

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

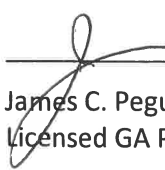
The Federal CCR Rule and the Georgia CCR Rule (391-3-4-.10) require the owner or operator of a CCR surface impoundment to conduct initial and periodic safety factor assessments. *See* 40 C.F.R. § 257.73(e); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)¹. A direct final rule revision to a partial vacatur 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 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); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)¹.


The CCR surface impoundment known as Plant Yates AP-A is located in Coweta County, Georgia approximately 5 miles northwest of Newnan, on Plant Yates property. AP-A has undergone CCR removal in accordance with 40 C.F.R. § 257.102(c). Georgia Power submitted a certification of removal report to Georgia EPD on October 2, 2020 demonstrating completion of CCR removal activities for AP-A. Based on review of the report and an inspection of AP-A on October 15, 2020, EPD acknowledged completion of CCR removal on March 16, 2021.

The embankment has been removed and AP-A is no longer designed to, nor has the ability to, impound water, factor of safety analyses for long term maximum storage pool (static) and maximum surcharge pool (static) can no longer be performed. Furthermore, as there is no CCR stored in the facility, stability analysis for seismic loading conditions is not required under the requirements of 40 C.F.R. § 257.73(e).

^[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 safety factor assessment was conducted in accordance with 40 C.F.R. § 257.73(e)(1).


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