

PERIODIC STRUCTURAL STABILITY ASSESSMENT
391-3-4-.10(4) and 40 C.F.R. Part 257.73
PLANT YATES ASH POND B (AP-B)
GEORGIA POWER COMPANY

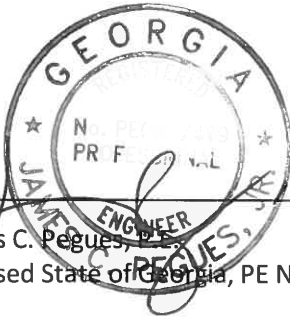
The Federal CCR Rule, and, for Existing Surface Impoundments where applicable, the Georgia CCR Rule (391-3-4-.10) require the owner or operator of an existing CCR surface impoundment to conduct initial and periodic structural stability assessments. The owner or operator must conduct an assessment of 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)¹. 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)¹.

The CCR surface impoundment known as Plant Yates AP-B is located on Plant Yates property northwest of Newnan, Georgia. The Notification of Intent to Initiate Closure was placed in the Operating Record on 04/20/2018 and closure has been designed to have no negative impacts on the stability of the embankment. Currently, all CCR has been removed from AP-B as a part of closure construction.

AP-B was originally formed by an engineered cross-valley embankment and was filled with CCR over the life of its operation. The area downstream of the dike was also filled in, effectively eliminating the configuration of the original dike structure, leaving only about 10 feet of embankment protruding above the ground surface. Several constructed breaches have been made in the remaining visible dike structure, and the dike remnants are not capable of retaining water. It should be noted that AP-B was not assigned a hazard rating by the EPA during its evaluation in 2010 because 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.” In 2016, a Hazard Potential Rating of “Low” was assigned to comply with §257.73 requirements. As stated above, all CCR has now been removed from AP-B.

^[1] 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.

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



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