

**CLOSURE PLAN FOR EXISTING CCR LANDFILL
PLANT GORGAS BOTTOM ASH LANDFILL
40 CFR 257.102(b)**

SITE INFORMATION

Site Name / Address

Plant Gorgas
460 Gorgas Road
Parrish, AL 35580

Owner Name / Address

Alabama Power Company
600 North 18th Street
Birmingham, AL 35203

CCR Unit

Plant Gorgas Bottom Ash Landfill

Closure Method

Close In-Place

CLOSURE PLAN DESCRIPTION

§ 257.102(b)(1)(i) – Narrative description of how the CCR unit will be closed.

The Plant Gorgas Bottom Ash Landfill will be closed by leaving CCR in place. In accordance with § 257.102(b)(3), the written closure plan will be amended if there is a change in operation that would substantially affect the written closure plan in effect and/or if there are unanticipated events that necessitate a revision of the closure plan.

§ 257.102(b)(1)(iii) – Closure of the CCR unit by leaving CCR in place

Methods and Procedures

The Bottom Ash Landfill is maintained in a dry state, such that drainage is unnecessary. The ash subgrade for the final cover of the Bottom Ash Landfill will be graded to create a stable subgrade for construction of the final cover system. In accordance with § 257.102(d), the final cover will be constructed to control, minimize or eliminate, to the maximum extent feasible, post closure infiltration of liquids into the waste and potential releases of CCR from the unit. This will be prevented by providing sufficient grades and slopes to; 1) preclude the probability of future impoundment of water or sediment; 2) ensure slope and cover system stability; 3) minimize the need for further maintenance; and, 4) be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices.

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Description of Final Cover System

The final cover system will be designed to minimize infiltration and erosion. The cover system to be used is currently being evaluated and final design is not yet complete. The final cover system, at a minimum, will be designed to meet or exceed the requirements of 40 C.F.R. §257.102(d)(3)(i) or (ii) (traditional and alternative cover system) in that the permeability of the final cover system will be less than or equal to the permeability of the natural subsoils present beneath the surface impoundment, but no greater than 1×10^{-5} cm/sec. The final cover, at a minimum, will consist of an 18-in infiltration layer overlain by 6-in of soil capable of sustaining vegetative growth, or instead may consist of an alternate cover system utilizing low permeability geosynthetic materials. Final design will ensure the disruption of the integrity of the final cover system is minimized through a design that accommodates settlement and subsidence, in addition to providing an erosion layer for protection from wind or water erosion.

§ 257.102(b)(1)(iv) – Estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit

The Gorgas Bottom Ash Landfill currently contains approximately 3,800,000 cubic yards of CCR. Estimated maximum inventory of ash is approximately 4,100,000 cubic yards. Future use of the unit will not substantially affect the written closure plan in effect.

§ 257.102(b)(1)(v) – Estimate of the largest area of the CCR unit ever requiring a final cover

The Gorgas Bottom Ash Landfill area is about 56 acres in size. The final cover will be applied to the footprint of the CCR unit.

§ 257.102(b)(1)(vi) – Closure Schedule

The milestones and the associated timeframes are initial estimates. Some of the activities associated with the milestones will overlap. Milestones reflect approximate time to implement closure instead of dates since there is no specific date to initiate closure. The facility has remaining volume available and continues to operate as an active landfill. Date to initiate closure has not yet been established; therefore, a reasonable estimate of the year of completing closure is not yet available. However, once closure is initiated it will take an estimated 30 months to complete all closure activities.

Milestones

Regulatory Interface – 6 months

Grading and Stabilization – 1 year

Installation of final cover – 1 year

Estimate of Year in which all closure activities will be completed – Approximately 2-3 years after initiation of closure

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Certification Statement 40 CFR § 257.102(b)(4)

Initial Written Closure Plan for a CCR Surface Impoundment or Landfill

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CCR Unit

Plant Gorgas Bottom Ash Landfill

I hereby certify that the written closure plan was prepared in accordance with the requirements of 40 CFR § 257.102, and that the final cover system will meet the requirements of §257.102(d)(3).

James C. Pegues, P.E.
Licensed State of Alabama, PE No. 16516

