

# **CLOSURE PLAN PLANT CRISP ASH POND CRISP COUNTY POWER COMMISSION Worth County, Georgia**

*Prepared for*



**Crisp County Power Commission**

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Revision 4  
April 2020

## CERTIFICATION

I certify under penalty of law that the information contained within this Closure Plan was prepared by me or under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I do hereby certify that in my professional opinion that the applicable requirements of Section § 257.100-104 of the Federal Hazardous and Solid Waste Management System, Disposal of Coal Combustion Residuals from Electric Utilities, Final Rule (40 C.F.R. § 257) and Section (7).b of the Georgia Environmental Protection Division, Solid Waste Rule 391-3-4-.10 for Management of Coal Combustion Residuals (GA EPD CCR Rule) have been met.

Mehmet Iscimen, P.E.

**Name**



**Signature**

PE034164

**Georgia P.E. License Number**

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**Date**

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**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

**Approved**  
**Solid Waste Management Program**

Approved By: \_\_\_\_\_

## TABLE OF CONTENTS

1.0	INTRODUCTION .....	1
1.1	Site Location and Background .....	2
1.2	Purpose .....	4
2.0	CLOSURE PLAN .....	6
2.1	Closure by Removal .....	6
2.2	Groundwater Monitoring.....	9
2.3	Estimated Ash Volume and Extents.....	10
2.4	Estimated Closure Schedule.....	11
2.5	Deed Notification .....	11
2.6	Other Considerations and Requirements .....	12
2.7	Facility Contact .....	13
3.0	REFERENCES .....	14

## LIST OF ACRONYMS

CCPC	Crisp County Power Commission
CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
CY	Cubic Yard
GA DNR	Georgia Department of Natural Resources
GA EPD	Georgia Environmental Protection Division
USEPA	United States Environmental Protection Agency
USEPA CCR Rule	USEPA Rule for Disposal of Coal Combustion Residuals from Electric Utilities (40 C.F.R. § 257)
MSW	Municipal Solid Waste
MW	Megawatt

## 1.0 INTRODUCTION

Geosyntec Consultants (Geosyntec) of Kennesaw, Georgia, at the request of Crisp County Power Commission (CCPC), prepared this Closure Plan for the ash impoundment located at CCPC's Plant Crisp. Plant Crisp is located in Warwick, Georgia on the southern end of Lake Blackshear. CCPC has elected to close the surface impoundment by removal of CCR under 40 C.F.R. § 257.102(c). See also Georgia Environmental Protection Division (GA EPD), Solid Waste Rule 391-3-4-.10(7). This revision (Revision 4) supplements the original initial closure plan issued October 17, 2016 as part of CCPC's November 19, 2018 application for a state permit for its existing coal combustion residual (CCR) surface impoundment and handling of solid waste to implement the October 2016 closure plan providing for closure by removal of CCR for CCPC's 6.5 acre ash pond (AP). In accordance with 40 C.F.R. § 257.102 as incorporated by GA DNR Rule 391-3-4-.10(7), this closure plan provides: (i) a narrative description of how the CCR unit will be closed in accordance with this section; (ii) a description of the procedures to remove the CCR and decontaminate the CCR unit; (iii) an estimate of the maximum inventory of CCR on-site over the active life of the CCR unit; and (iv) a schedule for completing the activities necessary to satisfy the closure criteria in this section, including an estimate of the year in which the closure activities for the CCR unit will be completed (40 C.F.R. § 257.102(b)).<sup>1</sup> The initial closure plan developed in accordance with 40 C.F.R. § 257.102(b) provided an estimated date for completion of closure by removal of February 2018. GA EPD approved the CCR Management Plan for the Crisp County Municipal Solid Waste

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<sup>1</sup> 40 C.F.R. § 257.102(f)(2)(i), incorporated by reference at DNR Rule 391-3-4-.10(7) provides: *Extensions of closure timeframes*. The timeframes for completing closure of a CCR unit specified under paragraphs (f)(1) of this section may be extended if the owner or operator can demonstrate that it was not feasible to complete closure of the CCR unit within the required timeframes due to factors beyond the facility's control. If the owner or operator is seeking a time extension beyond the time specified in the written closure plan as required by paragraph (b)(1) of this section, the demonstration must include a narrative discussion providing the basis for additional time beyond that specified in the closure plan. Factors that may support such a demonstration include: (A) Complications stemming from the climate and weather, such as unusual amounts of precipitation or a significantly shortened construction season; (B) Time required to dewater a surface impoundment due to the volume of CCR contained in the CCR unit or the characteristics of the CCR in the unit; (C) The geology and terrain surrounding the CCR unit will affect the amount of material needed to close the CCR unit; or (D) Time required or delays caused by the need to coordinate with and obtain necessary approvals and permits from a state or other agency. State approvals as a precondition and requirement prior to implementation of this closure plan and removal, handling, and disposal of CCR include GA DNR Rule 391-3-4-.10(9) and GA DNR Rule 391-3-4-.07(5).

(MSW) Landfill on March 28, 2019 authorizing receipt of CCR which establishes CCR management volumes. CCPC has developed the schedule herein based upon the receipt volumes at the Crisp County MSW Landfill.

## **1.1 Site Location and Background**

Plant Crisp is a dual-fuel (coal and natural gas) electrical generation facility, with a 12.5 megawatt (MW) capacity coal-fired unit and 5 MW capacity natural gas combustion turbine. Coal Combustion Residuals (CCR) are byproducts of coal combustion. The United States Environmental Protection Agency (USEPA) has determined that CCR constitutes solid waste under Subtitle D of the Resource Conservation and Recovery Act (RCRA) [USEPA Rule for Disposal of Coal Combustion Residuals from Electric Utilities, 80 Fed. Reg. 21302 (Apr. 17, 2015), as amended].<sup>2</sup>

Onsite, CCR was disposed into an ash impoundment (or ash pond) using a wet sluicing method. Constructed in the mid-1970s, as an unlined pond [CDM Smith, 2014], the ash pond started to receive sluiced ash in 1976. Due to changes in plant operations and utilization of the natural gas unit, coal burning and resulting ash sluice water generation has been minimal in recent years.<sup>3</sup> The last coal burning and resulting sluicing operation prior to the October 2016 initial

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<sup>2</sup> Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Amendments to the National Minimum Criteria (Phase One, Part One), 83 Fed. Reg. 36,435 (July 30, 2018); Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Extension of Compliance Deadlines for Certain Inactive Surface Impoundments; Response to Partial Vacatur 81 Fed. Reg. 51,838 (Aug. 5, 2016) (addressing prior provisions at 40 C.F.R. § 257.100, inactive and active units). The GA EPD CCR Rule has incorporated by reference the USEPA CCR Rule as provided in 80 Fed. Reg. 21468 (April 17, 2015); as amended at 80 Fed. Reg. 37988 (July 2, 2015) and 81 Fed. Reg. 51807 (August 5, 2016). The Federal amendment of July 30, 2018 has not been adopted by the GA EPD. GA EPD implements portions of the USEPA CCR Rule which have been repealed or modified. This fourth revised supplemental plan attempts to reconcile the state and federal regulatory provisions and interpretations as indicated by GA EPD.

<sup>3</sup> CCPC's AP was legally categorized as an inactive CCR impoundment under original regulatory definitions in the USEPA CCR Rule, which was effective on October 19, 2015 and provides that an "inactive CCR surface impoundment means a CCR surface impoundment that no longer receives CCR on or after October 19, 2015 and still contains both CCR and liquids on or after October 19, 2015 [Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule 80 Fed. Reg. 21301, 21469 (April 17, 2015). See also technical corrections, July 2, 2015 (80 Fed. Reg. 37988)]. These original regulatory definitions have not changed since the original federal rule was published. Litigation respecting the CCR rules, specifically requirements for active, inactive, and existing surface impoundment resulted in modifications to final rules. See

closure plan was conducted in August 2015. The coal burn unit was briefly re-activated from December 2016 to March 22, 2017 to address a small amount of remaining coal unable to be sold or transported.

Shown in **Figure 1**, the electrical generation facility, ash pond, and hydroelectric dam are located on approximately 100 acres of CCPC property near Lake Blackshear and the Flint River. The ash pond itself is approximately 6.5 acres, with embankments on the western and partially southern and northern sides. The maximum embankment height is near where the western and northern dikes meet and is approximately 22 feet high [Rizzo Associates, 2015]. The Plant Crisp ash pond was classified as a low hazard unit during the USEPA's coal combustion residuals impoundment assessment, dated February 2014 and conducted by CDM

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USWAG v. USEPA, No. 15-1219 (Aug. 21, 2018). USEPA first promulgated the Coal Combustion Residual (CCR) rule on April 17, 2015 (80 Fed. Reg. 21301). On June 14, 2016 the United States Court of Appeals for the D.C. Circuit ordered the vacatur of inactive impoundment provisions in the 2015 rule at 40 C.F.R. § 257.100. As USEPA stated in the preamble to regulations adopted by GA EPD, the effect of the vacatur is that “all inactive CCR surface impoundments must now comply with all of the requirements applicable to existing CCR surface impoundments.” The resulting regulatory revisions for inactive impoundments deleting provisions exempting such CCR units which completed closure prior to April 17, 2018 from all other requirements of the CCR Rule. See former 40 C.F.R. § 257.100(b). A direct final rule addressing the change in requirements for “inactive” CCR surface impoundments and extending deadlines for “inactive” CCR surface impoundments was issued on August 5, 2016 (81 Fed. Reg. 51802), with final revisions recognizing Participating and Non-Participating States on July 30, 2018 (83 Fed. Reg. 36435). Georgia adopted its CCR rule, incorporating certain portions of the 2015 federal rules by reference and certain amendments was issued August 5, 2016 and effective November 22, 2016. GA EPD incorporated 80 Fed. Reg. 21468 (April 17, 2015); as amended at 80 Fed. Reg. 37988 (July 2, 2015) and 81 Fed. Reg. 51807 (August 5, 2016 - effective November 22, 2016), with amendments effective March 28, 2018. GA EPD also adopted technical corrections to the Federal Rule issued July 2, 2015 (80 Fed. Reg. 37988). Accordingly, GA EPD and USEPA have different deadline for compliance for certain CCR Rule items. CCPC's notification letter of October 17, 2016 notified GA EPD of closure in accordance with regulatory provisions for existing ash impoundments notwithstanding the fact that it was an inactive impoundment on the date of its notification. After GA EPD's November 22, 2016 issuance of rules changing the regulatory requirements for closure of the Plant Crisp AP, an additional small amount of CCR material was produced from December 2016 to March 22, 2017 to address remaining coal unable to be sold or transported. Accordingly, the AP is now legally defined as an “existing CCR surface impoundment” which means “a CCR surface impoundment that receives CCR both before and after October 19, 2015, or for which construction commenced prior to October 19, 2015 and receives CCR on or after October 19, 2015” (40 C.F.R. § 257.53, 80 Fed. Reg. at 21470). The AP is no longer receiving CCR wastes and has been slated for closure. GA EPD approved the CCR Management Plan for the Crisp County Municipal Landfill on March 28, 2019. CCPC is awaiting a permit to close the AP pursuant to GA DNR Rule 391-3-4-.02.

Smith [CDM Smith, 2014] and confirmed by Rizzo Associates in 2015. Rizzo Associates and Geosyntec Consultants have conducted the annual inspections.

## **1.2 Purpose**

Disposal of CCR in landfills and surface impoundments and the safe operation and closure of these facilities are now regulated under the final USEPA CCR Rule, 40 C.F.R. Part 257, which was published on 17 April 2015 and went into effect on 19 October 2015. The Georgia Environmental Protection Division, which administers solid waste management and disposal provisions in Georgia, developed regulations relating to CCR landfills, surface impoundments, and expansions codified at GA EPD Solid Waste Rule, Section 391-3-4-.10 (“GA EPD CCR Rule”) effective November 22, 2016. This closure plan has been developed in accordance with both GA EPD Rules and USEPA CCR Rule. The GA EPD CCR Rule has incorporated by reference the Federal CCR Rule as provided in 80 Fed. Reg. 21468 (April 17, 2015); as amended at 80 Fed. Reg. 37988 (July 2, 2015) and 81 Fed. Reg. 51807 (August 5, 2016).

In accordance with USEPA’s CCR Rule, “existing” CCR surface impoundments and new surface impoundments, as defined at 40 C.F.R. § 257.53 and GA DNR Rule 391-3-4-.10(2), which will undergo closure must develop an initial written closure plan by October 2016 that describes the steps necessary to close the CCR unit at any point during the active life of the CCR unit consistent with recognized and generally accepted good engineering practices [40 C.F.R. § 257.102(b)(2)]. Note, however, at the time of the original 17 October 2016 closure plan, CCPCs AP was an inactive impoundment under the USEPA CCR Rule and the GA EPD Rules. This revision (Revision 4) was prepared to address state regulatory issues and comments from GA EPD to process CCPC’s November 19, 2018 application for a state permit for its existing coal combustion residual (CCR) surface impoundments and handling of solid waste to implement the October 2016 closure plan for Crisp County Power Commission’s (CCPC) 6.5 acre ash pond (AP) pursuant to 391-3-4.10(9) and constitutes revision of the original 17 October 2016 initial closure plan. Modifications herein address regulatory changes, guidance, state or GA EPD provisions, guidance, and comments.



For ash ponds which the owner/operator elects to close, or those requiring closure pursuant to 40 C.F.R. § 257, Section 102(b) states that “*the owner or operator of a CCR unit must prepare a written closure plan that describes the steps necessary to close the CCR unit at any point during the active life of the CCR unit consistent with recognized and generally accepted good engineering practices.*” The written closure plan was certified by a qualified professional engineer and completed on 17 October 2016. The purpose of this document is to provide the written closure plan for the ash pond at Plant Crisp.

In addition to the closure plan, 40 C.F.R. § 257.104 outlines the requirements for a written post-closure plan. 40 C.F.R. § 257.104(a)(2) states that “*An owner or operator of a CCR unit that elects to close a CCR unit as provided by 40 C.F.R. § 257.102(c) is not subject to the post-closure care criteria under this section.*” Since CCPC will be closing the ash pond under 40 C.F.R. § 257.102(c), closure by removal of CCR, post closure care and a written post-closure plan is not required for Plant Crisp Ash Pond Closure. 40 C.F.R. § 257.102(c) applies to owners and operators which elect closure by removal, as CCPC has done for the ash pond.

## **2.0 CLOSURE PLAN**

Criteria for conducting closure of the ash pond are detailed in 40 C.F.R. § 257.102. In 40 C.F.R. § 257.102(a), two alternatives are presented for closure of CCR units, specifically:

*Closure of a CCR landfill, CCR surface impoundment, or any lateral expansion of a CCR unit must be completed either by leaving the CCR in place and installing a final cover system or through removal of the CCR and decontamination of the CCR unit.*

CCPC conducted a feasibility assessment and elected “closure by removal of CCR and decontamination of the CCR unit” as the closure method for the unit. CCPC intends to dispose the CCR removed from the ash pond at the local Crisp County MSW Landfill permitted to receive CCR and in accordance with GA DNR Rules. Details of this closure method is presented in Section 2.1.

### **2.1 Closure by Removal**

To remove the CCR and decontaminate the unit, the following steps has been or will be completed (listed in the order of construction):

- Installation of Groundwater Monitoring System in accordance with 40 C.F.R. § 257.91.
- Ash Characterization and Vertical Delineation:  
Hand-augers were used to delineate ash thickness within the accessible areas of the ash pond. Total depth of ash at these locations were recorded to create an ash thickness map. Representative samples (combination of ash and underlying base material) were collected and sent to a laboratory for material characterization for landfill disposal. The laboratory testing results were provided to the Crisp County MSW Landfill for coordination of ash disposal.
- Mobilization and Site Preparation:  
This step includes mobilization of the contractor to the site, installation of erosion and sediment control measures, removal of vegetation present within the CCR unit, and establishing the general site setup.
- Dewatering of Ash Pond Free Liquids:

Currently, the ash pond does not contain a significant amount of free liquids. If there is a build-up of free liquids in the ash pond due to precipitation, they will be removed prior to the excavation of the CCR. If free liquid removal is necessary, the removed liquids will be analyzed, treated as necessary, and disposed in accordance with applicable state and federal regulations and permits. GA EPD Solid Waste Permitting Program will be notified if removal of free liquid is necessary.

- **Excavation of CCR:**

Mechanical methods (excavators, front-end loaders, etc.) will be used for excavation. Excavation will be continued until the CCR are removed from the ash pond. A minimum of 6 inches of underlying soils will also be removed. Excavation will be generally executed from high to low elevations and from east to west direction. Perimeter dikes will not be breached until the ash and underlying 6-inches of soil have been removed.

- **Dewatering of CCR:**

If the excavated CCR is too wet to transport and dispose of in the MSW landfill, the moisture content will be reduced by primarily using windrowing method. If windrowing method is not effective to reduce the moisture content to the desired levels, absorbent desiccation (i.e., lime or cement addition) or other drying methods may be utilized as necessary. Materials and methods that may alter the groundwater chemistry will be avoided. Procedures outlined in the Fugitive Dust Control Plan [Geosyntec, 2016] and any subsequent amendments will be used during excavation and dewatering of CCR to mitigate any fugitive dust concerns.

- **Transport and Disposal of CCR:**

The removed ash, at an acceptable moisture content, will be loaded into conventional haul trucks using mechanical methods and will be transported to the Crisp County MSW landfill for disposal. The range of the acceptable moisture content of removed ash will be defined using the following criteria: (i) a lower bound to prevent fugitive dust generation; and (ii) an upper bound to prevent bleeding of water during transportation. Haul trucks will be equipped with an adequate cover over the CCR for fugitive dust control. A construction entrance/exit will be designed and maintained to eliminate CCR

carried offsite on haul truck wheels, and haul trucks will be inspected prior to leaving the site.

- Verification of CCR Removal:

Visual methods will be used for verification of the CCR removal. An ash pond map using a 100-foot grid spacing will be prepared with unique alphanumeric label for reference and documentation of CCR removal. Observations will be made with reference to the ash pond grid map and will include, but not be limited to, taking photographs and describing soil color. Experience at the Site indicates that there is a distinct color difference between CCR and the underlying soils that supports reliable visual verification of CCR removal. The 100-foot grid map and photos documenting removal of ash will be included in the closure report.

- Site Grading and Stabilization:

Once the CCR removal is complete, the dikes of the ash pond will be lowered or removed, and the site will be graded to provide positive drainage and to mimic the pre-development topography to the extent practical. Native vegetation will be re-established to stabilize the exposed areas and to prevent future erosion. As soon as practical after final grading, the contractor will take necessary steps to establish a protective vegetative cover of acceptable grasses over disturbed areas of the site. These steps shall include seeding, mulching, and any necessary fertilization at a minimum, and may include additional activities such as sodding of steeper slopes and drainage ways if necessary. Temporary erosion control blankets may be used, if necessary, to provide seedbed protection and prevent wash-out of seed and fertilizer during vegetation establishment.

CCR removal and decontamination of the ash pond will be complete when all visible ash and 6 inches of underlying soils within the CCR unit have been removed, post-removal site grading and stabilization is performed, and per 40 C.F.R. § 257.102(c) “*groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to 40 C.F.R. § 257.95(h) for constituents listed in Appendix IV of the CCR Rule.*”

## 2.2 Groundwater Monitoring

Pursuant to the Rules of Solid Waste Management, Chapter 391-3-4-.10 (6), CCPC prepared a Groundwater Monitoring and Statistical Analysis Plan [Geosyntec, 2017] and installed a groundwater monitoring system within the uppermost aquifer beneath the Site. In order to establish groundwater protection standards and in conjuncture with 40 C.F.R. § 257.90, CCPC collected baseline groundwater monitoring data with eight independent sampling events from the four proposed groundwater monitoring wells presented in **Figure 1**. The results were analyzed for Appendix III and IV constituents.<sup>4</sup> Within 90 days after completing the sampling and analysis, the groundwater results were evaluated to determine if there has been a statistically significant increase over background concentrations for any constituent in any well. Appendix III and IV constituents are shown below.

### Appendix III – Detection Monitoring Constituents

- Boron
- Calcium
- Chloride
- Fluoride
- pH
- Sulfate
- Total Dissolved Solids (TDS)

### Appendix IV – Assessment Monitoring Constituents

- Antimony
- Arsenic
- Barium
- Beryllium

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<sup>4</sup> Existing and new surface impoundments are required to comply with the provisions of 40 C.F.R. § 257.90(b), groundwater monitoring, no later than 17 October 2017.

- Cadmium
- Chromium
- Cobalt
- Fluoride
- Lead
- Lithium
- Mercury
- Molybdenum
- Selenium
- Thallium
- Radium 226 and 228 combined

Following the statistically analysis, CCPC started a detection and assessment monitoring program in accordance with 40 C.F.R. § 257.94 and § 257.95.

CCR removal and decontamination of the ash pond will be complete when groundwater monitoring concentrations at the Site do not exceed the groundwater protection standards established pursuant to § 257.95(h) for constituents listed in Appendix IV. In accordance with the Georgia Water Well Standards Act (O.C.G.A. § 12-5-120), at least once every five years, the owner of the property on which a monitoring well is constructed 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.

Further details of the groundwater monitoring program are included in the Groundwater Monitoring and Statistical Analysis Plan [Geosyntec, 2017] and any subsequent amendments.

### **2.3 Estimated Ash Volume and Extents**

As presented in **Figure 1**, the ash pond at Plant Crisp covers approximately 6.5 acres. The extents of the ash are outlined and correspond to the limits of the constructed dikes. The ash limits were further delineated using a limited field investigation. Based on this investigation, approximately 51,100 cubic yards (CYs) of CCR are stored within the ash pond. It is assumed

that top 6 inches native soil beneath the CCR will also be removed as part of the “decontamination” process which will produce an additional 5,200 CYs of material to be disposed. In total, 56,300 CYs of ash and underlying soils will be excavated from the ash pond and disposed of at the Crisp County MSW Landfill.

## **2.4 Estimated Closure Schedule**

The following is an estimated schedule for the closure of the Plant Crisp ash pond by removal of CCR:

- Notification of Intent to Close
  - Year: 2020
- Mobilization and Site Preparation
  - Year: 2020
- Ash Pond Closure Construction
  - Year: 2020 to Year 2023<sup>5</sup>
- Submit a Certification Report Documenting the CCR Removal to GA EPD
  - Upon completion of CCR removal
- Notification of CCR Unit Closure
  - Upon demonstrating groundwater monitoring concentrations at the Site do not exceed the applicable Federal and State groundwater protection standards

## **2.5 Deed Notification**

40 CFR §257.102(i) states:

*Deed notations:*

*(1) Except as provided by paragraph (i)(4) of this section, following closure of a CCR unit, the owner or operator must record a notation on the deed to the property, or some other instrument that is normally examined during title search.*

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<sup>5</sup> Per 40 CFR § 257.102 (f), the allowable time frame for Plant Crisp Ash Pond closure is 5 years of commencing closure activities with up to an additional 2 years of an extension, if qualified.

*(2) The notation on the deed must in perpetuity notify any potential purchaser of the property that:*

*(i) The land has been used as a CCR unit; and*

*(ii) Its use is restricted under the post-closure care requirements as provided by §257.104(d)(1)(iii).*

*(3) Within 30 days of recording a notation on the deed to the property, the owner or operator must prepare a notification stating that the notation has been recorded. The owner or operator has completed the notification when it has been placed in the facility's operating record as required by §257.105(i)(9).*

*(4) An owner or operator that closes a CCR unit in accordance with paragraph (c) of this section (i.e., Closure by Removal) is not subject to the requirements of paragraphs (i)(1) through (3) of this section.*

Since the closure of the unit will be performed in accordance with 40 C.F.R. § 257.102(c) (i.e., Closure by Removal), a deed notification is not required in accordance with paragraph (4) of this section.

## **2.6 Other Considerations and Requirements**

- For closure construction activities, the site is considered to be a cut-fill balance site and use of on-site or off-site borrow source is not planned.
- Since closure by removal is selected as the closure method, no specific, low-permeability cover system will be installed. As previously indicated, the site will be re-graded for positive drainage and stabilized for erosion control following removal of the CCR.
- CCPC will maintain the Closure Plan in the facility's operating record as required by 40 C.F.R. § 257.105(i).
- No later than the date CCPC initiates closure of the ash pond, CCPC will prepare a notification of intent to close the ash pond. CCPC will maintain the notification in the facility's operating record as required by 40 C.F.R. § 257.105(i)(7).



- Upon completion of the closure of the ash pond, CCPC will obtain a certification from a qualified professional engineer verifying that closure has been completed in accordance with the closure plan and submit a closure report to GA EPD.
- Within 30 days of completion of closure of the ash pond, CCPC will prepare a notification of closure of a CCR unit. The notification will include the certification by a qualified professional engineer. CCPC will maintain the notification in the facility's operating record as required by 40 C.F.R. §257.105(i)(8).

## **2.7 Facility Contact**

The primary contact for Plant Crisp is as follows:

Steve Rentfrow, General Manager  
(229-273-3811)  
[srentfrow@crispcountypower.com](mailto:srentfrow@crispcountypower.com)  
961 Power Dam Road  
Warwick, GA 31796

### 3.0 REFERENCES

CCPC. (2016), “Proposal for Plant Crisp Ash Disposal Area Closure Feasibility Study”, e-mail correspondence on August 3, 2016.

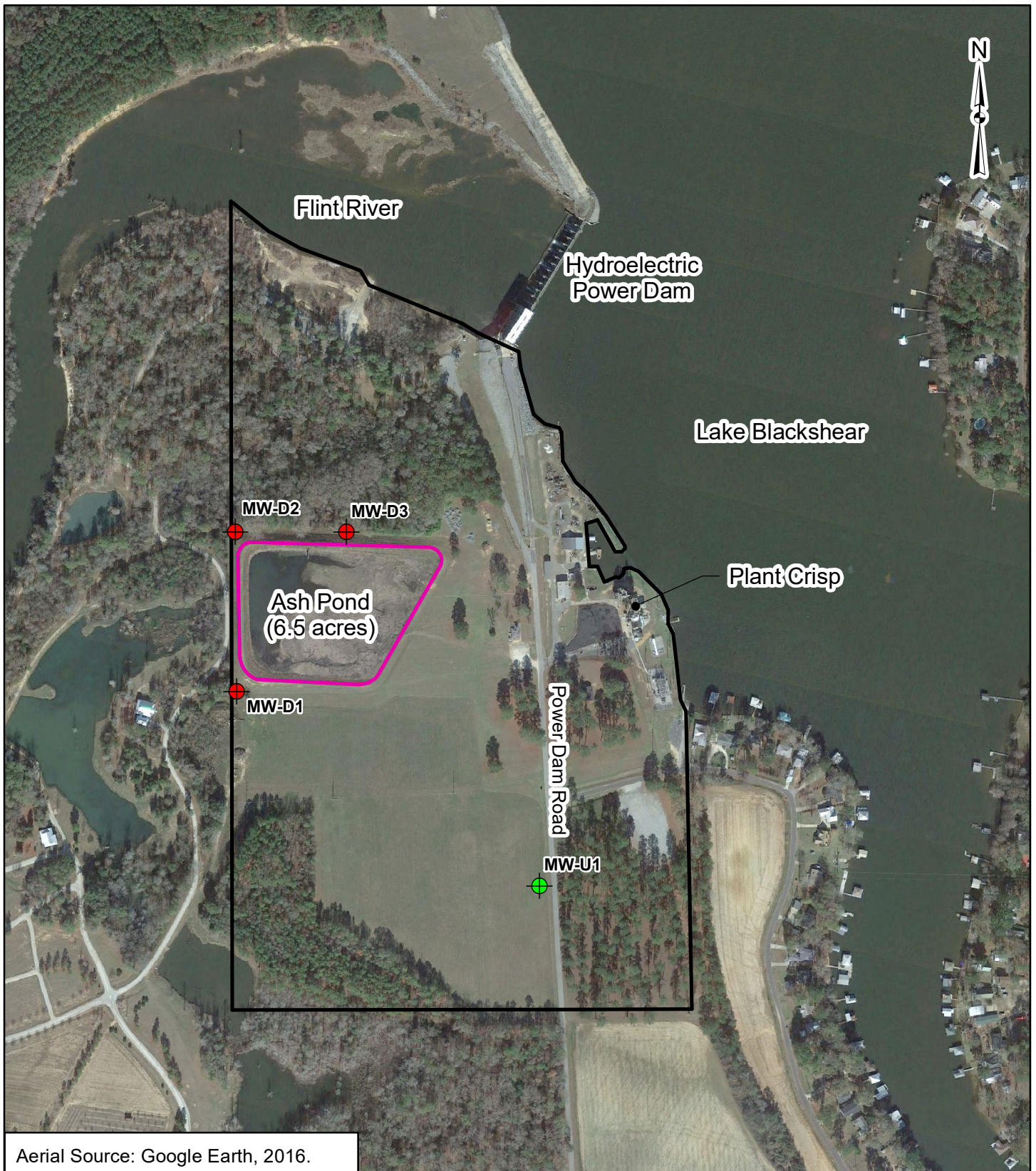
CDM Smith. (2014). “Assessment of Dam Safety of Coal Combustion Surface Impoundments – Final Report: Crisp County Power Commission Plant Crisp Warwick, Georgia.” Prepared for U.S. Environmental Protection Agency Washington, D.C., Rev. 1, February 2014.

Geosyntec Consultants. (2016). “Fugitive Dust Control Plan, Crisp County Power Commission, Plant Crisp Ash Pond.” Prepared for Crisp County Power Commission, September 2016, amended in August 2019 (Revision 1).

Geosyntec Consultants. (2017). “Groundwater Monitoring and Statistical Analysis Plan, Crisp Plant Crisp Ash Pond.” Prepared for Crisp County Power Commission, October 2017, amended in April 2020 (Revision 2).

Rizzo Associates. (2015). “Dam Safety Assessment Report Plant Crisp Coal Combustion Waste Impoundment.” Submitted to Crisp County Power Commission, 14-5232, Rev. 0, January 2015.

USEPA. (2015). “Subpart D – Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments,” Title 40 Code of Federal Regulations, Pt. 257, April 2015.



Aerial Source: Google Earth, 2016.

<p>Plant Crisp</p>	<p><b>Legend</b></p> <ul style="list-style-type: none"> <li>Downgradient Well (Red dot with black outline)</li> <li>Upgradient Well (Green dot with black outline)</li> <li>Plant Crisp Property Boundary (Black line)</li> <li>Ash Pond Limits (Pink line)</li> </ul> <p>0 100 200 400 Feet</p>	<p><b>Plant Crisp Groundwater Well Locations</b> Crisp County Power Commission Warwick, Georgia</p>		
		<p><b>Geosyntec</b> consultants</p> <p>KENNESAW, GA</p>	<p>DATE: Nov 2018</p> <p>PROJECT NO. GW6152</p> <p>DOCUMENT NO.</p> <p>FILE NO. FINALGWPLAN.MXD</p>	<p>FIGURE NO. 1</p>