

June 20, 2025

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

Subject: Georgia Power Company – Plant McIntosh Landfill No. 4
Request for Extension to Initiate Closure
Permit Number 058-010D(CCR)
GEOS ID: 934561

Dear Mr. Cook:

Georgia Power Company (Georgia Power) respectfully submits via GEOS a second 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 continue 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 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 any Georgia Power facility. Considering the complexity, long timelines necessary for CCR unit closures, and the recent promulgation of new rules that may create a need for additional disposal capacity, there continues to be a reasonable likelihood that the available capacity in Landfill 4 may be utilized in the foreseeable future for CCR disposal or storage.

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, and in correspondence dated October 12, 2023, EPD issued the first closure extension that moved the final closure date to October 13, 2025. In accordance with Rule 391-3-4-.10(7)(b), [257.102(e)(2)]..... "*The owner or operator may obtain*

two year extensions provided the owner or operator continues to be able to demonstrate that there is reasonable likelihood that the CCR unit will accept wastes in the foreseeable future or will remove CCR from the unit for the purpose of beneficial use.”

As a result of recent changes to the federal CCR rule that went into effect November 8, 2024 (Legacy Rule), additional disposal or storage capacity of CCR may be needed to support supplemental closures of CCR units and areas that were not subject to the initial federal CCR rule; and, therefore, Georgia Power expects that Landfill 4 may resume receiving CCR within the next 2 to 4 years. Approval of this second extension request will allow Georgia Power flexibility in the use of its CCR landfill and storage assets.


Georgia Power hereby respectfully requests approval of this second extension to allow Plant McIntosh Landfill 4 to retain the capability of receiving CCR until October 13, 2027, 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 if you require additional information, please contact David Gibbons at 470-426-7587.

Sincerely,



Jennifer McNelly
Vice President, Environmental Affairs
Georgia Power Company