

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

March 19, 2025

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 Ponds 3, B, and B'

**Coweta County** 

Dear Mr. Cook:

Georgia Power Company (Georgia Power) placed the Notification of Intent to Initiate Closure (NOI) for Plant Yates Ash Ponds 3, B, and B' (AP-3, AP-B, and AP-B'), which along with CCR unit AP-A comprise the area known as the Ash Management Area (AMA), in the facility operating record on April 20, 2018. This NOI was subsequently placed on Georgia Power'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 units 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(f)(1)(ii) 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(f)(2)(i), 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 AMA is part of a greater than 40-acre multi-unit CCR facility that includes CCR impoundments of AP-A and AP-B being closed by removal in accordance with the requirements of 40 CFR 257.102(c) and CCR impoundments AP-3 and AP-B' being consolidated and closed in placed in accordance with requirements in 40 CFR 257.102(d). Closure construction activities are ongoing at the AMA.

Based on the closure activity progress, greater than approximately 95% of the closure construction activities have been completed included the following:

- Removal of CCR from AP-B and the Shared Stormwater Infrastructure Ditch (SSID) area;
- Construction of the SSID;
- Completion of AMA CCR placement, compaction, and grading:
- Complete installation of the final cover system; and
- Placement of toe drain and sump.

Additional time is needed to complete the remaining construction activities for closure as listed below.

- Removal of CCR from the Boral Building area within the AMA permit boundary and subsequent grading of restorative backfill;
- Completing placement of low permeability soil cover within the SSID (required for French drain performance to design standards);
- Grading of the former AP-B footprint and the SSID;
- Completion of final stormwater management activities including culvert relocations; and
- Preparation and submittal of a final certification report.

The EPD Solid Waste Management Program is currently reviewing the CCR permit application for the AMA. Additional time is required to coordinate with and obtain the necessary approvals and permit from EPD. In accordance with 40 CFR 257.102(c), 40 CFR 257.102(d)(1)(v), 40 CFR 257.102(f)(2)(i)(D), and 40 CFR 257.102(f)(2)(ii)(B), an extension of two years is requested to complete activities and permit review and issuance process. 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.

Lauren Petty

Supervisor, Environmental Affairs

Georgia Power Company



# **CONFIRMATION OF SUBMITTAL**

- 1. Your application has been received and will be reviewed shortly.
- 2. Check your account, email and text message for system notification at various milestones. Thank you for using the GEOS system.



Please click Here to print your receipt.

# **Submittal Summary**

Submittal ID:	916905	Submittal Name:	SW02. Request for Minor Modification To Solid Waste Handling Permit
Submitted Date:	3/21/2025 1:39:10 PM	Submitted by:	Jennifer McNelly 241 Ralph McGill Blvd NE Atlanta GA 30308 404-506-6505 gpcenv2@southernco.com
Status:	Complete Submittal	Submission Method:	On-line submission
Facility / Property Name:	PLANT YATES AP-A, B, B', 3 (AMA)		

#### **Submittal Form List**

• Request for Minor Modification To Solid Waste Handling Permit

### **Attachment List**

#### Design and Operational (D&O) Plans (Optional) -- NONE

### Supporting Material (Optional) -- Online

• 20250319\_ClosureExtensionRequest\_YAT\_AMA.pdf

### **Certification Receipt**

I hereby certify that I am the owner, or authorized agent of the owner, of the described property. Further, I consent to the work to be done as described.
what is your favorite hobby?
******
***********
Jennifer McNelly
146.126.51.51

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