

CERTIFICATION STATEMENT COMPLETION OF CLOSURE ACTIVITIES DEMONSTRATION 391-3-4-.10(7) and 40 C.F.R. PARTS 102(f)(3) and 102(c) GEORGIA POWER COMPANY - PLANT YATES GYPSUM STACK LANDFILL

The Georgia CCR Rule (391-3-4-.10) requires the owner or operator of a CCR unit to obtain a certification from a qualified professional engineer verifying that closure has been completed in accordance with the closure plan specified in Ga. Comp. R. & Regs. r. 391-3-4-.10(7), which references 40 C.F.R. § 257.102. See 40 C.F.R. § 257.102(f)(3). This Certification Statement is provided to document that Georgia Power Company has completed all closure activities, including CCR removal and decontamination at the Plant Yates Gypsum Landfill.

A Notification of Intent to Initiate Closure of the Gypsum Landfill was completed on July 22, 2015, as required by Ga. Comp. R. & Regs. r. 391-3-4-.10(9)(c)(4). Closure construction activities have been completed by removing all CCR, the leachate collection system, liner materials, and an additional 6 inches of subgrade. A certification of removal report dated January 19, 2017 demonstrating completion of removal activities was submitted to Georgia Environmental Protection Division (EPD). EPD acknowledged the removal has been completed in a letter dated October 27, 2020.

Permit Number 038-016D(CCR) was issued for the Gypsum Landfill on January 5, 2022. In accordance with Permit Condition 9, groundwater monitoring can be discontinued on August 15, 2024 if constituents do not statistically exceed Appendix IV groundwater protections standards.

In accordance with the provisions of Ga. Comp. R. & Regs. R. 391-3-4-.10(9)(c)(4), which reference 40 C.F.R. § 257.102(c), CCR removal and decontamination is complete "when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to § 257.95(h) for constituents listed in Appendix IV."

Based on the past five years of semi-annual groundwater monitoring data documented in semiannual groundwater monitoring reports, concentrations in the permitted groundwater monitoring network wells at the Gypsum Landfill have not, and do not, statistically exceed the groundwater protection standards for Ga. Comp. R. & Regs. R. 391-3-4-.10(6)(b), which references 40 C.F.R. Part 257 Appendix IV constituents¹. Accordingly, Condition 9 of CCR Permit Number 038-016D(CCR) is satisfied.

Closure activities at the Plant Yates Gypsum Landfill, were conducted under the direct supervision of a Professional Engineer and Qualified Groundwater Scientist registered to practice in Georgia. According to Ga. Comp. R. & Regs. R. 391-3-4-.01, a Qualified Groundwater Scientist is "a professional engineer or geologist registered to practice in Georgia who has received a baccalaureate or post-graduate degree in the natural sciences or engineering and has sufficient training and experience in groundwater hydrology and related fields that enable individuals to make sound professional judgments regarding groundwater monitoring, contaminant fate and transport, and corrective action." In accordance with Permit Condition 10, I Geoffrey Gay hereby certify that the closure activities, including CCR removal and decontamination of the Yates Gypsum Landfill, have been completed in accordance with the Georgia CCR Rules and the approved permit documents.

Geoffrey Gay, P.E.

Technical Expert (Eng), Vice President Georgia Registration No. PE 27081 July 3, 2024 Date