

# POST-CLOSURE PLAN

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HUFFAKER ROAD LANDFILL

PLANT HAMMOND  
FLOYD COUNTY, GEORGIA

FOR



Georgia  
Power

**FEBRUARY 2025**



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## 1. INTRODUCTION

This Post-Closure Plan is included as part of the permit application package being submitted to Georgia Environmental Protection Division (EPD) for post-closure care of Georgia Power Company (Georgia Power) Plant Hammond Huffaker Road Landfill. Huffaker Road Landfill is an existing landfill and located in Floyd County, Georgia. This Post-Closure Care Plan has been prepared pursuant to the 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).

In accordance with State CCR Rule 391-3-4-.10(7)(a), Georgia Power will conduct post-closure care for the CCR unit for thirty (30) years which will consist of at least:

- a. 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, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover system;
- b. Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of State CCR Rule 391-3-4.10(6).

## 2. RESPONSIBLE SUPERVISOR

The contact person for post-closure care at Huffaker Road Landfill is:

Manager  
Georgia Power Environmental Affairs  
241 Ralph McGill Blvd NE  
Atlanta, Georgia 30308  
404-506-6505

## 3. POST-CLOSURE USE OF THE PROPERTY

Georgia Power will comply with the conditions of the solid waste handling permit. Any future use of the property after closure will not disturb the integrity of the final cover system or any other component of the containment system or groundwater monitoring system. Prior to any future use, Georgia Power will request approval from EPD for such use.

## 4. ROUTINE INSPECTION OF VEGETATIVE / FINAL COVER / DRAINAGE SYSTEM

Following closure, the site's required post-closure care period inspections will be performed on a quarterly basis for the first five (5) years, and annually thereafter, to identify any maintenance or repairs of the final cover system. Maintenance and repairs will be provided on the final cover system so that the integrity and effectiveness of the final cover system will be preserved. Maintenance activities will include, but not be limited to, any needed repairs to the final cover system to correct any damages related to settlement, subsidence, erosion, or other events, and will be performed to prevent run-off from eroding or otherwise damaging the final cover system. Maintenance tasks include, but are not limited to, repair of erosion features, repairs to any



synthetic cover system components and re-establishment of vegetation, where applicable. Maintenance will be performed on a semi-annual schedule, or more frequently if needed.

## 5. SILTATION AND EROSION CONTROL

Throughout the post-closure care period, all permanent ditches, pipes, culverts, silt fences, sediment basins, and other permanent drainage structures will be inspected and maintained. Erosion control structures will be maintained to prevent damage to the final cover system. Maintenance activities will include cleaning out erosion control structures on an as-needed basis.

## 6. VEGETATIVE PLAN

All areas lacking proper vegetation during the post-closure care period will be grassed and maintained according to specifications in the Closure Plan located in Part A of this Permit Application. If fertilizers are needed, the fertilizer plan included in the Closure Plan will be followed.

## 7. GROUNDWATER MONITORING

Groundwater monitoring will continue throughout the post-closure care period, which is a minimum of thirty (30) years, as described in the Groundwater Monitoring Plan included in Part A of this Permit Application and in accordance with State CCR Rule 391-3-4-.10. Any modifications to the monitoring system will be made in accordance with an EPD approved modification. Groundwater monitoring, as required by State CCR Rule 391-3-4-.10(6) [§257.90], will be performed on a semi-annual basis during the required post-closure care period.

In accordance with the Georgia Water Well Standards Act (O.C.G.A. § 12-5-134(5)(d)(vii)), at least once every five (5) years Georgia Power will have the monitoring wells inspected by a professional engineer or professional geologist, who will direct appropriate remedial corrective work to be performed if the well does not conform to standards. The well inspection records, and records of remedial corrective work, are subject to review by EPD. The well inspection cost estimates will be provided as part of the post-closure care cost estimate described in Section 13.

If, at the end of the thirty (30) year post-closure care period, groundwater at Huffaker Road Landfill is being monitored under the assessment monitoring program in accordance with 391-3-4-.10(6) [40 CFR §257.95], Georgia Power must continue to conduct post-closure care until Huffaker Road Landfill returns to detection monitoring in accordance with State CCR Rule 391-3-4-.10(6) [40 CFR §257.95].

If at the end of the post-closure care period the CCR unit is operating under detection monitoring in accordance with State CCR Rule 391-3-4-.10(6) [40 CFR §257.94], Georgia Power must submit a demonstration certified by a Qualified Groundwater Scientist to EPD for approval demonstrating that the facility is operating under detection monitoring. Evaluation criteria may include but are not limited to additional sampling, analysis, calculations, and/or modeling to demonstrate compliance with State CCR Rule 391-3-4.10 as determined by the Qualified Groundwater Scientist and approved by EPD.

**8. NOTIFICATION OF GROUNDWATER MONITORING STANDARDS EXCEEDED**

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

**9. LEACHATE COLLECTION AND REMOVAL SYSTEM**

The leachate collection and removal system, including storage and pumping systems, will be maintained for a minimum of thirty (30) years or until leachate is no longer generated. Leachate collected during the post-closure care period will be properly treated in a wastewater treatment facility prior to discharge. The pumps and associated piping, leachate pond and tanks will be maintained in operable condition while needed.

**10. LIMITED ACCESS**

Access to the site will be controlled by fencing, gates, buffers, etc. Access will be limited to those time periods when the site is undergoing maintenance activities or inspections.

**11. 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 unit should break down during post-closure care activities.

**12. POST-CLOSURE SUPERVISION**

Post-closure care of the site will be under the supervision of the Plant Manager. Contact information for this person will be provided to EPD at time of closure.

**13. POST-CLOSURE CARE COST AND FINANCIAL ASSURANCE**

In compliance with applicable securities laws and regulations, Georgia Power will provide unredacted cost estimates for post-closure care to EPD under separate cover. The post-closure care cost includes all items necessary for a third-party to conduct post-closure care maintenance and monitoring in accordance with the Post-Closure Plan as set forth herein. The cost estimate is generated in current dollars and will be adjusted annually for inflation. Georgia Power will provide a demonstration of financial assurance upon approval of closure and post-closure care cost estimates by EPD.

**14. AMENDMENT TO THE POST-CLOSURE PLAN**

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

**15. NOTIFICATION**

No later than sixty (60) days following the completion of the post-closure care period, Georgia Power must prepare a notification verifying that post-closure care has been completed. The notification must include the certification by a qualified professional engineer registered in



Georgia verifying that post-closure care has been completed in accordance with this plan. Georgia Power has completed the notification when it has been placed in the facility's operating record as required by State CCR Rule 391-3-4.10(7) and provided to EPD. The release of the CCR unit of post-closure care must be approved by EPD.

These notifications will be posted to the Georgia Power website under Environmental Compliance.

#### **16. RECORDKEEPING/NOTIFICATION/INTERNET REQUIREMENTS**

The requirements set forth in this post-closure plan comply with the recordkeeping, closure and post-closure notification, and internet requirements of State CCR Rule 391-3-4-.10(8).

#### **17. CERTIFICATION**

This post-closure plan meets the requirements of State CCR Rule 391-3-4-.10(7).