

POST-CLOSURE CARE PLAN

**PLANT KRAFT
INACTIVE CCR LANDFILL
GRUMMAN ROAD ASH LANDFILL
CHATHAM COUNTY, GEORGIA**

FOR



**Georgia
Power**

MAY 2023



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1. GENERAL

The Grumman Road Ash Landfill post-closure care plan is prepared to meet the requirements of Rule 391-3-4-.10(7), which requires the owner or operator of an existing CCR landfill that is closed in place to provide for post-closure care of the landfill for a period of at least 30 years. Post-closure care includes maintaining the integrity of the final cover system, the liner, as well as continuing groundwater monitoring in accordance with Rule 391-3-4-.10(6).

Georgia Power will amend the initial and subsequent written post-closure care plans whenever:

- There is a change in the facility's operation of the landfill that substantially affects the written post-closure care plan in effect; or
- If after post-closure activities have commenced, unanticipated events necessitate a revision of the written post-closure care plan.

Georgia Power will amend the written post-closure care plan at least 60 days prior to a planned change in the operation of the CCR landfill affecting post-closure care, or no later than 60 days after an unanticipated event requires the need to revise the existing written post-closure care plan. If the written post-closure care plan is revised after post-closure care activities have commenced, Georgia Power will amend the written post-closure care plan no later than 30 days following an unanticipated event that necessitates a revision of the written post-closure care plan.

All amendments to the approved post-closure care plan will include a certification from a professional engineer licensed to practice in the State of Georgia, that the amended post-closure plan meets the requirements of Rule 391-3-4-.10(7).

The release from the post-closure requirements in this plan must be approved by the Director of the Georgia Environmental Protection Division (EPD).

2. POST-CLOSURE USE OF THE PROPERTY

Georgia Power shall conduct post closure for the CCR unit which shall consist of at least:

- A. Maintaining the integrity and effectiveness of the final cover system, including making repairs to the final cover 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

- B. Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with Groundwater Monitoring Plan included in this application.

At the end of the 30-year post-closure care period, if the site is in detection monitoring, Georgia Power may request a release from the post-closure care requirements in this plan. The release must be approved by the Director of Georgia EPD. However, if the site is operating under assessment monitoring, Georgia Power will continue to conduct post-closure care and monitoring until the site returns to detection monitoring.

There is no planned use of this property during the Post-Closure Care Period at this time. Prior to any future use, EPD approval is required.

3. GROUNDWATER MONITORING

Georgia Power Company will monitor groundwater semi-annually pursuant to the requirements defined in the Groundwater Monitoring Plan for a period of at least thirty (30) years. Following each semi-annual sampling event, results will be provided to EPD for its review. The groundwater monitoring wells will be maintained throughout this period.

Georgia Power will be responsible for conducting all monitoring activities. If at any time the monitoring results indicate an exceedance of established standards or indicate a threat to human health or the environment, Georgia Power will notify the Environmental Protection Division and comply with the requirements of the Georgia Rules for Solid Waste Management Section 391-3-4.10(6).

If at the end of the 30-year post-closure care period the facility is operating under assessment monitoring in accordance with Georgia Rule 391-3-4-.10(6) and 40 CFR 257.95, the owner or operator will continue to conduct post-closure care until the facility returns to detection monitoring.

Following the post-closure care period, a qualified groundwater scientist will certify that the site is in Detection Monitoring prior to release from post-closure care. The certification statement will be submitted to EPD for review and concurrence and will include the following language: "I am a qualified groundwater scientist and I hereby certify that the groundwater monitoring program at the CCR landfill is operating under detection monitoring in accordance with 257.94 and the Georgia Rules for Solid Waste Management.

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

Throughout the Post-Closure Care Period, the site shall be inspected on a quarterly basis to ensure that all CCR disposed of in the facility remains properly covered with the approved final closure system for the facility. Any repair work on the soil cover or synthetic cap liner shall meet or exceed the original construction requirements. Any areas noted to have less than the required cover from the effects of erosion, vehicular traffic, etc., shall be immediately repaired. All areas lacking proper

vegetation shall be grassed and maintained according to the vegetation and fertilization plans in this Closure Plan. Down drain systems shall be maintained in proper working condition in accordance with the Permit Application. The contact person for post-closure care of the facility is provided below:

General Manager
Environmental Affairs
Georgia Power Company
241 Ralph McGill Blvd.
Atlanta, GA 30308
(404) 506-6505

5. SEDIMENT POND MAINTENANCE / CLEAN-OUT

Throughout the Post-Closure Care Period, all ditches, diversion berms, culverts, rip-rap, and other drainage structures shall be maintained in accordance with the permit application to prevent run-on and run-off from eroding or otherwise damaging the final cover. Erosion control structures shall be maintained so as to prevent damage to the final cover. Inspections of ditches, diversion berms, culverts, rip-rap, and other drainage structures will be performed by a qualified person and maintenance of these structures will be addressed as soon as practical.

6. LIMITED ACCESS

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

7. POST-CLOSURE SUPERVISION

Post-Closure Care of the site shall be under the supervision of a qualified professional.

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8. SITE EQUIPMENT

Georgia Power shall make adequate equipment available to ensure that Post-Closure Care requirements are executed correctly and efficiently. Rental equipment shall be utilized in the event that equipment dedicated to the CCR landfill should break down during Post-Closure Care procedures.

9. REMOVAL OF CCR

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

10. POST-CLOSURE CARE COST AND FINANCIAL INSURANCE

In compliance with applicable securities laws and regulations, unredacted cost estimates for post-closure care costs will be provided to GA EPD under separate cover. The costs include all items necessary for a third-party to complete the post-closure care requirements in accordance with this Post-Closure Plan included herein. The cost estimates provided to EPD are based on an area of 33.2 acres and in current year dollars and will be adjusted annually for inflation. GPC will provide a demonstration of financial assurance upon approval of the cost estimates by GA EPD.

Grumman Road Landfill Post-Closure Cost Estimate

Item Description	Quantity	Unit	Unit Cost	Cost
Post Closure Cost				
Maintenance - Grass/Turf ¹				
Dike, Road, and Maintenance				
Water Treatment				
Environmental Monitoring				
Groundwater Monitoring & Reporting ²				
Sampling				
Reporting				
Laboratory Analysis				
Groundwater Well Maintenance and Abandonment				
Well Maintenance & Replacement ³				
Well Abandonment ⁴				
			Subtotal	
			Contingency	
			30 Year Post Closure Cost Estimate	

Notes:

1. Maintenance - Grass includes cost for mowing the site five times per year.
2. Assumes 23 wells + 9 QA/QC samples = 32 samples collected 2 times/year for 30 years. Includes cost for additional analyses for semiannual well inspections, Alternate Source Demonstrations, resamples, and rush analysis. Assumes semi-annual reporting for 30 years.
3. Assumes 5% of miscellaneous costs in post-closure care are associated with well maintenance and replacement. Assumes, no additional wells will be installed during post-closure care since the site is in Assessment Monitoring.
4. Well abandonment includes 23 wells completed above grade.

11. NOTIFICATION OF MONITORING STANDARDS EXCEEDED

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

12. NOTIFICATION AND CERTIFICATION

No later than 60 days following the completion of the post-closure care period, Georgia Power will prepare a notification verifying that post-closure care has been completed. The notification will include the certification by a qualified professional engineer 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 Rule 391-3-4-.10(7) and provided to the Director of Georgia EPD. The release of the CCR unit of post-closure care must be approved by the Georgia EPD.

13. RECORDKEEPING/NOTIFICATION REQUIREMENTS

Georgia Power will comply with all applicable recordkeeping requirements and maintain the facility's operating record at all times.