

**CLOSURE PLAN FOR EXISTING CCR SURFACE IMPOUNDMENT
PLANT SMITH ASH POND
40 CFR 257.102(b)**

SITE INFORMATION

Site Name / Address

Plant Smith
4300 Highway 2300
Southport, FL 32409

Owner Name / Address

Gulf Power Company
One Energy Place
Pensacola, FL 32520

CCR Unit

Plant Smith Ash Pond

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 Smith Ash Pond will be closed by consolidating the footprint and leaving the 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 pond will be dewatered sufficiently to remove the free liquids and to an extent necessary to provide a stable base for the construction of an ash containment structure for the consolidated footprint, excavation of ash outside the consolidated footprint, and construction of the final cover system. All CCR will be excavated from the area outside the consolidated footprint, transported, and disposed of in the consolidated footprint to create a subgrade for the final cover system. Excavation will include removing all visible ash and over excavating into the subgrade soils.

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, slurry, 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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The final cover system is currently designed to be the ClosureTurf® system developed by Watershed Geosynthetics. ClosureTurf® consists of a 40 or 50 mil LLDPE geomembrane overlain by an engineered synthetic turf containing a minimum ½-inch sand infill. This final cover system will minimize infiltration and erosion and meets or exceeds the requirements of 40 C.F.R. §257.102(d)(3)(ii). 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 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 Plant Smith Ash Pond currently contains approximately 4,200,000 cubic yards of CCR.

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

The area of the existing ash pond is approximately 172 acres. The area of the consolidated footprint that will require final cover is approximately 53 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.

Estimated Milestone Durations

Regulatory interface and permitting – 6 months

Dewatering, Subgrade Grading & Preparation – 4.5 years

Installation of final cover – 6 months

Estimate of Year in which all closure activities will be completed – 2023

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Certification Statement 40 CFR § 257.102

Initial Written Closure Plan for a CCR Surface Impoundment or Landfill

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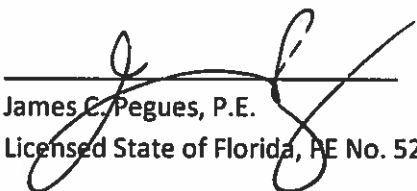
Owner Name / Address

Gulf Power Company
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CCR Unit

Plant Smith Ash Pond

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 Florida, PE No. 52519

