CLOSURE PLAN

HUFFAKER ROAD LANDFILL

PLANT HAMMOND
FLOYD COUNTY, GEORGIA

FOR

Georgia Power

FEBRUARY 2025

Stantec

Stantec Consulting Services Inc.
1110 Market Street, Suite 214A, Chattanooga, TN 37402
Phone (423) 800-5350, Fax (423) 800-5351

TABLE OF CONTENTS

1. Introduction 1
2. Notification of Closure 1
3. Survey Control 1
4. Estimate of CCR in Unit 1
5. Area of Unit Requiring Final Cover 2
6. Written Closure Plan 2
7. Amendment to the Closure Plan 2
8. Certification of Closure 2
9. Directional Informational Signs 2
10. Removal of CCR 3
11. Final Cover System 3
12. Surface drainage (Run-off) 3
13. Vegetative Plan 3
14. Site Equipment Needed 5
15. Sediment Removal 5
16. Erosion and Sedimentation Control 6
17. Cost of Closure and Financial Assurance 6
18. Closure Schedule 6
19. Recordkeeping 7
20. Notification and Internet Posting Requirements 7

Stantec

Stantec Consulting Services Inc.
1110 Market Street, Suite 214A Chattanooga, TN 37402
Phone (423) 800-5350, Fax (423) 800-5351

1. INTRODUCTION

This Closure Plan is included as part of the permit application package being submitted to Georgia Environmental Protection Division (EPD) to close Georgia Power Company (Georgia Power) Plant Hammond Huffaker Road Landfill. Huffaker Road Landfill is an existing landfill located in Floyd County, Georgia. This Closure Plan has been prepared pursuant to Georgia Rules for Solid Waste Management 391-3-4-.10 Coal Combustion Residuals (State CCR Rule) and the United States Environmental Protection Agency (USEPA) Title 40 of the Code of Federal Regulations (CFR) §257 (40 CFR §257) (Federal CCR Rule).

Georgia Power will close this site in a manner that minimizes the need for further maintenance and minimizes the potential of post-closure release of contaminants to the ground or surface waters. The closure plan considers closure of the CCR landfill at any point throughout the active life of the facility. Facility phasing drawings provide guidance on closure at the end of any parcel or phase construction. Should intermediate closure be required, all components of this plan will be followed.

2. NOTIFICATION OF CLOSURE

No later than the date Georgia Power initiates closure of the CCR unit, Georgia Power will notify EPD of the intent to close the unit after receipt of the final load of waste. This notification will include certification by a professional engineer registered in Georgia for the design of the final cover system as required in State CCR Rule 391-3-4.10(7)(b) [40 CFR §257.102(d)(3)(iii)]. Georgia Power will complete all closure activities of this CCR unit in accordance with this Closure Plan within six months following the beginning of closure unless an extension(s) is obtained.

Unless an extension is requested, initiation of closure will commence no later than thirty (30) days after the date on which the CCR unit either:

a. Receives the known final receipt of waste, either CCR or any non-CCR waste stream; or

b. Removes the known final volume of CCR from the CCR unit for the purpose of beneficial use of CCR.

3. SURVEY CONTROL

A survey of the permit boundary is provided in the Closure Drawings. All areas within which CCR has been disposed will be located to the best of Georgia Power's ability and surveyed by a Registered Surveyor who will provide a legal description of the CCR management boundaries. Filling and closure activities will be confined to within the limits indicated on the Permit Drawings. An "as-built" topographic survey will be conducted indicating the extent and final topography of the CCR disposal facility as part of the closure certification.

4. ESTIMATE OF CCR IN UNIT

Huffaker Road Landfill is permitted to contain approximately 12,415,643 cubic yards of CCR upon final receipt of CCR.

5. AREA OF UNIT REQUIRING FINAL COVER

Huffaker Road Landfill is permitted to consist of approximately 141 acres requiring a final cover system upon final receipt of CCR.

6. WRITTEN CLOSURE PLAN

All parcels will be closed by leaving CCR in place, and installing a final cover system, in accordance with State CCR Rule 391-3-4.10(7)(b) [40 CFR §257.102(b)(3)].

The CCR for active and future parcels will be graded to create a stable subgrade for the final cover system. In accordance with State CCR Rule 391-3-4.10(7)(b), 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 prevented by providing sufficient grades and slopes to: 1) preclude the probability of future impoundment of water, sediment, or slurry; 2) ensure slope and final cover system stability; 3) minimize the need for further maintenance; and 4) be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices. A detailed description of the final cover system is provided in Section 11 of this Closure Plan.

7. AMENDMENT TO THE CLOSURE PLAN

The 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.

8. CERTIFICATION OF CLOSURE

Upon completion of closure activities, a professional engineer registered in Georgia will prepare and Georgia Power will submit a Closure Certification Report to EPD. The closure report will include an as-built plan of the grades at the time of closure.

Concurrent with the submission of the Closure Certification Report to the Director, Georgia Power must submit confirmation to the Director that a notation on the property deed has been recorded. This recording must in perpetuity notify any potential purchaser of the property that the land has been used as a CCR Landfill and that its use is restricted under the post-closure care requirements of State CCR Rule 391-3-4-.10(7). Within thirty (30) days of completing this deed notification, the owner or operator must prepare a notification and place in the facility's operating record.

Within thirty (30) days of completion of closure, Georgia Power will prepare a notification which will include certification from a qualified professional engineer registered in Georgia verifying that closure has been completed in accordance with this closure plan. Georgia Power has completed the notification when it has been placed in the facility's operating record.

9. DIRECTIONAL INFORMATIONAL SIGNS

Signs will be posted at the entrance gate notifying users of the closure of the CCR landfill and a telephone number for emergencies will be printed on the sign.

10. REMOVAL OF CCR

If Georgia Power wishes to remove CCR, Georgia Power will request and receive written approval from EPD prior to conducting any such activity.

11. FINAL COVER SYSTEM

The final cover system for Parcels A and B consists of (from bottom to top) a 60-mil HDPE (High Density Polyethylene) liner, double-sided geocomposite drainage media, a minimum 18-inch protective soil cover, and a 6-inch vegetative layer to establish vegetation. The final cover system for Parcels C, D, E, and F consists of (from bottom to top) 1) a 50-mil LLDPE (Linear Low-Density Polyethylene) liner and engineered turf with sand infill or 2) a 60-mil HDPE (High Density Polyethylene) liner, double-sided geocomposite drainage media, a minimum 18-inch protective soil cover, and a 6-inch vegetative layer to establish vegetation. These final cover systems meet the requirements of State CCR Rule 391-3-4.10(7)(b) in that:

1. The permeability of the final cover system will be less than or equal to the permeability of the bottom liner system;
2. The infiltration of liquids through the closed CCR unit will be minimized;
3. The erosion of the final cover system will be minimized; and
4. The disruption of the integrity of the final cover system will be minimized.

The final cover system configuration includes the following:

1. Maximum slopes of 3H:1V;
2. Minimum slopes of 3%; and
3. 30-ft wide drainage benches approximately every 25 vertical feet.

12. SURFACE DRAINAGE (RUN-OFF)

The sedimentation basins, clear pools, drainage ditches and piping are sized to convey a 25-year, 24-hour storm event. The benches will be graded to drain to various low points around the stacks. Surface water will be conveyed between benches via rip-rap lined flumes. Five sediment basins and associated clear pools will provide final treatment of stormwater run-off.

13. VEGETATIVE PLAN

For final cover systems utilizing cover soils (i.e., Parcels A and B, and the second option as described in Section 11 for Parcels C, D, E, and F), upon completion of the cover placement, the topsoil layer will be fertilized and seeded with a perennial grass as indicated in the vegetation schedule below. The seeded areas will be mulched as soon as possible after placement. The seeded areas will be maintained by repairing washes, re-fertilizing, and reseeding such that a satisfactory stand of grass is established. Once established, the grass cover will be maintained by repairing erosion features, reseeding and re-fertilizing. Hydro-seeding, or other approved methods, may be utilized in lieu of the fertilizing, seeding and mulching steps above.

All disturbed areas will be grassed and maintained in accordance with the schedules shown in Tables 1 and 2. Permanent covers which are slow to establish will receive temporary seeding. The fertilizer requirements are suggested. The operator may submit soil samples to the County Extension Agent for analysis and determination of proper soil conditioners including lime. This analysis will become part of the operational records. 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.

Final cover systems not utilizing cover soils (i.e., the first option as described in Section 11 for Parcels C, D, E, and F) do not require a vegetative plan. However, disturbed areas outside the final cover system limits will follow the vegetative plan as outlined above.

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, should 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 Second Maintenance	6-12-12 6-12-12 10-10-10	1500 lbs./ac. 1000 lbs./ac. 400 lbs./ac.	10-100 lbs./ac.(1)(2) - 30
2. Cool Season Grasses and Legumes	First Second Maintenance	6-12-12 0-10-10 0-10-10	1500 lbs./ac. 1000 lbs./ac. 400 lbs./ac.	0-50 lbs./ac.(1) - -
3. Ground Covers	First Second Maintenance	10-10-10 10-10-10 10-10-10	1300 lbs./ac.(3) 1300 lbs./ac.(3) 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 Second Maintenance	6-12-12 6-12-12 10-10-10	1500 lbs./ac. 800 lbs./ac 400 lbs./ac.	50-100 lbs./ac.(2)(5) 50-100 lbs./ac.(2) 30 lbs./ac.
6. Warm Season Grasses and Legumes	First Second Maintenance	6-12-12 0-10-10 0-10-10	1500 lbs./ac. 1000 lbs./ac 400 lbs./ac.	50 lbs./ac.(5) - -

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”.

14. SITE EQUIPMENT NEEDED

Georgia Power will coordinate with the closure contractor to make adequate equipment available to ensure that closure requirements are executed correctly and efficiently. Should said equipment not be available, back up equipment may be obtained from rental companies.

15. SEDIMENT REMOVAL

Accumulated sediment will be removed from drop inlets, drainage pipes, diversion ditches, flumes, sediment basins and clear pools, and other drainage structures throughout closure construction as required.

16. EROSION AND SEDIMENTATION CONTROL

Upon closure, all ditches, flumes, diversion berms, rip-rap, and other drainage structures serving disturbed areas, but not already built, will be constructed and placed according to the Permit Drawings or as required. Erosion control methods include, but are not limited to, silt fence, rock check dams, and rip-rap 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, Georgia Power will provide cost estimates for closure to EPD under separate cover. The closure costs will include all items necessary for a third-party to complete the project in accordance with the Closure Plan as set forth herein. The closure cost estimate will be based on the largest area subject to final cover under the closure design (i.e., 141 acres) and will be generated in current dollars. The cost estimate will be adjusted annually for inflation. Georgia Power will provide a demonstration of financial assurance upon approval of the closure and post-closure care cost estimates by EPD.

18. CLOSURE SCHEDULE

Closure activities must commence within no later than thirty (30) days after the date on which the landfill receives the known final receipt of waste or removes the known final volume of CCR from the landfill for the purpose of beneficial use, unless an extension(s) is obtained. Once closure activities have commenced, the following schedule will be followed over a six (6) month period:

1. Submit notice of intent to close the landfill (or parcel) to EPD with the date of final CCR receipt;
2. Commence closure activities within thirty (30) days of final receipt of CCR;
3. Prepare accurate legal description of final CCR management boundary;
4. Obtain written permission from EPD to remove CCR, if required;
5. Construct all erosion and sediment control systems serving disturbed areas, but not previously built;
6. Install final cover system;
7. Initiate vegetative plan;
8. Remove all accumulated sediments from ponds, ditches, and other drainage structures;
9. Prepare final topographic as-built survey;
10. Within thirty (30) days of closure activities completion, prepare and submit the Closure Report and confirmation of the deed notation to EPD; and
11. Place the required notifications and records on the Georgia Power website under Environmental Compliance.

If it is determined that completion of closure is not feasible with respect to the above schedule, Georgia Power will seek to extend the closure timeframe in accordance with 391-3-4-.10(7)(b) [40 CFR §257.102(f)(2)].

19. RECORDKEEPING

Georgia Power 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 the Huffaker Road Landfill main office. 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.

20. NOTIFICATION AND INTERNET POSTING REQUIREMENTS

Unless otherwise specified by the State CCR Rule, Georgia Power will provide notifications to EPD within thirty (30) days of placing documents in the facility's operating record. The notifications will be sent before the close of business on or before the day the notification is required to be completed. Notifications to EPD will be postmarked or sent electronically. If a notification deadline falls on a weekend or federal holiday, the notification deadline will be extended to the next business day. Georgia Power will state in the notification to EPD if the relevant information was placed on the publicly available Georgia Power website under Environmental Compliance.