CONSTRUCTION QUALITY ASSURANCE PLAN

PLANT MCMANUS INACTIVE ASH POND AP-1 GLYNN COUNTY, GEORGIA

FOR









FEBRUARY 2021

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1. INTRODUCTION

This Construction Quality Assurance (CQA) Plan covers the closure by removal of the Plant McManus Coal Combustion Residuals (CCR) surface impoundment known as Ash Pond 1 (AP-1). The project consists of removing CCR from the ash pond (to be disposed at an off-site landfill), backfilling and re-grading certain areas of the former ash pond footprint to promote positive surface drainage and establishing permanent vegetative stabilization. The objective of this CQA Plan is to outline the CQA monitoring and reporting that will document that the ash pond closure was implemented in general accordance with the approved CCR Permit application documents.

2. CCR EXCAVATION AND REMOVAL CRITERIA

In the context of this CQA Plan, "CCR removal criteria" refers to the process of verifying and documenting that CCR has been removed from the ash ponds. The ash ponds are known to contain a mixture of fly ash and bottom ash, collectively referred to as CCR. The contractor will excavate CCR until a visible change in color and/or texture indicates that the CCR has been removed. In addition, a six- (6-) inch-thick layer of soil will be removed below the verified CCR/soil interface. The CCR excavation and removal criteria are defined in Section 4.6 of the companion Ash Pond Closure Plan and described below.

Visual Verification of CCR Removal Procedure:

Georgia Power Company (Georgia Power) will provide Construction Quality Assurance (CQA) through a third-party firm to monitor and document CCR removal according to the following procedure:

- The CQA personnel will prepare an ash pond map using a 100-foot grid spacing. Grid points will be assigned a unique alphanumeric label for reference and documentation of CCR removal.
- 2. CCR will be excavated until there is no visible CCR present. This surface will be referred to as the CCR/soil interface. Visual observations and use of the Munsell Soil Color Chart will be used to confirm that all visible ash has been excavated from the former CCR footprint. Additional laboratory methods, such as Polarized Light Microscopy are available if desired by GPC.
- 3. CQA personnel will observe the CCR/soil interface at the working face to confirm visible CCR has been removed. Observations shall be made with reference to the ash pond grid map. Observations will include, but not be limited to, taking photographs and describing soil color. CQA personnel will document observations in field logs or reports.
- 4. The CCR/soil interface surface will be surveyed.
- The excavation will continue to minimally 6 inches below the CCR/soil interface. This surface will be referred to as the bottom of excavation. Excavated soil will be disposed of at an offsite permitted landfill.
- 6. The bottom of excavation surface will be surveyed and confirmed to be a minimum of 6 inches below the CCR/soil interface.

3. REPORTS/CERTIFICATION OF CCR REMOVAL

Upon completion of CCR removal, the CQA Engineer, a professional engineer registered in Georgia, will prepare and Georgia Power will submit a certification report documenting the removal to GA EPD.

4. BACKFILLING AND RESTORATION

After the CCR is removed and the subgrade soils have been over-excavated, fill material may be placed to restore the removal area to approximately the pre-pond conditions. Soil may be imported from on or off-site as needed and will be placed to promote positive drainage, support permanent vegetation, and minimize erosion.

Soils utilized in the closure of AP-1 will originate from the AP-1 dike and, if necessary, appropriately permitted off-site sources. No new on-site borrow area will be established as part of this closure project.