

August 8, 2022

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

**Re Response to Georgia Environmental Protection Division Comments
Georgia Power Company – Former Plant Arkwright
CCR Landfill Site Acceptability Study (SAR)
Bibb County Submittal ID 534245**

Dear Mr. Cook:

Attached, and as submitted thru GEOS, please find Georgia Power Company's (GPC's) response to the Environmental Protection Division's (EPD) comments on the Site Acceptability Report (SAR) for a proposed CCR Landfill to be located on property of GPC's former Plant Arkwright. The comments were received in correspondence dated July 26, 2022, which were generated by EPD's review of supplemental figures related to the stream relocation submitted in a response letter dated July 22, 2022.

For clarity we have written out each EPD comment followed by a written response. The responses have been prepared with assistance from our permitting consultant, Jacobs Engineering.

EPD Comment No. 1: The EPD requests that in addition to being signed and sealed by a Georgia PE, the two figures submitted should be completed, as appropriate, with scales, north arrows, legends and titled/dated so that they can be referenced in the landfill site limitations, if needed. The proposed permit boundary and a sufficient number of site features such as piezometer and monitoring well locations should be added to the Phase 2 subgrade map to allow correlation with the potentiometric surface maps and other site maps included in the March 2022, Site Acceptability Report (SAR).

Response to Comment 1: The Stream Separation Study plan (Phase 2 Landfill Base Grades – Sheet 1 of 2) and cross-section (Phase 2 Landfill Sections – Sheet 2 of 2) figures have been revised as requested and are included as attachments 1 and 2 respectively.

EPD Comment No. 2: The EPD has noted that the overall size and shape of the proposed waste limits depicted in the recently submitted Phase 2 landfill base grade map does not appear to match the proposed waste limits shown on Figure 4, 10 and 11 of the SAR.

Response to Comment 2: The landfill design process has advanced since SAR Figures 4, 10, and 11 were prepared. However, the current design is within the previously proposed waste limits, which represent the maximum limits for the proposed landfill under consideration.

EPD Comment No. 3: Please indicate if the proposed relocated stream will be lined or unlined.

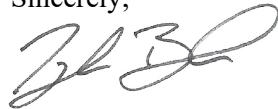
Response to Comment 3: The current landfill site design includes plans for the relocated stream to be unlined.

EPD Comment No. 4: Georgia Power should submit for EPD approval the justification for allowing waste associated with the Monofill to remain in the future 200-foot buffer of the proposed CCR landfill.

Response to Comment 4: Georgia Power is considering several options for the closed and capped Monofill. One such option is to leave the Monofill in place and construct the new CCR Landfill adjacent to it to avoid disturbing asbestos containing waste that was placed in the facility under the existing solid waste Permit. The existing permit, however, required only a 100-foot buffer that will become 200-feet upon issuance of the new CCR landfill permit. If allowed to remain, after closure only maintenance activities of the final cover system over the Monofill will be performed within the future 200-foot buffer. No new waste will be placed in the future 200-foot buffer.

Should you have any questions regarding this submittal, please contact David Gibbons 470-426-7587.

Sincerely,



Tyler Boyles
Manager, Environmental Affairs
Georgia Power Company

Attachments:

Figure – Plan View

Figure – Section View

Plant Arkwright – Proposed CCR Landfill
August 8, 2022

Attachment

Figures – Plan & Section Views