

December 4, 2020

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 McDonough Ash Pond 1 (AP-1)
Cobb County**

Dear Mr. Cook:

Georgia Power Company (GPC) placed the Notification of Intent to Initiate Closure (NOI) for Plant McDonough AP-1 in the facility's operating record on December 7, 2015. The NOI was subsequently placed on GPC'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 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, 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.

Based on the closure activity progress, greater than 90% of the closure construction activities for the Plant McDonough AP-1 CCR unit have been completed including the following:

- Identification and assessment of pipes and utilities within the affected closure area;
- Installation of the stormwater management system;
- Installation of an on-site wastewater treatment system to support the closure activities;
- Removal of initial ponded water and active dewatering of the CCR unit to facilitate closure;
- Placement and consolidation of CCR to achieve final grades;
- Installation of approximately 30 acres of the final cover system; and
- Installation of the groundwater monitoring network.

Additional time to complete closure is necessary because further evaluation of the site terrain determined that the final cover system should be extended in the northeast area, which will result in an additional area (less than 1 acre) of final cover system installation. This construction is in progress and the extension will provide the additional time needed to complete closure. 40 CFR 257.102(f)(2)(i).

The completion of closure construction for Plant McDonough AP-1 is anticipated in 2021 with the certification to be completed thereafter. The EPD Solid Waste Management Program is currently reviewing the CCR unit permit application. In accordance with 40 CFR 257.102(f)(2)(ii), an extension of two years is requested to complete the closure construction activities, certification, and permitting requirements. This additional time is required to coordinate with and obtain the necessary approvals and permit from EPD. 40 CFR 257.102(f)(2)(i). 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.



Jalpa Patel
Environmental Affairs Manager