

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 Ponds 2, 3, 4 (AP-2, AP-3, and AP-4)  
Cobb County**

Dear Mr. Cook:

Georgia Power Company (GPC) placed the Notification of Intent to Initiate Closure (NOI) in the facility's operating record for Plant McDonough AP-2 on December 7, 2015 and for Plant McDonough AP-3 and AP-4 on December 8, 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.

The Plant McDonough AP-2, AP-3, and AP-4 CCR surface impoundments are part of a multi-unit CCR facility that includes impoundments being closed by removal in accordance with the requirements in 40 CFR 257.102(c) and impoundments being consolidated and closed in place in accordance with requirements in 40 CFR 257.102(d). AP-2 is being closed by removal, and activities to remove all visible CCR from within the former surface impoundment have been completed. A certification of removal report was submitted to EPD on March 30, 2020. Based on review of the report and an inspection of AP-2 on March 22, 2020, EPD acknowledged completion of CCR removal on October 14, 2020. However, closure construction activities for this greater than 40-acre multi-unit CCR facility are ongoing at AP-3 and AP-4 (AP-3/4).

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

- Identification and assessment of pipes and utilities within the affected closure area;
- Installation of the initial 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;

- Grading and compacting of the CCR material in place within the existing AP-3 footprint;
- Relocation of CCR (from the eastern portion of AP-4 and from the northwest, north, and southern perimeter of the pre-closure AP-3 and AP-4 areas) and consolidation into the AP-3/4 combined unit footprint;
- Installation of 52 acres of the final cover system;
- Excavation of 232,695 cubic yards of the AP-3/4 dam; and
- Installation of the groundwater monitoring network.

Additional time is needed to dewater AP-3/4 due to unusual high amounts of precipitation, the complex configuration involving closure by removal and closure in place by consolidation, and the limited space within the permit boundary. As the dewatering of the CCR unit progresses, the remaining construction activities will also need to be completed for closure:

- Excavation of the remaining portion of the AP-3/4 dam;
- Installation of the remaining final cover system;
- Completion of the final stormwater management system including the perimeter ditch and hydrobinder installation for the ClosureTurf® final cover system; and
- Preparation and submittal of a final certification report.

The completion of closure construction for the CCR unit 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(c) and (d) and 40 CFR 257.102(f)(2)(ii), an extension of two years is requested to complete dewatering, 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**