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

September 8, 2023

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

RE: Request for Minor Modification: Buffer Relocation and Variance
Georgia Power Company – Plant Wansley CCR Landfill
CCR Permit No. 074-005D(CCR)
GEOS Submittal ID # 783463

Dear Mr. Stevens:

Please find accompanying this letter and submitted in GEOS a Request for a Minor Modification to the Plant Wansley Coal Combustion Residuals (CCR) Solid Waste Disposal Facility Permit No. 074-005D(CCR), Wansley Landfill.

In preparation of the proposed expansion of the Wansley Landfill and to achieve timely closure of the Plant Wansley Ash Pond (AP-1), changes to the existing 200-foot buffer per Rule 391-3-4-.10(3)(e) of Georgia EPD's *Rules of Solid Waste Management* (Rules) are being requested through this Minor Modification. Below is a summary of the requested changes.

1. The current approved plan includes a proposed security road along the southern edge of the landfill property. The 200' buffer is located on the north side of the security road construction area and is set from the "limit of disturbance". The proposed security road has not been constructed, and this modification request proposes to remove the security road construction area from the permit and shift the 200' buffer to the "permit boundary" in accordance with the Rules.

2. The proposed Cell 4 expansion will require diversion of stormwater run-on from the southern side of the landfill property. The water will be diverted via an excavated stormwater channel outside of the proposed relocated 200' buffer area. Early diversion of this stormwater is critical to the timely completion of the landfill construction and ultimate completion of the AP-1 closure project.

3. The proposed Cell 4 landfill expansion will require diversion of an existing stream through the currently permitted 200' buffer on the on the north side of the landfill property. Additionally, an expanded haul road is needed to accommodate the off-road trucks

necessary to transport CCR from AP-1. The expanded haul road with culvert over the future proposed relocated stream area is needed early in the project to minimize construction preparation time to begin CCR relocation from AP-1 to the landfill. Widening the road will allow safe and efficient operations of construction traffic and off-road haul trucks that will be transporting the material. In preparation for the relocation of the stream, Georgia Power proposes to conduct geotechnical borings within the proposed stream relocation area in support of stream design and to inform the groundwater monitoring plan for the proposed Cell 4 expansion project. Please note that stream and stream buffer impacts will not occur until approval from the U.S. Army Corps of Engineers and EPD has been granted. Further, the area where the borings are proposed will be restored to a natural state following completion of the borings.

For this work to occur, Georgia Power respectfully requests a variance to the 200-foot undisturbed buffer for the area shown at the northern permit boundary in the revised plan sheets, as allowable by Rule 391-3-4-.10(11)(b). The revised permit drawings have been enclosed with proposed changes highlighted.

If you have any questions regarding this submittal, please contact Bret McClellan at 470-631-4519.

Sincerely,

Lauren Petty, P.G.
Supervisor, Environmental Affairs
Georgia Power Company

Attachments: Revised permit drawings