

1. INTRODUCTION

OVERVIEW

Plant Yates is located at 708 Dyer Road, on approximately 2,400 acres on the east bank of the Chattahoochee River in Coweta County, Georgia, approximately eight miles northwest of the city of Newnan. Plant Yates originally operated seven coal-fired steam generating units. Five of the units were retired in 2015 and the two largest units were converted from coal to natural gas and currently operate as a natural gas electric generation plant owned by Georgia Power Company (Georgia Power).

Plant Yates is comprised of multiple Coal Combustion Residual (CCR) units which will be permitted separately according to Chapter 391-3-4-.10, Coal Combustion Residuals of the Georgia Rules for Solid Waste Management (State CCR Rules). Chapter 391-3-4-.10 incorporates by reference the provisions contained in the United States Environmental Protection Agency (USEPA) Title 40 of the Code of Federal Regulations 40 CFR 257 (Federal CCR Rule). Chapter 391-3-4-.10(9) of the State CCR Rules requires all CCR units in Georgia to obtain a solid waste handling permit.

The permit applications for the Plant Yates CCR units are as follows (see Figure 1):

- CCR Landfill - Gypsum Stack (Gypsum Stack) is an Inactive CCR landfill that was closed by removal and all removal and restoration activities were completed in late 2016. The Gypsum Stack was released from Permit No. 038-016D(CCR) on November 25, 2024;
- CCR Landfill – R6 CCR Landfill is an Inactive CCR landfill that is being closed in place;
- CCR Surface Impoundment – Ash Pond 1 (AP-1) is an Inactive CCR surface Impoundment that was closed by removal and closure construction has been completed;
- CCR Surface Impoundment – Ash Pond 2 (AP-2) is an Existing CCR surface Impoundment that will be closed by removal; and
- CCR Surface Impoundments – The Ash Management Area (AMA) is located within the former footprints of Ash Pond 3 (AP-3) and Ash Pond B' (AP-B'). This multi-pond area is currently being consolidated and closed in place and contains CCR from AP-1 and AP-2 (permitted separately as stated above) and Ash Pond A (AP-A) and Ash Pond B (AP-B) (included as part of the AMA permit application). AP-A is an Inactive CCR surface impoundment that was closed by removal and closure construction was completed in June 2017. AP-B is an Existing CCR surface impoundment that is also undergoing closure by removal.

Pursuant to the requirements of Chapter 391-3-4-.10(9), Georgia Power has prepared this permit application for the closure of the Plant Yates R6 CCR Landfill. R6, which encompasses the former footprint of Ash Pond C, operated under Solid Waste Handling Permit 038-011D (LI) issued by the Georgia Environmental Protection Division (EPD) on May 17, 1985.

In accordance with State CCR Rule 391-3-4-.10(2), which incorporates the definitions of the Federal CCR Rule (40 CFR § 257.53), R6 meets the definition of an Inactive Landfill as defined in the Georgia Rules for Solid Waste Management, 391-3-4-.10(2)(a)3 in that it no longer received CCR and other wastes on or after October 19, 2015.

Plant Yates R6 is a permitted ash monofill under Permit 038-011D(LI). This CCR landfill previously received ash waste from the coal fired Units 1-7. Subsequently, Plant Yates Units 1-5 were taken offline and demolished, while Units 6-7 were converted to natural gas. Due to decommissioning of the coal fuel infrastructure at Plant Yates, the associated R6 ash monofill no longer received ash waste. As a result, the ash monofill was to be closed under the requirements of Section 257.100 of 40 CFR Part 257 Subpart D, known hereafter as the “CCR Rule”. Initially, construction drawings were created to only close the southern end of the landfill (R6 Phase 1) by regrading the lower benches to a 3:1 slope and increasing the height by approximately 40-feet to meet the permitted grades. Once the Coal Combustion Residuals (CCR) rules came into effect, it was determined by Southern Company Technical and Project Solutions that R6 Phase 2 closure construction would be completed in conjunction with R6 Phase 1. R6 Phase 2 design criteria was based off of the original R6 Phase 1 design in that the lower benches would continuously wrap around the entire landfill while maintaining the permitted closure height and grades. No additional construction drawings were created for the R6 Phase 2 as it was field constructed using this design criteria.

Up through October 12, 2015, AP-A and AP-1 were undergoing CCR removal activities as the CCR removed was used as fill placement in R6 to achieve the permitted design grades. Approximately 650,000 cubic yards of CCR material came from AP-A and 40,000 cubic yards of CCR from AP-1. This amount of CCR placed ultimately resulted in a lower closure height, but within the permitted guidelines. After this date, the remainder of the material removed from AP-A and AP-1 was placed into AMA footprint.

An approximate 1,100-foot section of Dyer Road between AP-2 and the R6 Landfill was relocated about 90 feet east of its original alignment to allow for safe removal of CCR from areas within and adjacent to the roadway. The relocation was phased to allow the safe passage of local traffic. Construction of the road section was completed in August 2022, and the final alignment is shown in the Permit Drawings. The CCR was disposed of in the AMA after removal. CCR was fully removed from this area.

The following certified areas are depicted on Figure 2 and 3:

- a. Shared Stormwater Infrastructure Ditch (SSID) CCR Removal Certification Report (Brantley Engineering, 1/31/2025) GEOS submittal 907780 (figure 2);
- b. Ash Management Area (AMA) Perimeter Road CCR Removal Certification Report (Brantley Engineering, 1/8/2021) GEOS submittal 540694 (figure 2);
- c. Ash Pond-A CCR Removal Certification Report (Brantley Engineering, 1/12/2021) GEOS submittal 514684 (figure 2);

d. Ash Pond-B CCR Removal Certification Report (Brantley Engineering, 4/26/2024) GEOS submittal 819983 (figure 2);

e. Advanced Engineering Methods (AEM) Memorandum included in AMA permit application package (GP/SCS/TRC, 7/15/2021) see Part B, Supporting Documents, GEOS submittal 585909 (figure 3);

f. R6 Landfill Construction Certification Report, Phases 1 and 2 (Brantley Engineering, November, 2025); R6 Landfill Construction Certification Report, Phase 3 (WSP, November 2025); and Dyer Road CCR Removal Area (DRCRA) (WSP, November 2025) GEOS submittal 962949 (figure 3).

R6 CCR LANDFILL CCR CLOSURE PERMITTING REQUIREMENTS

Georgia Power has prepared this permit application for the closure of R6 to address State CCR Rule criteria specified for Inactive Landfill as required in State CCR Rule 391-3-4-.10(9)(b) and 391-3-4-.10(9)(c)4 as follows:

General CCR Unit Permit Application Requirements

- *391-3-4-.10(9)(b)1. - A completed form designated by EPD.*
The completed form is included in Section 2 of Part A of the permit application.
- *391-3-4-.10(9)(b)2. - Written verification that the site conforms to all local zoning or land use ordinances.*
Zoning Confirmation is included in Section 4 of Part A of the permit application.
- *391-3-4-.10(9)(b)3. - Property boundary survey and legal description.*
The permit boundary survey and legal description is included in the Closure Drawings in Section 7 of this Permit Application.
- *391-3-4-.10(9)(b)4. - Financial assurance mechanism meeting the criteria in Rule 391-3-4-.13.*
In compliance with applicable securities laws and regulations, Georgia Power will provide specific cost estimates for closure and post-closure care during the permit application review process as estimates are developed and finalized. Georgia Power will provide a demonstration of financial assurance upon approval of closure and post-closure care cost estimates by EPD.
- *391-3-4-.10(9)(b)5. - A qualified professional engineer's certification that all application requirements have been met.*
The professional engineer's certification is included in Section 3 of Part A of the permit application.

Inactive CCR Landfill Permit Application Requirements:

391-3-4-.10(9)(c)4. Inactive CCR landfills must meet the requirements of subparagraphs (9)(c)3.(i)-(iv) of this rule for an existing CCR landfill.

- *391-3-4-.10(9)(c)3.(i) - Location Restriction Demonstration in 40 CFR 257.64 (Unstable areas).*

The R6 CCR Landfill is not located in an unstable area as defined by 40 CFR 257.64. The data demonstrating this is included in the "Plant Yates R6 Ash Monofill Permit #038-011D (LI) Modification for Vertical Expansion, Design and Operation Plan Supplemental Data", dated October 1999. The unstable area location demonstration is included in Part B of this permit application.

- *391-3-4-.10(9)(c)3.(ii) – Operating Criteria (40 CFR 257.80, 40 CFR 257.81, 40 CFR 257.84).*

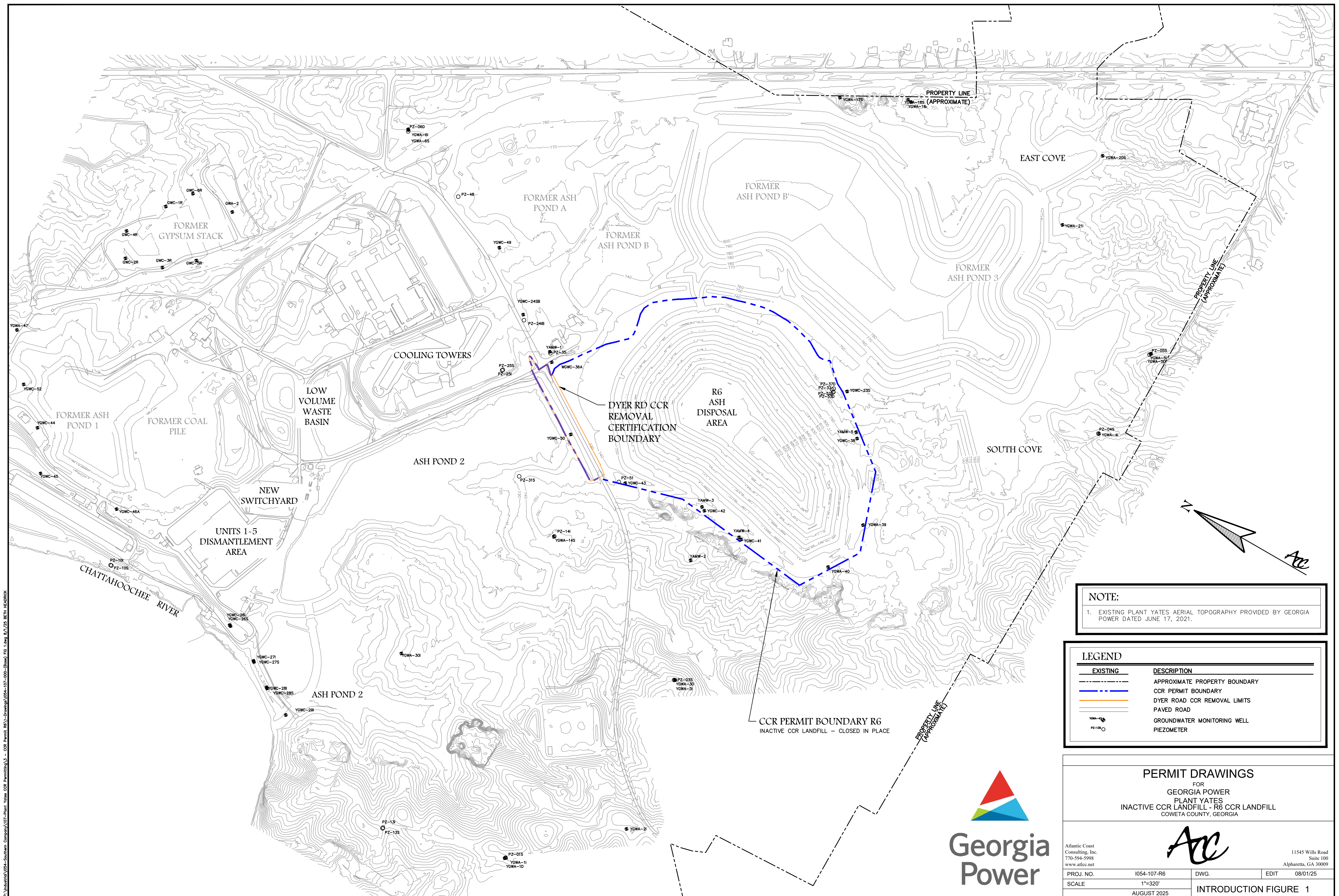
The R6 CCR Landfill is an Inactive landfill which is currently being closed. The operating criteria that are applicable during closure (i.e. run-on and run-off control system plan, dust control and inspections) are addressed in the Closure Plan included in Part A of this permit application.

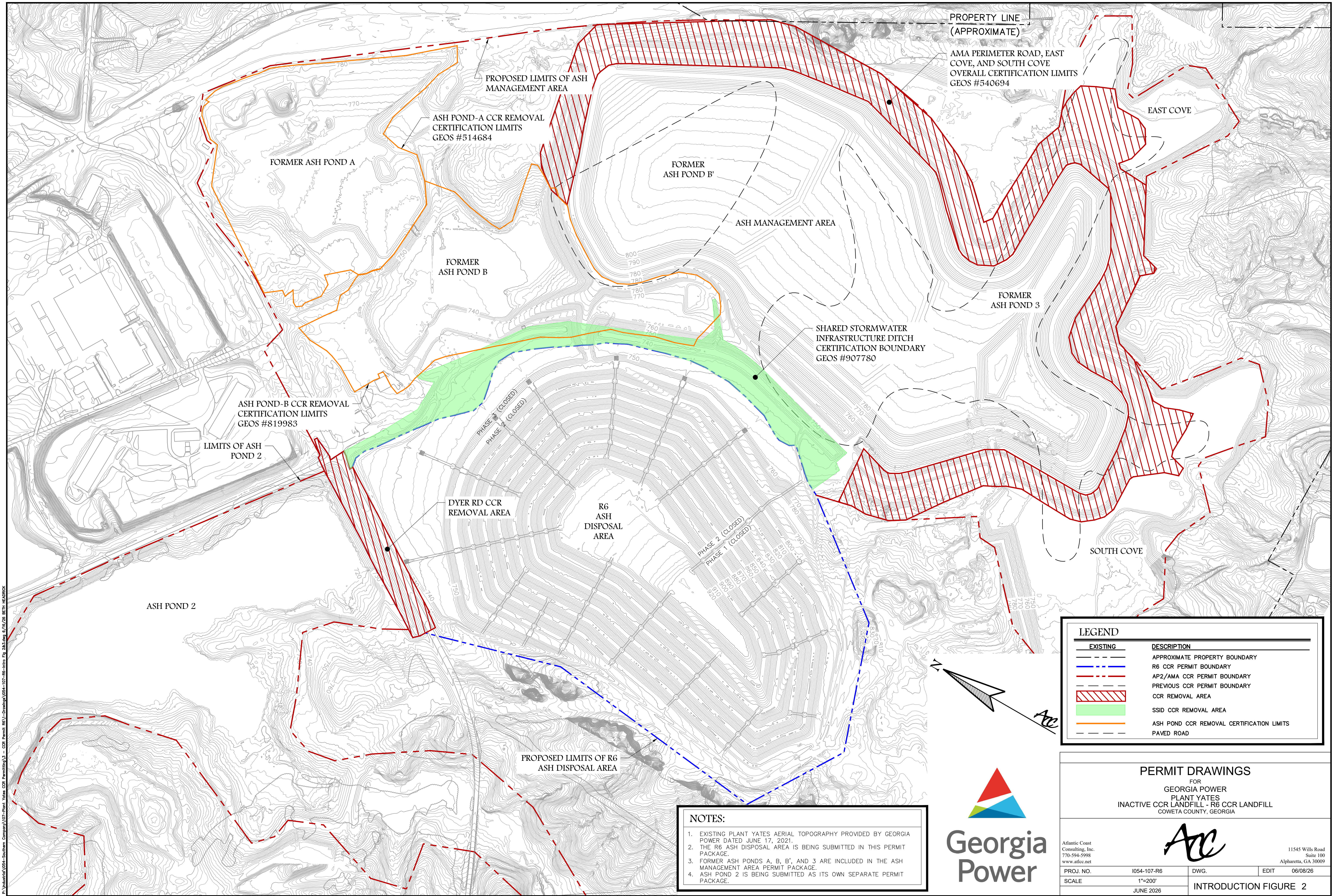
- *391-3-4-.10(9)(c)3.(iii) – Groundwater Monitoring Plan (40 CFR 257.90, .91, .93 – .98).*

A Groundwater Monitoring Plan has been prepared for the R6 CCR Landfill in accordance with 391-3-4-.10(6) and 40 CFR 257.90, 40 CFR 257.91, and 40 CFR 257.93 through .94 and is included in Part A of this permit application.

- *391-3-4-.10(9)(c)3.(iv) – Closure and Post Closure Care requirements (40 CFR 257.101, .102, .103, .104).*

The R6 CCR Landfill is an Inactive landfill which is currently being closed. This permit application includes both a Closure Plan and a Post Closure Plan in Part A of the permit application.





2. APPLICATION FORM

Send completed application to:

Environmental Protection Division, Solid Waste Management Program
4244 International Parkway, Suite 104
Atlanta, GA 30354-3902

County: _____

Facility Name: _____

CCR Unit - Application for Solid Waste Handling Permit

(Please type or print)

I. APPLICANT INFORMATIONOwner's Name or Registered Corporation Name: **Georgia Power Company – Plant Yates**Facility Address: **708 Dyer Road**Phone: **(404) 506-6505**City: **Newnan**State: **GA**ZIP Code: **30263**Authorized Official: **Aaron D. Mitchell**Title: **General Manager – Environmental Affairs**Mailing Address: **241 Ralph McGill Blvd. NE**Phone: **(404) 506-6505**City: **Atlanta**State: **GA**ZIP Code: **30308**Email Address: **gpcenv@southernco.com**Facility CCR Website(s): **www.georgiapower.com****II. PROPERTY DETAILS:** Complete below **and attach** a street or highway map indicating the site/facility location. Application must be accompanied by written zoning confirmation.County: **Coweta County**City: **Newnan**Co-ordinates (in decimal degrees, near facility center): **Latitude: 33.454085, Longitude: -84.896120**Property for Processing/Disposal is: ☒ Owned ☐ Leased (please complete owner details below)

Property Owner (if leased):

Address:

Phone:

City:

State:

Zip:

III. APPLICATION TYPE:☒ New Permit☐ Major Modification to Existing Permit☐ Transfer of Permit☐ Other**IV. CCR UNITS:** List all CCR units covered under this application**Plant Yates R6 CCR Landfill**

V. OWNERS: List all owners of the facility (defined as holding a 5% or greater share). All owners listed below must complete the Supplemental Form for O.C.G.A. 12-8-23.1(a)(3)(B)

Georgia Power Company

VI. SIGNATURE

Authorized Official's Signature:

[Handwritten Signature]

Date:

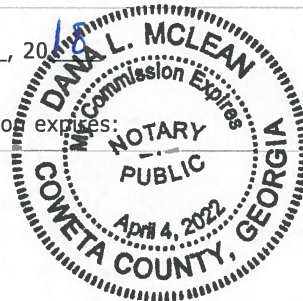
11/13/18

Sworn to and subscribed before me this 13 day of November, 2018

Notary Public:

Dana L. McLean

My commission expires:



Send with completed application to:

Environmental Protection Division, Solid Waste Management Program
4244 International Parkway, Suite 104
Atlanta, GA 30354-3902

County: _____

Facility: _____

Solid Waste Handling Permit
Supplemental Form for O.C.G.A. 12-8-23.1(a)(3)(B)
(Please type or print)

I. INFORMATION: This form must be completed by each owner, or an authorized official of a corporation, holding a 5% or greater ownership share. This form must be notarized.

Name of Facility Applying for Solid Waste Handling Permit: Plant Yates R6 CCR Landfill

Owner's Name or Registered Corporation Name: Georgia Power Company

Authorized Official: Aaron D. Mitchell

Title: General Manager – Environmental Affairs

Mailing Address: 241 Ralph McGill Boulevard

Phone: (404) 506 - 6505

City: Atlanta

State: GA

ZIP Code: 30308

Email Address: gpcenv@southernco.com

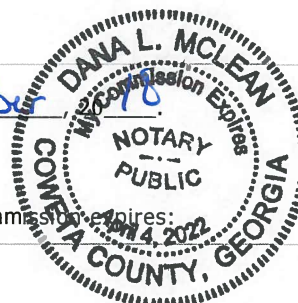
A.	Yes	No
(1) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association intentionally misrepresented or concealed any material fact in the application submitted to the director?	☐	X
(2) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association obtained or attempted to obtain the permit by misrepresentation or concealment?	☐	X
(3) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association been convicted by final judgment, and all appeals have been exhausted, in the State of Georgia or any federal court of any felony involving moral turpitude within three years immediately preceding the application for a permit?	☐	X
(4) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association been convicted of any violations of any environmental laws punishable as a felony in any state or federal court within five years preceding the application for a permit?	☐	X
(5) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association knowingly, willfully, and consistently violated the prohibitions specified in Code Section 12-8-30.7?	☐	X
(6) Has the applicant, or if the applicant is a corporation, partnership, or association, has any officer, director, manager, or shareholder of five percent or more of stock financial interest in the corporation, partnership, or association been adjudicated in contempt of any court order enforcing any federal environmental laws or any environmental laws of the State of Georgia within five years preceding the application for a permit?	☐	X

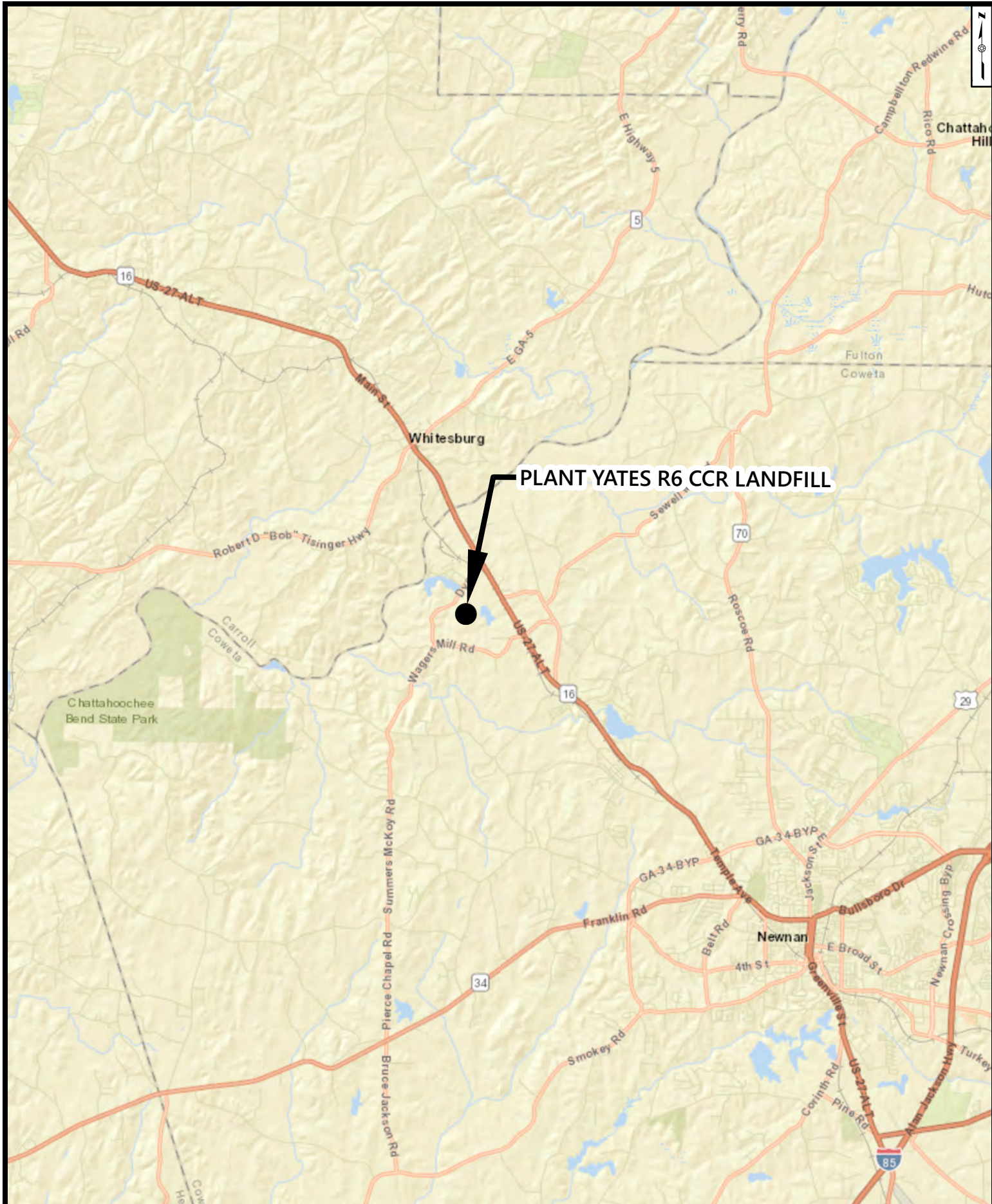
B. On a separate sheet, please provide detailed explanations for each question above answered "yes."Signature: *Aaron D. Mitchell*Date: *11/13/18*Sworn to and subscribed before me this 13 day of November

Notary Public:

Dana L. McLean

My commission expires:





Location Map

Georgia Power Company - Plant Yates
R6 CCR Landfill

Date: 11/2/2018



3. PROFESSIONAL ENGINEER CERTIFICATION



ATLANTIC COAST
CONSULTING, INC.

630 Colonial Park Drive

Suite 110

Roswell, GA 30075

(770) 594-5998

www.atlcc.net

November 12, 2018

Mr. Richard Dunn
Director
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive
Suite 1456
Atlanta, GA 30334-9000

**Re: Professional Engineer Certification
Rule 391-3-4-.10(9)(b)5
Plant Yates – R6 CCR Landfill**

Dear Mr. Dunn:

Atlantic Coast Consulting, Inc. (ACC), is an engineering firm employing professional engineers in good standing in accordance with State statutes, and the firm has experience in the design and construction of solid waste disposal facilities. Joy E. Headrick, P.E., with ACC is the Engineer of Record for this permit application. She is registered in the state of Georgia and has more than 20 years of experience in Engineering.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I do hereby certify that the permit application requirements of the Georgia Environmental Protection Division Solid Waste Rule 391-3-4-.10 for Management of Coal Combustion Residuals have been met."



ATTEST:

Atlantic Coast Consulting, Inc.

Engineering Firm

Joy E. Headrick, P.E.

Name of Professional Engineer

Joy E. Headrick

Signature

11-12-18

Date

4. LAND USE CONFIRMATION



COWETA COUNTY

PLANNING & ZONING

22 East Broad Street
Newnan, GA 30263
www.coweta.ga.us
770-254-2635
Fax - 770-254-2606

February 9, 2018

Jeffrey W. Cown
Branch Chief
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive, SE
Suite 1054, East Floyd Tower
Atlanta, GA 30334-9000

RE: GA Power – Plant Yates – R-6 Landfill
Permit Application – CCR Landfill
708 Dyer Rd, Newnan GA

Dear Mr. Cown:

Under the Coweta County Zoning & Development Ordinance Article 6 Section 69.1 Uses allowed,
(1) Improvements, buildings and facilities such as schools, roads, rights-of-way, railroad lines,
pipelines, transmission lines and similar elements; which are owned and/or operated by government
agencies and/or public utilities.

The R-6 Landfill is permitted under the Coweta County Zoning Ordinance as a customary accessory use in
connection with the operation of an electric generating plant.

Of course, the County also would require any applicable EPD, EPA and Federal/State approval of the
project.

If additional information is needed, please don't hesitate to contact our office.

Sincerely,



Robert L. Tolleson
Division Director