

CLOSURE PLAN

ASH POND 2 PLANT YATES COWETA COUNTY, GEORGIA

FOR



Georgia Power

APRIL 2023

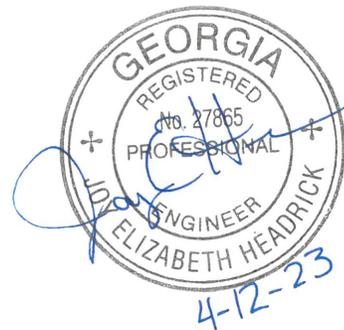


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1. GENERAL

Plant Yates, owned by Georgia Power Company (Georgia Power), is located at 708 Dyer Road, on approximately 2,400 acres located on the east bank of the Chattahoochee River in Coweta County, Georgia. Plant Yates originally operated seven coal-fired steam generating units. Five of the units were retired in 2015 and the two largest units were converted from coal to natural gas. Plant Yates currently operates as a natural gas electric generation plant. Ash Pond 2 (AP-2) was designed to receive and store coal combustion residuals (CCR) produced as a result of the coal-fired electric power generating process at Plant Yates. Currently, AP-2 is permitted to discharge under an individual National Pollutant Discharge Elimination System (NPDES) Permit (GA GA0001473).

2. NOTIFICATION

Closure activities will commence no later than 30 days after the date on which it receives the known final receipt of waste, either CCR or any non-CCR waste stream, or Permit approval from the Georgia Environmental Protection Division (GAEPD). Georgia Power will complete the closure activities for AP-2 in accordance with this Closure Plan within the timeframe allowed by 391-3-4-10(7)(b) of the State Rule, which incorporates the requirements of 40 CFR 257.102(f).

3. AMENDMENTS OF THE CLOSURE PLAN

Georgia Power must amend the written Closure Plan whenever:

- There is a change in the operation of the CCR unit that would substantially affect the written closure plan in effect; or
- Before or after closure activities have commenced, unanticipated events necessitate a revision of the written closure plan.

Georgia Power must amend the closure plan at least 60 days prior to a planned change in the operation of the facility or CCR unit, or no later than 60 days after an unanticipated event requires the need to revise an existing written closure plan. If a written closure plan is revised after closure activities have commenced for a CCR unit, Georgia Power will amend the current closure plan no later than 30 days following the triggering event.

Georgia Power will obtain a written certification from a qualified professional engineer that the amendment of the written closure plan meets the requirements of the GAEPD Rules.

4. CLOSURE PROCEDURES

4.1. OVERVIEW

Pursuant to State CCR Rule 391-3-4-.10(7)(c), AP-2 will be closed in accordance with this Closure Plan. AP-2 closure by removal will be accomplished in three phases, which are illustrated in the Closure Drawings attached to this permit application.

In Phase 1, a temporary soil mix wall will be constructed east of the existing energy dissipation dike to bisect AP-2 into two areas: AP-2 East and AP-2 West. An intake structure and principal spillway pipe will be installed in AP-2 East to carry contact water from AP-2 East to the existing onsite waste water treatment system that discharges through the existing National Pollutant Discharge Elimination System (NPDES) permitted outfall (GA0001473). AP-2 West will then be dewatered and CCR will be excavated and disposed of in the Ash Management Area (AMA) on Plant Yates property or sold for beneficial re-use. CCR removal will include removing all visible ash and over excavating into the subgrade soils a minimum of 6- inches.

In Phase 2, a permanent service water pond dam will be constructed adjacent to the soil mix wall to permanently divide the East and West ponds. AP-2 East will then be dewatered and CCR will be excavated and disposed of in the AMA or sold for beneficial re-use.

Finally, the temporary soil mix wall will be removed and AP-2 West will be backfilled and graded for positive drainage. Upon completion of the closure by removal, AP-2 West will no longer hold water and will no longer be a pond, and AP-2 East will serve as the plant's service water pond for operations.

4.2. FUGITIVE DUST CONTROL PLAN

During clearing and grubbing, excavation, grading, hauling, loading trucks, and transportation operations, dust control measures will be implemented to control fugitive dust from CCR removal, pond closure, and transportation activities. This fugitive dust control plan identifies and describes the CCR fugitive dust control measures that Georgia Power uses to minimize CCR from becoming airborne during closure activities, including CCR fugitive dust originating from the ash pond, roads, and material handling activities. Georgia EPD State CCR Rule 391-3-4-.10(2)(a) (incorporating 40 CFR § 257.53 by reference) defines "CCR fugitive dust" as "solid airborne particulate matter that contains or is derived from CCR, emitted from any source other than through a stack, or chimney."

Fugitive dust originating from the AP-2 closure activities is controlled by maintaining the level of the pond or water suppression. The fugitive dust control measures identified and described in this plan were adopted and implemented based upon an evaluation of site-specific conditions and are determined to be applicable and appropriate for the Plant Yates ash pond closure. Evaluation included assessing the effectiveness of the fugitive dust control measures for the facility, taking into consideration various factors such as site conditions, weather conditions, and operating conditions.

CCR that is transported via truck for disposal is conditioned to a moisture content appropriate to reduce the potential for fugitive dust.

Water suppression is used as needed to control fugitive dust on facility roads used to transport CCR and other CCR management areas.

Speed limits are utilized to reduce the potential for fugitive dust.

Trucks used to transport CCR are filled to or under capacity to reduce the potential for material spillage.

Georgia Power and construction personnel assess the effectiveness of the control measures by performing visual observations of the ash pond and surrounding areas and implementing appropriate corrective actions for fugitive dust, as necessary. Logs are used to record the utilization of water-spray equipment.

If a complaint is received from a citizen regarding a CCR fugitive dust event at the facility, the complaint will be documented and investigated. Appropriate steps will be taken, including any corrective action, if needed.

The Fugitive Dust Control Plan for all the Plant Yates CCR Units is posted on the Georgia Power website under Environmental Compliance.

4.3. ORGANICS MANAGEMENT

The ponds contain a variety of vegetation from trees and underbrush to non-woody plants. Woody vegetation will be cut above the ground surface and removed prior to removing CCR. Vegetation and wood waste will be managed in the following manner:

1. Trees and logs may be harvested, stockpiled for mulching, chipped for use on site as a best management practice (BMP) measure, or disposed of at an off-site landfill.
2. Large bushes may be stockpiled for mulching or disposed of at an off-site landfill.
3. Stumps and tree roots may be stockpiled for mulching, chipped for use on site as a BMP measure, or disposed of at an off-site landfill.
4. Grass and brush may be stockpiled for mulching or disposed of at an off-site landfill.

Remaining wood waste from grubbing work within the CCR will be managed and kept separate from clean wood waste. Wood waste that contains CCR will be managed within the pond limits in the following manner:

1. Stumps and tree roots may be mechanically screened to remove ash, or disposed of at an off-site landfill.
2. Grass and bushes may be mechanically screened to remove ash, or disposed of at an off-site landfill.

4.4. POND DEWATERING AND WASTE WATER TREATMENT SYSTEM

Dewatering of AP-2 is anticipated to be performed in stages as described in this closure plan. Dewatering will include removing water using a variety of methods, including but not limited to passive, gravity-based methods (e.g. rim ditches) and/or active dewatering methods (e.g. pumps and well points) as needed to allow for CCR excavation and transportation. CCR contact water and legacy wastewater from the ash pond will be further treated by an on-site wastewater

treatment system (WWTS). Water will be managed and discharged in accordance with the site's approved NPDES Wastewater Discharge Permit.

A detailed Dewatering Plan ("Dewatering Plan") was prepared and submitted to EPD's Watershed Protection Branch for review. This plan described specific treatment processes, monitoring frequency, any planned chemical usage, and best management practices necessary to comply with the NPDES permit limits. The Dewatering Plan was approved by the Water Protection Branch of the Georgia EPD on September 27, 2018.

4.5. STORMWATER AND CONTACT WATER MANAGEMENT

During CCR removal, run-on stormwater and run-off contact water (e.g. stormwater that has come into contact with CCR) will be controlled with best management practices such as channels, diversion berms, and pumps. Discharges from Plant Yates are currently regulated under NPDES Permit GA0001473. Georgia Power will prepare a phased erosion and sediment control plan that will be followed for closure construction activities, as needed.

Stormwater, or non-contact water runoff, will be managed in accordance with applicable stormwater and erosion and sediment control requirements and will be used on-site or conveyed through appropriate stormwater management features and erosion and sediment controls.

Upon removal of all visible CCR from the CCR units at Plant Yates and completion of all closure in place projects at the facility, no further CCR contact stormwater will be generated. Furthermore, the AP-2 East Service Water Pond will collect and be operated to receive only non-CCR contact stormwater from the Plant Yates property and other onsite CCR units. Effluent discharges from the subsurface drain system serving the AMA and R-6 CCR units, as well as wastewater from other sources at Plant Yates, will be managed in accordance with NPDES Permit 0001473, treated, and discharged in coordination with the EPD Watershed Protection Branch.

4.6. CCR EXCAVATION AND REMOVAL CRITERIA

In the context of this Closure Plan, "CCR removal" refers to the process of verifying and documenting that the CCR has been removed from the ash ponds. The ash pond 2 is known to contain a mixture of fly ash and bottom ash collectively referred to as CCR. The CCR removal verification is based on removing visible CCR and a minimum of six additional inches of soil. The documentation of this procedure is presented in the Construction Quality Assurance (CQA) Plan.

4.7. DAM DESIGN AND CONSTRUCTION

The service water pond (SWP) dam was designed by Schnabel Engineering, LLC (Schnabel) as part of the closure of ash pond 2 (AP-2) in general accordance with current engineering guidelines for Category I dams in the State of Georgia. However, there are no current downstream conditions that would require the new SWP earthen dam to be classified as a Category I dam under the Georgia Safe Dams Program (GSDP). The design was performed under these conditions because future changes in development downstream could result in re-classification of the dam as a Category I structure.

Design of the SWP Dam was performed with oversight by an engineer recognized by the GSDP as an 'Engineer-of-Record,' as required by the Rules for Dam Safety, Chapter 391-3-8. The SWP

Dam was designed as a zoned earthen embankment with a central low-permeability core, and zones of higher permeability earth-fill material, or shell, flanking the core. The embankment design included a chimney drain between the core and the downstream shell extending two feet below the core trench and into the foundation. A blanket drain was designed beneath the downstream slope which extends from just downstream of the chimney drain to a trench drain located near the downstream toe of the dam. The upstream and downstream slopes were constructed at 3H:1V grades and the crest has a width of 14-feet. The principal spillway system for the SWP Dam consists of a four-foot by four-foot (interior dimension) reinforced concrete riser structure and a 36-inch diameter HDPE outlet conduit which will control the normal operating pool level at elevation 722 feet. The principal spillway outlet conduit connects to the existing NPDES system to convey outflows to the Chattahoochee River. A 24-inch by 24-inch slide gate is fixed to the upstream face of the primary spillway riser structure for use in lowering the impoundment. Additionally, a 16-inch diameter siphon spillway in the northern portion of the embankment will aid in lowering the impoundment when deemed necessary. The auxiliary spillway for the SWP dam consists of a reinforced concrete labyrinth-crested chute spillway through the central portion of the embankment. The labyrinth spillway aids in discharging inflows from the 25-year, 6-hour storm event up to and including the ½ Probable Maximum Precipitation (PMP) design storm. The documentation of this procedure is presented in the Construction Quality Assurance (CQA) Plan.

The SWP Dam has been constructed and while it is not a CCR containment structure, Schnabel is, nevertheless, providing Construction Quality Assurance and Quality Control testing services to ensure that the dam and spillway systems are constructed in general accordance with the plans and specifications. Construction observations were conducted by Schnabel's on-site CQA personnel, and material testing and inspections were performed by Schnabel's quality control technician. At the completion of the project, Schnabel will provide a construction report prepared by the GSDP recognized Engineer-of-Record.

5. GROUNDWATER MONITORING

GPC will monitor groundwater semi-annually pursuant to the requirements defined in the Groundwater Monitoring Plan included in the permit. Groundwater will be monitored for a period of five (5) years after the CCR has been removed from the AP-2 footprint to confirm that groundwater constituent concentrations are not detected at statistically significant levels above the groundwater protection standards established in State CCR Rule 391-3-4-.10(6)(b) which references the constituents listed in the Federal CCR Rule Subpart D, Appendix III and IV. A demonstration certified by a Qualified Groundwater Scientist will be submitted to EPD for approval documenting that groundwater constituent concentrations are not detected at statistically significant levels above the groundwater protection standards established in Rule 391-3-4.10(6)(b) for constituents listed in Appendix IV. Evaluation criteria may include but are not limited to, additional sampling, analysis, calculations, and/or modeling to demonstrate compliance with 391-3-4.10(7)(b) as determined by the Qualified Groundwater Scientist and approved by EPD.

6. ESTIMATE OF CCR QUANTITY

The estimated volume of CCR to be excavated from AP-2 and placed in the AMA is presented in Table 1 below.

Table 1. Estimated CCR Quantity

Ash Pond	Quantity of CCR (cubic yards) to AMA
2	855,000 ¹

1. Initial Written Closure Plan posted to Plant Yates CCR Rule Compliance Information website.

7. VEGETATION PLAN

At the completion of closure activities all exposed areas we be grassed and maintained to meet the requirements in the Manual for Erosion and Sediment Control in Georgia. These areas will be stabilized as appropriate for the final conditions. Final surfaces will be seeded and mulched within 30-days after reaching final grades. Permanent covers which are slow to establish will receive temporary seeding.

8. EROSION AND SEDIMENTATION CONTROL

Plant Yates currently discharges stormwater under NPDES Industrial Discharge Permit GA0001473. This permit governs discharges into the Chattahoochee River from outfall 01. The permit establishes effluent limitations and monitoring requirements, which Georgia Power will follow for discharges from the waste water treatment system (WWTS).

AP-2 is totally contained within the NPDES permit system. The WWTS will not be decommissioned until all CCR material has been removed from the footprint of AP-2 and water treatment is no longer needed on site.

Erosion and Sedimentation Control measures are shown on the drawings. Additional measures will be taken as required or as directed by the CQA Engineer to minimize erosion of soil.

9. INSPECTIONS

Surface impoundment inspections during closure activities will continue to be performed in accordance with 40 CFR 257.83 until CCR removal has been completed.

As part of the closure plan, the cost estimate based upon current year cost for the well inspections must be provided for as part of the cost calculations for the groundwater monitoring period.

7-DAY INSPECTIONS

Georgia Power currently inspects the compacted soil embankment of AP-2 at intervals not exceeding seven (7) days. The 7-day inspections are made by a Qualified Person and include observation and documentation of any appearance of actual or potential structural weakness and other conditions which are disrupting or have the potential to disrupt the closure activities or the safety of the surface impoundment.

Additionally, at intervals not exceeding seven days, the discharge primary spillway is inspected for abnormal discoloration, flow, or discharge of debris or sediment.

Georgia Power records the results of these inspections on a form that is filed in the facility's operating record.

If a potential deficiency or release is identified during an inspection, Georgia Power will remedy the deficiency or release as soon as feasible. Georgia Power will prepare documentation detailing the corrective measures taken and place it in the facility's operating record.

ANNUAL INSPECTIONS

As required by Chapter 391-3-4-.10(5)(b), which incorporates the operating criteria listed in 40 CFR 257.80, 40 CFR 257.82, and 257.84 of the Federal CCR Rules, a Professional Engineer registered in Georgia inspects AP-2 on an annual basis. The inspection includes, at a minimum:

- a. A visual inspection of AP-2 to identify signs of distress or malfunction of the compacted soil embankment and/or the principal spillway.
- b. A review of available information regarding the status and condition of AP-2, including, but not limited to, files available in the facility's operating record such as:
 - i. The results of weekly inspections and the results of previous annual inspections,
 - ii. Files available in the operating record and other conditions which have disrupted or have the potential to disrupt the closure activities or safety of AP-2.

ANNUAL REPORTING

At the completion of each annual inspection, the Professional Engineer who completed the inspection will prepare an annual report that includes the following:

- a. Any changes in geometry of the AP-2 compacted soil embankment since the previous annual inspection;
- b. The approximate volume of CCR contained in AP-2 at the time of the inspection;
- c. Any appearances of an actual or potential structural weakness of the CCR within AP-2, or any existing conditions that are disrupting or have the potential to disrupt the closure activities and stability of the CCR; and
- d. Any other change(s) which may have affected the stability or operation of the compacted soil embankment since the previous annual inspection.

Annual Inspection Reports for the Plant Yates AP-2, which meet the requirement of Chapter 391-3-4-.10(5) of the Georgia Rules, can be found online at Georgia Power website under Environmental Compliance Information.

10. ON-GOING PLANT OPERATIONS AND MAINTENANCE

Plant operations and maintenance will occur within the permit boundary. Activities needed to construct, maintain, replace or repair systems for electric power generation or its delivery (such as subsurface piping, electrical appurtenances, transmission structures, etc.) may be conducted at Georgia Power's discretion within the permit boundary during and after removal activities have been completed.

11. FUTURE USE

Plant Yates AP-2 is being closed in accordance with 391-3-4-.10(7)(b), pursuant to 257.101(b)(1), by reference. CCR removal from AP-2 is substantially complete; however, closure will be completed after at least five (5) years of groundwater monitoring with no Appendix IV constituents statistically exceeding groundwater protection standards. Prior to certification of closure, AP-2 East is proposed for use as a Service Water Pond. A pool elevation of 722 msl is targeted for the AP-2 East Service Water Pond. However, this water level will fluctuate periodically due to weather conditions, withdrawal for Plant operations, and drawdown for maintenance needs. The Ash Pond/Service Water Pond shall be operated in a manner consistent with the requirements of 391-3-4-.10(7)(b) and 257.101(b)(1) prohibiting the introduction of CCR waste and/or non-CCR wastes into the pond. Closure includes removal of CCR and decontamination.

12. COST OF CLOSURE AND FINANCIAL ASSURANCE

In compliance with applicable securities laws and regulations, cost estimates for CCR removal activities and post CCR removal groundwater monitoring for Ash Pond 2 will be provided to GA EPD under separate cover. The costs include all items necessary for a third party to complete the project in accordance with the Closure Plan included herein. The cost estimates provided to GA EPD will be based on an area of 75 total acres and in 2022 dollars and adjusted annually for inflation.

AP-2 Closure by Removal Estimate

Item Description	Quantity	Unit	Unit Cost	Cost
Program Management				
Groundwater Sampling & Reporting, Compliance Evaluations ¹				
AP Closure Construction				
<u>Construction Management, Construction Support</u>				
Construction Management				
Support Facilities				
Engineering and CQA Construction Support				
Mobilization/Site Preparation and Demobilization				
<u>CCR - Excavate, Transport, Place, Manage</u>				
Stability and Performance Monitoring Equipment				
Organics Management				
Dust Control				
CCR Excavate, Conditioning for compaction, Transport, and Place & Compact ²				
<u>Foundation Improvements</u>				
Foundation Improvements (InSite Grouting, Solution Features Evaluation/Abatement)				
<u>Fill Material</u>				
Fill Material - Procure, Transport, Place Structural and Non-Structural Fill ³				
<u>Water Management (Stormwater, Leachate and Ash Pond Dewatering⁴)</u>				
Water Treatment				
Storm & Contact Water Management				
<u>Site Maintenance During Construction & Restoration</u>				
Site Maintenance During Construction & Restoration				
<u>Contractor's Overhead & Profit</u>				
Quoted Overhead & Profit				
			Subtotal	
			Contingency	
			Total Closure Cost Estimate	

Notes:

1. Groundwater monitoring includes costs for conducting routine monitoring of App III & IV during the construction period.
2. Cubic Yards Projected Remaining as of December 31, 2021
3. Includes fill material from on-site and off-site sources, evaluation for chemical and geotechnical properties, procurement, transportation, and placement per the CQA Plan.
4. Category includes the management of storm water, CCR contact water, and operations associated with the in-situ dewatering of CCR during the closure.

AP-2 Post Removal Cost Estimate

Item Description	Quantity	Unit	Unit Cost	Cost
Post Closure Cost				
Maintenance - Grass/Turf ¹				
Dike, Road, and Maintenance				
Environmental Monitoring				
Groundwater Monitoring & Reporting ²				
Sampling				
Reporting				
Laboratory Analysis				
Groundwater Well Maintenance and Abandonment				
Well Maintenance & Replacement ³				
Well Abandonment ⁴				
			Subtotal	
			Contingency	
			5 Year Post Removal Cost Estimate	
Total Financial Assurance Required (Closure Cost + 5 Year Post Removal Care Cost)				

Notes:

1. Maintenance - Grass includes cost for mowing the site five times per year.
2. Assumes 16 wells + 4 QA/QC samples = 20 samples collected 2 times/year for 5 years. Includes cost for additional analyses for Alternate Source Demonstrations, resamples, and other analysis. Assumes semi-annual reporting for 5 years.
3. Assumes 5% of miscellaneous costs in post removal period are associated with well maintenance and replacement. Assumes, no additional wells will be installed during post removal period since the site is in Assessment Monitoring.
4. Well abandonment includes 16 wells.

13. CLOSURE SCHEDULE

Plant Yates AP-2 is being closed in accordance with 391-3-4-.10.(7)(b), pursuant to 257.101(b)(1), by reference. CCR removal from AP-2 is substantially complete; however, closure will be completed after at least five (5) years of groundwater monitoring with no Appendix IV constituents statistically exceeding groundwater protection standards. A list of milestones is provided below that will be met over the closure period:

- Notify Georgia EPD of intent to close;
- Provide Georgia EPD with date of final CCR receipt;
- Site preparation and development of contractor laydown areas;
- Install and maintain erosion and sediment control systems serving disturbed areas;
- Construct temporary Soil Mix Wall to bisect AP-2 into West and East;
- Construct Principal Spillway Pipe from AP-2 East to NPDES outfall;
- Dewater AP-2 West and mechanically excavate CCR;
- Construct permanent earthen dam (Service Water Pond Dam);
- Dewater AP-2 East and mechanically excavate CCR;
- Remove Soil Mix Wall;
- Refill Service Water Pond and final grade AP-2 West;

- Prepare accurate legal description of the former CCR boundary; and
- Provide the CCR removal completion report to the Director. Submit to the Director confirmation that the notation on the property deed has been recorded.

14. RECORDKEEPING/NOTIFICATION/INTERNET REQUIREMENTS

Georgia Power will comply with the requirements of State CCR Rule 391-3-4-.10(8) which reference the closure recordkeeping, notification, and internet posting requirements listed in 40 CFR 257.105(i), 40 CFR 257.106(i) and 40 CFR 257.107(i) of the Federal Rules. Internet postings may be found in the Georgia Power Company website under Environmental Compliance.

<https://www.georgiapower.com/CCRRuleCompliance>

Documents will be retained for a minimum of five years as required by 40 CFR 257.105(b). Information required to be posted to the CCR Web site will be made available to the public for at least five years following the date on which the information was first posted to the CCR Web site in accordance with 40 CFR 257.107(c). Information required by 40 CFR 257.105 will be posted to the CCR Web site within 30 days of placing the pertinent information in the operating record, as required by 40 CFR 257.107(d).

15. CERTIFICATION OF CLOSURE

Upon completion of CCR removal, a professional engineer registered in Georgia will prepare and Georgia Power will submit a closure construction report documenting the removal to GA EPD. Pursuant to State CCR Rule 391-3-4-.10(7)(e), once all CCR removal is complete and groundwater monitoring concentrations at the site have been demonstrated not to exceed the applicable Federal and State groundwater protection standards, Georgia Power will submit a closure report to the EPD Director. The closure report will be completed on forms provided by GA EPD.

Georgia Power, as required by EPD, will submit confirmation that a notation on the property deed, inclusive of the AP-2 permit boundary, has been recorded in accordance with State CCR Rule 391-3-4-.10(7)(f). This recording will notify any potential purchaser of the property in perpetuity that the land has been used as a CCR surface impoundment and that its use is restricted under the post-closure care requirements of the GA EPD CCR Rule. The deed will include the dates that the surface impoundment operations commenced and terminated, an accurate legal description of the surface impoundment location, and a description of the type of CCR that have been deposited in the impoundment. Within 30 days of completing this deed notification, Georgia Power will place this documentation in the operating record for the Plant.

16. BOUNDARY AND LEGAL DESCRIPTION

The permit boundary is defined on the Closure Drawings for AP-2. A survey drawing of the permit boundary and a legal description, prepared by a Registered Professional Surveyor, is included on Sheet 3 in the Closure Drawings of this permit package.

All that parcel or tract of land lying and being in land lots 44, 50, 51 and 73 of the 4th District, Coweta County, Georgia and being more particularly described as follows:

BEGINNING at the Land Lot Corner common to Land Lots 19, 20, 45 and 46, having Georgia State Plane, West Zone, NAD83 coordinates of: N 1262995.61 and E 2076620.13; thence leave said common Land Lot Corner and run S34°31'41"W a distance of 5,340.56 feet to a point, said point being the TRUE POINT OF BEGINNING.

FROM THE TRUE POINT OF BEGINNING AS THUS ESTABLISHED, thence run S32°10'08"W a distance of 912.84 feet to a point; thence run N28°43'23"W a distance of 159.92 feet to a point; thence run N21°27'23"W a distance of 236.97 feet to a point; thence run N48°31'45"W a distance of 166.51 feet to a point; thence run S65°38'54"W a distance of 326.53 feet to a point; thence run S70°28'04"W a distance of 172.41 feet to a point; thence run S18°41'52"W a distance of 139.67 feet to a point; thence run S10°14'09"E a distance of 142.26 feet to a point; thence run S40°17'20"E a distance of 191.43 feet to a point; thence run S33°17'59"E a distance of 292.66 feet to a point; thence run S24°49'17"E a distance of 212.67 feet to a point; thence run S10°52'24"W a distance of 406.83 feet to a point; thence run S29°09'43"W a distance of 528.07 feet to a point; thence run N36°31'37"W a distance of 288.63 feet to a point; thence run N13°00'24"E a distance of 382.64 feet to a point; thence run N21°01'52"W a distance of 260.74 feet to a point; thence run S80°38'26"W a distance of 243.67 feet to a point; thence run N13°30'00"W a distance of 188.46 feet to a point; thence run N18°38'08"E a distance of 359.00 feet to a point; thence run N22°24'40"W a distance of 180.54 feet to a point; thence run N80°21'13"W a distance of 108.13 feet to a point; thence run N45°47'02"W a distance of 119.97 feet to a point; thence run N23°50'49"E a distance of 643.40 feet to a point; thence run N12°03'55"W a distance of 247.53 feet to a point; thence run N09°18'01"W a distance of 132.81 feet to a point; thence run N34°39'07"W a distance of 221.98 feet to a point; thence run N73°50'58"W a distance of 138.26 feet to a point; thence run N90°00'00"W a distance of 197.35 feet to a point; thence run S79°38'29"W a distance of 151.07 feet to a point; thence run S10°22'06"W a distance of 177.15 feet to a point; thence run S14°16'02"E a distance of 237.75 feet to a point; thence run S58°09'35"W a distance of 242.62 feet to a point; thence run N70°58'17"W a distance of 128.70 feet to a point; thence run S54°08'17"W a distance of 124.78 feet to a point; thence run N58°22'35"W a distance of 128.99 feet to a point; thence run S28°37'30"W a distance of 76.61 feet to a point; thence run S39°22'57"E a distance of 126.98 feet to a point; thence run S27°07'26"W a distance of 154.11 feet to a point; thence run S23°00'44"E a distance of 351.19 feet to a point; thence run S57°02'46"E a distance of 131.62 feet to a point; thence run S24°04'30"W a distance of 95.13 feet to a point; thence run S40°17'30"W a distance of 91.71 feet to a point; thence run N42°46'46"W a distance of 128.89 feet to a point; thence run S68°30'52"W a distance of 78.96 feet to a point; thence run N71°47'37"W a distance of 58.56 feet to a point; thence run S44°30'58"W a distance of 234.93 feet to a point; thence run N03°43'40"E a distance of 275.67 feet to a point; thence run N18°53'37"W a distance of 225.28 feet to a point; thence run N04°11'47"E a distance of 158.79 feet to a point; thence run N48°30'58"W a distance of 47.92 feet to a point; thence run S59°52'04"W a distance of 102.35 feet to a point; thence run S73°39'58"W a distance of 140.40 feet to a point; thence run N40°30'11"W a distance of 33.07 feet to a point; thence run N21°23'45"E a distance of 293.27 feet to a point; thence run N22°41'32"W a distance of 202.11 feet to a point; thence run N59°50'11"W a distance of 113.86 feet to a point; thence run N01°26'40"W a distance of 157.43 feet to a point; thence run N29°10'20"E a distance of 873.68 feet to a point; thence run S54°49'03"E a distance of 362.00 feet to a point; thence run N72°11'28"E a distance of 70.35 feet to a point; thence run S44°11'20"E a distance of 65.82 feet to a point; thence run N70°00'36"E a distance of 231.35 feet to a point; thence run

N70°56'40"E a distance of 62.00 feet to a point; thence run N75°18'03"E a distance of 78.03 feet to a point; thence run S87°34'36"E a distance of 63.23 feet to a point; thence run S80°23'21"E a distance of 418.21 feet to a point; thence run S88°57'43"E a distance of 455.71 feet to a point; thence run S54°36'34"E a distance of 453.36 feet to a point; thence run S52°43'18"E a distance of 1160.34 feet to a point, said point being the TRUE POINT OF BEGINNING.

Said tract or parcel of land containing 93.705 acres (4,081,804.34 square feet).