

**PERIODIC STRUCTURAL STABILITY ASSESSMENT**  
**391-3-4-.10(4) AND 40 C.F.R. PART 257.73**  
**PLANT YATES ASH POND 1 (AP-1)**  
**GEORGIA POWER COMPANY**

The Federal CCR Rule and the Georgia CCR Rule (391-3-4-.10) require the owner or operator of an existing CCR surface impoundment to conduct initial and periodic structural stability assessments. A direct final rule revision to a partial vacatur of the Final Rule became effective on October 4, 2016. This revision eliminated the exemption for inactive CCR surface impoundments and required such units to meet the same requirements as existing CCR surface impoundments. The owner or operator must conduct an assessment of the CCR unit and document whether the design, construction, operation and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded therein. *See* 40 C.F.R. § 257.73(d); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)<sup>1</sup>. 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); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)<sup>1</sup>.


The CCR surface impoundment known as Plant Yates AP-1 is located in Coweta County, Georgia, approximately 5 miles northwest of Newnan, on Plant Yates property. AP-1 has undergone CCR removal in accordance with 40 C.F.R. § 257.102(c). On November 25, 2019, Georgia Power submitted a certification of removal report to the Georgia Environmental Protection Division demonstrating completion of CCR removal activities for AP-1. Based on review of the report and an inspection of AP-1 on October 15, 2020, EPD acknowledged completion of CCR removal on November 3, 2020.

Also, the facility no longer impounds water on a regular basis. Although the embankment for AP-1 remains, a new discharge outlet for the CCR unit was installed as a part of the closure by removal construction and only temporary storage of a limited amount of non-contact storm water now takes place. As a result, the closure construction activities completed on AP-1 have rendered the former surface impoundment incapable of receiving, discharging or impounding water; thus, AP-1 no longer functions as a surface impoundment thereby rendering the applicability of Rule 40 C.F.R. §257.73(d) inconsistent with the CCR unit's current condition. Further, Georgia Power Company is in the process of obtaining a solid waste permit for AP-A (As part of the Ash Management Area along with AP-3, AP-B, and

<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.

AP-B') under the Georgia Rules for Solid Waste Management, 391-3-4-.10. The closure method has eliminated the future impoundment of water, sediment, or slurry.

I hereby certify that the structural stability assessment was conducted in accordance with 40 C.F.R. § 257.73(d).

  
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