


**PERIODIC SAFETY FACTOR ASSESSMENT  
391-3-4-.10(4) and 40 C.F.R. PART 257.73  
PLANT YATES ASH POND B (AP-B)  
GEORGIA POWER COMPANY**

The Federal CCR Rule, and, for Existing Surface Impoundments where applicable, the Georgia CCR Rule (391-3-4-.10) require the owner or operator of a CCR surface impoundment to conduct initial and periodic safety factor assessments. See 40 C.F.R. § 257.73(e); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)<sup>1</sup>. The owner or operator must conduct an assessment of the CCR unit and document that the minimum safety factors outlined in § 257.73(e)(1)(i) through (iv) for the critical embankment section are achieved. In addition, the Rules require a subsequent assessment be performed within 5 years of the previous assessment. See 40 C.F.R. § 257.73(f)(3); See Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)<sup>1</sup>.

The CCR surface impoundment known as Plant Yates AP-B is located on Plant Yates property, northwest from Newnan, Georgia. AP-B was originally formed by an engineered cross-valley embankment. Several breaches have been constructed in the dike protrusion, and the dike remnants are not capable of retaining water. In addition, the area downstream of the dike has also been filled in, effectively eliminating the configuration of the original dike structure. Furthermore, the Notification of Intent to Initiate Closure was placed in the Operating Record on 04/20/2018. Currently, all CCR has been removed from the footprint of AP-B. AP-B was originally assigned a Low Hazard Potential rating in 2016. However, during the EPA assessment conducted in 2010 it was “assessed as ‘less than low hazard’ due to grading activities that, over the years, backfilled over a majority of the embankment, rendering it essentially indiscernible from the surroundings.” Because there were no viable sections to evaluate, an initial slope stability analysis was not performed. Similarly, as all CCR has now been removed from AP-B and the embankment has been breached, a subsequent factor of safety analysis was not performed.

I hereby certify that the safety factor assessment was conducted in accordance with 40 C.F.R. § 257.73 (e)(1).

  
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<sup>[1]</sup> In a typographical error, 391.3-4.10(4)(b) references the “structural integrity criteria in 40 CFR 247.73,” when the reference to such criteria should be 40 CFR 257.73.