



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

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 Yates Ash Pond A (AP-A)
Coweta County**

Dear Mr. Cook:

Georgia Power Company (GPC) placed the Notification of Intent to Initiate Closure (NOI) for Plant Yates AP-A 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.

The Plant Yates AP-A CCR surface impoundment is 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-A is being closed by removal 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. However, closure construction activities for this greater than 40-acre multi-unit CCR facility are ongoing.

The EPD Solid Waste Management Program is currently reviewing the certification report and the CCR unit permit application for AP-A. 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 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'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.

A handwritten signature in blue ink, appearing to read "Jalpa Patel", with a long horizontal flourish extending to the right.

Jalpa Patel

Environmental Affairs Manager