AMENDED WRITTEN CLOSURE PLAN 40 C.F.R. PART 257.102 PLANT SCHERER ASH POND (AP-1) GEORGIA POWER COMPANY

SITE INFORMATION

Site Name / Address Plant Scherer 10986 Highway 87 Juliette, Georgia 31046

Owner Name / Address

Georgia Power Company 241 Ralph McGill Blvd Atlanta, GA 30308

CCR Unit AP-1

Closure Method

Close In-Place

CLOSURE PLAN DESCRIPTION

§ 257.102(b)(1)(i) – Narrative description of how the CCR unit will be closed.

The Plant Scherer AP-1 will be closed by consolidating the CCR within the 550-acre CCR unit to a smaller footprint covering approximately 300 acres. The proposed closure footprint will consist of two primary regions within the existing AP-1 footprint; the northern excavated area where CCR will be excavated, and the southern consolidated closure-in-place footprint. The two proposed closure areas will be separated by a new northern embankment berm (referenced herein as the north berm) that will buttress the CCR materials within the consolidated closure-in-place footprint and form the northern limit of the final cover. The reduced footprint will then be closed by leaving CCR in place. In accordance with § 257.102(b)(3), the written closure plan will be amended if there is a change in operation that would substantially affect the written closure plan in effect or if there are unanticipated events that necessitate a revision of the closure plan.

§ 257.102(b)(1)(iii) -Closure of the CCR unit by Consolidation and by leaving CCR in place

Methods and Procedures

AP-1 will be dewatered sufficiently to remove the free liquids and to provide a stable base for the construction of a CCR containment structure for the consolidated footprint, excavation of CCR outside the consolidated footprint and construction of the final cover system. All CCR will be excavated from the area outside the consolidated footprint, transported, and placed in the consolidated footprint to create a subgrade for the final cover system. Excavation will include removing all visible CCR and over excavating into the subgrade soils. Free liquids will be dewatered in accordance with the Dewatering Plan once submitted to and approved by Georgia Environmental Protection Division (EPD).

In accordance with § 257.102(d), the final cover system will be constructed to control, minimize or eliminate, to the maximum extent feasible, post closure infiltration of liquids into the waste and potential releases of CCR from the unit. This will be accomplished by providing sufficient grades and slopes to: 1) preclude the probability of future ponding of stormwater, sediment or slurry on top of the final cover system; 2) support slope and cover system stability; 3) minimize the need for further maintenance; and 4) be completed consistent with recognized and generally accepted good engineering practices.

Description of Final Cover System

The final cover system has been designed to minimize infiltration and erosion. The final cover system will include an engineered geomembrane-synthetic turf cover system (e.g. ClosureTurf®) although a traditional vegetative soil-geomembrane system may be considered at the time of final design and construction. The final cover system, at a minimum, will be designed to meet or exceed the requirements of 40 C.F.R. §257.102(d)(3)(i) or (ii) (traditional and alternative cover system, respectively). Permeability of the final cover system will be less than or equal to the permeability of the natural subsoils present beneath the surface impoundment, but no greater than 1×10^{-5} cm/sec. Final design will confirm that the integrity is maintained and accommodates settlement, in addition to providing an erosion layer for protection from wind or water erosion. As an advanced engineering method, the non-CCR area known as the knob area will be covered with the same cover system as the consolidated waste footprint to minimize infiltration and facilitate a transition from the consolidated closure-in-place footprint final cover system to the knob area cover system. Since the knob area does not contain CCR, it is not subject to closure restrictions.

§ 257.102(b)(1)(iv) – Estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit

AP-1 currently contains approximately 15.3 million cubic yards of CCR. No further placement of CCR into AP-1 will occur.

§ 257.102(b)(1)(v) – Estimate of the largest area of the CCR unit ever requiring a final cover

The current size of the AP-1 is 550 acres. Consolidation of CCR within AP-1 is anticipated to approximately 300 acres.

§ 257.102(b)(1)(vi) – Closure Schedule

The milestones and the associated timeframes are initial estimates. Some of the activities associated with the milestones will overlap. An extension of the time required to complete closure may be needed given the size of the CCR unit and the time required to dewater and consolidate/stabilize the CCR and then complete final cover system installation.

Estimated Milestones

Design & Permitting (State Agency coordination and permit acquisition) – Currently underway Notification of Intent to Initiate Closure – Q4 2020 Early Sitework Activities – Q1 2021 to Q1 2022 Water Treatment and Dewatering Equipment Installation – Q3 2021 to Q2 2022 Initiate Dewatering – Q2 2022 CCR Excavation/Grading & Stabilization – Q4 2023 to Q3 2028 Installation of final cover system – Q4 2025 to Q4 2029 Estimate of Year in which all closure activities will be completed – 2031

Certification Statement 40 CFR § 257.102(b)(4)

Written Closure Plan for a CCR Surface Impoundment or Landfill

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CCR Unit

AP-1

I hereby certify that the written closure plan was prepared in accordance with the requirements of 40 CFR § 257.102, and that the final cover system will meet the requirements of § 257.102(d)(3).

G No. PEOS 2 James C. Pegues, Licensed State of G