



Environmental Affairs
BIN10221
241 Ralph McGill Boulevard NE
Atlanta, GA 30308-3374

April 12, 2024

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 Pond 2 (AP-2)
Carroll County**

Dear Mr. Cook:

On April 17, 2019, Georgia Power Company (Georgia Power) provided the Notification of Intent to Initiate Closure (NOI) for Yates AP-2 to the Georgia Environmental Protection Division (EPD). This NOI was placed on Georgia Power's public website in accordance with Solid Waste Management Rule 391-3-4-.10(8). Closure activities for the CCR unit are ongoing; however, additional time to complete all activities in accordance with the facility's Closure Permit 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.

Yates AP-2 is being closed by removal in accordance with the requirements of 40 CFR 257.102(c). Closure construction activities were completed by removing all visible CCR from within the boundaries of the CCR unit. Certification of removal reports, demonstrating completion of removal activities, were submitted to EPD for AP-2 Amax Cove, AP-2 West, and AP-2 East. Based on a review of the reports and inspections of the CCR Unit, EPD acknowledged the removal of CCR from AP-2 Amax Cove in correspondence dated March 16, 2021, AP-2 West June 24, 2021, and AP-2 East February 19, 2024. However, groundwater monitoring at AP-2 is continuing in accordance with condition No. 16 of CCR Permit 038-016D(CCR), which requires monitoring of the groundwater for a period of five years from removal of CCR to verify decontamination of the unit. Therefore, in accordance with 40 CFR 257.102(c) and 40 CFR 257.102(f)(2)(ii), an extension of two years is requested to complete closure requirements. This additional time requested is required to satisfy requirements of the AP-2 CCR Permit needed to demonstrate decontamination of the unit. This demonstration for extension of closure timeframe will be placed in the facility 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.

Tyler J. Boyles
Manager, Environmental Affairs
Georgia Power Company