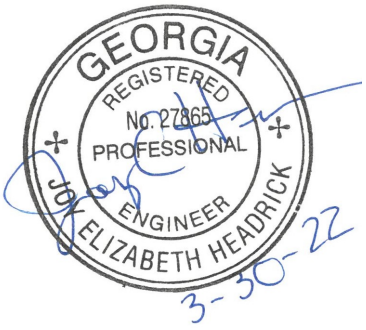

WASTE MANAGEMENT, INC.
610 BENNET ROAD | HOMER, GEORGIA 30547

R&B LANDFILL
COAL COMBUSTION RESIDUALS (CCR) MANAGEMENT PLAN ANNUAL UPDATE

PERMIT #: 006-009D (MSWL)

ANNUAL CCR MANAGEMENT PLAN AND DUST CONTROL REPORT

ATLANTIC COAST CONSULTING, INC.

March 2022

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This annual CCR management plan and dust control report was prepared in accordance with OCGA Solid Waste Management Rule 391-3-4-.07(5) and the Annual Coal Combustion Residuals (CCR) Management Plan and Dust Control Report Guidance Document provided by Georgia Department of Natural Resources, Environmental Protection Division (EPD) dated May 2018.

SUMMARY:

The R&B Landfill is composed of three distinct disposal areas identified as the East, Central, and West Disposal Units. The East Disposal Unit was closed and capped in 2006. The Central Disposal Unit is separated from the East Disposal Unit by Frank Bennett Road. The West Disposal Unit is separated from the Central Unit by Carlan Creek. Portions of the Central Disposal Unit are undergoing closure activities while the West Disposal unit is the area of active waste placement. The current Design and Operation (D&O) plan was approved by EPD on January 23, 2017 with the current CCR Management Plan being established through a minor modification approved by Georgia's Environmental Protection Division (EPD) on May 18, 2017.

FACILITY LOCATION AND DESCRIPTION:

The R&B Landfill is located at 610 Bennett Road, Homer, Georgia. The landfill sits on a 970.59 acre tract of land located in Banks County in a rural area approximately 3.5 miles northeast of the center of Homer, Georgia. The landfill entrance is located approximately four miles southeast of Interstate 85.

CCR MANAGEMENT ACTIVITIES:

CCR and Non-CCR Waste Volumes:

R&B did not receive CCR materials for disposal between January 1, 2021 and December 31, 2021. It is permitted, however, to receive CCR at an estimated rate 1,000,000 tons per year with an estimated daily maximum of 3,500 tons. These limits are defined in Section 1 of the current Operational Narrative shown on Sheet 44 of the Design and Operation (D&O) Plans. The facility's capacity for placement of CCR material was established by verifying that the facility's design is able to withstand the additional loads presented by the higher density CCR material. The basis of the design verification provided in the May 18, 2017 CCR Management Minor Modification was an overall waste mass density of 115 lb/CF (3,105 lb/CY). This density takes into account the elevated waste mass density experienced by the containment systems when subjected to the CCR waste placement.

The facility did not receive any CCR material between January 1, 2021 and December 31, 2021, therefore, no adjustments are needed to the plan or design components related to stability, leachate collection or base grade settlement.

CCR Source:

No CCR material was received at the facility between January 1, 2021 and December 31, 2021. Duke Energy remains an approved source as noted in Part 14 of the CCR Disposal Procedures on Sheet 46 of the D&O Plan. The CCR interned at the landfill is from the same source whose material was used as the basis of design for the original CCR Management Permit. Additionally, its 'as received' physical condition (i.e. moisture and grain size) has remained generally consistent throughout the disposal process and no new CCR waste streams were accepted by the facility during this reporting period. The facility does not utilize CCR material as a solidification agent for liquid wastes.

CCR Characterization and Compatibility:

Parts 14 and 15 of the CCR Disposal Procedures on Sheet 46 of the D&O Plan requires that all CCR waste streams entering the facility be tested for characterization and compatibility using the Toxicity Characteristic Leaching Procedure (TCLP) 8 RCRA Metals by SW-846 Method 1311 and a Paint Filter Test by SW-845 Method 9095.

As stated above, the material source and general physical characteristics have remained consistent since the CCR Management permit's initial issue date and the customer has not notified the facility of any significant process changes. Therefore, additional testing to verify characterization and compatibility have not been required.

CCR Placement, Compaction and Cover:

The facility is permitted to operate two independent working faces. The second working face is required to be located at least 100 feet from the primary working face and is intended to support smaller vehicles and operational requirements. The combined area of the individual working faces operated during this period did not exceed 40,000 square feet. The maximum area of the working face and their management were conducted in accordance with Section 2 of the Operational Narrative on Sheet 44. Daily cover for the working faces were applied, at a minimum, at the end of each workday in accordance with Section 3 of the Odor Management Plan and CCR Disposal Procedures on Sheet 46.

No CCR material was received at the facility during the reporting period however, as required, in the CCR Disposal Procedures on Sheet 46 of the D&O Plan, a test pad area will be established to determine any future placement and compaction requirements necessary to obtain a minimum compaction of 90% standard proctor. Due to the consistent physical nature of the CCR material and sourcing, the original test pad results have been used to guide placement and compaction efforts to date.

No leachate outbreaks were observed during this reporting period. No new cells for CCR material were constructed during this reporting period. When constructing a new cell for CCR material the leachate collection gravel will be covered with a minimum of 12-inches of protective cover soil as required by the CCR disposal procedures on Sheet 46 of the D&O Plan. Additionally, none of the previously placed CCR material was harvested for beneficial re-use.

Record Keeping:

Records of all waste transported to the site along with daily logs and operational records are retained at the facility's site office building. All record keeping is in accordance with the Georgia Rules for Solid Waste Management 391-3-4-.07(3)(u).

Fugitive Dust Control:

No CCR material was received at the facility between January 1, 2021 and December 31, 2021.

The facility did not receive any complaints related to dust during the reporting period and has remained compliant with requirements established by Air Quality Rule 391-3-1-.02(2)(n)1.

Leachate Collection and Removal System:

The facility's leachate collection, removal and storage system is in good working order with no known issues related to the disposal of CCR wastes.

Stormwater Management System:

The working face(s) were managed to ensure that surface water contacting CCR waste was not discharged into the stormwater management system. This was accomplished by placing and compacting material away from the side slopes, using soil diversion berms near side slopes and by sloping the working face into the waste mass.

The facility did not experience any incidents of CCR material entering the stormwater management system during this reporting period.

Environmental Monitoring:

The environmental monitoring program for the facility was modified during development of the CCR Management Plan to include appropriate Appendix III/IV analytical parameters in accordance with United States Environmental Protection Agency recommendations and Georgia Environmental Protection Division Regulations. The monitoring network (consisting of groundwater wells, surface water, underdrain, and leachate monitoring points) and extended parameter list, based on data collected to date, remains suitable for detection of CCR related constituents. Current data does not suggest confirmed impacts at these monitoring points as a result of handling CCR material. The facility will continue implementing the CCR monitoring program and documenting results to EPD in semi-annual monitoring reports.

Emergencies:

The facility did not experience any events or circumstances that represented an operational or environmental emergency during this reporting period.

Documentation of Notification to Local Governments:

The operation of CCR disposal activities during this reporting period have been in compliance with the currently approved CCR management plans and design parameters. Therefore, no plan modifications or local government notifications are required at this time.

CONCLUSION:

The current CCR Management routines required by the facility's Design and Operation Plan has proven to be effective in governing the proper handling and placement of CCR material as required by OCGA's Solid Waste Management Rule 391-3-4-.07(5) and the Guidance Document for Coal Combustion Residuals (CCR) Management Plans dated December 22, 2016.