CLOSURE PLAN FOR EXISTING CCR LANDFILL DANIEL NORTH ASH MANAGEMENT UNIT LANDFILL 40 CFR 257.102(b)

SITE INFORMATION

Site Name / Address

Plant Victor Daniel 13201 Highway 63 North Moss Point, MS 39562

Owner Name / Address

Mississippi Power Company 2992 West Beach Boulevard Gulfport, MS 39501

CCR Unit

North Ash Management Unit

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 Daniel North Ash Management Unit (NAMU) 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 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

The NAMU was constructed with a 2-ft compacted clay liner having a maximum hydraulic conductivity of 1×10^{-7} cm/sec overlain by a geosynthetic clay liner. There is also 5-ft of natural clay having a maximum hydraulic conductivity of 1×10^{-5} cm/sec beneath the liner system.

The ash subgrade for the final cover of NAMU will be graded to create a stable subgrade for 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.

<u>Description of Final Cover System</u>

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 compacted clay liner. Final design will ensure the disruption of

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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 NAMU is currently in operation and has an initial design capacity of approximately 2,200,000 cubic yards of CCR. 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 NAMU has an area of approximately 30 acres.

§ 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. The unit continues operation, and a closure date has not yet been established as remaining capacity varies depending upon generation and beneficial reuse sales of ash.

Estimated Milestone Durations

State Regulatory Agency Approval for Closure – 6 months
Subgrade Grading & Preparation – 6 months
Installation of final cover – 1 year
Estimate of Year in which all closure activities will be completed - TBD

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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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Owner Name / Address

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CCR Unit

North Ash Management Unit

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.V Ligensed State of Mississippi, PE No. 18942

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