CLOSURE PLAN FOR EXISTING CCR LANDFILL PLANT DANIEL GYPSUM STORAGE AREA 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

Plant Daniel Gypsum Storage Area 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 Daniel Gypsum Storage Area 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 Gypsum Storage Area was permitted and constructed with a composite liner system consisting of a minimum 24-inch compacted clay layer with a maximum hydraulic conductivity of 1 x 10⁻⁷ cm/sec. overlain by a 60 mil HDPE geomembrane. The liner system is completed with a geocomposite drainage layer overlying the HDPE with a minimum 24 – inch thick sand drainage/protection layer (leachate collection & removal system).

The gypsum in the storage area 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.

Description of Final Cover System

The final cover system is currently designed to consist of a GCL overlying the prepared subgrade overlain with a 60 mil HDPE geomembrane. A drainage geocomposite, overlying the HDPE geomembrane, will be covered with a minimum 18 – inch protective soil layer and a minimum 6 – inch topsoil layer capable of sustaining vegetative growth. This final cover system will minimize infiltration and erosion and meets or

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exceeds the requirements of 40 C.F.R. §257.102(d)(3)(ii) in that the permeability of the final cover system will be less than or equal to the permeability of the bottom liner system. 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

Cell 1 of the Gypsum Storage Area is currently in operation and has an initial design capacity of approximately 1,895,000 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 area of the Disposal Cell is approximately 36 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 facility was placed into operation in 2015. The closure completion date will be determined at a later date, and will be influenced by generation and potential beneficial reuse of gypsum.

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

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

Plant Daniel Gypsum Storage Area 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 Mississippi, PE No. 1894