

INITIAL WRITTEN CLOSURE PLAN 40 C.F.R. 257.100(e)(6)(i) PLANT HAMMOND ASH POND 3 (AP-3) GEORGIA POWER COMPANY

The Environmental Protection Agency's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257 & Part 261) was published in the Federal Register on April 17, 2015. A direct final rule revision in response to a partial vacatur of the Final Rule became effective on October 4, 2016. This revision eliminated the exemption for inactive coal combustion residual (CCR) surface impoundments and required such units to meet the same requirements as existing CCR surface impoundments. An extended timeline was given to inactive CCR surface impoundments that had prepared Notification of Intent to Initiate Closure compliant with 40 C.F.R. §257.105(i)(1), 40 C.F.R. §257.106(i)(1) and 40 C.F.R. §257.107(i)(1).

40 C.F.R. §257.100(e)(6)(i) for inactive CCR surface impoundments requires an initial written closure plan to be completed as set forth by 40 C.F.R. §257.102(b).

SITE INFORMATION

Rome, GA 30165

Site Name / AddressPlant Hammond
5963 Alabama Highway SW

Owner Name / Address Georgia Power Company 241 Ralph McGill Blvd Atlanta, GA 30308

CCR Unit

Close In-Place

CLOSURE PLAN DESCRIPTION

§257,102(b)(1)(i) – Narrative description of how the CCR unit will be closed

AP-3 closure construction consisted of leaving CCR in place and installing a final cover system. AP-3 is capped with construction to be completed in Q2 2018. Closure construction is substantially complete in accordance with 40 C.F.R. §257.102(d), no longer impounds free water nor receives CCR or other wastestreams, and no longer meets the definition of a CCR Surface Impoundment. Georgia Power Company is in the process of obtaining a solid waste permit for AP-3 under the Georgia Rules for Solid Waste Management, 391-3-4-.10. This closure method has eliminated the future impoundment of water, sediment, or slurry.

In accordance with 40 C.F.R §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 leaving CCR in place

Methods and Procedures

AP-3 was dewatered sufficiently to remove the free liquids and to an extent to provide a stable base for the construction of the final cover system. Ash was graded within the footprint of the impoundment to create a subgrade for the final cover system. In accordance with 40 C.F.R. §257.102(d), the final cover is 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 was accomplished by providing sufficient grades and slopes to: 1) preclude the probability of future impoundment of water, slurry, or sediment; 2) ensure slope and 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.

<u>Description of Final Cover System</u>

The final cover for the 25-acre unit consists of a 60 mil HDPE (High Density Polyethylene) liner, geocomposite drainage media, a minimum 18-inch protective soil cover, and a 6-inch vegetative layer to establish vegetation.

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

The AP-3 final closed footprint contains approximately 1,108,000 cubic yards of CCR.

 $\S257.102(b)(1)(v)$ – Estimate of the largest area of the CCR unit ever requiring a final cover

AP-3 consists of approximately 25 acres requiring a final cover.

§257.102(b)(1)(vi) - Closure Schedule

Closure construction began in Q2 2016 with stabilization and grading of CCR. AP-3 is capped with construction to be completed in Q2 2018. Georgia Power Company is in the process of obtaining a Georgia State CCR Permit by Q4 2018.



Certification Statement 40 C.F.R. § 257.102(b)(4) Initial Written Closure Plan

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Owner Name / Address

Georgia Power Company 241 Ralph McGill Blvd Atlanta, GA 30308

CCR Unit

AP-3

I hereby certify that the written closure plan was prepared in accordance with the requirements

of 40 C.F.R. §257.102.

Jon A. Sparkman, PE

Licensed, State of GA, PE No. 028622