

1. INTRODUCTION

OVERVIEW

Plant Yates is located at 708 Dyer Road, on approximately 2,400 acres on the east bank of the Chattahoochee River in Coweta County, Georgia, approximately eight miles northwest of the city of Newnan. Plant Yates originally operated seven coal-fired steam generating units. Five of the units were retired in 2015 and the two largest units were converted from coal to natural gas and currently operate as a natural gas electric generation plant owned by Georgia Power Company (Georgia Power).

Plant Yates is comprised of multiple Coal Combustion Residual (CCR) units which will be permitted separately according to Chapter 391-3-4-.10, Coal Combustion Residuals of the Georgia Rules for Solid Waste Management (State CCR Rules). Chapter 391-3-4-.10 incorporates by reference the provisions contained in the United States Environmental Protection Agency (USEPA) Title 40 of the Code of Federal Regulations 40 CFR 257 (Federal CCR Rule). Chapter 391-3-4-.10(9) of the State CCR Rules requires all CCR units in Georgia to obtain a solid waste handling permit.

The permit applications for the Plant Yates CCR units are as follows (see Figure 1):

- CCR Landfill - Gypsum Stack (Gypsum Stack) is an Inactive CCR landfill that was closed by removal and all removal and restoration activities were completed in late 2016;
- CCR Landfill – R6 CCR Landfill is an Inactive CCR landfill that is being closed in place;
- CCR Surface Impoundment – Ash Pond 1 (AP-1) is an Inactive CCR surface Impoundment that was closed by removal and closure construction has been completed;
- CCR Surface Impoundment – Ash Pond 2 (AP-2) is an Existing CCR surface Impoundment that will be closed by removal; and
- CCR Surface Impoundments – The Ash Management Area (AMA) is located within the former footprints of Ash Pond 3 (AP-3) and Ash Pond B' (AP-B'). This multi-pond area is currently being consolidated and closed in place and contains CCR from AP-1 and AP-2 (permitted separately as stated above) and Ash Pond A (AP-A) and Ash Pond B (AP-B) (included as part of the AMA permit application). AP-A is an Inactive CCR surface impoundment that was closed by removal and closure construction was completed in June 2017. AP-B is an Existing CCR surface impoundment that is also undergoing closure by removal.

Pursuant to the requirements of Chapter 391-3-4-.10(9), Georgia Power has prepared this permit application for the closure of the Plant Yates CCR Landfill - Gypsum Stack (facility). The Gypsum Stack operated under Solid Waste Handling Permit 038-014D (LI) issued by the Georgia Environmental Protection Division on February 14, 1992. Georgia Power submitted a formal Notification of Intent to Initiate Closure through removal of CCR on July 22, 2015. The closure included the removal of all CCR and liner materials. Removal and restoration activities were completed in late 2016. The Gypsum Stack closure by removal activities, including design plans, project milestones and as built surveys, are presented in the Closure Certification Report, Closure of the Private Industrial Solid Waste Landfill Gypsum Stack, dated January 19, 2017 signed and sealed by James C. Pegues, P.E.

In accordance with State CCR Rule 391-3-4-.10(2) which incorporates the definitions of the Federal CCR Rule (40 CFR 257.53), the Plant Yates Gypsum Stack meets the definition of an Inactive CCR Landfill as defined in 391-3-4-.10(2)(a)3 of the State CCR Rule, in that it no longer received CCR or other wastes on or after October 19, 2015. The Gypsum Stack has been closed by removal of all CCR and liner materials.

GYPSUM STACK CLOSURE BY REMOVAL CCR PERMITTING REQUIREMENTS

Georgia Power has prepared this permit application for the closure by removal of the Gypsum Stack to address State CCR Rule criteria specified for an Inactive CCR Landfill as required in State CCR Rule 391-3-4-.10(9)(b) and 391-3-4-.10(9)(c)4. as follows:

General CCR Unit Permit Application Requirements

- *391-3-4-.10(9)(b)1. - A completed form designated by EPD.*
The completed form is included in Section 2 of Part A of the permit application.
- *391-3-4-.10(9)(b)2. - Written verification that the site conforms to all local zoning or land use ordinances.*
Zoning Confirmation is included in Section 4 of Part A of the permit application.
- *391-3-4-.10(9)(b)3. - Property boundary survey and legal description.*
The property boundary survey and legal description is included in Section 7 of this Permit Application.
- *391-3-4-.10(9)(b)4. - Financial assurance mechanism meeting the criteria in Rule 391-3-4-.13.*
In compliance with applicable securities laws and regulations, Georgia Power will provide specific cost estimates for post-CCR removal monitoring during the permit application review process as estimates are developed and finalized. It is anticipated these estimates will be available to EPD in the first half of 2019. Georgia Power will provide a demonstration of financial assurance upon approval of post-CCR removal monitoring cost estimates by EPD.
- *391-3-4-.10(9)(b)5. - A qualified professional engineer's certification that all application requirements have been met.*
The professional engineer's certification is included in Section 3 of Part A of the permit application.

Inactive CCR Landfill Permit Application Requirements:

- *391-3-4-.10(9)(c)3.(i) - Location Restriction Demonstration in 40 CFR 257.64 (Unstable areas).*
The Plant Yates Gypsum Stack is an Inactive CCR Landfill and has been closed by removal, therefore this rule requirement is no longer applicable.
- *391-3-4-.10(9)(c)3.(ii) – Operating Criteria (40 CFR 257.80, 40 CFR 257.81, 40 CFR 257.84).*

The Plant Yates Gypsum Stack is an Inactive CCR Landfill and has been closed by removal, therefore this rule requirement is no longer applicable.

- *391-3-4-.10(9)(c)3.(iii) – Groundwater Monitoring Plan (40 CFR 257.90, .91, .93 – .98).*

A Groundwater Monitoring Plan has been prepared for the Gypsum Stack and is included in Part A of this permit application.

- *391-3-4-.10(9)(c)3.(iv) – Closure and Post Closure Care requirements (40 257.101, .102, .103, .104).*

Plant Yates Gypsum Stack is an Inactive CCR Landfill and has been closed by removal of all CCR and liner material. The closure narrative in Section 6 of this permit application provides a description of how the CCR unit was closed.

The Plant Yates Gypsum Stack is not subject to the post– closure care requirements, because the CCR unit was closed by removal of all CCR. However, Georgia Power proposes to conduct post-CCR removal groundwater monitoring for five (5) years to verify the completion of closure-by-removal by demonstrating that the groundwater concentrations do not exceed the groundwater protection standard. Georgia Power will provide a demonstration of financial assurance upon approval of post-CCR removal monitoring estimates by EPD.

2. APPLICATION FORM

Send completed application to:
Environmental Protection Division, Solid Waste Management Program
4244 International Parkway, Suite 104
Atlanta, GA 30354-3902

County: _____

Facility Name: _____

CCR Unit - Application for Solid Waste Handling Permit

(Please type or print)

I. APPLICANT INFORMATION

Owner's Name or Registered Corporation Name: **Georgia Power Company – Plant Yates**

Facility Address: **708 Dyer Road**

Phone: **(404) 506-6505**

City: **Newnan**

State: **GA**

ZIP Code: **30263**

Authorized Official: **Aaron D. Mitchell**

Title: **General Manager – Environmental Affairs**

Mailing Address: **241 Ralph McGill Blvd. NE**

Phone: **(404) 506-6505**

City: **Atlanta**

State: **GA**

ZIP Code: **30308**

Email Address: **gpcenv@southernco.com**

Facility CCR Website(s): **www.georgiapower.com**

II. PROPERTY DETAILS: Complete below **and attach** a street or highway map indicating the site/facility location. Application must be accompanied by written zoning confirmation.

County: **Coweta County**

City: **Newnan**

Co-ordinates (in decimal degrees, near facility center): **Latitude: 33.466419, Longitude: -84.899391**

Property for Processing/Disposal is: Owned Leased (please complete owner details below)

Property Owner (if leased):

Address:

Phone:

City:

State:

Zip:

III. APPLICATION TYPE:

New Permit Major Modification to Existing Permit Transfer of Permit

Other

IV. CCR UNITS: List all CCR units covered under this application

Plant Yates CCR Landfill Gypsum Stack

V. OWNERS: List all owners of the facility (defined as holding a 5% or greater share). All owners listed below must complete the Supplemental Form for O.C.G.A. 12-8-23.1(a)(3)(B)

Georgia Power Company

VI. SIGNATURE

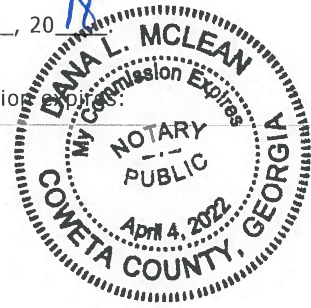
Authorized Official's Signature: *A. S. Mitchell*

Date: *11/13/18*

Sworn to and subscribed before me this 13 day of November, 2018

Notary Public: *Dana L. McLean*

My commission expires



Send with completed application to:
 Environmental Protection Division, Solid Waste Management Program
 4244 International Parkway, Suite 104
 Atlanta, GA 30354-3902

County: _____

Facility: _____

Solid Waste Handling Permit Supplemental Form for O.C.G.A. 12-8-23.1(a)(3)(B)

(Please type or print)

I. INFORMATION: This form must be completed by each owner, or an authorized official of a corporation, holding a 5% or greater ownership share. This form must be notarized.

Name of Facility Applying for Solid Waste Handling Permit: Plant Yates CCR Landfill - Gypsum Stack

Owner's Name or Registered Corporation Name: Georgia Power Company

Authorized Official: Aaron D. Mitchell

Title: General Manager – Environmental Affairs

Mailing Address: 241 Ralph McGill Boulevard

Phone: (404) 506 - 6505

City: Atlanta

State: GA

ZIP Code: 30308

Email Address: gpcenv@southernco.com

A.	Yes	No
(1) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association intentionally misrepresented or concealed any material fact in the application submitted to the director?	<input type="checkbox"/>	X
(2) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association obtained or attempted to obtain the permit by misrepresentation or concealment?	<input type="checkbox"/>	X
(3) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association been convicted by final judgment, and all appeals have been exhausted, in the State of Georgia or any federal court of any felony involving moral turpitude within three years immediately preceding the application for a permit?	<input type="checkbox"/>	X
(4) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association been convicted of any violations of any environmental laws punishable as a felony in any state or federal court within five years preceding the application for a permit?	<input type="checkbox"/>	X
(5) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association knowingly, willfully, and consistently violated the prohibitions specified in Code Section 12-8-30.7?	<input type="checkbox"/>	X
(6) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association been adjudicated in contempt of any court order enforcing any federal environmental laws or any environmental laws of the State of Georgia within five years preceding the application for a permit?	<input type="checkbox"/>	X

B. On a separate sheet, please provide detailed explanations for each question above answered "yes."

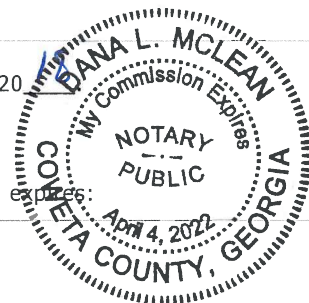
Signature: *Aaron D. Mitchell*

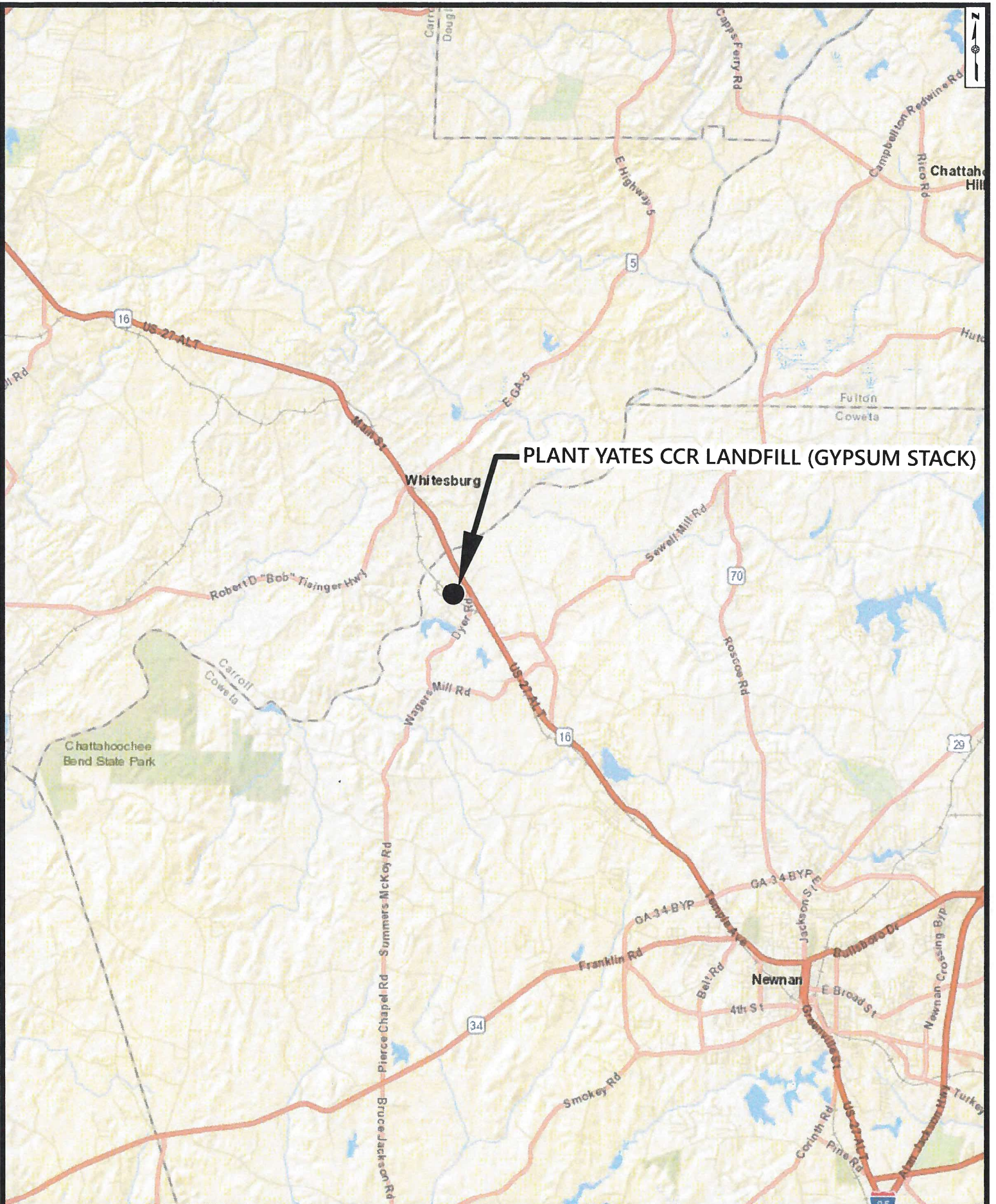
Date: 11/13/18

Sworn to and subscribed before me this 13 day of November, 2018

Notary Public: *Dana L. McClean*

My commission expires:





PLANT YATES CCR LANDFILL (GYPSUM STACK)

Whitesburg

Chattahoochee Bend State Park

Newnan

Location Map

Georgia Power Company - Plant Yates
CCR Landfill



Date: 11/2/2018

3. PROFESSIONAL ENGINEER CERTIFICATION



ATLANTIC COAST CONSULTING, INC.

1150 Northmeadow Pkwy
Suite 100
Roswell, GA 30076
(770) 594-5998
www.atlcc.net

September 30, 2021

Mr. Richard Dunn
Director
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive
Suite 1456
Atlanta, GA 30334-9000

**Re: Professional Engineer Certification
Rule 391-3-4-.10(9)(b)5
Plant Yates – Gypsum Stack**

Dear Mr. Dunn:

Atlantic Coast Consulting, Inc. (ACC), is an engineering firm employing professional engineers in good standing in accordance with State statutes, and the firm has experience in the design and construction of solid waste disposal facilities. Joy E. Headrick, P.E., with ACC is the Engineer of Record for this permit application. She is registered in the state of Georgia and has more than 20 years of experience in Engineering.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I do hereby certify that the permit application requirements of the Georgia Environmental Protection Division Solid Waste Rule 391-3-4-.10 for Management of Coal Combustion Residuals have been met."

ATTEST:

Atlantic Coast Consulting, Inc.
Engineering Firm

Joy E. Headrick, P.E.
Name of Professional Engineer


Signature

9-30-2021
Date



4. LAND USE CONFIRMATION



COWETA COUNTY
PLANNING & ZONING

22 East Broad Street
Newnan, GA 30263
www.coweta.ga.us
770-254-2635
Fax - 770-254-2606

February 9, 2018

Jeffrey W. Cown
Branch Chief
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive, SE
Suite 1054, East Floyd Tower
Atlanta, GA 30334-9000

RE: GA Power – Plant Yates – Gypsum Landfill
Permit Application – CCR Landfill
708 Dyer Rd, Newnan GA

Dear Mr. Cown:

Under the Coweta County Zoning & Development Ordinance Article 6 Section 69.1 Uses allowed,
(1) Improvements, buildings and facilities such as schools, roads, rights-of-way, railroad lines,
pipelines, transmission lines and similar elements; which are owned and/or operated by government
agencies and/or public utilities.

As previously noted in correspondence of March 4, 1994, the Gypsium Stack Project is permitted under the
Coweta County Zoning Ordinance as a customary accessory use in connection with the operation of an
electric generating plant.

Of course, the County also would require any applicable EPD, EPA and Federal/State approval of the
project.

If additional information is needed, please don't hesitate to contact our office.

Sincerely,

Robert L. Polleson
Division Director