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September 27, 2023

Mr. William Cook, Program Manager
Georgia Environmental Protection Division
Solid Waste Management Program
4244 International Parkway, Suite 104
Atlanta, Georgia 30354

**Subject: Georgia Power Company – McIntosh Landfill 4 Permit No. 058-010D(CCR)
Request for Extension to Initiate Closure
GEOS Submittal ID 788080**

Dear Mr. Cook:

Georgia Power Company (Georgia Power) respectfully submits via GEOS this request to extend initiation of closure activities for the subject facility by two years in accordance with the Georgia Environmental Protection Division's (EPD's) *Rules of Solid Waste Management* Section 391-3-4-.10(7)(b), [257.102(e)(2)]. This request for Plant McIntosh Landfill 4 to remain open is necessary for potential future acceptance of coal combustion residuals (CCR). As required by the above-referenced rule, the following demonstration is provided:

As documented in the facility's approved *Closure Plan* (Table 1.1, page 6), Landfill 4 has approximately 3,209,371 cubic yards (CY) of remaining permitted capacity that can be utilized for the disposal or storage of CCR. Approximately 154,028 CY of available capacity is available within Cell 2A, which has been constructed and capped with a temporary cover meeting the requirements of the final cover system as detailed in the CCR unit's Closure Drawings. The remaining 3,055,343 CY of available capacity is associated with Cells 2B, 3 and 4, which are permitted but not yet constructed.

Per the site's approved *Operating Plan*, Landfill 4 can accept CCR generated by Georgia Power. Considering the complexity and long timelines necessary for CCR unit closures, and the potential for new rules to create a need for additional disposal capacity, there is a reasonable likelihood that the available capacity at Landfill 4 may be utilized in the foreseeable future for CCR disposal or storage.

Potential new rules and rule changes with respect to CCR are expected to occur within the next two years and possibly create the need for additional landfill disposal and/or storage capacity. As such, Georgia Power expects that Landfill 4 may resume receiving CCR within the next 2 to 4 years. Approval of this extension request will allow Georgia Power flexibility in use of its storage assets.

The last receipt of CCR at Landfill 4 occurred on October 13, 2021, when the facility was operating under Solid Waste Handling Permit No. 051-010D(LI). On April 19, 2023 EPD issued Permit No. 051-010D(CCR) for Landfill 4. In accordance with Rule 391-3-4-.10(7)(b), [257.102], closure must commence within 2 years of the last receipt of CCR, unless a two-year extension is secured per 257.102(e)(2)(ii).

Therefore, GPC respectfully requests approval to allow Plant McIntosh Landfill 4 to retain the capability of receiving CCR until October 13, 2025, at which time an additional request for extension to initiate closure activities may be submitted.

As part of this demonstration, the following certification is provided as required:

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.

If you have any questions or need additional information, please contact Bret McClellan at (470) 631-4519.

Sincerely,



Jennifer McNelly
Vice President, Environmental Affairs
Georgia Power Company