backfill materials.

Ash Pond 4 Post Removal Cost Estimate

Item Description	Quantity	Unit	Unit Cost	Cost
Post Removal Cost				
Maintenance - Grass ²				
Dike & Road Maintenance				
Water Treatment				
Environmental Monitoring				
Groundwater Monitoring & Reporting				
Sampling				
Reporting				
Laboratory Analysis				
Groundwater Well Maintenance and Abandonment				
Well Maintenance				
Well Abandonment				
				Subtotal
				Contingency
				5 Year Post Removal Cost Estimate
				Total Financial Assurance Required (Closure Cost + 5 Year Post Removal Care Cost)

Notes:

1. No costs for project management are included for closure by removal.
2. Maintenance - Grass includes cost for mowing the site five times per year.



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18. CLOSURE SCHEDULE

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

- a. Onsite landfill development / Offsite landfill negotiations – 43 months
- b. CCR Excavation and Removal – 72 months
- c. CCR Removal Verification – 3 months
- d. Backfill and Grading – 6 months
- e. Stabilization – 0.5 years
- f. Post-Construction Demobilization and Certification – 6 months

Prior to initiating removal activities, maintenance of AP-4, which is currently capped with a composite cover system consisting of geosynthetic clay liner overlain by 18" of compacted soil having a hydraulic conductivity of 1.0×10^{-5} cm/sec, and topped with 6" of topsoil supporting vegetation, will continue to be conducted in accordance with procedures included in the Plant Hammond AP-4 Stacking Plan submitted to GA EPD Industrial Wastewater Unit October 1994 and revised in September 2000. Installation of the cover system was completed in September 2014 in accordance with standards and procedures detailed by the GA EPD Solid Waste Program at the time. Maintenance activities are also consistent with EPD Solid Waste Program practices and will continue throughout the period it takes GPC to safely remove CCR Unit.

Following verification of closure-by-removal of all CCR from the unit, the closure period will extend for five (5) additional years. During this closure period, groundwater monitoring will be performed as described in the Groundwater Monitoring section of this plan.

19. AMENDMENT TO THE CLOSURE PLAN

This Closure Plan will be amended within the timeframes established in State CCR Rule 391-3-4-.10(7)(b) if there is a change that would substantially affect the Closure Plan in effect or if there are unanticipated events that necessitate a revision of the Closure Plan.

20. CERTIFICATION OF CLOSURE

Upon completion of CCR removal, a professional engineer registered in Georgia will prepare and GPC will submit a certification report documenting the removal to EPD. Pursuant to State CCR 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 Federal and State groundwater protection standards, GPC will submit a Construction Certification Report to the EPD Director. The Construction Certification Report will be completed on forms provided by EPD.

Concurrent with the submission of this Construction Certification Report to EPD, GPC will submit confirmation to EPD that a notation on the property deed, inclusive of the AP-4 permit boundary, has been recorded in accordance with the State CCR Rule 391-3-4.10(7)(f).



21. ON-GOING PLANT OPERATIONS AND MAINTENANCE

Activities 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 GPC's discretion within the permit boundary after removal activities have been completed.

22. RECORDKEEPING

GPC maintains and will continue to maintain the facility's operating record at all times during the life of the disposal facility including the closure period. These records are maintained by plant personnel and are located at Plant Hammond. All information contained in the facility's operating record will be furnished to EPD or be made available at all reasonable times for inspection by EPD staff. Unless specified otherwise, each file must be retained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, record, or study.

APPENDIX



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A. PERMIT BOUNDARY LEGAL DESCRIPTION



Plant Hammond
Ash Pond 4
Permitted Site Boundary
Legal Description

All that parcel or tract of land lying and being in land lots 181, 182, 215 and 216 of the 4th District, 4th Section, Floyd County, Georgia and being more particularly described as follows:

To find The Point of Beginning at a railroad iron found on the southeasterly right-of-way of Georgia State Route 20 (having a varied right-of-way), having Georgia State Plane, West Zone, NAD83 coordinates of: N 1551356.38 and E 1941840.87; thence leaving said right-of-way and running South 65 degrees 05 minutes 28 seconds West a distance of 5468.35 feet to a point on southerly right-of-way of Georgia State Route 20 and The Point of Beginning;

Thence leaving said right-of-way and running South 00 degrees 28 minutes 59 seconds West a distance of 255.78 feet to a point; Thence running South 76 degrees 52 minutes 45 seconds East a distance of 188.57 feet to a point; Thence running North 70 degrees 08 minutes 13 seconds East a distance of 183.42 feet to a point on the westerly right-of-way of Georgia State Route 100 (having a varied right-of-way); Thence running along said right-of-way along a curve to the right an arc distance of 152.17 feet (said arc having a radius of 1700.00 feet and being subtended by a chord 152.12 feet in length lying to the west of said arc and bearing South 03 degrees 53 minutes 13 seconds East) to a point; Thence continuing along said right-of-way South 09 degrees 04 minutes 15 seconds East a distance of 203.20 feet to a point; Thence continuing along said right-of-way South 01 degrees 40 minutes 06 seconds West a distance of 193.52 feet to a point; Thence continuing along said right-of-way South 13 degrees 29 minutes 19 seconds West a distance of 220.55 feet to a point; Thence continuing along said right-of-way South 01 degrees 37 minutes 38 seconds West a distance of 197.15 feet to a point; Thence leaving said right-of-way and running North 75 degrees 45 minutes 23 seconds West a distance of 281.64 feet to a point; Thence running South 76 degrees 53 minutes 07 seconds West a distance of 355.91 feet to a point; Thence running South 50 degrees 13 minutes 05 seconds West a distance of 270.41 feet to a point; Thence running South 88 degrees 16 minutes 15 seconds West a distance of 362.90 feet to a point; Thence running North 65 degrees 58 minutes 37 seconds West a distance of 334.68 feet to a point; Thence running North 81 degrees 25 minutes 50 seconds West a distance of 323.97 feet to a point; Thence running North 81 degrees 23 minutes 08 seconds West a distance of 286.38 feet to a point; Thence running South 88 degrees 04 minutes 03 seconds West a distance of 319.17 feet to a point; Thence running North 79 degrees 42 minutes 41 seconds West a distance of 491.05 feet to a point; Thence running North 00 degrees 03 minutes 57 seconds East a distance of 1171.94 feet to a point on the southerly right-of-way of Georgia State Route 20; Thence running along said right-of-way along a curve to the left an arc distance of 326.95 feet (said arc having a radius of 2919.97 feet and being subtended by a chord 326.95 feet in length lying to the northeast of said arc and bearing South 75 degrees 59 minutes 36 seconds East) to a point; Thence continuing along said right-of-way South 79 degrees 12 minutes 02 seconds East a distance of 43.90 feet to a point; Thence continuing along said right-of-way South 12 degrees 49 minutes 20 seconds West a distance of 27.34 feet to a point; Thence South 12 degrees 49 minutes 20 seconds East a distance of 16.40 feet to a point; Thence continuing along said right-of-way South 77 degrees 10 minutes 40 seconds East a distance of 180.45 feet to a

point; Thence continuing along said right-of-way South 77 degrees 23 minutes 02 seconds East a distance of 84.33 feet to a point; Thence continuing along said right-of-way South 11 degrees 45 minutes 36 seconds East a distance of 16.40 feet to a point; Thence continuing along said right-of-way along a curve to the left an arc distance of 314.76 feet (said arc having a radius of 1748.68 feet and being subtended by a chord 314.34 feet in length lying to the south of said arc and bearing South 83 degrees 23 minutes 48 seconds East) to a point; Thence continuing along said right-of-way North 01 degrees 26 minutes 48 seconds East a distance of 9.84 feet to a point; Thence continuing along said right-of-way along a curve to the left an arc distance of 69.55 feet (said arc having a radius of 1738.84 feet and being subtended by a chord 69.55 feet in length lying to the north of said arc and bearing South 89 degrees 41 minutes 57 seconds East) to a point; Thence continuing along said right-of-way South 00 degrees 50 minutes 42 seconds East a distance of 9.84 feet to a point; Thence continuing along said right-of-way along a curve to the left an arc distance of 174.87 feet (said arc having a radius of 1748.68 feet and being subtended by a chord 174.80 feet in length lying to the north of said arc and bearing North 86 degrees 17 minutes 24 seconds East) to a point; Thence continuing along said right-of-way North 06 degrees 34 minutes 29 seconds West a distance of 9.84 feet to a point; Thence continuing along said right-of-way along a curve to the left an arc distance of 127.16 feet (said arc having a radius of 1738.84 feet and being subtended by a chord 127.13 feet in length lying to the north of said arc and bearing North 81 degrees 19 minutes 49 seconds East) to a point; Thence continuing along said right-of-way North 79 degrees 14 minutes 08 seconds East a distance of 404.97 feet to a point; Thence continuing along said right-of-way South 10 degrees 45 minutes 52 seconds East a distance of 13.12 feet to a point; Thence continuing along said right-of-way North 79 degrees 14 minutes 08 seconds East a distance of 277.00 feet to a point; Thence continuing along said right-of-way along a curve to the left an arc distance of 383.94 feet (said arc having a radius of 1528.87 feet and being subtended by a chord 382.93 feet in length lying to the south of said arc and bearing North 86 degrees 25 minutes 48 seconds East) to a point; Thence continuing along said right-of-way South 86 degrees 22 minutes 36 seconds East a distance of 98.45 feet to a point; Thence continuing along said right-of-way North 03 degrees 37 minutes 24 seconds East a distance of 42.65 feet to a point; Thence continuing along said right-of-way South 86 degrees 23 minutes 52 seconds East a distance of 117.75 feet to a railroad iron found on the southeasterly right-of-way of Georgia State Route 20 and The Point of Beginning;

Said tract contains 75.45 acres (3,286,491 square feet).