

December 7, 2022

Mr. William Cook
Georgia Environmental Protection Division
Solid Waste Program
4244 International Parkway, Suite 104
Atlanta, Georgia 30354

**Re: Request for Closure Extension
Georgia Power Company – Plant Yates Ash Ponds 3, B, and B' (AP-3, AP-B, and AP-B')
Coweta County**

Dear Mr. Cook:

Georgia Power Company (Georgia Power) placed the Notification of Intent to Initiate Closure (NOI) for Plant Yates AP-3, AP-B, and AP-B' (which along with CCR unit AP-A comprise the area known as the Ash Management Area (AMA)) in the facility's operating record on April 20, 2018. The NOI was subsequently placed on Georgia Power's public website, and a notification was provided to the Georgia Environmental Protection Division (EPD) in accordance with Solid Waste Management Rule 391-3-4-.10(8). Closure activities for the CCR units are ongoing, and additional time to complete all activities in accordance with the facility's Closure Plan and the Georgia Solid Waste Management Rules is necessary.

Solid Waste Management Rule 391-3-4-.10(7) requires closure of CCR units to be conducted in accordance with 40 CFR 257.102. Specifically, regarding closure timeframes, 40 CFR 257.102(f)(1)(ii) includes the requirement that existing and new CCR surface impoundments and any lateral expansion of a CCR surface impoundment must complete closure within five years of commencing closure activities. As anticipated in 40 CFR 257.102(f)(2)(i), extension of closure timeframes may be needed and can be extended upon demonstration that completion of all activities was not feasible within the designated timeframes.

The Plant Yates AMA is part of a greater than 40-acre multi-unit CCR facility that includes CCR impoundments AP-A and AP-B being closed by removal in accordance with the requirements in 40 CFR 257.102(c) and CCR impoundments AP-3 and AP-B' being consolidated and closed in place in accordance with requirements in 40 CFR 257.102(d). Closure construction activities are ongoing at the AMA.

Based on the closure activity progress, greater than approximately 90% of the closure construction activities have been completed including the following:

- Removal of CCR in AP-B and surrounding AMA areas;
- Installation of the initial stormwater management system;
- Installation of an on-site wastewater treatment system to support the closure activities;
- Majority of grading and compacting of the CCR material in place within the AMA footprint;
- Installation of greater than 70% of the final cover system;

- Installation of the groundwater monitoring network.

Additional time is needed to complete the remaining construction activities for closure as listed below:

- Grading and compaction of remaining CCR material in the AMA footprint;
- Grading of the former AP-B footprint;
- Installation of the remaining final cover system;
- Completion of the final stormwater management system in coordination with other site work; and
- Preparation and submittal of a final certification report.

The completion of closure construction for the CCR units is anticipated in early 2023 with the certification to be completed thereafter. The EPD Solid Waste Management Program is currently reviewing the CCR permit application for AMA. Additional time is required to coordinate with and obtain the necessary approvals and permit from EPD. In accordance with 40 CFR 257.102(c), 40 CFR 257.102(d)(1)(v), 40 CFR 257.102(f)(2)(i)(D), and 40 CFR 257.102(f)(2)(ii)(B), an extension of two years is requested to complete closure activities and permit review and issuance process. This demonstration for extension of closure timeframe will be placed in the facility's operating record.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

 2022-12-07
07:38-05:00

Tyler Boyles
Manager, Environmental Affairs
Georgia Power Company



CONFIRMATION OF SUBMITTAL

- 1. Your application has been received and will be reviewed shortly.
 - 2. Check your account, email and text message for system notification at various milestones.
- Thank you for using the GEOS system.



Please click [Here](#) to print your receipt.

Submittal Summary

Submittal ID:	717961	Submittal Name:	SW02. Request for Minor Modification To Solid Waste Handling Permit
Submitted Date:	12/7/2022 12:25:45 PM	Submitted by:	Aaron Mitchell 241 Ralph McGill Blvd NE Atlanta 30308 404-506-6505 gpcenv@southernco.com
Status:	Complete Submittal	Submission Method:	On-line submission
Facility / Property Name:	PLANT YATES AP-A, B, B', 3 (AMA)		

Submittal Form List

- Request for Minor Modification To Solid Waste Handling Permit

Attachment List

Design and Operational (D&O) Plans (Optional) -- NONE

Supporting Material (Optional) -- Online

- 20221207 GPC Req Closure Schedule Ext YAT APA.pdf
- 20221207 GPC Req Closure Schedule Ext YAT AP3BB'.pdf

Certification Receipt

Certification Statement:	I hereby certify that I am the owner, or authorized agent of the owner, of the described property. Further, I consent to the work to be done as described.
Certification Question:	what is your favorite hobby?
Certification Question Answer:	*****
PIN Number:	*****
Responsible Officer:	Aaron Mitchell
Sender IP Address:	146.126.61.241