

# CLOSURE PLAN

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## PLANT WANSLEY ASH POND 1 (AP-1) CLOSURE

HEARD AND CARROLL COUNTIES, GEORGIA

FOR



Georgia  
Power

REVISION 0  
MAY 2024



Geosyntec   
consultants



**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

**Approved**

**Solid Waste Management Program**

Approved By: Keith Stevens Digitally signed by Keith Stevens  
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## LIST OF ACRONYMS

ACD	air curtain destructor
AP-1	Ash Pond 1
BMP	best management practice
CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
CQA	construction quality assurance
EL	Elevation
GA EPD	Georgia Environmental Protection Division
GPC	Georgia Power Company
gpm	Gallons Per Minute
GWSCC	Georgia Water Soil Conservation Commission
NPDES	National Pollutant Discharge Elimination System
P.E.	Professional Engineer
SSL	Statistically Significant Level
TCLP	Toxic Characteristic Leaching Procedure
WTP	water treatment plant

**1. INTRODUCTION**

This Closure Plan is included as part of the permit application package being submitted to Georgia Environmental Protection Division (GA EPD) to close Ash Pond 1 (AP-1), an existing coal combustion residuals (CCR) surface impoundment at Plant Wansley, located in Heard and Carroll Counties near Carrollton, Georgia. This Closure Plan has been prepared for Georgia Power Company (GPC) pursuant to the State CCR Rule in Chapter 391-3-4-.10 of the Georgia Rules for Solid Waste Management for Closure of CCR Surface Impoundment Units and the Federal CCR Rule in Title 40 of the Code of Federal Regulations (CFR) §257 (40 CFR §257).

**2. GENERAL**

AP-1 will be closed by removal of CCR from the unit. This closure strategy will eliminate the need for future maintenance and long-term post-closure care. Georgia Power will accomplish this closure of the ash pond by removing, transporting, and placing this CCR in the onsite, existing CCR landfill (expansion to be permitted under a separate application). Note that should GPC choose, CCR may also be transported to an offsite solid waste facility approved to accept CCR. Drawings depicting existing conditions, CCR removal, and final conditions illustrating the closure activities are included in Section 8 of Part A of this permit application.

**3. NOTIFICATION**

The Notification of Intent to Initiate Closure was signed and posted in the CCR Unit’s Operating Record on April 17, 2019. It was revised in Q1 2024 to indicate that the closure strategy for AP-1 has changed from closure in place to closure by removal of CCR. Closure activities will commence according to the closure schedule presented in Section 11 of this Closure Plan. Depending on the actual CCR excavation rate achieved during closure activities, complete CCR removal, certification, and Site stabilization, in accordance with this Closure Plan, will be accomplished in an estimated ten to fifteen years following the beginning of closure activities. Natural refilling former AP-1 with water from the surrounding watershed will take another estimated ten years.

**4. BOUNDARY SURVEY AND LEGAL DESCRIPTION**

A survey drawing (plat) and legal description of the permit boundary, prepared by a Registered Professional Surveyor, is included on Drawing 3 of the Closure Drawings (Section 8 of Part A in this permit application).

**5. OPERATING CRITERIA**

Pursuant to State CCR Rule 391-3-4-.10(9)(c)5(iii), AP-1’s operating criteria required by 40 CFR §257.80, 40 CFR §257.82, and 40 CFR §257.83 are met as described below.

- Air criteria, implemented in accordance with the Plant Wansley Fugitive Dust Control Plan are included as Section 6.3.5 of this Closure Plan.

- Hydrologic and hydraulic capacity requirements, addressed as documented in the Plant Wansley AP-1 Inflow Design Flood Control System Plan dated October 12, 2016, are included in the CCR Postings (Section 4 of Part B in this permit application).
- Inspection requirements for CCR surface impoundments as set forth in 40 CFR §257.83.

## 6. WRITTEN CLOSURE PLAN

### 6.1 OVERVIEW

Pursuant to State CCR Rule 391-3-4-.10(7)(c), AP-1 will be closed in accordance with this Closure Plan. An initial written closure plan was posted to the GPC CCR compliance website on October 17, 2016 in accordance with the self-implementing federal CCR Rule 40 CFR §257.102(b), and is now superseded by this written closure plan, which may be amended by GPC at any time. Moreover, as required by 391-3-4-.10(7)(b) [40 CFR §257.102(b)(3)(ii)(B)], this closure plan must be amended before or after closure activities have commenced, unanticipated events necessitate a revision of the written closure plan. The time frames for amendment to the written closure plan will be in accordance with those specified in 391-3-4-.10(7)(b) [40 CFR §257.102(b)(3)(iii)].

GPC will amend this Closure Plan whenever there is a change that would substantially affect closure of the site or unanticipated events necessitate a revision of the closure plan. The Closure Plan will be amended no later than 30 days following a triggering event.

The purpose of this section of the Closure Plan is to describe the steps and procedures required to close Plant Wansley AP-1 in a manner consistent with recognized and generally accepted engineering practices.

### 6.2 CLOSURE STEPS

The general sequence of activities for Closure by Removal of AP-1 include:

- Site preparation, including but not limited to, clearing trees, grading, constructing access roadways and laydown construction areas, and installing erosion and sediment controls;
- Installation, testing, start-up, and operation of a water treatment plant (WTP) to support construction dewatering activities;
- Bulk Removal, including Construction Quality Assurance (CQA) in accordance with the CQA Plan, by either: (i) bulk removal of CCR via dredging or similar method, followed by removal of free water within AP-1; or (ii) removal of free water within AP-1 followed by bulk removal of CCR via conventional excavation;

- CCR material transport via piping from dredge, piping from dredge to paste thickening plant, conveyor, or haul truck to the GA EPD approved onsite CCR landfill or other solid waste facility approved to accept CCR;
- Final removal of CCR, including CQA in accordance with the CQA Plan, via conventional excavation and transportation by conveyor or haul truck to the GA EPD approved onsite CCR landfill or other solid waste facility approved to accept CCR, to its bottom in AP-1 as defined by the visual interface between CCR and underlying native soils with the complete drawdown of the free pool within AP-1;
- Removal, including CQA in accordance with the CQA Plan, via conventional excavation and transportation by conveyor or haul truck to the GA EPD approved onsite CCR landfill or other solid waste facility approved to accept CCR, of a minimum six inches of additional soils after reaching the CCR/native soil interface, with the exceptions noted in Section 6.3.3 below;
- Certification of CCR Removal;
- Temporary stabilization of bottom of excavation surface through approved methods in Manual for Erosion and Sediment Control in Georgia to prevent erosion;
- Placement of riprap, stability and seepage berm, and riprap buttress on the Separator Dike; and
- Refill of former AP-1 via natural processes for potential plant uses.

The site layout, presenting the extents of the permit boundary is presented in the Closure Drawings in Section 8 of Part A in this permit application.

### **6.3 PROCEDURES DURING CLOSURE**

#### **6.3.1 Dewatering of AP-1**

As part of Closure by Removal activities contact water will be removed from AP-1 to facilitate excavation and certification of CCR removal. Dewatering will occur throughout the closure construction. Drawdown rate will be based on recommendations from and under the direction of the Closure Design Consultant Engineer of Record and Southern Company Services Dam Safety Engineer of Record. See Section 6.3.2 below for details on treatment and discharge location.

Free contact water will be removed via pumping of the water. Both in-situ and ex-situ dewatering techniques will be used for removal of interstitial contact water. Examples of in-situ dewatering techniques that will be considered for use include, but are not limited to, trench drains, wellpoints, deep wells, and wick drains. Examples of ex-situ dewatering techniques that will be considered for use

include, but are not limited to, thickening to create a paste, gravity dewatering (e.g., settling basins), belt filter press dewatering, recessed chamber filter press dewatering, centrifuge dewatering, geotextile tube dewatering, windrowing, and absorbent desiccation. Some of the dewatering methods may require the addition of a polymer; GPC will review any use of polymer and will complete analytical testing on the material mixture such as toxic characteristic leaching procedure (TCLP). Thickening technology (sometimes called Paste as the material is thickened to a paste consistency) is a common application that is used in mining operations. In this instance the CCR from AP-1 will be dewatered to approximately 70% solids. Processes in a thickening application include, but may not be limited to: (i) dredging of material to a surge pond; (ii) screening or cycloning to segregate/remove coarse material such as bottom ash that can be hauled; (iii) thickening process to dewater fine materials such as fly ash by use of disc filters, polymer addition, centrifugal pumps, and settling tanks; and (iv) pumping of thickened material for deposition at the onsite CCR landfill. Any requirements of placement of thickened material will be included in the onsite CCR landfill documentation to GA EPD.

The Contractor will have the latitude to propose dewatering means and methods to best meet the project requirements in a way that satisfies the design criteria and requirements. During closure, specific Contractor-proposed means and methods will be submitted to and approved by GPC.

### **6.3.2 Stormwater and Contact Water Management**

As detailed above in Section 6.3.1 closure construction will include a dewatering program that will generate contact water. Additionally, the Contractor will work to separate non-contact (stormwater) throughout construction. Management of water will include:

- Removal and disposal of contact water will be accomplished in accordance with the National Pollutant Discharge Elimination System (NPDES) Permit No. GA0026778, effective November 1, 2020 and routed through the onsite WTP prior to treatment and discharge through the current outfall structure in accordance with the Dewatering Plan, approved by GA EPD in October 2021. The pipe outlet from AP-1 to the current outfall structure will be sealed prior to commencement of CCR removal such that contact water from AP-1 cannot be discharged prior to passing through the WTP.
- The WTP is located in the vicinity of the outfall structure on a lined laydown/containment area to assure that, in the unlikely event of an overflow or accidental discharge, water from the WTP area can be conveyed back into AP-1 for storage and retreatment by the WTP. The



WTP will operate at all times when discharging water; the system may operate up to 24 hours per day. The WTP will be configured to treat a water flow of approximately 4,000 gallons per minute (gpm), but the treatment flow capacity of the WTP may be increased to 6,000 gpm, if needed.

- During AP-1 closure, contact water may be separated from non-contact stormwater. Non-contact stormwater will be managed in accordance with applicable NPDES stormwater and erosion and sediment controls (BMPs) and will be conveyed through appropriate stormwater management features in accordance with the Site's existing Industrial General Permit, NPDES Permit No. GAR050000, as applicable.
- Post closure, discharge of non-contact stormwater will comply with requirements of the GA EPD Watershed Protection Branch, including but not limited to, NPDES permitting, as applicable.

### **6.3.3 CCR Removal and Removal Criteria**

CCR removal technique and sequence will be based on Contractor means and methods. Many site-specific factors will be considered including access into and out of the ash pond, haul routes, dewatering methods, detailed CCR excavation and final restoration phasing plans, the excavation working face size, and excavation and hauling methods. Bulk removal of CCR may be completed either by dredging or conventional excavation. Final removal of CCR will be completed via conventional excavation, such that both CCR and additional six inch excavation verification can be completed in dry conditions (i.e., not pooled water).

In general, the Contractor will remove CCR and associated infrastructure from the southwest of AP-1 working east towards the Separator Dike, constructing berms to reduce contact water as areas of AP-1 are certified for CCR removal. This certification process will be performed in accordance with the CQA Plan, included in Section 5 of Part A of the permit application. The CCR removal verification process will generally include the following:

- CCR removal activities will be observed by the CQA Consultant. Observations will be made in reference to a 100-foot by 100-foot Site grid system established for the closure project. Each grid location will be assigned a unique label for reference and documentation purposes.
- Once the Contractor has reached the bottom of CCR excavation, the surface will be jointly observed in the dry condition and documented to confirm removal of visible CCR. Visual observations and the Munsell Soil Color Chart will be used as the basis to confirm that visible CCR has been

removed to the extent practicable. At a minimum frequency of one per 100-foot grid, the interface (i.e., top of the natural soils immediately underlying the CCR that is removed) will be photographed by the CQA Consultant to document the CCR removal verification process. Additionally, the area will be surveyed to develop a topographic map denoting the bottom-of-CCR across AP-1.

- Once CCR removal is confirmed, documented, and the area is surveyed, the excavation will continue by removing at least six inches of additional soil underlying the bottom of CCR. Verification and documentation of removal thicknesses will be performed by surveying the area again to create a bottom of excavation surface. If the bottom of excavation is found to be at least six inches below the surveyed bottom of CCR [provided that it is practicable to achieve the excavation (e.g., competent bedrock has not been encountered and if it is, it will not be removed) and does not impact stability of the Separator Dike as determined by the Dam Safety Engineer], then the removal action for the surveyed area is considered complete. CCR excavation activities will cease when CCR removal verification for each grid location is completed and documented by the CQA Consultant.
- All field activities performed by the CQA Consultant to support verification of CCR removal will be documented in the CQA Certification Report that will be submitted to GA EPD.

#### **6.3.4 Site Restoration**

Following completion of CCR removal and certification the former AP-1 will be restored per the Closure Drawings, including the following:

- Placement of a stability and seepage berm at the toe of the Separator Dike in the former AP-1.
- Placement of riprap on the Separator Dike in the former AP-1 for erosion control.
- Placement of a riprap buttress at the toe of the Separator Dike in the Storage Water Pond.
- Stabilization of exposed areas in accordance with the Manual for Erosion and Sediment Control in Georgia.
- Refill of former AP-1 via natural processes (i.e., rain and stormwater runoff) for potential plant uses.

- Upon completion of CCR removal, the former AP-1 will continue to serve as a treatment pond and provide any remaining treatment function for any residual CCR-impacted water that may be present. No new waste streams will be introduced into the former AP-1 during or following completion of dewatering activities and removal of CCR. The former AP-1 will continue to provide any remaining treatment function until final regulatory closure is achieved in accordance with the Rules for Solid Waste Management, Chapter 391-3-4-.10.
- Discharges from the CCR unit will continue to be managed under the NPDES permitting program in coordination with the EPD Watershed Protection Branch.
- Maintenance of the surface impoundment, including the Separator Dike and primary spillway structure (NPDES outfall structure), will continue during the post CCR removal period that includes groundwater monitoring.

#### **6.3.5 Geotechnical Instrumentation**

Geotechnical instrumentation may be utilized to obtain subsurface information to monitor ground conditions during CCR removal. Instrumentation may include settlement plates, slope inclinometers, vibrating wire piezometers, standpipes, and other instruments.

#### **6.3.6 Fugitive Dust Control Plan**

The purpose of this fugitive dust control plan is to demonstrate compliance with the fugitive dust requirements in GA EPD Rule 391-3-4.10 and 40 CFR § 257.80 (b)(1) through (7) of the CCR Final Rule. See 80 Fed. Reg. 21,302 (April 17, 2015). EPA defines CCR 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.” [40 CFR § 257.53; incorporated by reference in GA EPD Rule 391-3-4.10(2)(a)].

This fugitive dust plan identifies and describes the CCR fugitive dust control measures that will be used to minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities. The fugitive dust control measures that will be used are presented below:

- Fugitive dust originating from the closure of AP-1 will be controlled using water suppression, compaction, synthetic or vegetative covers, or dust suppression agents.

- CCR that is transported via truck to the existing onsite landfill will be conditioned to appropriate moisture content to reduce the potential for fugitive dust.
- Water suppression 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 used 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.

The fugitive dust control measures identified and described in this Closure Plan were selected based upon an evaluation of site-specific conditions at AP-1, including the physical properties of CCR, the specific closure construction activities, weather conditions, and operating conditions.

GPC personnel and/or their contractors will assess the effectiveness of the control measures by performing visual observations of AP-1 and surrounding areas. Appropriate corrective actions for fugitive dust will be implemented as necessary. Logs will be used to record the use of water-spray equipment.

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

Amendments to the fugitive dust control plan may be made at any time as required due a change in conditions that would affect the in-place plan. All revisions to the fugitive dust control plan will be documented and placed in the operating record. Upon completion of CCR removal, the fugitive dust control plan will no longer be applicable and associated activities including reporting will cease.

### **6.3.7 Organic Materials Management**

AP-1 contains a variety of vegetation from trees and underbrush to non-woody plants. Woody vegetation will be cut above the ground and removed prior to removing CCR. Vegetation and wood waste will be managed in the following manner:

1. Trees and logs may be harvested, windrowed or stockpiled for mulching prior to off-site disposal, chipped for use on-site as a best management practice (BMP) measure, burned through approved methods and times, or disposed of at a permitted offsite landfill.

2. Large bushes may be windrowed or stockpiled for mulching prior to disposal, burned through approved methods, or disposed of at a permitted offsite landfill.
3. Stumps and tree roots may be windrowed or stockpiled for mulching prior to disposal, chipped for use on-site as a BMP measure, burned through approved methods, or disposed of at a permitted offsite landfill.
4. Grass and brush may be windrowed or stockpiled for mulching prior to disposal or disposed of at a permitted offsite landfill.

Remaining wood waste from grubbing work within the CCR footprint will be managed and kept separate from surface-cut wood waste. Wood waste that contains CCR will be managed within the ash pond limits in the following manner:

1. Stumps and tree roots may be mechanically screened to remove CCR, windrowed or stockpiled for mulching prior to disposal, burned through approved methods, or disposed of at a permitted offsite landfill.
2. Grass and bushes may be mechanically screened to remove CCR and windrowed or stockpiled for mulching prior to disposal at a permitted offsite landfill.

The following procedures will be followed for onsite burning:

Air curtain destructors (ACDs) will be used for all burning in accordance with Solid Waste Thermal Treatment Operations (Rule 391-3-4-.08(2)). The ACD(s) will be mobile units, therefore construction certification as required by 391-3-4-.08(2)(b) will not be required; however, if a permanent ACD structure is utilized, then a construction certification will be prepared and submitted to EPD. The following conditions will be met for utilization of any ADC:

1. Location: The ACD(s) must be at least 500 feet from any occupied dwelling. The distance may be increased or decreased on a site-specific basis at the discretion of the Division.
2. If needed, areas for storing wastes prior to treatment will be clearly defined and maximum capacity specified.
3. Types of Wastes: Only wood wastes consisting of trees, logs, brush, stumps relatively free of soil, and natural wood products free of wood preserving chemicals, paints, and other contaminants may be burned. Fallen leaves, sawdust, other densely packed wood wastes, and paper (any type) may not be burned.

4. Air Quality: The facility shall be designed in such a manner as to meet applicable air quality standards of the Division. No smoke emissions exceeding 20 percent opacity may be produced during operation except for a specified ignition period.
5. Disposal of Ash and Residue: Ash and residue shall be removed from the facility, handled as a recovered material or and disposed in a permitted facility.
6. Fire Protection: Facility design shall provide for fire control equipment and a soil stockpile placed near the storage and ACD area(s). Additional fire fighting equipment shall be made available for emergencies.
7. Supervision: Operation and management of ACDs shall be under the direct supervision and control of an operator who is present at all times of operation and is qualified in ACD management by training, education or experience.
8. Residue: Temperature and combustion time shall be sufficient to produce a satisfactory residue, and such residue shall be promptly deposited in a landfill operated and maintained as provided herein or handled in such other manner as may be allowed by these Rules. Ashes may not be allowed to build up on the combustion pit to higher than one-third the pit depth to the point where combustion is impeded, whichever comes first.
9. Access: Facility access shall be restricted to prohibit unauthorized storage or disposal of wastes and to prevent injury during ACD operation.
10. Inspection and Maintenance: The ACD and all operating appurtenances must be routinely inspected and adequately maintained to ensure proper working order. Storage areas must be inspected and maintained to exclude unauthorized wastes and minimize any fire hazard.
11. No ACD may burn any household waste or yard trimmings.

#### **6.3.8 Equipment Decontamination**

Before removing a piece of equipment that has been in contact with CCR from the active work area of AP-1, the equipment will be inspected and cleaned with water. Water generated from this activity will be managed as contact water and treated by the dewatering system prior to discharge. Equipment decontamination activities will be completed in accordance with the latest version of the US EPA Field Equipment Cleaning and Decontamination operating procedure.

### 6.3.9 Inspections

The following inspections are performed in accordance with State CCR Rule 391-3-4-.10(5)(b):

- 7-Day Inspections: GPC inspects the CCR unit and discharge of all hydraulic structure outlets at intervals not exceeding seven (7) days. The 7-day inspections are made by a qualified person and include observation and documentation of any appearance of actual or potential structural weakness and other conditions which are disrupting or have the potential to disrupt the operation or safety of the facility.
- 30-Day Inspections: GPC monitors all CCR unit instrumentation at intervals not exceeding 30 days. These instrumentation monitoring examinations are made by a qualified person.
- Annual Inspections: A qualified professional engineer (P.E.) registered in Georgia inspects the CCR unit on an annual basis to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards. The inspection includes at a minimum, the following activities:
  - i. A review of available information regarding the status and condition of the CCR unit, including but not limited to, files available in the operating record (e.g., CCR unit design and construction information required by §§ 257.73(c)(1) and 257.74(c)(1), previous periodic structural stability assessments required under §§ 257.73(d) and 257.74(d), the results of inspections by a qualified person, and results of previous annual inspections);
  - ii. A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit and appurtenant structures; and
  - iii. A visual inspection of any hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation.

The results of this annual inspection are presented in a report that is placed in the facility's operating record as well as on the GPC CCR Compliance website. The annual inspection report will address the following: (i) any changes in geometry of the impounding structure since the previous annual inspection; (ii) the location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection; (iii) the approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual

inspection; (iv) the storage capacity of the impounding structure at the time of inspection; (v) the approximate volume of impounded water and CCR at the time of the inspection; (vi) any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation or safety of the CCR unit and appurtenant structure; and (vii) any other changes which may have affected the stability or operation of the impounding structure since the previous annual inspection.

If a potential deficiency or release is identified during an inspection, GPC will remedy the deficiency as soon as feasible. If needed, GPC will activate the Emergency Action Plan and follow the appropriate procedures outlined in that plan. GPC will prepare documentation detailing the corrective measures taken and will place it in the facility's operating record.

#### **6.3.10 Site Security**

Access to Plant Wansley property will be controlled by fence and security personnel. All gates will be locked and a sign will be placed at the entrance to AP-1.

#### **6.3.11 Groundwater Monitoring**

GPC will monitor groundwater semi-annually pursuant to the requirements defined in the Groundwater Monitoring Plan. Groundwater will be monitored for a period of five (5) years after the CCR has been removed from AP-1 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 GA 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 as determined by the Qualified Groundwater Scientist and approved by GA EPD.

### **6.4 MAXIMUM INVENTORY OF CCR**

AP-1 currently contains an estimated 15.9 million cubic yards of in-place CCR (Material Balance in Section 2 of Part B in this permit application). While the extent of CCR removed from AP-1 will be placed in the onsite CCR landfill, to the extent possible GPC will look to divert CCR to beneficial use.



**7. CERTIFICATION OF CLOSURE**

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 Appendix IV groundwater protection standards, GPC will submit a closure report/demonstration to the GA EPD Director. The closure report/demonstration will be completed on forms provided by GA EPD.

**8. VEGETATIVE PLAN**

The final restoration areas for AP-1 will be maintained to meet the requirements in the Manual for Erosion and Sediment Control in Georgia. Areas will be stabilized within two weeks after reaching and verifying final grades by the CQA Consultant. As previously stated, following closure the former AP-1 will be refilled via natural processes for potential plant uses.

**9. EROSION AND SEDIMENT CONTROL**

Erosion and sediment control measures will be designed, permitted, installed, and maintained in accordance with the Manual for Erosion and Sediment Control in Georgia [GSWCC, 2016], the permit drawings, and the detailed design drawings prepared in accordance with the State CCR Rule. A phased Erosion, Sedimentation, and Pollution Control Plan will be prepared as part of the detailed design depicting erosion, sediment, and stormwater and contact water management strategies during CCR excavation.

**10. COST OF CLOSURE**

In compliance with applicable securities laws and regulations, GPC will provide specific cost estimates for the closure under separate cover. A narrative has been added to note the acreage the estimate is based on, the year in which estimates were completed, and that costs will be adjusted annually for inflation. GPC will provide a demonstration of financial assurance upon approval of closure and post-closure cost estimates by GA EPD.

**11. CLOSURE SCHEDULE**

The following is a conceptual-level schedule communicating the anticipated milestones of major closure activities; it will be refined as closure activities begin.

**Table 1. Anticipated Closure Schedule for AP-1**

<b>Activity</b>	<b>Duration/Schedule</b>
Mobilization and Site Preparation (including clearing and grubbing)	Year 1
Ash Pond Closure Construction Activities (including dewatering, CCR removal, related earthwork, and site restoration)	Year 1 to Year 15 (estimated 10 to 15 years)
Submit CCR Removal Documentation to GA EPD	Year 5 to Year 15
Groundwater Monitoring During Ash Pond Closure	Year 1 to Year 15 (estimated 10 to 15 years)
Notification of Closure preparation as required by 40 CFR 257.102(h)	30 days after completion of closure of CCR
Post CCR-Removal Groundwater Monitoring	5 years following completion of closure construction
Submit a Closure Report/Demonstration to the GA EPD Director	Upon demonstrating groundwater monitoring concentrations at the Site do not exceed Appendix IV groundwater protection standards

As noted above, closure construction of AP-1 is expected to exceed the five year timeline outlined in 40 CFR 257.102(f)(1). In accordance with 40 CFR 257.102(f)(2) GPC will complete the requirements for application of a 2-year closure extension for AP-1. GPC will demonstrate the basis and detail the factors for the need of additional time. This documentation will be submitted to EPD prior to the end of the initial 5-year or any subsequent 2-year extension period. Included in the demonstration, per 40 CFR 257.102(f)(2)(iii), GPC as the owner and operator will include the following statement: *I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. A maximum of five 2-year extensions may be granted.*

**12. RECORDKEEPING/NOTIFICATION/INTERNET REQUIREMENTS**

GPC will comply with the requirements of State CCR Rule 391-3-4-.10(8), which references the recordkeeping requirements of 40 CFR §257.105(i), closure notification requirements specified in 40 CFR §257.106(i), and closure internet requirements in 40 CFR §257.107(i).

Specifically, the following notifications, document retention, and timely postings to the internet include:

- Notifications must be sent to the State Director within 30 days of placing information required by 257.105 in the operating record in accordance with 40 CFR 257.106(d).
- The information required by 40 CFR 257.105 must be posted to the CCR Web site within 30 days of placing the information in the operating record in accordance with 40 CFR 257.107(d).
- The information required to be posted to the CCR Web site must be made available to the public for at least five years following the date on which the information was first posted to the CCR Web site as required by 40 CFR 257.107(c).

### **13. POST-CCR REMOVAL**

Following the removal of CCR from AP-1, GPC will utilize the refilled pond as an industrial pond for Plant operations. Given that the closure strategy is Closure by Removal, a formal Post-Closure Plan is not needed. Following CCR removal, GPC will conduct post-CCR removal groundwater monitoring for five (5) years to verify the completion of Closure by demonstrating that the groundwater monitoring concentrations at the Site do not exceed the groundwater protection standards established pursuant to GA EPD rules 391-3-4-.10(6) (incorporating 40 CFR 257.95(h)) for constituents listed in Appendix IV. GPC will cease groundwater monitoring after five years post removal of CCR from AP-1 so long as no statistically significant level (SSL) for constituents listed in Appendix IV are observed at the end of the 5-year period. Once complete, AP-1 will be formally closed.