

December 7, 2022

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 McDonough Ash Ponds 2, 3, 4 (AP-2 and AP-3/4)
Cobb County**

Dear Mr. Cook:

Georgia Power Company (Georgia Power) placed the Notification of Intent to Initiate Closure (NOI) in the facility's operating record for Plant McDonough AP-2 on December 7, 2015, and for Plant McDonough AP-3 and AP-4 (henceforth known as combined unit AP-3/4) on December 8, 2015. The 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 Coal Combustion Residuals (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(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 McDonough AP-2 and AP-3/4 CCR surface impoundments are part of a greater than 40-acre multi-unit CCR facility that includes CCR impoundment AP-2 being closed by removal in accordance with the requirements in 40 CFR 257.102(c) and CCR impoundments AP-3/4 being consolidated and closed in place in accordance with requirements in 40 CFR 257.102(d). At AP-2, activities to remove all visible CCR from within the former surface impoundment have been completed. A certification of removal report was submitted to EPD on March 30, 2020. Based on review of the report and an inspection of AP-2 on March 22, 2020, EPD acknowledged completion of CCR removal on October 14, 2020. At AP-3/4, closure construction activities have been completed with the exception of the following:

- Excavation of the remaining portion of the AP-3/4 dam below elevation 795;
- Installation of remaining ClosureTurf® final cover system within the perimeter ditch adjacent to water treatment system; and
- Preparation and submittal of a final certification report.

The closure construction for AP-3/4 is significantly complete with remaining items anticipated to be complete in early 2023 with the certification to be completed thereafter. The EPD Solid Waste

Management Program is currently reviewing the CCR unit permit application. 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 closure activities and permit review and issuance process. This demonstration for extension of closure timeframe will be placed in the facility 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.



2022-12-07
07:40-05:00

Tyler Boyles
Manager, 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:	717936	Submittal Name:	SW02. Request for Minor Modification To Solid Waste Handling Permit
Submitted Date:	12/7/2022 12:02:28 PM	Submitted by:	Aaron Mitchell 241 Ralph McGill Blvd NE Atlanta 30308 404-506-6505 gpcenv@southernco.com
Status:	Complete Submittal	Submission Method:	On-line submission
Facility / Property Name:	PLANT MCDONOUGH ASH PONDS 2, 3, 4		

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

- 20221207 GPC Req Closure Schedule Ext MCD AP234.pdf

Certification Receipt

Certification Statement:	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.
Certification Question:	What is your birthday?
Certification Question Answer:	*****
PIN Number:	*****
Responsible Officer:	Aaron Mitchell
Sender IP Address:	146.126.61.241