

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

November 7, 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 A (AP-A)

Coweta County

Dear Mr. Cook:

Georgia Power Company (Georgia Power) placed the Notification of Intent to Initiate Closure (NOI) for Yates AP-A in the facility's operating record on December 7, 2015. 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 unit 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 AP-A CCR surface impoundment is part of a greater than 40-acre multi-unit CCR facility along with AP-B, AP-B', and AP-3 (the Ash Management Area (AMA)). AP-A is being closed by removal in accordance with the requirements in 40 CFR 257.102(c) and activities to remove all visible CCR from within the former surface impoundment have been completed, and a certification of removal report was submitted to EPD on October 2, 2020. Based on review of the report and an inspection of AP-A on October 15, 2020, EPD acknowledged completion of CCR removal on March 16, 2021.

The EPD Solid Waste Management Program is currently reviewing the CCR unit permit application for AP-A. Additional time is required to coordinate with and obtain the necessary approvals and CCR permit from EPD. In accordance with 40 CFR 257.102(c), 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 the permit review and issuance process. This demonstration for extension of the 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.

Lauren Petty

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Supervisor, 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: | 885487 | Submittal Name: | SW02. Request for Minor Modification To Solid Waste Handling Permit |
|---------------------------|----------------------|--------------------|--|
| Submitted Date: | 11/8/2024 1:42:43 PM | Submitted by: | Jennifer McNelly 241 Ralph McGill Blvd NE Atlanta GA 30308 404-506-6505 gpcenv2@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

• 20241107 YAT AP-A Clo Ext Rqst.pdf

Certification Receipt

| 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. |
|--|
| who is your favorite author? |
| ****** |
| ********** |
| Jennifer McNelly |
| 146.126.61.241 |
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